Indigenous and Northern Affairs Canada
Affaires autochtones et du Nord Canada

Agnico Eagle Mines Ltd's Whale Tail Pit Project

Nunavut Impact Review Board /
Nunavut Water Board

ᐊᒡᓃᑯ ᐃᒍ ᐅᔭᕋᖕᓂᐊᕐᕕᒃ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓᓄᑦ ᓴᐅᔭᐅᔪᒃᓴᓄᑦ ᐱᓕᕆᐊᒃᓴᖅ

ᓄᓇᕗᒻᒥ ᐱᕙᓪᓕᐊᔪᓄᑦ ᖃᐅᔨᓴᖅᑏᑦ ᑲᑎᒪᔨᖏᑦ/ᓄᓇᕗᒻᒥ ᐃᒪᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᖏᑦ

Technical Meeting
Baker Lake
April 28-29, 2017

ᓴᓇᔭᕆᐊᖃᖅᑐᒃᑯᑦ ᑲᑎᒪᓂᖅ
ᖃᒪᓂᑦᑐᐊᖅ
ᐊᐃᕆᓕ 28-29, 2017

INAC·AANC

Canada

INAC's Role in the NIRB and NWB Assessment of the Proposed Whale Tail Pit Project

- **Responsible Minister**: Has decision-making role under the Nunavut Agreement, NuPPAA, and NWSRTA
- **Intervenor**: Provide expert advice
- **Regulator**: Administration of Crown land and water licence inspections / enforcement

INAC-ᑯᑦ ᖃᓄᐃᓕᐅᕐᓂᖏᑦ NIRB-ᑯᓐᓄᑦ ᐊᒻᒪᓗ NWB-ᑯᓐᓄᑦ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᑐᒃᓯᕋᖅᑐᓄᑦ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᓴᐅᔭᐅᔪᒃᓴᒧᑦ ᐱᓕᕆᐊᒃᓴᖅ

- ᑲᒪᔨ ᒥᓂᔅᑕ: ᐃᓱᒪᓕᐅᓲᖑᔪᖅ ᓄᓇᕗᒻᒥ ᓄᓇᑖᖅᓯᒪᓂᒃᑯᑦ ᐊᖏᕈᑎᐊᒍᑦ, NuPPAA, ᐊᒻᒪᓗ NWNSRTA
- ᐅᖃᖅᑎ: ᑐᓂᓯᓗᓂ ᖃᐅᔨᒪᔨᕐᔪᐊᒥᑦ ᐅᖃᖅᑎᒥᑦ
- ᐊᐅᓚᑦᑎᔨ: ᐊᐅᓚᑦᑎᓂᖅ ᒐᕙᒪᓕᕆᓂᕐᒧᑦ ᑭᒃᑯᑐᐃᓐᓇᕐᓄᑦ ᓄᓇᒋᔭᐅᔪᓄᑦ ᐊᒻᒪᓗ ᐃᒪᐅᑉ ᓚᐃᓴᖓᓄᑦ ᖃᐅᔨᓴᕐᓂᖅ/ᐱᕙᓪᓕᐊᓂᖅ

Summary of INAC's participation in the review of the proposed Whale Tail Pit Project

- **Scoping**
  - Attended NIRB community scoping meetings (Baker Lake, Rankin Inlet, Whale Cove, Arviat)
  - Comments on project scope to the NIRB
- **Information Requests** (IRs)
  - Nine (9) IRs submitted to the NIRB
  - Application completeness comments submitted to the NWB
- **Technical Review Comments** (TRCs)
  - Eight (8) TRCs submitted solely to the NIRB
  - Eight (8) TRC submitted to the NIRB and NWB
  - One (1) TRCs submitted solely to the NWB
- **Technical Meeting and Pre-Hearing Conference**

ᓇᐃᓈᖅᓯᒪᔪᑦ ᓄᓇᖃᖅᑳᖅᓯᒪᔪᒃᑯᑦ ᐃᓚᒋᔭᐅᓂᖏᑦ ᖃᐅᔨᓴᖅᑎᓪᓗᒋᑦ ᑐᒃᓯᕋᖅᑕᐅᔪᒧᑦ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᓴᐅᔭᐅᔪᒃᓴᓄᑦ ᐱᓕᕆᐊᒃᓴᖅ

- ᓇᓗᓇᐃᔭᐃᓂᖅ
  - ᐃᓚᒋᔭᐅᓚᐅᖅᑐᑦ ᓄᓇᕗᒻᒥ ᐱᕙᓪᓕᐊᓂᕐᒧᑦ ᖃᐅᔨᓴᖅᑏᑦ ᑲᑎᒪᔨᖏᑦ ᓄᓇᒋᔭᐅᔪᒥ ᑲᑎᒪᑎᓪᓗᒋᑦ (ᖃᒪᓂᑦᑐᐊᖅ, ᑲᖏᖅᓱᓂᖅ, ᑎᑭᕋᕐᔪᐊᖅ, ᐊᕐᕕᐊᑦ)
  - ᐅᖃᐅᓯᖃᓚᐅᖅᑐᑦ ᐱᓕᕆᐊᒃᓴᐅᑉ ᓇᓗᓇᐃᔭᐃᓂᕐᒧᑦ ᓄᓇᕗᒻᒥ ᐱᕙᓪᓕᐊᓕᕆᔨᒃᑯᑦ ᖃᐅᔨᓴᖅᑏᑦ ᑲᑎᒪᔨᖏᓐᓄᑦ (NIRB)
- ᑐᑭᓯᐊᔾᔪᑏᑦ ᐱᔭᐅᔪᒪᔪᑦ **(IRs)**
  - ᖁᓕᖏᓗᐊᖅᑐᑦ (9) IRs ᑐᓂᔭᐅᓯᒪᔪᑦ NIRB-ᑯᓐᓄᑦ
  - ᑐᒃᓯᕋᐅᑎᑦ ᐱᐊᓂᒃᓯᒪᔪᑦ ᐅᖃᐅᓯᑦ ᑐᓂᔭᐅᓯᒪᔪᑦ NWB-ᑯᓐᓄᑦ
- ᓴᓇᔭᐱᐊᖃᖅᑐᒃᑯᑦ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐅᖃᐅᓯᑦ **(TRCs)**
  - ᐊᕐᕕᓂᓖᑦ ᐱᖓᓱᓪᓗ (8) TRC ᑐᓂᔭᐅᓯᒪᔪᑦ ᑕᒪᒃᑭᑦ NIRB-ᑯᓐᓄᑦ
  - ᐊᕐᕕᓂᓖᑦ ᐱᖓᓱᓪᓗ (8) TRC ᑐᓂᔭᐅᓯᒪᔪᑦ NIRB-ᑯᓐᓄᑦ ᐊᒻᒪᓗ NWB-ᑯᓐᓄᑦ
  - ᐊᑕᐅᓯᖅ (1) TRC ᑐᓂᔭᐅᓯᒪᔪᑦ ᑕᒪᒃᑭᑦ NWB-ᑯᓐᓄᑦ
- ᓴᓇᔭᕆᐊᖃᖅᑐᒃᑯᑦ ᑲᑎᒪᓂᖅ ᐊᒻᒪᓗ ᑐᓴᖅᑎᑦᑎᓂᕐᒧᑦ ᑲᑎᒪᓂᖅ

Summary of INAC's review of the Whale Tail Pit Project Proposal

INAC provided expertise on the following:

- Environmental impact assessment methodology;
- Potential for contamination and/or deterioration of Crown land (including permafrost);
- Surface water quality and quantity;
- Groundwater;
- Closure costs;
- Community engagement and consultation;
- Economic development; and,
- Socio-economic plans.

ᓇᐃᓈᖅᓯᒪᔪᑦ ᓄᓇᖃᖅᑳᖅᓯᒪᔪᒃᑯᑦ ᖃᐅᔨᓴᕐᓂᖅ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᓴᐅᔭᐅᔪᒃᓴᒧᑦ ᐱᓕᕆᐊᒃᓴᖅ ᑐᒃᓯᕋᐅᑎᒧᑦ

ᐃᓄᓕᕆᔨᑐᖃᒃᑯᑦ ᑐᓂᓯᓯᒪᔪᑦ ᓇᓗᐃᓇᐃᖅᓯᓂᕐᒧᑦ ᐅᑯᓄᖓ:

- ᐊᕙᑎᒧᑦ ᐱᕙᓪᓕᐊᔪᓄᑦ ᖃᐅᔨᓴᕐᓂᖅ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᓂᒃ
- ᑕᐃᒪᐅᑐᐃᓐᓇᕆᐊᖃᖅᑐᓂᒃ ᓱᕋᐃᑎᑦᑎᔪᓂᒃ ᐊᒻᒪᓗ/ᐅᕝᕙᓘᓐᓃᑦ ᐊᓯᙱᖅᐸᓪᓕᐊᔪᓂᒃ ᑯᐃᓐ ᓄᓇᖓᓄᑦ (ᐃᓚᒋᓗᒍ ᕿᕿᓯᒪᓂᖓ ᓄᓇᐅᑉ ᐊᑖᓂ)
- ᐃᒪᐅᑉ ᖄᖓᓂ ᖃᓄᐃᓐᓂᖓ ᐊᒻᒪᓗ ᐊᖏᓂᖓ
- ᓄᓇ ᐃᒻᒪᒃᐸᓪᓕᐊᔪᖅ
- ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐊᑭᖓ
- ᓄᓇᒋᔭᐅᔪᒧᑦ ᐱᕙᓪᓕᐊᖃᑎᖃᕐᓂᖅ ᐊᒻᒪᓗ ᑐᓴᖅᑎᑦᑎᓂᖅ
- ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᔪᓄᑦ ᐱᕙᓪᓕᐊᓂᖅ
- ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᖃᑦᑕᕐᓂᖏᓐᓄᑦ ᐸᕐᓇᐅᑏᑦ

Summary of INAC's Technical Review Comment Submissions

- NIRB
  - Eight technical comments
- NIRB/NWB
  - Eight technical comments
- NWB
  - One technical comment

ᓇᐃᓈᓯᒪᔪᑦ INAC-ᑯᑦ ᓴᓇᔭᕆᐊᖃᖅᑐᒃᑯᑦ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐅᖃᐅᓯᑦ ᑐᓂᔭᐅᓯᒪᔪᑦ

- NIRB-ᑯᑦ
  - ᐊᕐᕕᓂᑦ ᐱᖓᓱᒡᓗ ᓴᓇᔭᕆᐊᖃᖅᑐᒃᑯᑦ ᐅᖃᐅᓯᑦ
- NIRB/NWB-ᑯᑦ
  - ᐊᕐᕕᓂᑦ ᐱᖓᓱᒡᓗ ᓴᓇᔭᕆᐊᖃᖅᑐᒃᑯᑦ ᐅᖃᐅᓯᑦ
- NWB-ᑯᑦ
  - ᐊᑕᐅᓯᖅ ᓴᓇᔭᕆᐊᖃᖅᑐᒃᑯᑦ ᐅᖃᐅᓯᑦ

Socio-Economics

1. **Evaluation of Valued Socio-economic Components (VSECs) and Indicators** (NIRB - INAC-TRC#10)
   - The VSECs assessed in the Whale Tail Pit proposal are based on those used for Meadowbank and have not addressed NIRB's final scoping guidelines.
   - Spatial and temporal boundaries used to assess the VSECs are too narrow.

