NUNAVUT WATER BOARD
Date: September 11, 2024
Exhibit No.: 6

NTI Presentation ᑐᖏᓚᐃᔭᒃᑯᑦ ᐅᓂᒃᑲᖏᓚ

# For Nunavut Water Board's Public Hearing on Agnico Eagle Mines Ltd's Application to Amend its Type A Water Licence for Meliadine Mine

ᓄᓇᕗᖅᑕ ᐃᒪᓕᕆᔨᑦ ᑲᑎᒪᔨᖏᑦ ᐃᓄᓕᒧᓂᒃ ᑲᑎᒪᑎᑦᑎᔾᑦ ᐊᖏᕐᓂᐅᑯ ᐃᔨᓪ ᐅᓴᖅᓂᐊᑎᒃᑯᑦ ᓕᒥᑦᑐᑦ ᑐᒃᔪᖅᐅᑎᖏᓂᒃ ᐊᖅᑭᑲᐊᖅᑕᐅᖅᑯᓪᓗᒍ ᐃᒪᓕᕆᓂᖅᓯᒪᑦ ᓇᓗᓇᐃᒃᑯᑕᖏᓂ A ᓯᐃᓴᑦᑕᒪᔭᕐᓂᖏᓂ ᒥᓕᐊᑕᐃᓐ ᐅᓴᖅᓂᐊᖅᓱᒪᒍᑦ

September 11, 2024, Rankin Inlet
ᔪᑦᑏᕐᓂ 11, 2024, ᑲᖏᑦᓚᓂᖅ

# Role of Nunavut Tunngavik Incorporated (NTI)
# ᐱᓕᓐᓇᐊᖏᑦᑐᖅᓯᖅ ᓄᓇᕗᑦ ᑎᒥᖅᓯ (ᑐᖅᓯᒪᔪᖅ)

- NTI represents the Inuit of Nunavut for the purpose of ensuring that Inuit rights are fully respected, including:
  - Aboriginal rights such as the duty to consult under s. 35 of Canadian constitution; and
  - treaty rights, meaning Nunavut Agreement rights and obligations.
- NTI's role extends to ensuring that the processes of the Institutions of Public Government are in keeping with the Nunavut Agreement, the *Nunavut Waters and Surface Rights Tribunal Act* and uphold Inuit participation and consultation requirements.
- In this review process, NTI supports the Kivalliq Inuit Association (KivIA), the Kivalliq Wildlife Board (KWB), the Hunter and Trappers Organizations (HTOs) and communities generally in addressing issues that are of concern to all Inuit in Nunavut including the promotion of Inuit culture and the safeguarding of Nunavut's wildlife, environment, culture, lands and economy.

