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## Re: Questions - Agnico Eagle water permitting process

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Richard Dwyer <richard.dwyer@nwb-oen.ca>

Tue, Aug 25, 2020 at 10:39 AM

Draft To: Stephanie Autut <stephanie.autut@nwb-oen.ca>

On Mon, Aug 17, 2020 at 6:54 PM Chris Kanaan <chriskanaan@yahoo.com> wrote:

Dear Ms. Autut,

As you wrote to the Nunatsiaq News inviting questions to your personal e-mail and attention regarding your "letter to the editor" pertaining to the Meliadine water ammendment, I do have several questions that I would like to respectfully direct your way:

i) the NWB accepted Agnico Eagle's word at par (against the will of KivIA) regarding the quality of the water and source of high TDS and high volume; given that the 2019 submissions on Agnico Eagle annual response to comments establish that their Saline Water Treatment Plant was dysfunctional from early 2019, is that something that the NWB plans to look at in retrospect? Agnico Eagle evidently did not inform the Nunavut Water Board, NIRB, or any other regulator regarding their dysfunctional SWTP until at least April 2020 in their groundwater management plan - for those like myself who studied it. It was only because CIRNAC pursued the SWTP failures that Agnico Eagle was seemingly forced into revealing the truth about the cause of high TDS.

ii) the "Type A" water license awarded to Agnico Eagle demands the company \*immediately\* report anything that would put them out of compliance. Given Agnico Eagle failed to inform regulators of the dysfunctional SWTP, will this be something that the NWB investigates as a violation of their terms and conditions? Agnico Eagle could have forecasted well in advance they would face a TDS "emergency" which led to accumulated volumes as the water was "too toxic" to discharge under current terms and conditions of Type "A" water license. AEM had forecasted a rise of TDS as early as mid 2019 according to their own technical files - which I've studied in-depths.

iii) the NWB stated that Agnico Eagle's water is "non-toxic." What evidence or science was studied to establish such water is "non-toxic" to Meliadine Lake? Can you provide me with information on any other mine in North America or Europe that allows such levels of TDS effluent to be discharged into a freshwater lake?

As you may have read in my article in the Nunatsiaq News, the Red Dog mine in Alaska was almost shutdown in 2010 for beaching 1,500 mg/L of TDS yet the Nunavut Water Board permitted Agnico Eagle to discharge up to 3,500 mg/L without any scientific evidence unique to the lake that it would not harm the local environment.

We are hearing some rumors that Agnico Eagle is going to seek a permanent discharge criteria of 3,500 mg/L for TDS into Meliadine Lake. We are concerned the process is not transparent and does not invite members of the public to provide feedback.

I would really value your feedback to my queries.

Thanks!

Chris Kanaan