

REVIEW OF NWB File # 2AM-MEL 1631

INTERIM CLOSURE & RECLAMATION PLAN – UPDATE 2020

Prepared By:



KIVALLIQ INUIT ASSOCIATION

for the

NUNAVUT Water Board (NWB)

November 1, 2021

Executive Summary

The Kivalliq Inuit Association (KivIA), represents the Inuit beneficiaries of the Kivalliq Region, at the territorial and regional levels, and supports sustainable economic development opportunities for Inuit beneficiaries.

The KivIA has reviewed all the documents related to Agnico Eagle Mines Ltd.'s (AEM) September 22nd, 2021 submission to the Nunavut Water Board (NWB). This submission is for the Meliadine Gold Project under NWB file # 2AM-MEL 1631 and is titled "Meliadine Interim Closure & Reclamation Plan – Updated 2020"

The KivIA has the following comments related to this report.

KivIA – Comment 1

Document:

Final report, sections 1.2.1 (Site Geology and Mining Methods) and 1.2.2 (Project Mine Plan and Facilities), page 4.

Comment:

In section 1.2.1 it is stated that "The Company anticipates that mining will be carried out through several underground mining operations and open pits over a 14-year mine life." However, in section 1.2.2. it is stated that "Meliadine operations started after commissioning was completed at the end of Q2 2019 and will span approximately 8.5 years (Q2 2019 to 2027)."

Question:

Can AEM confirm if the mine life will be 8.5 or 14 years.

KivIA – Comment 2

Document:

Appendix D, Lessons Learned from Other Projects

Comment:

Given that AEM has been operating in the Kivalliq Region since 2010 would it be possible to add in lessons learned related to how permafrost is responding in areas of Waste Rock Storage Facilities (WRSF) and Tailings Storage Facilities (TSF) on the Meadowbank Project. In particular, is there a progression of permafrost into the WRSF and/or TSF.

Question:

The KivIA would request that comments on permafrost based on the above comment be included in the 2021 ICRP update.

KivIA – Comment 3

Document:

Appendix E, Reclamation Research Plans

Comment:

There is no reference to any reclamation research related to the cover designs for Waste Rock Storage Facilities (WRSF) and Tailings Storage Facilities (TSF)

Question:

The KivIA would request that any research based on the above comment be included in the 2021 ICRP update.

KivIA – Comment 4

Document:

Final report, sections 1.3.3 (Underground), 5.2.3 (Underground)

Comment:

Though it is suggested there is minimal exchange between deep and active groundwater reservoirs, the possibility of deep groundwater contamination should be addressed.

Question:

What volume of paste backfill is expected to be used? Is there a possibility of significant contamination leaching into the deep groundwater?

KivIA – Comment 5

Document:

Final report, sections 1.3.7 (Water Management Structures), 5.2.7 (Water Management Structures)

Comment:

Saline water can have significant adverse impacts on soil and vegetation. After discharge to Melvin Bay is completed, saline groundwater will be present along the pipeline, and should not be deposited on the tundra.

Question:

What precautions will AEM take to minimize the amount of spilled saline during pipeline decommissioning?

The KivIA would like to thank the NWB for the opportunity to be part of this review.

Regards



Luis Manzo
Director of Lands
Kivalliq Inuit Association