Recommendation:

- The Proponent review and revise the VSECs and indicators used in the assessment in order to adequately cover the NIRB's guidelines and the relevant spatial boundaries.
- The Proponent should provide further analysis and evidence supporting the selection or exclusion of VSECs and indicators chosen for detailed analysis.
- The study period should be extended to address longer-term socio-economic impacts of closure.

ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕈᑕᐅᕙᖕᓂᖕᒋ

1. **ᖃᐅᔨᓴᕐᓂᖅ ᓈᒻᒪᒃᑐᑯᑦ ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᔪᓄᑦ ᐊᔾᔨᒌᙱᑦᑐᑦ (VSECs)** ᐊᒻᒪᓗ ᓇᓗᓇᐃᒃᑯᑕᐃᑦ (NIRB - INAC-TRC#10)
   - VSEC-ᖕᒋᑦ ᖃᐅᔨᓴᖅᑕᐅᓯᒪᔪᑦ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᓴᐅᔭᐅᔪᒃᓴᒧᑦ ᐱᓕᕆᐊᒃᓴᖅ ᑐᒃᓯᕋᐅᑎᖓ ᑐᕌᖓᔪᑦ ᐊᐳᖅᑎᓈᖅᑐᒥ ᐊᒻᒪᓗ ᑐᓴᖅᑎᑦᑎᓯᒪᙱᑦᑐᑦ ᓱᓕ NIRB-ᑯᓐᓄᑦ ᓇᓗᓇᐃᔭᐃᓂᕐᒧᑦ ᒪᓕᒃᑕᐅᔭᕆᐊᖃᖅᑐᓂᒃ.
   - ᐃᓂᒋᔭᐅᓂᐊᖅᑐᑦ ᐊᒻᒪᓗ ᓄᓇᐃᑦ ᐊᕕᒃᑐᖅᓯᒪᓂᖕᒋᑦ ᐊᑐᖅᑕᐅᔪᑦ ᐱᕙᓪᓕᐊᓗᒍ VSEC-ᖕᒋᑦ ᑭᒡᓕᖃᓗᐊᖅᑐᑦ.

ᐊᑐᕐᑯᔭᐅᙳᐊᕋᔭᖅᑐᑦ:

- ᑐᒃᓯᕋᖅᑐᑦ ᖃᐅᔨᓴᖅᓯᒪᔪᖅ ᐊᒻᒪᓗ ᐋᖅᑭᒋᐊᖅᓗᒋᑦ VSC-ᖕᒋᑦ ᐊᒻᒪᓗ ᓇᓗᓇᐃᒃᑯᑕᖕᒋᑦ ᖃᐅᔨᓴᕐᓂᒃᑯᑦ ᐱᔪᓐᓇᕐᑯᓪᓗᒍ NIRB-ᑯᑦ ᒪᓕᒋᐊᖃᖅᑕᖕᒋᓐᓂᒃ ᐊᒻᒪᓗ ᐊᑐᖅᑕᐅᔭᕆᖃᕐᓂᒃᑯᑦ ᐃᓂᒋᔭᐅᓂᐊᖅᑐᒧᑦ
- ᑐᒃᓯᕋᖅᑐᑦ ᑐᓂᓯᒐᔭᖅᑐᖅ ᖃᐅᔨᓴᖅᑕᐅᓯᒪᒃᑲᓐᓂᖅᑐᓂᒃ ᐊᒻᒪᓗ ᓇᓗᓇᐃᖅᓯᒪᔪᒃᑯᑦ ᐃᑲᔫᑎᓂᒃ ᓂᕈᐊᖅᑕᐅᓯᒪᔪᓂᒃ ᐅᕝᕙᓘᓐᓃᑦ ᐃᓚᒋᔭᐅᙱᓪᓗᒍ VSC-ᖕᒋᑦ ᐊᒻᒪᓗ ᓇᓗᓇᐃᒃᑯᑕᓂᖕᒋᓐᓂᒃ ᓂᕈᐊᖅᑕᐅᓯᒪᔪᓂᒃ ᖃᐅᔨᓴᖅᑕᐅᓯᒪᔪᓄᑦ.
- ᖃᐅᔨᓴᖅᑕᐅᔪᑦ ᐊᑯᓂᐅᓂᖕᒋᑦ ᐋᖅᑭᒃᑕᐅᔭᕆᐊᖃᕋᔭᖅᑐᑦ ᑐᓴᖅᑎᑦᑎᓗᑎᒃ ᐊᑯᓂᐅᔪᒃᑯᑦ ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕈᑕᐅᕙᒃᑐᒃᑯᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ.

Socio-Economics

2. Methodology and Analysis of Prediction of Impacts and Determination of Significance (NIRB - INAC-TRC#11)

- The basis for prediction of project impacts and assessment of significance for VSECs needs to be clarified. Little or no information is provided on the methodology or models used in making impact predictions.

Recommendation:

- Proponent provide additional information to justify and to allow for verification of the conclusions presented in the EIS. These include:
  - The assumptions, evidence, models and methodologies for the predictions of impacts, need to be presented in detail for each VSEC.
  - For the determination of significance, the specific approach and information sources considered in assessing the relevant factors needs to be outlined for each VSEC.

ᐃᓅᖅᑲᑎᑦᑕ-ᑮᓇᐅᔭᓕᐅᕈᑕᐅᔪᑦ

2. ᐊᑐᖅᑕᐅᓂᐊᖅᑐᑦ ᐊᒻᒪᓗ ᖃᐅᔨᓴᖅᑕᐅᔪᑦ ᑕᐅᑐᕐᑮᖅᑕᐅᔪᒃᑯᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ ᐊᒻᒪᓗ ᐱᔭᐅᔪᒪᔪᑦ ᖃᓄᐃᑦᑑᓂᖏᑦ (NIRB-INAC-TRC#11)

- ᑐᙵᕝᕕᐅᔪᑦ ᑕᐅᑐᕐᑮᖅᑕᐅᓯᒪᔪᑦ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ ᐊᒻᒪᓗ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᖃᓄᐃᑦᑑᓂᖏᑦ VSEC-ᖏᓐᓄᑦ ᐋᖅᑭᒃᑕᐅᔭᕆᐊᖃᖅᑐᑦ ᑐᑭᖏᑦ. ᐱᖃᙱᓗᐊᕐᓂᖓ ᐅᕝᕙᓘᓐᓃᑦ ᑐᑭᓯᐊᔾᔪᑎᑕᖃᙱᓐᓂᖓ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᓂᒃ ᐅᕝᕙᓘᓐᓃᑦ ᑎᑎᖅᑐᕋᖅᓯᒪᔪᖃᙱᑦᑐᑦ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᓂᒃ ᐱᕙᓪᓕᐊᔪᓂᒃ ᑕᐅᑐᕐᑮᖅᑕᐅᓯᒪᔪᓂᒃ.

ᐊᑐᖅᑕᐅᙳᐊᕐᑯᔭᐅᔪᑦ:

- ᑐᒃᓯᕋᖅᑐᑦ ᑐᓂᓯᓗᑎᒃ ᐃᓚᒋᐊᖅᓯᒪᔪᓂᒃ ᑐᑭᓯᐊᔾᔪᑎᒃᓴᓂᒃ ᐋᖅᑭᒋᐊᕐᓗᒍ ᐊᒻᒪᓗ ᐊᖏᖅᑕᐅᓗᑎᒃ ᐱᐊᓂᒃ ᐊᖏᖅᑕᐅᓗᑎᒃ ᐱᐊᓂᒃᑕᐅᓯᒪᔪᓂᒃ ᑐᓂᔭᐅᓯᒪᔪᓂᑦ EIS-ᒥ. ᐅᑯᐊᖑᔪᑦ:
  - ᐊᑐᖅᑕᐅᕙᓪᓕᐊᔪᑦ, ᓇᓗᓇᐃᖅᓯᒪᔪᑦ, ᑎᑎᖅᑐᒐᐃᑦ ᐊᒻᒪᓗ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᑦ ᑕᐅᑐᕐᑮᕐᓂᒃᑯᑦ ᐱᕙᓪᓕᐊᓂᐊᖅᑐᓂᒃ, ᑐᓂᔭᐅᔭᕆᐊᖃᖅᑐᑦ ᓇᓗᓇᐃᑦᑎᐊᖅᓯᒪᔪᒃᑯᑦ ᐃᒻᒥᒃᑰᖓᔪᒃᑯᑦ VSEC-ᖏᑦ.
  - ᐱᔭᐅᔪᒪᔪᑦ ᖃᓄᐃᑦᑑᓂᖏᑦ, ᐅᖃᐅᓯᖃᕐᓗᒋᑦ ᐊᒻᒪᓗ ᑐᑭᓯᐊᔾᔪᑎᒃᓴᓂᒃ ᐃᓱᒪᒋᔭᐅᔪᑦ ᖃᐅᔨᓴᖅᑕᐅᕐᑯᓗᒋᑦ ᑕᐃᒪᐅᔪᓂᒃ ᓇᓗᓇᐃᖅᑕᐅᔭᕆᐊᖃᖅᑐᑦ ᐃᒻᒥᒃᑰᖓᔪᒃᑯᑦ VSEC-ᖏᑦ.

