



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
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Your file - Votre référence
2BB-MEA1828
Our file - Notre référence
CIDM# 1291281

December 2, 2020

Richard Dwyer
Manager of Licensing
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada Review Comments
for the Amaruq Exploration Camp Agnico Eagle Water Licence 2BB-MEA1828
updated management plans**

Dear Mr. Dwyer,

Thank you for your August 12, 2020 invitation to Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to review three updated management plans for Water Licence 2BB-MEA1828.

CIRNAC has reviewed the management plans pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. Please find attached CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-4550 or godwin.okonkwo@canada.ca

Sincerely,

Godwin Okonkwo
Manager, Water Resources



Technical Review Memorandum

Date: November 2, 2020

To: Richard Dwyer – Manager of Licensing, Nunavut Water Board

From: Godwin Okonkwo – Manager Water Resources, CIRNAC

**Subject: Crown-Indigenous Relations and Northern Affairs Canada Review
Comments for the Amaruq Exploration Camp Agnico Eagle for Water
Licence 2BB-MEA1828 updated management plans**

A. BACKGROUND

Agnico Eagle Mines Limited (AEM) submitted the following updated management plans for the Amaruq Exploration Camp Agnico Eagle for Water Licence 2BB-MEA1828;

- Waste Management Plan
- Quarrying Management Plan
- Conceptual Closure and Reclamation Plan & RECLAIM Estimate

On August 12, 2020, the Nunavut Water Board invited interest parties to review the three referenced updated management plans for Water Licence 2BB-MEA1828.

B. RESULTS OF REVIEW

B.1 QUARRY MANAGEMENT PLAN

1. Scope of Quarry Management Plan

Comment 1

The Record revision table at the beginning of the document indicates that the revision of this plan was based on changes to Quarry 1. The remainder of the document contains no reference to Quarry 1. It is not clear whether Quarry 1 has been reclaimed or if the information pertaining to Quarry 1 is contained in a different Management Plan.

Recommendation 1

CIRNAC recommends that AEM clarify why Quarry 1 is no longer referenced in the Quarry Management Plan. If Quarry 1 is still in use, CIRNAC recommends that AEM provide a reference to the Management Plan in which this information can be found.



2. Ammonia Management Procedures

Comment 2

Page 8 of the Quarry Management Plan indicates that approved ammonia management procedures will be followed. These procedures are not specified in the plan. It is not clear to the reader where or how these procedures were approved and what they entail. CIRNAC suggests that operators and workers handling ammonia be provided with a reference to these procedures.

Recommendation 2

CIRNAC recommends that AEM provide the ammonia management procedures that will be followed by operators, or provide a reference to where the approved procedures can be found.

3. Surface Water Management

Comment 3

The previous iteration of the Quarry Management Plan (AEM, 2017) provides a description of the surface (contact) water management strategy, including collection, disposal, and other uses for the contact water. It is not clear why this information has been removed in the current version. CIRNAC considers surface water management around borrow pits and quarries to be a crucial aspect of site management.

Recommendation 3

CIRNAC recommends that AEM provide the surface water management strategy for eskers 7 and 7B, or provide a reference to where surface water management strategies for the site can be found.

B.2 Waste Management Plan

1. Waste Segregation

Comment 1

Section 2.1 general waste of the waste management plan states that;

“waste management requires that materials be segregated at the source to minimize the potential for inadvertent loading of the incinerator with problematic materials”.

Appendix A shows the waste segregation operated at the camp site. It is unclear if AEM has indicated a clear separation of the domestic, hazardous and other wastes materials by labeling the waste containers in appendix A which will prevent unnecessary mixing of wastes, thereby minimizing the creation of hazardous compounds as by-products in the incinerator.



Recommendation 1

CIRNAC recommends that AEM provide a waste management strategy that involves a clear labeling of waste containers during storage to distinguish all categories of waste prior to incineration or disposal.

2. Date of Update on Appendix A

Comment 2

The date on the Appendix A reads May 2016. It is not clear if the document was updated to reflect the changes in the Water Licence 2BB-MEA1828 amendment.

Recommendation 2

CIRNAC recommends that AEM clarify the date on Appendix A part of the waste management plan to confirm the document was updated in alignment with Water Licence 2BB-MEA1828 amendment.

Reference

Waste Management Plan

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2B/2BB%20-%20Bulk%20Sampling/2BB-MEA1828%20Agnico/3%20TECH/D%20WASTE%20DISP/>

Quarrying Management Plan

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2B/2BB%20-%20Bulk%20Sampling/2BB-MEA1828%20Agnico/3%20TECH/E%20C%20A%20I%20O/>

Conceptual Closure and Reclamation Plan & RECLAIM Estimate

<ftp://ftp.nwb-oen.ca/registry/2%20MINING%20MILLING/2B/2BB%20-%20Bulk%20Sampling/2BB-MEA1828%20Agnico/3%20TECH/I%20A%20and%20R/>