- ᑐᖅᓯᒪᔪᖅᑯᑦ ᑭᖑᓪᓕᖅᑐᐃᓐᓇᑦ ᐃᓄᐊᓂᖅ ᓄᓇᕗᒻᒥ ᐃᓄᐃᑦ ᐱᓐᓇᐊᐅᑎᖏᑦ ᐊᑐᖅᑕᐅᓯᕐᓂᐊᓕᖅᑐᑦᑕ, ᐃᓕᑎᕐᕈᓗᑎᒃ:
  - ᓄᓇᖅᑲᖅᑲᖅᓯᒪᓂᑦ ᐱᓇᓐᓇᐅᑎᖏᑦ ᓂᕆᓗ ᑐᓴᐅᔨᖅᑕᐅᔨᖅᑲᖅᓯᖅ ᑎᑎᕋᖅᓯᒪᓂᖏᓐᓄᓂ s. 35 ᑲᓇᑕ ᑐᖅᓯᒪᔪᓴᐅᖏᓐᓄᓂ; ᐊᒻᒪᓗ
  - ᓄᓇᖅᑲᖅᑲᖅᓯᒪᓂᑦ ᐱᓇᓐᓇᐅᑎᖏᑦ, ᑐᑭᖏᓐ ᓄᓇᕗᒻᒥ ᐊᖏᑦᑭᑎᓂ ᐱᓇᓐᓇᐅᑎᖓᑦ ᐊᖏᑦᑭᑕᐅᓯᒪᓂᓗ.
- ᑐᖅᓯᒪᔪᖅᑯᑦ ᐱᓕᓐᓇᐊᓪᓚᑦ ᑎᑭᐅᑎᓯᒪᓂᕐᒥᖅ ᓇᓗᓇᐃᓐᓇᓯᒪᓂᖅᑎᖅ ᐊᐅᓚᓂᖓᑦ ᐊᖏᑦᑭᑎᑎᒍᑦ ᑎᒥᖅᑐᖅᑎᑕᐅᓯᒪᓂᑦ ᐊᖅᑐᖅᑎᓕᖅᓯᐊᕐᓇᖅᑐᓕᖅᑎᓐᓄᑦ ᓄᓇᕗᑦ ᐊᖏᑦᑭᑎᖏᓐᓄᑦᓯᐅᑦ, *ᓄᓇᕗᒻᒥ ᐃᒪᖏᑦ ᐊᒻᒪᓗ ᓄᓇᐅᑉ ᖃᐅᖏᓐᓄᑦᓯᐅᑦ* ᐱᓕᓐᓇᐊᓕᕆᓚᐅᖅᑐᑦ ᐱᓇᓐᓇᐅᑎᖓᑦ ᐊᒻᒪᓗ ᐊᖅᐅᖅᑲᐃᓗᓐᓂᖅ ᐃᓄᐃᑦ ᐃᓕᑎᕐᕈᓗᑎᐊᖅᑐᖓᓂᖅᑐᑦ ᐊᒻᒪᓗ ᑐᓴᐅᔨᖅᑕᐅᓕᖅᑎᓐᓄᖏᓐᓄᑦ.
- ᑕᕐᕋᓂ ᖃᑎᖅᑭᓂᖅᖁᓪ, ᑐᖅᓯᒪᔪᖅᑯᑦ ᐃᑲᔪᖅᓱᐃᓐᓇᑦ ᑭᕋᓕᒫᖅ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖅᑎᑎᓂᓂᖅ (KivIA), ᑭᕋᓕᒫᖅ ᐅᒪᔨᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᖏᓐᓂᖅᓂᖅ (KWB), ᓄᓇᓕᓐᓂ ᐊᖏᔪᓱᑐᑐᓕᕆᔨᓂᖅᑐᖅ (HTO) ᐊᒻᒪᓗ ᓄᓇᓕᓐᓂᖅᑐᖅ ᐊᖅᑭᑦᑭᓱᐃᓇᓱᐊᖅᑎᓕᒫᑦ ᐃᓱᒪᓕᐅᔨᓂᖅᑐᖅ ᐃᓄᐃᓐᓂᖅ ᐃᓄᐃᑦ ᓄᓇᕗᒻᒥ ᐃᓕᑎᕐᕈᓕᒫᓐᓇᖅ ᐱᙳᓕᓕᒫᖅᑎᑦᑎᓐᓂᖅᑐᖅ ᐃᓄᐃᑦ ᐃᓕᓴᖅᑯᓂᖅᑐᖅ ᐊᑦᑕᓇᐃᖅᓱᒪᑎᒃᓴᓕᓂᖅᓗ ᓄᓇᕗᒻᒥ ᓂᐊᔨᑎᓄᑦ, ᐊᐸᑎᒪᑦ, ᓄᓇᖑᓄᑦ ᒪᑭᒪᔨᐊᑎᖓᓕᓂᖅᓗ.

# NTI Supports Kivalliq Inuit Association's Hearing Submissions

NTI supports KivIA's Final Written Submissions and has additional comments on three of KivIA's proposed amendments to AEM's Meliadine Water Licence.

ᓄᓇᕗᑦ ᑐᓴᒪᓕᒃᑯᑦ ᐃᒃᓱᖏᑕᐃᕗᑦ
ᑭᓯᓚᕐᓂᖅ ᐃᓄᐃᑦ ᒃᑐᐸᖏᑎᑎᒃᑯᓕᖅᓂᒃ
ᑎᑎᕋᖏᑦᑕᕆᓂᖅᓂᒃ ᑐᓂᓗᓂᐊᖏᑎᓪᓗᑎᑦ
ᐊᒻᒪᓗ ᓗᓚᒃᒃᓴᓂᖏᒃ ᐅᖏᒃᐅᓗᒃᖢᒃᓴᓂᕐᓂᒃ
ᐱᖓᒐᓗᓂᒃ ᑭᓯᓚᕐᓂᖅ ᐃᓄᐃᑦ
ᒃᑐᐸᖏᑎᑎᒃᑯᓕᖅᓂᑦ
ᑐᒃᓗᕋᐅᑎᑎᓗᒍᖓᓕᖅᓂᒃ ᐊᖏᒃᑭᑎᐊᖏᒃᓗᒪᔪᓂᒃ
ᐊᓚᓂᑯ ᐅᕐᕋᓴᓂᐊᑎᒃᑯᑦ ᐃᒥᖏᓪᓗᑦ
ᓪᐃᓴᖓᓂᒃ.