Socio-Economics

3. Nature and Scope of Baseline (NIRB - INAC-TRC#12)

- Baseline information, as presented in the EIS, is inadequate or incomplete.
- Baseline data are not fully addressing the scope required by the NIRB and is generally restricted to results of the Meadowbank Mine.

Recommendation:

- Review and expand baseline data to include all critical categories needed to determine and assess community impacts.
- Obtain additional data on community conditions beyond those represented by the operating results of Meadowbank Mine.
- Obtain specific data on each of the communities in the local study area.

ᐃᓄᕐᑲᑎᑦ-ᑮᓇᐅᔭᓕᐅᖅᑕᐅᕙᒃᑐᑦ

3. ᑕᐃᒪᐃᓂᖓᓄᑦ ᐊᒻᒪᓗ ᓇᓗᓇᐃᔭᐃᓂᕐᒧᑦ ᑐᙵᕝᕕᑦ (NIRB - INAC-TRC#12)

- ᑐᙵᕝᕕᑦ ᑐᑭᓯᐊᔾᔪᑏᑦ, ᑐᓂᔭᐅᓯᒪᔪᒃᑯᑦ EIS-ᑯᑦ, ᓈᒻᒥᙱᑦᑐᑦ ᐅᕝᕙᓘᓐᓃᑦ ᐱᐊᓂᒃᓯᒪᙱᑦᑐᑦ.
- ᑐᙵᕝᕕᑦ ᑎᑎᕋᖅᓯᒪᔪᑦ ᐱᐊᓂᑦᑎᐊᖅᓯᒪᙱᑦᑐᑦ ᐅᖃᐅᓯᐅᓂᒃᑯᑦ ᓇᓗᓇᐃᔭᐃᓂᕐᒧᑦ ᐊᑐᖅᑯᔭᐅᔪᒃᑯᑦ NIRB-ᑯᓐᓄᑦ ᐊᒻᒪᓗ ᐊᑐᖅᑯᔭᐅᓯᒪᙱᑦᑐᑦ ᐊᐳᖅᑎᓐᓈᖅᑐᒥ ᐅᔭᕋᖕᓂᐊᖅᕕᒻᒥ.

ᐊᑐᓕᖅᑯᔭᐅᙳᐊᕋᔭᖅᑐᑦ:

- ᖃᐅᔨᓴᖅᑕᐅᓗᑎᒃ ᐊᒻᒪᓗ ᐱᒃᑲᓐᓂᕆᐊᖅᓗᒍ ᑐᙵᕝᕕᐅᔪᑦ ᑎᑎᕋᖅᓯᒪᔪᑦ ᐃᓚᒋᓗᒋᑦ ᐊᔪᖅᓇᖅᑐᑦ ᑎᑎᕋᖅᓯᒪᔪᓂᒃ ᐱᔭᐅᔪᒪᔪᓂᒃ ᐊᒻᒪᓗ ᖃᐅᔨᓴᖅᓂᖅ ᓄᓇᒋᔭᐅᔪᒧᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ.
- ᐱᒃᑲᓐᓂᖅᓗᑎᒃ ᑎᑎᕋᖅᓯᒪᔪᓂᒃ ᓄᓇᒋᔭᐅᔪᒥ ᖃᓄᐃᑦᑑᓂᖕᒋᓐᓂᒃ ᐅᖓᑖᒍᑦ ᑐᓂᔭᐅᓯᒪᔪᓂᑦ ᐊᐅᓚᑕᐅᓯᒪᔪᒃᑯᑦ ᐱᐊᓂᒃᓯᒪᓂᖅᒧᑦ ᐊᐳᖅᑎᓐᓈᐸ ᐅᔭᕋᖕᓂᐊᖅᕕᖓᓂ.
- ᑐᓂᓯᓗᑎᒃ ᑎᑎᕋᖅᓯᒪᔪᓂᒃ ᐃᒻᒥᒃᑰᖓᔪᒃᑯᑦ ᓄᓇᒋᔭᐅᔪᒥ ᖃᐅᔨᓴᖅᕕᐅᓂᐊᖅᑐᒥᑦ ᓇᔪᖅᕕᐅᔪᓂᒃ.

Socio-Economics

4. Public Consultation and Incorporation of Community Concerns into the EIS (NIRB - INAC-TRC#13)

- Little evidence is presented to show that community consultation adequately captures concerns related to the Whale Tail Pit development.
- It is unclear how socio-economic concerns raised through consultation have been used to inform the socio-economic baseline and the overall assessment.

Recommendation:

- Conduct community consultations to validate the revised socio-economic assessment.
- Provide additional information on how socio-economic concerns raised were addressed within project planning.
- The Proponent commit to working with the Community Liaison Committee (CLC) and other partners to ensure consultation information is passed on to the community.

ᐃᓄᖅᑲᑎᑦ-ᑮᓇᐅᔭᓕᐅᖅᑕᐅᕙᒃᑐᑦ

4.ᑭᒃᑯᑐᐃᓐᓇᕐᓄᑦ ᑐᓴᖅᑎᑦᑎᓂᖅ ᐊᒻᒪᓗ ᑐᓴᖅᑎᑦᑎᓂᖅ ᓄᓇᒋᔭᐅᔪᒧᑦ ᐃᓱᒪᔫᑎᒃᓴᓂᕐ EIS-ᒧᑦ (NIRB - INAC-TRC#13)

- ᒥᑭᓗᐊᕐᓂᖓ ᓇᓗᓴᐃᖅᓯᒪᔪᓂᒃ ᑐᓂᔭᐅᓯᒪᔪᑦ ᑕᑯᑎᑦᑎᓗᑎᒃ ᓄᓇᒋᔭᐅᔪᒥ ᑐᓴᖅᑎᑦᑎᓂᕐᒧᑦ ᓈᒻᒪᒃᑐᒃᑯᑦ ᐃᓱᒪᔫᑕᐅᔪᑦ ᐃᓚᒋᓗᒍ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᓴᐅᔭᐅᔪᒃᓴᒧᑦ ᐱᕙᓪᓕᐊᓂᕐᒧᑦ.
- ᑐᑭᓯᐊᓇᙱᑦᑐᑦ ᖃᓄᖅ ᐃᓄᖅᑲᑎᑦ-ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᔪᑦ ᐃᓱᒪᔫᑎᖏᑦ ᑐᓴᖅᑎᑦᑎᓂᒃᑯᑦ ᐊᑐᖅᑕᐅᓯᒪᔪᑦ ᑐᓴᖅᑎᑦᑎᓗᑎᒃ ᐃᓄᖅᑲᑎᑦ-ᑭᓴᐅᔭᓕᐅᕐᓂᓇᔭᐅᓂᖏᑦ ᑐᙵᕝᕕᖏᑦ ᐊᒻᒪᓗ ᑕᒪᒃᑭᓐᓄᑦ ᖃᐅᔨᓴᕐᓂᒃᑯᑦ.

ᐊᑐᓕᕐᑯᔭᐅᙳᐊᕋᔭᖅᑐᑦ:

- ᐱᕙᓪᓕᐊᑎᒃ ᓄᓇᒋᔭᐅᔪᒥ ᑐᓴᖅᑎᑦᑎᓂᖅ ᐱᔪᓐᓇᐅᑎᑦᑎᔪᓐᓇᕐᓂᕐᒧᑦ ᐋᖅᑭᒋᐊᕐᓗᒋᑦ ᐃᓄᖅᑲᑎᑦ-ᑮᓇᐅᔭᓕᐅᖅᑕᐅᕙᖅᓂᖏᑦ ᖃᐅᔨᓴᕐᓂᒃᑯᑦ.
- ᑐᓂᓯᓗᑎᒃ ᑐᑭᓯᐊᔾᔪᑎᒃᓴᒃᑲᓐᓂᕐᓂᒃ ᖃᓄᖅ ᐃᓄᖅᑲᑎᑦ-ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᕙᑦᑐᓄᑦ ᐃᓱᒪᔫᑎᖏᓐᓂᒃ ᑐᓴᖅᑎᑦᑎᓂᕐᒧᑦ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐸᕐᓇᐅᑎᖏᓐᓄᑦ.
- ᑐᒃᓯᕋᖅᑐᑦ ᐱᔪᒪᓗᓂ ᐱᓕᕆᖃᑎᒋᓗᒍ ᓄᓇᒋᔭᐅᔫᑉ ᑐᓴᖅᑎᑦᑎᔨᖏᓐᓄᑦ ᑲᑎᒪᔨᐅᔪᓄᑦ (CLC) ᐊᒻᒪᓗ ᐊᓯᖏᓂᒃ ᐃᓚᒋᔭᐅᔪᓂᒃ ᓇᓗᓴᐃᖅᓯᓗᑎᒃ ᑐᓴᖅᑎᑦᑎᓂᕐᒧᑦ ᑐᑭᓯᐊᔾᔪᑎᒃᓴᓂᒃ ᓄᓇᒋᔭᐅᔪᒧᑦ.

Socio-Economics

5. Socio-Economic Component of the Closure Plan (NIRB - INAC-TRC#14)

- The proposed closure plan in the EIS does not directly address socio-economic issues.
- The Proponent addresses socio-economic issues related to closure through mitigation measures for construction and operation, rather than directly through closure planning.

Recommendation:

- Proponent provide an updated closure plan that directly addresses anticipated adverse socio-economic effects of closure to the Kivalliq communities related to loss of employment and income.
- The revised interim closure plan should be provided before initiation of the project.

ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕈᑕᐅᕙᖕᓂᖕᒋᑦ

5. ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕈᑕᐅᕙᖕᓂᖕᒋᑦ ᐃᓚᒋᔭᐅᔪᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐸᕐᓇᐅᑏᑦ (NIRB - INAC-TRC#14)

- ᑐᒃᓯᕋᖅᑐᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒋᑦ ᐸᕐᓇᐅᑎᖕᒋᑦ EIS-ᒧᑦ ᑐᕌᖕᒐᓗᐊᙱᑦᑐᑦ ᑐᓴᖅᑎᑦᑎᓂᕐᒧᑦ ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕈᑕᐅᕙᖕᓂᖕᒋᑦ ᒥᒃᓵᓄᑦ.
- ᑐᒃᓯᕋᖅᑐᑦ ᑐᓴᖅᑎᑦᑎᓗᑎᒃ ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕈᑕᐅᕙᑦᑐᑦ ᐊᑲᐅᙱᓕᐅᕈᑎᖕᒋᑦ ᐃᓚᖃᖅᑐᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐋᖅᑭᒃᓱᐃᓂᕐᒧᑦ ᓴᓇᓂᒃᑯᑦ ᐊᒻᒪᓗ ᐊᐅᓚᓂᒃᑯᑦ, ᒪᑐᓂᐊᖅᑐᒃᑯᑦ ᐸᕐᓇᐅᑎᒃᑰᙱᓐᓂᖅᓴᐅᓪᓗᑎᒃ.

ᐊᑐᓕᕐᑯᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᑐᒃᓯᕋᖅᑐᑦ ᑐᓂᓯᓗᑎᒃ ᓄᑖᙱᖅᓯᒪᔪᓂᒃ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐸᕐᓇᐅᑎᓂᒃ ᑐᓴᖅᑎᑦᑎᔪᒥᒃ ᐃᓱᒪᒋᔭᐅᔪᒃᑯᑦ ᐊᑲᐅᙱᓕᐅᕈᑎᓂᒃ ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᕙᒃᑐᒃᑯᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᑭᕙᓪᓕᐅᑉ ᓄᓇᒋᔭᐅᔪᓂᑦ ᐃᓚᖃᖅᑐᓂᒃ ᐱᓕᕆᐊᒃᓴᖃᕈᓐᓃᖅᑐᓂᒃ ᐊᒻᒪᓗ ᑮᓇᐅᔭᓕᐅᕐᓂᕐᒧᑦ.
- ᐋᖅᑭᒋᐊᖅᑕᐅᓯᒪᔪᑦ ᐊᑭᓕᖅᑕᐅᓂᐊᕐᓂᖕᒋᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐸᕐᓇᐅᑏᑦ ᑐᓂᔭᐅᓯᒪᒐᔭᖅᑐᑦ ᐱᕙᓪᓕᐊᖅᑳᖅᑎᓐᓇᒋᑦ ᐱᓕᕆᐊᒃᓴᒧᑦ.

Socio-Economics

6. Framework for Monitoring of Project Impacts (NIRB - INAC-TRC#15)

- The short project time frame presents major challenges for monitoring and reporting.

Recommendation:

- Include in the Management and Monitoring Plan examples of how the adaptive management responses identified in the EIS would be implemented and effectively managed within the short time frame of the project.

- Develop and implement formal arrangements with the Socio-Economic Monitoring Committee for collaborative monitoring of community and regional socio-economic impacts.

ᐃᓄᖅᑎᒌᑦ-ᑭᓇᐅᔭᓕᐅᕈᑕᐅᕙᓂᖏᑦ

6. ᐃᓱᒪᒋᔭᐅᔪᑦ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐱᕙᓪᓕᐊᔪᑦ (NIRB - INAC-TRC#15)

- ᓇᐃᑦᑐᒃᑯᑦ ᐱᓕᕆᐊᒃᓴᖅ ᖃᑯᑎᒃᑰᓂᖓ ᐊᖏᔪᒃᑯᑦ ᐊᔪᕐᓇᕈᑕᐅᔪᒃᓴᓂᒃ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐊᒻᒪᓗ ᐅᓂᒃᑳᓕᐅᖃᑦᑕᕐᓂᕐᒧᑦ.

ᐊᑐᓕᕐᑯᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᐃᓚᒋᔭᐅᓗᒍ ᐊᐅᓚᓂᕐᒧᑦ ᐊᒻᒪᓗ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐸᕐᓇᐅᑎᓂᒃ ᐆᑦᑑᑎᒃᓴᓂᒃ ᖃᓄᖅ ᐊᑐᖅᑕᐅᕙᓪᓕᐊᓂᐊᖅᑐᓂᒃ ᐊᐅᓚᓂᕐᒧᑦ ᑭᐅᔾᔪᑕᐅᔪᑦ ᓇᓗᓇᐃᖅᓯᔪᑦ EIS-ᖏᓐᓂ ᐊᑐᓕᖅᑎᑕᐅᓯᒪᔪᑦ ᐊᒻᒪᓗ ᐊᑲᐅᓈᖅᑐᒃᑯᑦ ᐊᐅᓚᑕᐅᔪᑦ ᓇᐃᓈᖅᑐᒃᑯᑦ ᐱᓕᕆᐊᒃᓴᐅᑎᓪᓗᒍ ᐱᓕᕆᐊᒃᓴᖅ

- ᐱᕙᓪᓕᐊᓂᖅ ᐊᒻᒪᓗ ᐊᑐᓕᖅᑎᑦᑎᓂᖅ ᐋᖅᑭᒃᑕᐅᓯᒪᔪᓂᒃ ᐃᓄᖅᑎᒌᑦ-ᑭᓇᐅᔭᓕᐅᕈᑕᐅᕙᓂᖏᑦ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᑲᑎᒪᔨᑦ ᐱᓕᕆᖃᑎᒌᓪᓗᑎᒃ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᓄᓇᒋᔭᐅᔪᒥ ᐊᒻᒪᓗ ᐊᕕᒃᑐᖅᓯᒪᔪᒃᑯᑦ ᓄᓇᒋᔭᐅᔪᓄᑦ ᐃᓄᖅᑎᒌᑦ-ᑭᓇᐅᔭᓕᐅᕈᑕᐅᕙᓂᖏᓐᓄᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ.

Socio-Economics

7. **Cumulative Socio-Economic Effects** (NIRB - INAC-TRC#16)

- The deficiencies regarding the scope and nature of baseline data used, the temporal and spatial scope of the assessment of impacts presented, and the mitigation of long term effects from the closure of the project make it difficult to conclude that the Whale Tail assessment is cumulative in nature.

Recommendation:

- The Proponent provide a combined socio-economic cumulative effects assessment for all of its developments (Whale Tail, Meadowbank and Meliadine).
- The assessment should highlight the overlaps and synergies between the three projects, aligns their mitigation and monitoring, and, allows for adaptive management and monitoring of impacts between projects.

ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᕙᖕᓂᖕᒋᑦ

7. ᐱᕙᓪᓕᖅᓯᒪᔪᒃᑯᑦ ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᔪᑦ ᐱᕙᓪᓕᐊᔪᑦ (NIRB - INAC-TRC#16)

- ᐱᔾᔪᑕᐅᔪᑦ ᐃᓱᒪᒋᓗᒍ ᓇᓗᓇᐃᕐᓂᖕᒋᑦ ᐊᒻᒪᓗ ᖃᓄᐃᓐᓂᖕᒋᑦ ᑐᙵᕝᕕᐅᔪᓄᑦ ᑎᑎᕋᖅᓯᒪᔪᓂᒃ ᐊᑐᖅᑕᐅᔪᑦ, ᐊᑯᓂᐅᙱᑦᑐᒃᑯᑦ ᐊᒻᒪᓗ ᓇᔪᕐᕕᐅᔪᑦ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ ᑐᓂᔭᐅᓯᒪᔪᑦ, ᐊᒻᒪᓗ ᒥᑭᓐᓂᖅᐸᒃᑯᑦ ᐊᑦᑕᕐᓇᖅᑕᐃᓕᒪᓂᕐᒧᑦ ᐊᑯᓂᐅᔪᒃᑯᑦ ᐱᕙᓪᓕᐊᔪᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐱᓕᕆᐊᒃᓴᖅ ᐊᔪᕐᓇᕈᑕᐅᔪᑦ ᐱᐊᓂᒋᐊᕈᑎᒋᓗᒍ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖕᒐ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐱᕙᓪᓕᐊᓂᕐᒧᑦ ᖃᓄᐃᓐᓂᖕᒐᓄᑦ.

ᐊᑐᓕᕐᑯᔭᐅᙳᐊᕋᔭᖅᑐᑦ:

- ᑐᒃᓯᕋᖅᑐᑦ ᑐᓂᓯᓗᑎᒃ ᑲᑎᓯᒪᔪᓂᒃ ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᕐᓂᓇᔭᐅᔪᓂᒃ ᐱᕙᓪᓕᕐᓂᕐᒧᑦ ᐱᕙᓪᓕᐊᓂᖅ ᖃᐅᔨᓴᕐᓂᖅ ᑕᒪᒃᑭᓐᓄᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ (ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖕᒐ, ᐊᐳᖅᑎᓐᓈᖅᑐᖅ ᐊᒻᒪᓗ ᐃᖃᓗᒑᕐᔪᒃ).

- ᖃᐅᔨᓴᖅᑕᐅᓯᒪᔪᑦ ᓇᓗᓇᐃᖅᓯᒐᔭᖅᑐᑦ ᐅᖕᒐᑖᓄᐊᖅᓯᒪᔪᑦ ᐊᒻᒪᓗ ᐱᕙᓪᓕᕐᓂᕐᒧᑦ ᐊᑯᓐᓂᖕᒐᒍᑦ ᐱᖕᒐᓲᔪᓄᑦ ᐱᓕᕆᐊᒃᓴᐃᑦ, ᓈᒻᒪᑦᑎᐊᕆᐊᕐᓗᒋᑦ ᒥᑭᓂᖅᐸᒃᑯᑦ ᐊᑦᑕᕐᓇᖅᑕᐃᓕᒪᓂᕐᒧᑦ ᐊᒻᒪᓗ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ, ᐊᒻᒪᓗ ᐱᔪᓐᓇᖃᕐᓗᓂ ᐊᐅᓚᓂᕐᒧᑦ ᐊᒻᒪᓗ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ ᐊᑯᓐᓂᖕᒐᓂ ᐱᓕᕆᐊᒃᓴᐅᔪᓂᑦ.

Adaptive Management and Reclamation Research

1. **Re-Vegetation Research** (NIRB - INAC-TRC#8)

   - The proposed Closure and Reclamation Plan involves natural re-vegetation of these disturbed areas but will likely require centuries. The Proponent indicates it may conduct research but has not confirmed how or when it will make the decision.

Recommendation:

- Proponent commit to and initiate the design and implementation of active re-vegetation studies that are applicable to the reclamation of comparable northern developments.

- The Proponent's commitment to perform the re-vegetation studies should be provided prior to the final hearing.

