



Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 008/015
NWB File: 2AM-WTP1826

October 24, 2018

Via email at: licensing@nwb-oen.ca

Ida Porter
Licence Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Ms Porter:

**RE: 2AM-WTP1826 – Agnico Eagle Mines Ltd. – Whale Tail Project – AEM
Response to ECCC comments on the Mercury Monitoring Plan**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned responses and is submitting comments via email. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, and the pollution prevention provisions of the *Fisheries Act*.

ECCC is satisfied with the responses provided by Agnico Eagle Mines Ltd. (AEM) to recommendations #2 and 3.

AEM has indicated that recommendations #1, 4 and 5 will be considered following review of the monitoring plan, the 2018 monitoring results, and discussions with consultants and partners. As these recommendations have not been fully addressed at this time, ECCC recommends that AEM provide full responses to recommendations #1, 4 and 5 in the 2018 annual report. These outstanding recommendations are listed below:

1. ECCC Recommendation #1

ECCC recommends that suitable mid-field locations be added to the Mercury Monitoring Plan in order to allow for the collection of additional (*i.e.*, tiered) monitoring data, in the event that near-field monitoring results exceed predictions and/or near-field levels

increase faster than anticipated. Lake A76 may provide suitable mid-field sampling locations.

2. ECCC Recommendation #4

ECCC recommends using sediment core sampling as it would be better suited to the purpose of the Mercury Monitoring Plan. The sediment core sampling method allows isolation of sediment layers, which would support the analysis of pre- and post-flooding sediments as distinct samples.

3. ECCC Recommendation #5

ECCC recommends that the Proponent provide the rationale for collecting water surface level grabs only. In addition, ECCC recommends a discussion be provided to explain if and how vertical differences in mercury concentrations will be monitored. Vertical monitoring during periods of stratification should also be discussed and addressed.

Should you require further information, please do not hesitate to contact me at (867) 669-4744 or eva.walker@canada.ca.

Sincerely,

[original signed by]

Eva Walker
Environmental Assessment Coordinator

cc:

Melissa Pinto, Senior Environmental Assessment Coordinator
Georgina Williston, Head, Environmental Assessment North (NT and NU)