

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



March 13, 2024

via email at: [licensing@nwb-oen.ca](mailto:licensing@nwb-oen.ca)

Robert Hunter  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU X0B 1J0

Dear Robert Hunter:

**RE: 2BB-MEL1424 – Agnico Eagle Mines Limited – Meliadine Gold Mine – Agnico Eagle’s Second Round of Responses to Comments for 2BB-MEL1424 Water Licence Renewal**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) regarding the above-mentioned Proponent’s second round responses to ECCC’s comments on the Type B Water Licence Renewal Amendment Application.

ECCC provides expert information and knowledge to project assessments on subjects within the department’s mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent’s characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

**1. Remediation Criteria for Soil Treated in Landfarm**

Reference(s)

- Meliadine Mine, Landfarm Management Plan – 2BB-MEL Water Licence, December 2023, Version 5
- Meliadine Gold Project, Interim Reclamation and Closure Plan – 2BB-MEL, December 2023



- Abandoned Military Site Remediation Protocol, Volume I – Main Report, Indian and Northern Affairs Canada, Northern Affairs Organization, Contaminated Sites Program, December 2008
- Environmental Guideline for Contaminated Site Remediation, Department of Environment, Government of Nunavut, March 2009
- Agnico Eagle, Meliadine 2BB-MEL1424 Renewal, Responses to Comments, February 6, 2024
- Agnico Eagle's Second Round of Responses to Comments for 2BB-MEL Water Licence Renewal, February 29, 2024

### Comment

In the Proponent's responses, they clarified that all treated soil will be covered with a minimum of 0.5 m of waste rock or non-impacted soil. This clarification is helpful, and justifies the use of the Abandoned Military Sites Remediation Protocol (AMSRP) guidelines.

It remains unclear in the documentation, that the only acceptable final disposal locations are at a depth greater than 0.5 m under non-impacted cover. The Remedial Action Plan, attached in Appendix D of the Proponent's February 19, 2024 response, states that "At the latest, the treated soil will need to be covered by a minimum of 0.5 m of waste rock or other non-impacted soil when the mine site is undergoing closure." This condition should be integrated into the Landfarm Management Plan V5.

Furthermore, the Proponent's response states that "the final TSF [Tailings Storage Facility] cover will be covered with a minimum of 0.5 m of waste rock or non-impacted soil if the surface contains treated soil that do not meet GN [Government of Nunavut] Remediation Guidelines for Agricultural/Wildland use at closure." ECCC notes that adding a 0.5 m cover over the final TSF cover is atypical and should be clarified in the plan.

The Landfarm Management Plan should be updated to describe the tracking method that will be used, to help ensure that all areas of the final TSF cover (with remediated soil within 0.5 m of surface) get an additional cover at closure. Compiling a record of the final disposal location of remediated soil as it is removed from the landfarm, will ensure they can be properly dealt with at closure.

### ECCC Recommendation(s)

ECCC accepts the response regarding the use of AMSRP guidelines.

ECCC recommends updating the Landfarm Management Plan:

- a) to clearly specify that treated soils must be disposed of at a depth greater than 0.5 m and a distance greater than 30 m from waterbodies; and
- b) with a description of how the locations of remediated soils (exceeding agricultural/wildland guidelines, and disposed of at the surface) will be tracked, so they can be covered with an extra 0.5 m cover at closure.

ECCC acknowledges all other responses provided by the Proponent, and considers the corresponding comments resolved.

If you need more information, please contact Stephinie Mallon at [Stephinie.Mallon@ec.gc.ca](mailto:Stephinie.Mallon@ec.gc.ca).

Sincerely,

*[original signed by]*

Stephinie Mallon  
Acting Senior Environmental Assessment Officer

cc: Melissa Pinto, Acting Head, Environmental Assessment North (NT and NU)