# NTI Supports Kivalliq Inuit Association's Hearing Submissions

## 1. KivIA Comment 6

NTI appreciates AEM's new proposed commitment in the draft Water Licence (Part F, section 4) to limit the annual discharge of treated effluent into Meliadine Lake.

Similarly, NTI supports KivIA's call for ***a new Licence term that AEM will under no circumstances discharge underground saline groundwater to Meliadine Lake.*** This AEM commitment to KivIA related to protecting water quality in Meliadine Lake is fundamental. It should be an explicit obligation in the NWB's main authorization for Meliadine Mine. As a Licence term, it will be legally enforceable, less easily amended than a management plan commitment, and prominent for Inuit and the public to see.

## 1. ᑭᓵᓕᖅᑎ ᐃᓄᐃᑦ ᑲᑐᔨᖏᑎᒋᔭᐅᑦ ᐅᖏᐅᓯᕐᓴᖅᓯᒪᓕᑦ 6

ᓄᓇᕗᑦ ᑐᖓᓚᐃᔭᐅᑦ ᖃᐅᓯᒪᓕᕗᑦ ᐊᒃᓂᐅᑦ ᐅᓴᖃᓄᓂᐊᑎᔭᐅᑦ ᑐᔭᕋᐅᑎᖓᓕᑦ ᓄᑦᖃᖅ ᐱᓪᓗᒍ ᑐᓂᕿᑎᕈᓯᒪᓂᕆᖓᓚᓄᑦ ᐃᒥᖃᒍᑦ ᐱᐊᓂᔭᓯᒪᖓᕐᑐᖅ ᓚᐃᓴᖓᓕᑦ (ᐃᓚᖓᓕᑦ ᒥ, ᐊᒃᒍᖅᓯᒪᓂᖓ 4) ᒥᑭᓂᖅᓴᐅᑲᓂᔪᓪᓗᒍ ᐊᖃᖏᒍᑕᒫᑦ ᑯᕕᑎᑦᑎᓂᓂᕐᑕᖓᑦ ᐃᓚᐅᖅᓯᒪᔪᒥᑦ ᒥᓂᐅᖅᑐᑦ.

ᐊᐳᑲᓴᖓᓪᓗ, ᓄᓇᕗᑦ ᑐᖓᓚᐃᔭᐅᑦ ᐃᑲᔪᖅᑐᐃᓐᕗᑦ ᑭᓵᓕᖅᑎ ᐃᓄᐃᑦ ᑲᑐᔨᖏᑎᒋᔭᐅᑦ ᑐᖓᓯᒪᓂᖅ **ᓄᑦᒥᒥᖅ ᓚᐃᓴᒥᖅ ᐃᓱᓕᓴᕕᒥᖅ ᐊᒃᓂᐅᑦᑯᑦ ᐊᓱᖅᑯᖅᖢᖅᓯᕐᑐᑎᒥᖅ ᑯᕕᑎᑦᑎᓂᐊᖓᓚᕐᒥᖅ ᐃᒪᖅᑎᖅ ᒥᓂᐅᖅᑐᑦ.** ᑐᓂᖅᑐᑎᒥᓯᒪᓂᖅ ᑭᓵᓕᖅᑎ ᐃᓄᐃᑦ ᑲᑐᔨᖏᑎᒋᔭᐅᓄᑦ ᐊᒃᓂᐅᑦ ᐅᓴᖃᓄᓂᐊᑎᔭᐅᑦ ᓴᓪᓕᐊᓂᖅᑕᒪᑦ ᐃᒪᓕᒃᐅᓂᖅ ᐱᐅᓂᖅᑐᖅ ᐃᓕᓴᕐᓂᖅ ᒥᓂᐅᖅᑐᑦ ᐅᓪᓗᒥᒃ ᐊᓯᔪᓕᐊᑎᒋᔭᐅᑦ ᒥᓂᐅᖅᑐᑦ ᐃᓄᐃᑦ ᑲᑐᔨᖏᑎᒋᔭᐅ

# NTI Supports Kivalliq Inuit Association's Hearing Submissions

## 2. KivIA Comment 7 re Draft Water Licence Part B, section 10

NTI shares KivIA's concern that under AEM's new proposed wording for Part B, s. 10, a management plan could be deemed approved despite Inuit or others having expressed legitimate, unresolved concerns with the Plan.

Therefore, NTI urges the NWB not to accept the wording AEM proposed in June 2024 or in its Final Submission. The Water Licence's original wording should continue.