ᐊᑐᖅᑕᐅᔪᓐᓇᖅᑐᓂᒃ ᐊᐅᓚᔪᓐᓇᕐᓂᖅ ᐊᒻᒪᓗ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ

1. **ᐱᕈᖅᑎᑦᑎᒃᑲᓐᓂᕈᓐᓇᕐᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ** (NIRB - INAC-TRC#8)

   - ᑐᒃᓯᕋᖅᑕᐅᔪᖅ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐊᒻᒪᓗ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᐸᕐᓇᐅᑏᑦ ᐃᓚᒋᔭᖃᖅᑐᖅ ᐱᕈᖅᑎᑦᑎᒃᑲᓐᓂᕈᓐᓇᕐᓂᕐᒧᑦ ᓱᕋᒃᑕᐅᔪᓄᑦ ᓇᔪᕐᕕᐅᔪᑦ ᑭᓯᐊᓂ ᐊᒥᓱᓂᒃ ᐅᑭᐅᓄᑦ ᐅᑎᕋᔭᖅᑐᑦ. ᑐᒃᓯᕋᖅᑐᑦ ᓇᓗᓇᐃᖅᓯᒪᔪᑦ ᖃᐅᔨᓴᕐᓂᐊᕐᓂᕋᖅᓗᑎᒃ ᑭᓯᐊᓂ ᓇᓗᓇᐃᖅᓯᒪᖕᒋᑦᑐᑦ ᖃᑯᒍ ᐃᓱᒪᓕᐅᕐᓂᐊᕐᓂᖕᒋᓐᓄᑦ.

ᐊᑐᓕᕐᑯᔭᐅᖕᒍᐊᕋᔭᖅᑐᑦ:

- ᑐᒃᓯᕋᖅᑐᑦ ᐱᔪᒪᓗᑎᒃ ᐊᒻᒪᓗ ᐱᕙᓪᓕᐊᓗᑎᒃ ᑎᑎᖅᑐᕋᖅᒪᔪᓂᒃ ᐊᒻᒪᓗ ᐊᑐᓕᖅᑎᑦᑎᕙᓪᓕᐊᓂᖅ ᐱᕙᓪᓕᐊᓯᒪᔪᒃᑯᑦ ᐱᕈᖅᑎᑦᑎᒃᑲᓐᓂᕐᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ ᐊᑐᖅᑕᐅᔪᓐᓇᖅᑐᓂᒃ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᐊᔾᔨᒌᖕᒋᑦᑐᒃᑯᑦ ᐅᑭᐅᖅᑕᖅᑐᒥ ᐱᕙᓪᓕᐊᓯᒪᔪᒃᑯᑦ.

- ᑐᒃᓯᕋᖅᑐᑦ ᐱᔪᒪᓂᖕᒋᑦ ᐱᕙᓪᓕᐊᓗᑎᒃ ᐱᕈᖅᓯᑎᑦᑎᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ ᑐᓂᔭᐅᔭᕆᐊᖃᖅᑐᑦ ᑐᓴᖅᑎᑦᑎᒋᐊᖅᑳᖅᑎᓐᓇᒋᑦ.

Adaptive Management and Reclamation Research

2. **Adaptive Management Plan** (NIRB-INAC-TRC#9; NWB-INAC-TRC#8)

- The short operational phase will make it difficult to use adaptive management and reclamation research to address uncertainties regarding environmental performance of the project.

Recommendation:

- Provide an Adaptive Management Plan that identifies specific reclamation research and/or mitigations that will be taken to ensure adequate post-closure performance.
- The required financial security (Water Licence) should be sufficient to implement future mitigation that may be necessary due to uncertainty in post-closure outcomes.

ᐊᑐᖅᑕᐅᔪᓐᓇᖅᑐᒃᑯᑦ ᐊᐅᓚᓂᖅ ᐊᒻᒪᓗ ᐅᑎᖅᑎᑦᑎᔪᓐᓇᕐᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ

2. ᐊᑐᖅᑕᐅᔪᓐᓇᖅᑐᒃᑯᑦ ᐊᐅᓚᓂᖅ ᐸᕐᓇᐅᑎ (NIRB-INAC-TRC#9; NWB-INAC-TRC#8)

- ᓇᐃᑦᑐᒃᑯᑦ ᐊᐅᓚᓂᖕᒐ ᐊᔪᕐᓇᕈᑕᐅᓂᐊᖅᑐᖅ ᐊᑐᕐᓗᓂ ᐊᑐᖅᑕᐅᔪᓐᓇᖅᑐᒃᑯᑦ ᐊᐅᓚᓂᕐᒧᑦ ᐊᒻᒪᓗ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ ᑐᓴᖅᑎᑦᑎᓗᑎᒃ ᓇᓗᓇᕈᑕᐅᔪᓂᒃ ᐱᔾᔪᑎᖃᖅᑐᓂᒃ ᐊᕙᑎᐅᑉ ᐱᕙᓪᓕᐊᓂᖕᒋᓐᓄᑦ ᐱᓕᕆᐊᒃᓴᒧᑦ.

ᐊᑐᓕᕐᑯᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᑐᓂᓯᓗᑎᒃ ᐊᑐᖅᑕᐅᔪᓐᓇᖅᑐᒃᑯᑦ ᐊᐅᓚᔪᓐᓇᕐᓂᕐᒧᑦ ᐸᕐᓇᐅᑎᓂᒃ ᓇᓗᓇᐃᖅᓯᒪᔪᓂᒃ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ ᐊᒻᒪᓗ/ᐅᕝᕙᓘᓐᓃᑦ ᒥᑭᑦᓕᕆᐊᕈᑕᐅᔪᓂᒃ ᐊᑦᑕᕐᓇᖅᑐᓂᒃ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᓂᒃ ᓇᓗᓇᐃᖅᓯᓗᒍ ᓈᒻᒪᒃᑐᒃᑯᑦ ᒪᑐᓂᐊᓕᖅᑎᑦᓗᒍ ᐱᕙᓪᓕᐊᔪᓂᒃ.

- ᐱᕐᑯᔭᐅᓯᒪᔪᒃᑯᑦ ᑮᓇᐅᔭᓄᑦ ᐊᑦᑕᕐᓇᖅᑕᐃᓕᒪᓂᕐᒧᑦ (ᐃᒪᐅᑉ ᓚᐃᓴᖕᒐ) ᓈᒻᒪᒐᔭᖅᑐᖅ ᐊᑐᓕᖅᑎᑦᑎᓗᓂ ᓯᕗᓂᒃᓴᒧᑦ ᒥᑭᓇᓂᖅᐹᒃᑯᑦ ᐊᑦᑕᕐᓇᖅᑕᐃᓕᒪᓂᕐᒧᑦ ᐊᑐᐃᓐᓇᐅᓯᓐᓇᕆᐊᓕᒃ ᒪᑐᓂᐊᓕᖅᑎᑦᓗᒋᑦ ᐱᐊᓂᒃᐸᓪᓕᐊᓂᕐᒧᑦ.

Waste Rock Storage and Tailings Management

1. Design and Depth of Waste Rock Cover (NIRB & NWB - INAC-TRC#1)

- The final quantity of cover material is unknown and the availability is limited.
- The maximum thaw depth remains unknown.
- The time available to revise the cover design is insufficient given the project will be completed by 2021.

Recommendation:

- A defensible cover design that considers the availability of cover material should be submitted for review. This design should include thermal modelling to confirm thaw depths and include the effects of climate change.
- Develop a contingency plan to identify an alternative source of clean cover material(s).
- Develop a contingency plan for placement of additional cover, or alternative contingencies should future monitoring and assessment indicate the selected design will not prevent thawing below the cover.

ᐊᑐᙱᑦᑐᖅ ᐅᔭᕋᐅᔭᐃᑦ ᑐᖅᑯᕝᕕᒃ ᐊᒻᒪᓗ ᓴᐅᔭᐅᓂᑯᓄᑦ ᐊᐅᓚᔪᓐᓇᕐᓂᖅ

1. ᑎᑎᖅᑐᒐᖅᓯᒪᔪᑦ ᐊᒻᒪᓗ ᐃᑎᓂᖓ ᐊᑐᙱᑦᑐᓄᑦ ᐅᔭᕋᐅᔭᓄᑦ ᐅᓕᖓ (NIRB & NWB - INAC-TRC#1)

- ᑭᖑᓪᓕᖅᐹᖅ ᖃᓄᐃᓐᓂᖓ ᐅᓕᖓ ᖃᐅᔨᒪᔭᐅᙱᑦᑐᖅ ᐊᒻᒪᓗ ᐊᑐᐃᓐᓇᐅᔪᒃᓴᖅ ᑭᒡᓕᖃᖅᑐᖅ.
- ᐊᖏᓂᖅᐹᒃᑯᑦ ᐃᑎᓂᖓ ᖃᐅᔨᒪᔭᐅᙱᑦᑐᖅ.
- ᐱᕕᖃᓗᐊᙱᓐᓂᖓᓄᑦ ᐋᖅᑭᒋᐊᕐᓂᕐᒧᑦ ᐅᓕᖓᓄᑦ ᑎᑎᖅᑐᒐᖅ ᓈᒻᒪᙱᑦᑐᖅ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐱᓂᒃᑕᐅᒐᔭᖅᑐᖅ 2021-ᖑᓕᖅᑎᓪᓗᒍ.

ᐊᑐᓕᕐᑯᔭᐅᙳᐊᕋᔭᖅᑐᑦ:

- ᓴᙱᔪᒥᒃ ᐅᓕᖓᓂᒃ ᑎᑎᖅᑐᒐᕐᒥᒃ ᐊᑐᐃᓐᓇᐅᔪᓐᓇᖅᑐᒥᒃ ᐅᓕᐅᔪᓐᓇᖅᑐᒥᒃ ᑐᓂᔭᐅᔭᕆᐊᓕᒃ ᖃᐅᔨᓴᕈᑕᐅᓗᓂ. ᑕᒪᓐᓇ ᑎᑎᖅᑐᒐᖅ ᐃᓚᒋᔭᖃᕐᓗᓂ ᕿᕿᓚᙱᑦᑐᒥᒃ ᐆᒃᑐᕋᐅᑎᓂᒃ ᓇᓗᓇᐃᕐᓗᒍ ᐃᑎᓂᖓ ᐊᒻᒪᓗ ᐃᓚᒋᓗᒍ ᐱᕙᓪᓕᐊᓂᖓᓄᑦ ᓯᓚᐅᑉ ᐊᓯᙳᖅᐸᓪᓕᐊᓂᖓᓄᑦ.
- ᐱᕙᓪᓕᐊᓗᓂ ᑲᔪᓯᓂᕐᒧᑦ ᐸᕐᓇᐅᑎᓂᒃ ᓇᓗᓇᐃᕐᓗᒍ ᐊᑲᐅᓈᖅᑐᒃᑯᑦ ᐊᑐᒐᒃᓴᐅᔪᓂᒃ ᓴᓗᒪᔪᒃᑯᒃ ᐅᓕᐅᓂᐊᖅᑐᒧᑦ.
- ᐱᕙᓪᓕᐊᓗᓂ ᑲᔪᓯᓂᕐᒧᑦ ᐸᕐᓇᐅᑎᓂᒃ ᐃᓇᖏᕈᑕᐅᓂᐊᖅᑐᒥᒃ ᐅᓕᒥᒃ, ᐅᕝᕙᓘᓐᓃᑦ ᐊᑲᐅᓈᖅᑐᒥᒃ ᑲᔪᓯᓂᕐᒧᑦ ᓯᕗᓂᒧᑦ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᐊᒻᒪᓗ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᓇᓗᓇᐃᖅᓯᓗᓂ ᓂᕈᐊᖅᑕᐅᓯᒪᔪᓄᑦ ᑎᑎᖅᑐᒐᕐᓂᒃ ᐊᐅᒃᓲᓚᙱᓐᓂᖓ ᐅᓕᐅᑉ ᐊᑖᓂ.

