



Environmental Protection Operations Directorate  
Prairie & Northern Region  
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ECCC File: 6100 000 012/008  
NWB File: 2BB-MEL1424

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Nunavut Water Board  
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Via email: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

**RE: 2BB-MEL1424 – Agnico Eagles Mines Ltd. – Meliadine Gold Project – Freshet Action Plan**

Attention: Karen Kharatyan

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board regarding the above-mentioned action plan. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comments are provided:

Pond 1

1. Section 2.1.1 (Pond 1) states that "Pond 1 containment is holding the Lake A58 which is the only place allowing snow movement for the portal". It is not clear what this means and whether Lake A58 is used for snow disposal. Clarify what is meant by allowing snow movement.

P1 Area Capacity Management

2. Agnico Eagle Mines Ltd. (the Proponent) is taking steps to develop discharge criteria for the release of water from P1 in the event capacity must be maintained. The total capacity of the ponds is 32,404 m<sup>3</sup>, and the plan for discharge will form

part of the Freshet Action Plan once finalized. ECCC notes that discharges to Pond A54 drain ultimately to Lake A8, which is frequented by fish. Discharges from the P1 containment area are subject to the pollution prevention provisions of the *Fisheries Act*, and must be non-deleterious. It should be noted that the Meliadine Gold Project may become subject to the *Metal Mining Effluent Regulations* (MMER) if total discharges from the site, including surface runoff and seepage, reach the threshold of 50 m<sup>3</sup>/day, and discharges contain deleterious substances. Requirements under these regulations (once triggered) would not preclude criteria being set under the Proponent's water licence, but the MMER would have to be complied with regardless of licence conditions.

It is a reasonable approach to incorporate discharge criteria and management response options in the Freshet Action Plan; however, the Proponent should be aware of the conditions that trigger MMER.

Should you require further information, please do not hesitate to contact me at (867) 669-4733 or [Melissa.Pinto@canada.ca](mailto:Melissa.Pinto@canada.ca).

Sincerely,



Melissa Pinto  
Environmental Assessment Coordinator

cc: Wade Romanko, Head, Environmental Assessment North (NT and NU)  
ECCC Review Team  
Jeffrey Pratt, Senior Environmental Coordinator, Agnico Eagle Mines Ltd.