## 2. ᑭᓵᓕᒥᒃ ᐃᓄᐃᑦ ᑲᑐᔪᖅᑎᑎᒃᓯᑦ ᑐᓂᖃᑎᒋᔭᒪᓂᕆᖅᓯᒪᑦ 7 ᐱᓕᑐᒍ ᐱᐊᓂᔪᒪᓕᕐᑐᑐᖅ ᐃᒥᕐᒧᑦ ᓕᐃᖅᓯᖅ ᐃᓕᓐᓄᒪ ᐃ, ᐊᒃᒍᖅᓯᒪᓂᖅ

ᓄᓇᕗᑦ ᑐᙱᓚᐅᔪᑦ ᑲᑐᔪᖅᑎᖅᖅᓴᑦ ᑭᓵᓕᒥᒃ ᐃᓄᐃᑦ ᑲᑐᔪᖅᑎᑎᒃᓯᑦ ᐃᓕᒍᓐᓇᓚᓂᒃ ᐊᑦᑕᓂ ᐊᒃᓂᔪᒃᑎᑦ ᐅᕗᖅᓂᐊᑎᒃᑦ ᓄᑕᒥᒃ ᑐᔪᓕᐅᑎᓚᓂᒃ ᐅᖅᐅᓯᖅᑕᙱᑦᓂᒃ ᐃᓕᓐᓂᑦ ᐱ, ᐊᒃᒍᖅᓯᒪᔪᑦ 10, ᐊᐅᓕᑦᑎᓂᒋᒧᑦ ᕿᖏᓄᐅᑎᓐᓚ ᐊᓐᓕᖅᑕᐅᑐᐃᓐᓇᓕᐊᖅᑎᖅᖅᓴᖅ ᐃᓄᐃᑦ ᐊᓯᙱᓕᓪ ᐃᓯᒪᓂᕆᖅᓴᖏᓐᓂᒧᑦ ᓇᓵᒍᖅᑐᓂᒃ, ᐊᖅᑭᑕᐅᕐᓂᒋᓯᒪᙱᓕᕐᑐᓂᒃ ᐃᓯᒪᓂᑎᒃ ᕿᖏᓄᐅᑎᒧᑦ.

ᑕᐃᒪᐃᓱᒪᑦ, ᓄᓇᕗᑦ ᑐᙱᓚᐅᔪᑦ ᑲᔪᓐᓕᖅᓴᐃᕗᑦ ᓄᓇᕗᑦ ᐃᒪᓕᓗᐃᔪᑦ ᑲᑎᒪᔨᖅᑐᓂᒃ ᐊᓐᓕᖅᓯᑯᓇᖅᑐᑦ ᐅᖅᐅᓯᖅᑕᙱᑦᓂᒃ ᐊᒃᓂᔪ ᐅᖅᐊᓂᔪᐊᑎᒃᑦ ᑐᔪᓕᐅᑎᓚᓂᒃ ᔭᓂ 2024 ᐅᒃᖠᓗ ᑭᓚᓕᖅᕿᒥᒃ ᑐᔪᓕᐅᑎᓚᓂᒃ. ᐃᒪᓕᒧᑦ ᓕᐃᖅᓯᖅᑐᑦ ᐅᖅᐅᓯᖅᑕᖅᑎᑦ ᑲᔪᓯᕆᐊᖅᑎᖅᖅᑐᖅ.

# NTI Supports Kivalliq Inuit Association's Hearing Submissions

**3. KivIA Comment 7 re Draft Water Licence Part C, section 7**

NTI agrees that the Water Licence should require AEM to file an updated cost estimate for reclamation along with its Final Reclamation and Closure Plan and therefore supports KivIA's proposed amendment to the existing s.7 in Part C of the Water Licence.

At the same time, NTI sees value in AEM's proposed new section 7 whereby the NWB, Licensee, the Crown and/or KivIA could review the liability reclamation requirements and seek to revise the amount of security that AEM must hold in light of changed circumstances. Should the costs of security increase significantly, revising AEM's legal obligations in a timely way confirms that the proponent is positioned to meet all their closure obligations.

Therefore, NTI recommends including in the amended Water Licence both the current Part C s. 7 as edited by KivIA as well as AEM's proposed new term.