Waste Rock Storage and Tailings Management

2. **Tailings Management** (NIRB & NWB - INAC-TRC#2)

- There is insufficient evidence that the Meadowbank Tailing Storage Facility is capable of handling increased tailings deposition from the Whale Tail Project.
- Possible reassessment of Closure Cost Estimate for the tailings facility under water licence 2AM-MEA1525 (Meadowbank).

Recommendation:

- Demonstrate that the deposition of tailings as a result of the Whale Tail Pit Project will not result in any significant impacts.
- The Tailings Management Plan under water licence 2AM-MEA1525 be updated to reflect the additional tailings from Whale Tail.
- The NWB may have to reassess the security held under water licence 2AM-MEA1525 to confirm that it is sufficient to manage the incremental tailings associated with the Whale Tail Project.

ᐅᔭᕋᐅᔭᐃᑦ ᑐᖅᑰᓯᕝᕕᒃ ᐊᒻᒪᓗ ᓴᐅᔭᐅᓂᑯᐃᑦ ᐊᐅᓚᓂᖓ

2. ᓴᐅᔭᐅᓂᐊᖅᑐᓄᑦ ᐊᐅᓚᓂᖅ (NIRB & NWB - INAC-TRC#2)

- ᓈᒻᒪᖕᒋᑦᑐᓂᒃ ᑕᑯᑎᑦᑎᔪᑦ ᐊᐳᖅᑎᓈᖅᑐᑉ ᓴᐅᔭᐅᓂᑯᓄᑦ ᑐᖅᑰᓯᕝᕕᒻᒥᒃ ᐊᑐᐃᓐᓇᐅᔪᓐᓇᖅᑐᒥᒃ ᐊᖏᓂᖅᓴᒃᑯᑦ ᓴᐅᔭᐅᔪᓂᒃ ᐃᓕᔭᐅᖃᑦᑕᕐᕕᖓᓄᑦ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓᓄᑦ ᐱᓕᕆᐊᒃᓴᖓᓄᑦ.
- ᐊᑐᐃᓐᓇᐅᔪᓐᓇᖅᓯᓐᓇᕆᐊᓕᒃ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᒪᑐᓂᐊᓕᖅᑎᑦᓗᒍ ᐊᑭᖏᓐᓂᒃ ᓴᐅᔭᐅᔪᒃᓴᒧᑦ ᓴᓇᕝᕕᖓᓄᑦ ᒪᓕᑦᓗᒍ ᐃᒪᐅᑉ ᓚᐃᓴᖓ 2AM-MEA1525 (ᐊᐳᖅᑎᓐᓈᖅᑐᖅ).

ᐊᑐᖅᑕᐅᕐᑯᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᓇᓗᓇᐃᖅᓯᓗᓂ ᐃᓕᔭᐅᓂᐊᖅᑐᑦ ᓴᐅᔭᐅᓂᑯᐃᑦ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᓴᐅᔭᐅᔪᒃᓴᖅ ᐱᓕᕆᐊᒃᓴᖅ ᐊᖏᔪᒃᑯᑦ ᐊᑲᐅᙱᓕᐅᕈᑕᐅᔪᓕᐅᕐᓗᓂ.
- ᓴᐅᔭᐅᔪᒃᓴᐃᑦ ᐊᐅᓚᓂᖓ ᐸᕐᓇᐅᑎ ᐃᒪᐅᑉ ᓚᐃᓴᖓᒍᑦ 2AM-MEA1525 ᓄᑖᙱᖅᑎᑕᐅᓗᑎᒃ ᐋᖅᑭᒋᐊᕐᓗᒋᑦ ᐃᓚᒋᔭᐅᓂᐊᖅᑐᓂᒃ ᓴᐅᔭᐅᔪᒃᓴᓂᒃ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓᓂᑦ.
- NWB-ᑯᑦ ᖃᐅᔨᓴᒃᑲᓐᓂᕆᐊᖃᕈᓐᓇᖅᑐᑦ ᐊᑦᑕᕐᓇᖅᑕᐃᓕᒪᓂᕐᒧᑦ ᒪᓕᑦᓗᒍ ᐃᒪᐅᑉ ᓚᐃᓴᖓ 2AM-MEA1525 ᓇᓗᓇᐃᖅᓯᓗᑎᒃ ᓈᒻᒪᖕᓂᖓᓄᑦ ᐊᐅᓚᔪᓐᓇᕐᓂᕐᒧᑦ ᐃᓚᒋᐊᖅᑕᐅᓯᒪᔪᓂᒃ ᓴᐅᔭᐅᔪᒃᓴᓂᒃ ᐃᓚᖃᖅᑐᒥᒃ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᐱᓕᕆᐊᒃᓴᖓᓂᒃ.

Water Quality

1. **Predicted Post-Closure Arsenic Levels in Waste Rock Seepage/Runoff** (NIRB & NWB - INAC-TRC#3)

- No allowance for metals leaching from waste rock in the cover.
- Monitoring period is likely too short to assess impacts of seepage in the longer term.

Recommendation:

- Undertake a sensitivity analysis to assess the impact of metals leaching and acid generating waste rock in the cover materials.
- Consider cover design to mitigate potential seepage should water quality modelling suggest that long-term treatment is required.
- Given the potential for delayed onset of drainage from the waste rock storage facility, the Proponent should justify its proposed post-closure monitoring period and if necessary extend the monitoring period.

ᐃᒪᐅᑉ ᖃᓄᐃᓐᓂᖓ

1. ᐃᓱᒪᒋᔭᐅᔪᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᑐᖁᓐᓇᖅᑐᑦ ᐊᔾᔨᒌᙱᓐᓂᖏᑦ ᐊᑐᙱᑦᑐᓄᑦ ᐅᔭᕋᖕᓂᐊᖁᒻᒧᑦ ᑯᕕᔪᑦ (NIRB & NWB - INAC-TRC#3)

- ᐱᕕᒃᓴᖃᓗᐊᙱᒋ ᓴᕕᒃᓴᓄᑦ ᐱᔪᓐᓇᖁᓂᖁᒧᑦ ᐊᑐᙱᑦᑐᓂᒃ ᐅᔭᕋᐅᔭᖁᓂᒃ ᐅᓕᖓᓂ.
- ᖃᐅᔨᓴᖁᓂᖁᒧᑦ ᓇᐃᓈᓗᐊᖁᓂᖓᓄᑦ ᖃᐅᔨᓴᖁᓂᖁᒧᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ ᑯᕕᕝᕕᐅᔪᓄᑦ ᐊᑯᐅᓂᐅᓂᖅᓴᒃᑯᑦ.

ᐊᑐᓕᖁᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᐱᕙᓪᓕᐊᓗᓂ ᐊᑦᑕᖁᓇᖅᑐᓂᒃ ᖃᐅᔨᓴᖁᓂᖅ ᖃᐅᔨᓴᖁᓪᓗᒍ ᐱᕙᓪᓕᐊᔪᓂᒃ ᓴᕕᒃᓴᓂᒃ ᑯᕕᕙᓪᓕᐊᔪᓂᒃ ᐊᒻᒪᓗ ᐆᑕᖁᓇᖅᑐᓂᒃ ᐱᕙᓪᓕᐊᔪᓂᒃ ᐅᔭᕋᐅᔭᖁᓂᒃ ᐊᑐᙱᑦᑐᓂᒃ ᐅᓂᖓᓂ.
- ᐃᓱᒪᒋᓗᒍ ᐅᓕᖓ ᓴᓇᓯᒪᓂᖓ ᒥᑭᓂᖅᐸᒃᑯᑦ ᐊᑦᑕᖁᓇᖅᑕᐃᓕᒪᓗᒍ ᑯᕕᕝᕕᐅᓂᒃᑯᑦ ᐃᒪᖅ ᖃᓄᐃᓐᓂᖓ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᑦ ᐊᑐᖁᔨᔪᑦ ᐊᑯᓂᐅᔪᒃᑯᑦ ᓴᓗᒻᒪᖅᓴᐃᓂᖁᒧᑦ ᐊᑐᖁᔭᐅᓯᒪᔪᑦ.
- ᑕᐃᒪᐅᑐᐃᓐᓇᕆᐊᖃᖁᓂᖓᓄᑦ ᑭᖑᕙᖁᓂᖓᓄᑦ ᑰᕙᕝᕕᐅᔪᒃᑯᑦ ᐅᔭᕋᖕᓂᐊᖁᕝᕕᐅᑉ ᑐᖅᑰᓯᕙᕝᕕᖕᒐᓂᒃ, ᑐᒃᓯᕋᖅᑐᑦ ᐋᖅᑮᒋᐊᕋᔭᖅᑐᖅ ᑐᒃᓯᕋᖅᑕᖓᓂᒃ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᖃᐅᔨᓴᖁᓂᖁᒧᑦ ᐊᒻᒪᓗ ᐊᑐᐃᓐᓇᐅᑉᐸᑦ ᑲᔪᓯᑎᒋᐊᖁᓗᒍ ᖃᐅᔨᓴᖁᓂᖁᒧᑦ.

