



**NIRB File No.: 15EN050**  
NPC File No.: 148143

December 10, 2015

David Frenette  
Agnico Eagle Mines Ltd.  
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Val-d'Or, QC J9P 4N9

*Sent via email:* [david.frenette@agnicoeagle.com](mailto:david.frenette@agnicoeagle.com)

**Re: Opportunity to address comments received regarding Agnico Eagle Mines Ltd.'s "Amaruq, Meadowbank and White Hills" project proposal**

Dear David Frenette:

On October 21, 2015 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Agnico Eagle Mines Ltd.'s (AEM) "Amaruq, Meadowbank and White Hills" project proposals from the Nunavut Planning Commission (NPC or Commission). On November 13, 2015 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by December 4, 2015.

On or before December 4, 2015 the NIRB received comments from the following interested parties:

- Government of Nunavut (GN)
- Indigenous and Northern Affairs Canada (INAC)
- Environment Canada (EC)
- Fisheries and Oceans Canada (DFO)
- Baker Lake Hunters and Trappers Organization (BL HTO)
- Kivalliq Wildlife Board (KWB)

All comment submissions received by the NIRB relating to this project proposal can be obtained from the NIRB's online registry at the following location:

<http://ftp.nirb.ca/01-SCREENINGS/ACTIVE%20SCREENINGS/15EN050-AEM-Amaruq,%20MB,%20White%20Hills/>

A *summary* of the public concerns reflected in the comment submissions relate to the following:

### General

- Require confirmation on the specific drill locations and associated layout locations including the number of drill holes per location/area.
- No record of public consultation and public concerns provided for the proposals.
- No cumulative effects assessment completed as part of the proposals. Baker Lake Hunters and Trappers Organization (HTO) and believe that the projects may already be having cumulative impacts on caribou migrations and these impacts would worsen unless new and stricter terms and conditions are applied.
- Additional information required on whether the current water licence (2BE-MEA1318) would cover what is currently being proposed for and whether it includes the White Hills area. If the current water licence does not include the White Hills area then AEM should provide information on whether an amendment would be required/applied for the activities in the White Hills area.
- Clarify whether current proposed activities at the White Hills area would occur on the Crown land portion, or on both Crown land and Inuit-owned land.
- Provide information on the proposed winter access routes prior to commencing the ground portion of the activities.

### Culture, Heritage and Traditional Activities:

- Proposal may pose a threat to recorded and unrecorded archaeological resources.
- Proposal would require an archaeological permit; request AEM consult with the Department of Culture and Heritage regarding project proposals.
- Request AEM have a professional archaeologist and/or palaeontologist perform functions associated with specific types of activities listed.
- Recommendations provided related to culture and heritage sites.
- The Baker Lake HTO previously recommended a condition prohibiting all activities and personnel within a 500 metre radius of the grave during the screening of the Amaruq all-season road but was not included by the NIRB in the screening report. The HTO requested the NIRB put in place new terms and conditions on these exploration projects related to graves.
- Project areas located in areas of important historic land use for Inuit. Recommended AEM provide a summary of the known heritage resources in the area, its knowledge of Inuit land use in/near the project area and explain how it has changed project activities to mitigate impacts on heritage resources and Inuit land use.

### Wildlife, Fish and Fish Habitat

- Proposal located in an area that overlaps the range of Ahiak, Lorillard and Water Bay caribou herds. Disturbances from the proposals such as noise may have the potential to impact sensitive life history stages for caribou.
- Recommended seasonal restrictions be put in place on project activities to avoid risks to migrating and calving caribou with all project activities ceasing when caribou migrate through the area.
- Potential disturbance to wildlife (caribou, muskoxen and birds) from aerial traffic and recommended raising flight altitudes and the development of a caribou mitigation and monitoring plan to reduce impacts to wildlife.

- Potential interaction of muskox with project activities with potential displacement from calving areas could have negative effects on muskox breeding.
- High probability of encounters with grizzly bears in the project area with bears attracted to human installations. Recommended proponent put in place plans to avoid human-bear conflicts, meet with local hunters to discuss local traditional knowledge of bears and ensure staff are aware and trained in human-bear conflicts.
- Wildlife mitigation and monitoring plan(s) were not provided for review of the potential impacts to wildlife from the proposals. This is to assist impacts to all wildlife, including those used for country foods.
- Potential disturbance of raptors and nesting raptors by project activities. Avoidance of raptors nesting during critical periods is required with a minimum distance of at least 100 metres from a nest site recommended.
- No assessment provided on whether the project(s) are likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities.
- The proposal has the potential for deposit of deleterious substance in water frequented by fish.
- Potential impacts to surface waters from drilling activities. Appropriate sediment/erosion control measures should be in place to ensure no materials including drilling additives or drilling muds enter the water, and no surface erosion occur.
- Request implementation of mitigation measures to help reduce or eliminate some effects of the project on migratory birds, nests of migratory birds and Species at Risk.
- Recommended that AEM provide mitigation measures to ensure that domestic food and wastes, as well as petroleum-based chemicals are inaccessible to wildlife.

#### Fuel and Chemical Storage

- Information required regarding the use of “normally, flexible berms” as secondary containment facilities.
- Clarification needed on the source of peat moss which would be used to absorb film of petroleum products (as noted in the Spill Contingency Plans).

#### Dust

- Hunters in Baker Lake have repeatedly noted that the current exiting road to Meadowbank produces dust that potentially damages caribou caches and caribou habitat. Increased activities in the area may cause the dust to worsen north of Baker Lake.
- The Baker Lake HTO noted that it does not agree AEM’s assessment that dust is not having a significant impact especially with the amount of time this topic has been raised as a concern by hunters and Elders.
- Recommended AEM to comply with the NIRB’s terms and conditions and apply dust suppressants to both roads or at a minimum suppress dust on the sections of the Meadowbank road which is adjacent to important areas of Inuit land use.

#### Marine Shipping

- Further mineral development in the area with increase in volume of shipping may impact marine mammals and the Chesterfield Inlet hunters. Recommended regulators consider imposing a limit on the total number of ships and barges travelling between

Bake Lake and Chesterfield Inlet. Further recommended regulators and the proponent explore other technical mitigation measures to reduce impacts of shipping to marine mammals.

The NIRB would like to provide AEM with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **December 28, 2015**.

If AEM determines that the time required to supply a written response is significantly greater than 2 weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at [info@nirb.ca](mailto:info@nirb.ca) or via fax at **(867) 983-2594**.

If you have any questions or require clarification, please contact the undersigned directly at (867) 857-2052 or [sgranchinho@nirb.ca](mailto:sgranchinho@nirb.ca).

Sincerely,



Sophia Granchinho, M.Sc., EP  
Senior Technical Advisor  
Nunavut Impact Review Board

cc: Distribution List  
Phyllis Beaulieu, Nunavut Water Board  
Luis Manzo, Kivalliq Inuit Association  
Tracey McCaie, Indigenous and Northern Affairs Canada