**3. ᑭᓵᓕᒫᖅ ᐃᓄᐃᑦ ᑲᑎᒪᔨᖅᑎᑎᒋᔭᑦ ᐅᖅᐅᓂᖅᓯᒪᓕᒃ 7 ᐱᐊᓂᒃᓂᒪᖅᑕᑐᖅ ᐃᒥᐅᒧᑦ ᓯᐃᓕᖅᓯᒪᓕᒃ ᐃᓕᓴᖅᓯᒪᓕᒃ ᑎ, ᐊᒻᒍᖅᓂᒪᔪᖅ 7**

ᓄᓇᕗᑦ ᑐᙵᓚᐃᒃᓂᑦ ᐊᖏᕐᖅᑎᓕᕆᓪ ᐃᒥᐅᒧᑦ ᓯᐃᓕᖅᓯᒪᓕᒃ ᐱᑕᖅᓚᐊᖅᖏᓐᓇᑦ ᐋᒃᓂᑯ ᐅᓴᕐᓂᓂᐅᑎᓂᐊᓚᐊᖅᖏᓐᓇᑦ ᐊᑭᑎᓴᙵᔪᐊᖅᑕᙵᓯᒪᑦ ᐅᑎᖅᑎᑕᐅᔪᓴᒃᑎᓄᑦ ᐊᑎᒪᓄ ᑭᙵᓕᕐᖅᕿᒃ ᐅᑎᖅᑎᑕᐅᔪᓴᒃᑎᓄᑦ ᒪᑐᐃᐅᓄᓂᓄ ᕿᖏᐅᑎᖅᓯᒪᑦ ᐊᖏᒪᓄ ᑕᐃᒪᐃᓴᒪᑦ ᐃᑲᔪᖅᑐᐃᐅᓕᑦ ᑭᙵᓕᕐᖅᕿᒃ ᐃᓄᐃᑦ ᑲᑎᒪᔨᖅᑎᑎᒋᔭᖅᓯᒪᓂᖅ ᑕᐃᓕᖅᑐᕐᓂᐊᓕᖅᓯᒪᓂᖅ ᐅᑦᓗᓄ ᐊᒻᒍᖅᓂᒪᔪᖅ 7 ᐃᓕᓴᖅᓯᒪᑦ ᙰᑎ ᐃᒥᐅᒧᑦ ᓯᐃᓕᖅᓯᒪᓕᒃ.

ᑕᑯᓂᙰᖅᓴᐅᓪᓚᖅ, ᓄᓇᕗᑦ ᑐᙵᓚᐃᒃᓂᑦ ᑕᓂᕗᑦ ᐊᑐᑎᖅᑎᓂᙰᓂᖅ ᐊᒻᒍᖅᓂᒪᔪᖅ ᑐᑦᓯᓂᐊᖅᑎᒃᓂᑦ ᑐᒃᓂᕐᑐᑎᓂᖅ ᓄᑕᙰᔪᖅ ᐊᒻᒍᖅᓂᒪᔪᖅ 7 ᑕᑯᓂᐊ ᓄᓇᕗᒥ ᐃᒪᓕᓗᓂᖅᓴᒥᑦ ᑲᑎᒪᔨᐅᑎᖅᓂᑎᔨᑦ, ᑲᓇᐃᖅᑲᖅᑎᑎᒋᔨᑦ, ᑲᓇᑕᐅᐸᑦ ᒪᙰᒪᔭᖅᑐᓂᑦ ᐊᒻᒪᓗᐊᖅᑐᓄᓇᕗᒻᒥᓂ ᑭᐅᑎᖅᔪᓂᓇᖅᑐᒥ ᐊᑭᓕᓚᐅᖅᑎᓂᒃ ᐅᑎᖅᑎᑕᐅᓂᖅᓯᒪᓂᒃ ᐊᑐᖅᑕᐅᔪᓚᐊᕆᓂᒃ ᐊᒻᒪᓗᓄ ᓄᓇᕗᑦᑐᑦᓯᓂᐊᓕᒫᑎᓪᓗ ᐅᓇᓱᖅᓴᐅᓪᓚᖅ ᐃᓕᓴᖅᓯᒪᓕᒃ ᐊᑭᑦᑐᖅᓯᒪᓕᒃ ᐊᑐᖅᑕᐅᓂᖅᓯᒪᓂ

# NTI Comments on CIRNA, DFO and ECCC Submissions

- The outstanding technical comments raised by the Department of Fisheries and Oceans (DFO) and Environment and Climate Change Canada (ECCC) as well as the comments on security by Crown Indigenous Relations and Northern Affairs (CIRNA) all relate to environmental protection and, by extension, to the long-term ability of Inuit to meaningfully harvest and enjoy the land and waters affected by the Meliadine Mine.
- NTI agrees with CIRNA's proposal to update the NWB on the issue of security before and at the public hearing. CIRNA, KivIA and AEM should all provide this update.