Water Quality

2. Long-Term Water Quality in the Flooded Pit
(NIRB & NWB - INAC-TRC#4)

- There are potentially underestimated sources of contamination to surface water that will be contained in the flooded pit.

Recommendation:

- Perform sensitivity analysis to assess implications of groundwater inputs from mineralized zones around the pit as well as the pit walls.
- If the assessment indicates concerns over long-term water quality in the flooded pit, the Proponent should provide a detailed analysis confirming that stable, meromictic conditions will occur within the flooded pit.

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2. ᐊᑯᓂᐅᔪᒃᑯᑦ ᐃᒪᐅᑉ ᖃᓄᐃᓐᓂᖓ ᐃᒻᒪᕝᕕᐅᔪᒥ ᓴᐅᔭᐅᓂᑯᐃᑦ (NIRB & NWB - INAC-TRC#4)

- ᑕᐃᒪᐅᑐᐃᓐᓇᕆᐊᖃᖅᑐᑦ ᖃᐅᔨᒪᔭᐅᙱᑦᑐᒃᑯᑦ ᐊᑐᒐᒃᓴᓂᒃ ᐃᓚᒃᓴᓂᒃ ᓱᕋᐃᓂᕐᒧᑦ ᐃᒪᕐᒧᑦ ᐃᓚᒋᔭᐅᔪᓐᓇᖅᑐᖅ ᐃᒻᒪᕝᕕᒻᒥ ᓴᐅᔭᐅᓂᑯᓂᑦ.

ᐊᑐᓕᕐᑯᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᑕᑯᑎᑦᑎᓗᑎᒃ ᐊᑦᑕᕐᓇᖅᑕᐃᓕᒪᓂᕐᒧᑦ ᖃᐅᔨᓴᕐᓂᖅ ᖃᐅᔨᓴᕐᓗᑎᒃ ᐱᕙᓪᓕᐊᓯᒪᔪᓂᒃ ᐃᒻᒪᕝᕙᓪᓕᐊᔪᓂᒃ ᓄᓇᒧᑦ ᐃᓚᒃᓴᖕᓂᙱᖅᑐᓂᒃ ᓴᐅᔭᐅᓯᒪᔫᑉ ᓇᔪᕐᕕᖓᓂ ᐊᕙᑖᓂᓗ.

- ᖃᐅᔨᓴᖅᑕᐅᔪᖅ ᓇᓗᓇᐃᖅᓯᐸᐸᑦ ᐃᓱᒫᓗᑎᒃᓴᓂᒃ ᐊᑯᓂᐅᔪᒃᑯᑦ ᐃᒪᐅᑉ ᖃᓄᐃᓐᓂᖓᓄᑦ ᐃᒻᒪᒃᐸᓪᓕᐊᔪᒥ, ᑐᒃᓯᕋᖅᑐᖅ ᑐᓂᓯᓇᔭᖅᑐᖅ ᓇᓗᓇᐃᖅᓯᒪᔪᓂᒃ ᖃᐅᔨᓴᕈᑎᓂᒃ ᓇᓗᓇᐃᖅᓯᒪᔪᑦ ᓈᒻᒪᑦᑎᐊᕐᓂᖓᓄᑦ, ᐱᐊᓂᒃᓯᒪᙱᑦᑐᓂᒃ ᖃᓄᐃᑦᑐᓂᒃ ᐱᕙᓪᓕᐊᑐᐃᓐᓇᕐᓂᐊᖅᑐᑦ ᐃᒻᒪᕝᕕᐅᔪᒥ.

Water Quality

3. Ammonia and Nitrate Levels from Explosive Use
(NIRB & NWB - INAC-TRC#5)

- It is unclear what levels of ammonia and nitrate will be discharged from explosive usage since estimates are based on Meadowbank data and have not been corrected for Whale Tail Pit.

Recommendation:

- Ammonia and nitrate concentrations should be estimated for Whale Tail using loading data from Meadowbank, including annual losses in mine and pit water per tonne of rock blasted and rock placed in pile.
- Analysis should be done for each year to reflect differences in blasting requirements.

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3. ᐅᖅᓱᒃᓴᐃᑦ ᐊᒻᒪᓗ ᐆᑕᕐᓇᖅᑐᑦ ᐊᔾᔨᒌᙱᓐᓂᖕᒋᑦ ᖄᖃᑦᑕᖅᑐᓂᒃ ᐊᑐᕐᓂᖅ (NIRB & NWB - INAC-TRC#5)

- ᑐᑭᓯᐊᓇᙱᑦᑐᑦ ᐊᔾᔨᒌᙱᓐᓂᖕᒋᑦ ᐊᑦᑎᓐᓂᖕᒋᑦ ᐅᖅᓱᒃᓴᓂᒃ ᐊᒻᒪᓗ ᐆᑕᕐᓇᖅᑐᓂᒃ ᐱᔭᐅᓂᐊᕐᓂᖕᒋᑦ ᖃᖃᑦᑕᖅᑐᒥᙵᖅᑐᓂᒃ ᐊᑐᕐᓂᐊᕐᓂᖕᒋᑦ ᐆᒃᑐᕋᐅᑎᖕᒋᑦ ᐊᐳᖅᑎᓐᓈᖅᑐᒦᓐᓂᖓᓄᑦ ᑎᑎᕋᖅᓯᒪᔪᓂᒃ ᐊᒻᒪᓗ ᐋᖅᑭᒋᐊᖅᑕᐅᓯᒪᙱᓐᓂᖓᓄᑦ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓ ᓴᐅᔭᒃᓴᖓᓄᑦ.

ᐊᑐᓕᕐᑯᔭᐅᙳᐊᕋᔭᖅᑐᑦ:

- ᐅᖅᓱᒃᓴᐃᑦ ᐊᒻᒪᓗ ᐆᑕᕐᓇᖅᑐᑦ ᐃᓚᒃᓴᖕᒋᑦ ᐆᒃᑐᕋᖅᑕᐅᒐᔭᖅᑐᖅ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖓᓄᑦ ᐊᑐᖅᑕᐅᓂᐊᕐᓂᖕᒋᓐᓄᑦ ᑎᑎᕋᖅᓯᒪᔪᓂᒃ ᐊᐳᖅᑎᓐᓈᖅᑐᒥᑦ, ᐃᓚᒋᓗᒍ ᐅᑭᐅᒧᑦ ᐊᑐᙱᑦᑐᓂᒃ ᓈᓴᐃᓂᕐᒥᒃ ᐅᔭᕋᖕᓂᐊᕐᕕᒻᒥ ᐊᒻᒪᓗ ᓴᐅᔭᐅᓂᐊᖅᑐᓂᒃ ᐃᒪᕐᓂᒃ ᐅᕐᑯᒪᐃᑦᑐᒃᑯᑦ (tonne) ᐅᔭᕋᕐᓂᒃ ᖃᖅᑕᐅᕐᑲᑦᑕᖅᑐᓂᒃ ᐊᒻᒪᓗ ᐅᔭᕋᕐᓂᒃ ᑲᑎᖅᓱᐃᕐᑲᑦᑕᕐᓂᖕᒋᓐᓄᑦ.

- ᖃᐅᔨᓴᖅᑕᐅᔪᑦ ᖃᐅᔨᓴᖅᑕᐅᒐᔭᖅᑐᑦ ᐅᑭᐅᑕᒫᑦ ᓇᓗᓇᐃᓇᐊᕐᓗᒍ ᐊᔾᔨᒌᙱᓐᓂᖕᒋᑦ ᖃᖅᑕᐅᕐᑲᑦᑕᖅᑎᓪᓗᒋᑦ ᐊᑐᖅᑕᐅᔭᓇᐊᖃᕐᓂᒃᑯᑦ.

Water Quality

4. Post-Closure Surface Water Impacts (NIRB & NWB - INAC-TRC#6)

- Seepage from the Waste Rock Storage Facility into Mammoth Lake could result in a mixing zone with water quality parameters above guidelines.
- There is insufficient analysis to forecast the extent of the mixing zone.

Recommendation:

- Indicate the spatial extent of the mixing zone
- Complete a sensitivity analysis of contaminant loading scenarios for post-closure
- Evaluate ecological impacts in areas where proposed water quality criteria are expected to be exceeded.

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4. ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐃᒪᐅᑉ ᖃᖓ ᐱᕙᓪᓕᐊᓯᒪᔪᑦ (NIRB & NWB - INAC-TRC#6)

- ᑯᕕᕝᕕᐅᔪᑦ ᐊᑐᙱᑦᑐᓂᒃ ᐅᔭᕋᐅᔭᕐᓂᖅ ᑐᖅᑰᓯᕝᕕᒻᒥᑦ ᒫᒪᑦᒧᑦ (Mammoth) ᑕᓯᐊᓄᑦ ᑕᐃᒪᐅᑐᐃᓐᓇᕆᐊᓖᑦ ᐊᔾᔨᒌᙱᑦᑐᓂᒃ ᑲᑎᖅᓱᐃᓂᕐᒧᑦ ᐃᒪᕐᒧᑦ ᖃᓄᐃᓐᓂᖓᓄᑦ ᒪᓕᒋᐊᖃᖅᑐᒃᑯᑦ ᐅᖃᐅᓯᐅᔪᓂᙵᖅᑐᓂᒃ.
- ᓇᓗᓇᓗᐊᕐᓂᖓ ᖃᐅᔨᓴᕐᓂᕐᒧᑦ ᖃᐅᔨᒪᒋᐊᕐᓗᒍ ᐊᖏᓂᖅᐸᒃᑯᑦ ᑲᑎᖅᓱᖅᑕᐅᓂᐊᖅᑐᓂᒃ ᐊᔾᔨᒌᙱᑦᑐᓂᒃ.

ᐊᑐᓕᕐᑯᔭᐅᙳᐊᕋᔭᖅᑐᑦ:

- ᓇᓗᓇᐃᕐᓗᒍ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᑦ ᐃᓂᖏᑦ ᑲᑎᖅᓱᐃᓂᕐᒧᑦ ᐊᔾᔨᒌᙱᑦᑐᓂᒃ
- ᐱᐊᓂᒋᐊᕐᓗᒍ ᐊᑦᑕᕐᓇᕐᓂᕐᒧᑦ ᖃᐅᔨᓴᕈᑎᓂᒃ ᓱᕈᖕᓇᖅᑐᓂᒃ ᓇᓗᓇᐃᒃᑯᑕᓂᒃ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ
- ᖃᐅᔨᓴᕐᓗᒋᑦ ᐊᕙᑎᒧᑦ ᐃᓚᒋᔭᐅᔪᑦ ᓇᔪᕐᕕᐅᔪᓂᑦ ᑐᒃᓯᕋᖅᑕᐅᓯᒪᔪᑦ ᐃᒪᐅᑉ ᖃᓄᐃᓐᓂᖓᓄᑦ ᐃᓱᒪᒋᔭᐅᔪᑦ ᐅᖓᑖᓄᐊᖅᑎᑕᐅᓂᐊᕐᓇᓱᒋᔪᓂᒃ.

Water Quality

5. **Post-Closure Surface Water Uncertainty** (NIRB & NWB - INAC-TRC#7)

- There is uncertainty regarding water quality for an extended period after closure (potentially for decades).

Recommendation:

- The Proponent should provide a detailed assessment of proactive measures it will undertake to confirm and/or enhance the assumed water quality performance of the project.
- Proactive measures should be implemented prior to project initiation.

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5. ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᐃᒪᐅᑉ ᖄᖓ ᓇᓗᓇᖅᑐᑦ(NIRB & NWB - INAC-TRC#7)

- ᓇᓗᒋᔭᐅᔪᑦ ᐱᔾᔪᑎᒋᓗᒍ ᐃᒪᐅᑉ ᖃᓄᐃᓐᓂᖓᓄᑦ ᑲᔪᓯᑎᑕᐅᓂᐊᕐᓂᖓᓄᑦ ᒪᑐᓯᒪᓕᖅᑎᓪᓗᒍ (ᐊᒥᓱᑦ ᐅᑭᐅᓂᒃ ᑕᐃᒪᐅᑐᐃᓐᓇᕆᐊᖃᖅᑐᑦ).

ᐊᑐᓕᕐᑯᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᑐᒃᓯᕋᖅᑐᑦ ᑐᓂᓯᒐᔭᖅᑐᑦ ᓇᓗᓇᐃᖅᓯᒪᔪᓂᒃ ᖃᐅᔨᓴᖅᑕᐅᓯᒪᔪᓂᒃ ᐊᐅᓚᔪᓂᒃ ᐆᒃᑐᕋᐅᑎᓂᒃ ᐊᑐᖅᑕᐅᓂᐊᖅᑐᓂᒃ ᓇᓗᓇᐃᕆᐊᕐᓗᒍ ᐊᒻᒪᓗ/ᐅᕝᕙᓘᓐᓃᑦ ᐱᕚᓪᓕᕐᓂᕐᒧᑦ ᐃᒪᐅᑉ ᖃᓄᐃᓐᓂᐊᕐᓂᖓᓄᑦ ᐊᐅᓚᑕᐅᔪᓂᒃ ᐱᓕᕆᐊᒃᓴᒧᑦ.

- ᐊᐅᓚᔪᑦ ᐆᒃᑐᕋᐅᑎᖕᒋᑦ ᐊᑐᖅᑕᐅᒐᔭᖅᑐᑦ ᐱᒋᐊᖅᑳᖅᑎᓐᓇᒋᑦ ᐱᓕᕆᐊᒃᓴᒧᑦ .

Reclamation Security

1. **Preliminary reclamation closure** (NWB - INAC-TRC#9)

   - INAC has produced a preliminary reclamation closure cost estimate for the Whale Tail Pit Project of $27 million, which differs from the Applicant's closure cost estimate of $19 million.

Recommendation:

- Further discussions between the Applicant, INAC and the Kivalliq Inuit Association should take place before a public hearing in order to reach agreement on a reclamation closure cost estimate.

ᐅᑎᖅᑎᑦᓂᕐᒧᑦ ᐊᑦᑕᕐᓇᖅᑕᐃᓕᒪᓂᖅ

1. ᓯᕗᓪᓕᒃᑯᑦ ᐅᖃᐅᓯᐅᔪᑦ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ (NWB - INAC-TRC#9)

   - INAC-ᑯᑦ ᐱᕙᓪᓕᐊᓯᒪᔪᑦ ᓯᕗᓪᓕᖅᐹᒃᑯᑦ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᒪᑐᓂᐊᓕᖅᑎᓪᓗᒍ ᓇᓚᐅᑦᑖᕐᓂᒃᑯᑦ ᐊᕿᖕᒋᓐᓂᒃ ᕿᓇᓗᒐᐅᑉ ᐸᒥᐅᖕᒐ ᓴᐅᔭᐅᔪᒃᓴᒧᑦ ᐱᓕᕆᐊᒃᓴᖕᒐ ᐊᑭᕐᑲᖅᑐᒥᒃ $27 ᒥᓕᐊᓐ, ᐊᔾᔨᒌᙱᑕᖕᒐ ᑐᒃᓯᕐᑲᖅᑑᑉ ᓇᓚᐅᑦᑖᕐᓂᒃᑯᑦ ᐊᑭᖕᒋᓐᓂᒃ $19 ᒥᓕᐊᓐᓂᒃ.

ᐊᑐᓕᕐᑯᔭᐅᙱᐊᕋᔭᖅᑐᑦ:

- ᐅᕐᑲᕐᑲᖅᑎᒌᒃᑲᓐᓂᕐᓗᑎᒃ ᑐᒃᓯᕋᖅᑐᖅ, INAC-ᑯᑦ ᐊᒻᒪᓗ ᑭᕙᓪᓕᖅ ᐃᓄᐃᑦ ᑲᑐᔾᔨᕐᑲᑎᒌᖕᒋᑦ ᑲᑎᒪᒐᔭᖅᑐᑦ ᑭᒃᑯᑐᐃᓐᓇᕐᓄᑦ ᑐᓴᖅᑎᑦᑎᖅᑳᖅᑎᓐᓇᑎᒃ ᐱᔪᓐᓇᕐᑯᓗᒍ ᐊᖕᒋᕈᑎᐊᓂᒃ ᐅᑎᖅᑎᑦᑎᓂᕐᒧᑦ ᒪᑐᖅᑳᖅᑎᓐᓇᒍ ᓇᓚᐅᑦᑖᕐᓂᒃᑯᑦ ᐊᑭᖕᒋᑦ.

Conclusions

- In general, the information, analysis and presentation of the EIS and Water Licence application submissions were good.
- However, many aspects of the proposed project are still at a preliminary conceptual stage and, as a result, significant uncertainties remain.
- In many respects, potential biophysical impacts associated with the operational phase are well understood, are of limited duration, and/or are readily mitigated through active interventions.
- In contrast, uncertainties regarding post-closure could result in unintended and difficult to mitigate impacts.
- The socio-economic assessment in the EIS also presents some concerns through all phases of the project.

ᐱᐊᓂᒍᑕᐅᔪᑦ

- ᑕᐃᒪᐃᓚᓗᐊᖅᑎᑦᓗᒍ, ᑐᑭᓯᐊᔾᔪᑏᑦ, ᖃᐅᔨᓴᖅᑕᐅᓯᒪᔪᑦ ᐊᒻᒪᓗ ᑲᑎᒪᔾᔪᑕᐅᔪᑦ EIS-ᑯᓐᓄᑦ ᐊᒻᒪᓗ ᐃᒪᓕᕆᔨᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᖕᒋᑦ ᑐᓂᔭᐅᔪᑦ ᓈᒻᒪᒃᑐᑦ.
- ᑭᓯᐊᓂ, ᐊᒥᓱᑦ ᐱᔾᔪᑕᐅᔪᑦ ᑐᒃᓯᕋᐅᑎᒧᑦ ᐱᓕᕆᐊᒃᓴᒧᑦ ᓯᕗᓪᓕᖅᐹᒃᑯᖅᑎᑕᐅᓯᒪᔪᑦ ᓱᓕ ᐊᒻᒪᓗ ᑕᐃᒪᐃᓐᓂᖓᓄᑦ ᐊᖏᔪᒃᑯᑦ ᓇᓗᓇᖅᑐᑦ ᓱᓕ.
- ᐊᒥᓱᒃᑯᑦ ᐱᔾᔪᑕᐅᔪᓂᒃ, ᑕᐃᒪᐃᑐᐃᓐᓇᕆᐊᓕᒃ ᐊᑲᐅᙱᓕᐅᕈᑎᓂᒃ ᐱᕙᓪᓕᐊᔪᓂᒃ ᐃᓚᒋᔭᖃᖅᑐᓂᒃ ᐊᐅᓚᓂᖓᓄᑦ ᑐᑭᓯᐊᔭᐅᑦᑎᐊᖅᑦ, ᑭᒡᓕᖃᓗᐊᖅᓂᖏᑦ ᐊᒻᒪᓗ/ᐅᕝᕙᓘᓐᓃᑦ ᐋᖅᑭᒃᓯᒪᔪᑦ ᒥᑭᓂᖅᐸᒃᑯᑦ ᐊᑦᑕᖅᓇᖅᑕᐃᓕᒪᓂᖅᒧᑦ ᐊᐅᓚᓂᖓᓄᑦ.
- ᐃᓱᒪᒋᓗᒍ, ᓇᓗᒋᔭᐅᔪᑦ ᐱᔾᔪᑎᒋᓗᒍ ᒪᑐᓂᐊᓕᖅᓂᖓᓄᑦ ᐱᑐᐃᓐᓇᕆᐊᓕᒃ ᐱᒋᐊᙱᑦᑐᒃᑯᑦ ᐊᒻᒪᓗ ᐊᔪᖅᓇᖅᑐᒃᑯᑦ ᒥᑭᓐᓂᖅᐹᒃᑯᑦ ᐊᑦᑕᖅᓇᖅᑕᐃᓕᒪᓂᖅᒧᑦ ᐱᕙᓪᓕᐊᔪᓂᒃ.
- ᐃᓅᖃᑎᒌᑦ-ᑮᓇᐅᔭᓕᐅᖃᑦᑕᖅᓂᖏᑦ ᖃᐅᔨᓴᕈᑏᑦ EIS-ᑯᓐᓂᑦ ᑕᑯᑎᑦᑎᔪᑦ ᐃᓚᖏᓐᓂᒃ ᐃᓱᒫᓘᑎᒃᓴᓂᒃ ᑕᒪᒃᑭᓐᓄᑦ ᐱᓕᕆᐊᒃᓴᖓᓄᑦ.

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