- ᑭᖏᓂᖅᓯᒪᔪᑦ ᐅᖃᐅᓯᒋᑦ ᓴᖅᑭᑕᐅᓯᒪᔪᑦ ᐃᒪᖅᑎᐅᑕᓕᕆᔨᒃᑯᓐᓄᑦ ᐊᐃᒪᓗ ᐊᓂᒍᑎᓕᕆᔨᒃᑯᓐᓄᑦ ᓯᓚ ᐊᓯᔨᐸᓪᓕᐊᓂᖓ ᑲᓇᑕᒥ ᐊᐃᒪᓗ ᐱᖓᓱᐅᑎᔪᑦ ᐅᖃᐅᓯᐅᓯᒪᔪᑦ ᐅᐊᖅᑎᕐᐅᑕᑎᐊᖃᖅᓯᖓ ᑯᐃᓐ ᑭᓇᐅᔪᖅᑐᑦ ᐅᖃᖅᑐᒃᑯᐊᓕᖅᑐᑦ ᐊᐃᒪᓗ ᐃᓄᓕᕆᔨᑐᑎᒃᓯᒪᓂᖅ ᐊᐃᒪᓗ, ᐃᓕᓴᐅᓗᓂ, ᐊᑯᓂᖅᑐᒥᑦ ᐱᔪᓐᓇᖅᑐᓗᒋᑦ ᐃᓄᐃᑦ ᐅᓇᓕᕆᔨᖅᑕᑦᑐᒥᑦᑐᒃᑯᑦ ᑕᑯᓗᒍ ᑐᑭᓯᐊᓂᖅᑐᑦ ᐊᐃᒪᓗ ᐃᓄᓕᕆᔨᑐᑎᒃᓯᒪᓂᖅ ᐊᐃᒪᓗ ᐃᒪᖅᑎᑦ ᐊᑐᑐᒃᑯᐊᓕᖅᓯᒪᓂᖅ ᒥᓕᕆᓂᖅᑐᑦ ᐃᓄᐃᑦ ᐅᓇᓕᕆᔨᖅᑕᑦᑐᒥᑦᑐᒃᑯᑦ ᐊᐃᒪᓗ ᐃᒪᖅᑎᑦ ᐃᒪᖅᑎᑦ ᐊᑐᑐᒃᑯᐊᓕᖅᓯᒪᓂᖅ ᒥᓕᕆᓂᖅᑐᑦ.

- ᓄᓇᓕᒋᑦ ᑐᓴᓚᕕᖅᑎᑦ ᐊᓱᑕᖅᑎᓕᓪᑦ ᑯᐃᓐ ᑭᓚᑐᑎᑕᖅᑐᖅᓯᒪᓂᖅᑐᒃ ᓄᓇᖅᑲᖅᓱᒪᔪᓕᕆᓂᖅᓯᖅ ᐊᐃᒪᓗ ᐃᓄᓕᕆᔨᑐᑎᒃᓯᒪᓂᖅ ᑐᖅᑭᑕᐅᑎᖅᓯᒪᓂᖅᑐᒃ ᓄᓇᒋᒥ ᐃᒪᓕᕆᓂᖅᓱᒻᒪᑦ ᑲᑎᒪᔨᖓᓱᓂᖅᑐᒃ ᐅᖅᑲᑕᐅᑎᓪᓗᒍ ᐱᖓᔪᐃᖅᓱᒪᔪᓕᕆᓂᖅᓯᖅᑕᖅᑐᑦ ᓯᓂᐅᓕᐊᑎᒃᓯᒪᓂᖅ ᐊᐃᒪᓗ ᐃᓄᓕᕆᔨᑐᑎᒃᓯᒪᓂᖅ ᐊᐃᒪᓗ ᐃᒪᖅᑎᑦ

# NTI Comments on CIRNA, DFO and ECCC Submissions

**1. Draft Water Licence Part E section 2**

NTI shares DFO and ECCC's concerns with AEM's proposal to more than double the authorized volume of water that AEM may take from Meliadine Lake to flood the pits upon closure of Meliadine Mine, from 4 to 8.7 million cubic metres.

An authorized volume should be based on reliable predictions about what amount of water is needed to reflood the pits and how much volume can be withdrawn without jeopardizing the quality of Meliadine Lake's aquatic environment.

NTI recommends that planning for this aspect of the Meliadine Mine's closure happen as soon as possible and in time for AEM to adjust its operations if it turns out that the volume of water needed would compromise the aquatic environment in Meliadine Lake. It would be unacceptable to Inuit to discover that the plan to draw water from Meliadine Lake jeopardizes the lake's health and that there is no sound alternative to complete the closure of the Mine.

**1. ᐱᓴᓇᖅᓯᒪᓕᕐᓂᑕᖅ ᐃᒥᕐᒧᑦ ᓪᐃᓴᖅᑎᑦ ᐃᓪᓕᖅᑎᑦ ᑭ ᐊᒡᒍᖅᓯᒪᔪᖅ 2**

ᓄᓇᕗᑦ ᑐᓴᖅᐸᑦ ᐃᑲᔪᖅᓯᐃᕗᑦ ᐃᒪᕐᒥᐅᑕᓚᓱᐳᑦᓄᓐᓂᖅ ᐊᒡᒪᓗ ECCC-ᓄᖅ ᐃᓯᒦᓗᑎᕐᑎᓐᓂᖅ ᐊᒡᓂᓄ ᐅᓴᕐᓂᓄᐊᑎᖅᓄᑦ ᑐᖅᓯᐊᐅᑎᕐᖅᓂᖅ ᒪᕐᕉᐊᖅᑎᓗᐊᖅᓯᒪᒪᑦ ᐱᔪᓇᓇᖅᑎᑕᐅᓯᒪᓂᓱᖅᓂᑦ ᐃᒥᕐᒥᖅ ᐊᒡᓂᓄ ᐅᓴᕐᓂᓄᐊᑎᖅᓄᑦ ᐱᔪᓇᓇᒪᕐᓕᖅᑎᑦ ᑕᓯᖅᓂᓂᑦ ᑕᑕᓕᖅᓄᑦᓗᔭᒍ ᐃᓗᑦᑐᖅᑎᓯᒪᔪᑦ ᐃᒪᒋᓗᓗᑦ ᒪᑐᐅᔭᓂ ᒥᓕᓕᐊᐃᓐ ᐅᓴᕐᓂᓄᐊᖅᓱᖅ, ᐅᕙᓪᓕᑦ 4-ᒥᖅ ᐅᕐᓴᖅ 8.7-ᒧᑦ ᒥᓕᐊᓐ ᐅᑦᑐᑎᑦ ᒥᑕᓄᑦ.

ᐱᔪᓇᓇᖅᑎᑕᐅᔪᖅ ᐅᖅᓄᒪᐃᓐᓂᖅᓱᖅ ᐊᑐᖅᑕᐅᓴᕆᐊᖅᖃᖅᓗᓗᐊᖅᑎᑦ ᐃᓯᒪᑎᓴᐅᓯᒪᔪᓄᑦ ᖃᓄᐃᑎᖅ ᐃᒥᕐᒥᖅ ᐱᓴᕆᐊᖅᖃᖅᓱᖅᓂᖅ ᐃᓕᓴᕐᑕᐅᖅᓄᑦᓄᓐᓂᓕᖅᓄᖅ ᐃᒪᒃᑕᐅᖅᓄᑦᓄᓐᓂᑦᓯᓚᓂᑦ ᐊᒡᓂᓄ ᖃᓄᐃᑎᖅ ᐅᖅᓄᒪᐃᓐᓂᓕᖅᓄᖅ ᐃᒪᓕᕐᓂᑦ ᐊᓯᐅᓇᓱᒋᔭᐅᓂᖅ ᐃᒪᓕᕐᓂᑦ ᐊᓯᐅᓇᓱᒋᔭᐅᓂᖅ ᐱᔪᓇᓇᖅᑎᑕᐅᔪᖅ ᑕᓯᖅᓂᓂᑦ ᐃᓕᓴᕐᑕᐅᖅᓄᑦ ᐅᑦᑐᑎᑦ ᒥᑕᓄᑦ.

ᓄᓇᕗᑦ ᑐᓴᖅᐸᑦ ᐱᖅᑯᔭᕗᑦ ᐸᖅᓭᓪᓕᖅᑯᔭᓚᓱᐳᑦ ᑕᒪᓐᓇ ᐱᓚᓗᐃ ᒥᑕᐅᖅᓄᑦ ᐅᓴᕐᓂᓄᐊᖅᓱᖅᑯᔭᑦ ᒪᑐᐅᑕᐅᖅᑕᑎᓪᓗᐊᖅᓯᒪᒪᑦ ᐊᓐᓇᑦᓯᓗᓂ ᐊᐅᓚᓂᓕᕐᓂᖅᓂᖅ ᐃᒥᕐᒥᖅ ᐅᖅᓄᒪᐃᓐᓂᓕᖅᓄᖅ ᐊᒡᓂᓄ ᖃᓄᐃᑎᖅ ᐊᖏᕐᕈᑎᐊᖅᑎᓗᑎᓱᐳᑦᓄᓐᓂᑦ ᐃᒪᓕᕐᓂᑦ ᐊᐅᓚᓂᓕᕐᓂᖅᓂᖅ ᐃᒥᕐᒥᖅ ᐅᓴᕐᓂᓄᐊᖅᓱᖅᑯᔭ

# NTI Comments on CIRNA, DFO and ECCC Submissions

## 2. ECCC Comment 19 – Closure Criteria for Surface Water Quality

NTI supports ECCC's recommendation that water quality criteria for closure of Meliadine Mine in AEM's Interim Closure and Reclamation Plan be protective of aquatic life for all waterbodies if, as ECCC predicts, all the waterbodies will be reconnected to the regional surface water network post closure and fish will eventually populate all these waterbodies.

Fishing edible and healthy fish is essential to the Inuit way of life. Post closure, water must be safe for fish and Inuit.

## 2. ECCC-ᑯᑦ ᐅᖃᐅᓯᖏᓚᑦ 19 - ᒪᑐᐸᐅᓂᐊᖅᐸᑦ ᐊᑐᖅᑕᐅᕆᓇᐊᓂᑦ ᓄᓇᐅᐸᑦ ᖃᖏᓚᓂ ᐃᒪᐅᐸᑦ ᖃᓄᐃᓐᓂᖏᓚ

ᓄᓇᕐᓕᑦ ᑐᒥᕕᖏᑯᑦ ᐃᑲᔪᖅᑐᐃᕐᓕᑦ ECCC-ᑯᑦ ᐊᑐᖅᑕᐅᕋᓱᓐᓂᖅ ᐃᒥᐅᐸᑦ ᐱᐅᓂᖏᓚᓄᑦ ᒪᓕᒋᐊᓕᖅ ᒪᑐᐸᐅᑎᓕᒍ ᒥᐅᕐᓂᐊᕐᐃᐅᐸᑦ ᐊᒃᓂᑯ ᐅᓴᖏᓐᓂᐊᖅᐃᐅᐸᑦ ᒪᑐᐸᐅᓕᐅᑲᓐᓂᖏᓚ ᐊᓪᒪᓗ ᐅᑎᖅᑎᑕᑎᓂᖏᓚ ᐸᖅᓭᐅᑎᖏᓚ ᓴᓗᐳᖅᑯᓕᒍ ᐃᒪᒋᐅᑕᐅᑦ, ECCC-ᑯᑦ ᓭᓕᐅᑦᑕᖅᑕᐅᔪᑦ, ᑕᒪᖅᑎᑦ ᐃᒪᐅᔪᓕᒥᒃ ᐅᑎᖅᑎᑕᐅᓂᐊᖅᒪᑕ ᐊᐃᑕᑐᑦᑐᒃ ᑕᒪᐃᓐᓄᑦ ᐃᒪᐅᔪᓄᑦ ᑕᐃᒪᐃᑲᑯᓂᖅ ᐊᓪᒪᓗ ᐃᖅᓗᐃᓐᓂᖅ ᐃᒪᓕᕆᓂᖅᓴᑦ ᑲᑯᖅᑎᑎᑲᓂᖅᒪᓂᑦ ᒪᑐᐸᐅᔪᖅ ᐊᓪᒪᓗ ᐃᖅᓗᐃᓐᓂᖅ ᐊᒥᔭᑭᐸᖅᑐᐃᓐᓇᖅᑐᑦ ᐃᒪᐅᔪᓂᒃ ᐊᑐᖅᑕᐅᕋᓱᓐᓂᖅ ᐃᓕᓴᕐᓂᐊᖅᑐᑦ.

ᐃᖅᓗᓚᑯᓗᓂᓄᑦ ᓂᕆᔨᖅᓴᓂᑦ ᖃᓄᐃᐃᖅᑲᓂᑦ ᐃᖅᓗᐃᓐᓂᖅ ᐃᒪᐅᓂᓂᑦ ᐱᒻᒪᕆᐅᓕᒪᑦ ᐃᓄᐃᑦ ᐃᓕᓴᕐᓂᐊᖅᐃᐅᐸᑦ ᐃᓄᐃᓐᓂᖅᓴᑦ. ᒪᑐᐸᐅᓗᐃᓐᓇᖅᓂᖅ, ᐃᒥᖅ ᐊᑦᑕᓇᐃᓐᓂᑦᑎᐊᖅᖅᓂᖅ ᐃᖅᓗᐃᓐᓂᖅ ᐃᓄᐃᓐᓂᑦ.