



NIRB File No.: 03MN107
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NIRB File No.: 16MN056

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Sent via email: melissa.pinto@canada.ca; and ec.eenordrpnnu-eanorthpnrnu.ec@canada.ca

Re: The Nunavut Impact Review Board's 2017-18 Annual Monitoring Report for the Meadowbank Gold Project and the Whale Tail Pit Project with Board's Recommendations

Dear Melissa Pinto:

The Nunavut Impact Review Board (NIRB or Board) issued the enclosed *2017-18 Annual Monitoring Report for Agnico Eagle Mines Ltd.'s Meadowbank Gold Project (NIRB File No. 03MN107) and the Whale Tail Pit Project (NIRB File No. 16MN056)* [Monitoring Report] to Agnico Eagle Mines Ltd. (Agnico Eagle) under a separate cover earlier today. The Monitoring Report is based on the NIRB's monitoring activities as set out within the Meadowbank Gold Mine Project Certificate No. 004, Amendment 2 and the Whale Tail Pit Project Certificate No. 008, pursuant to Sections 12.7.1 and 12.7.2 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and pursuant to s. 135 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*).

This report provides findings that resulted from monitoring of the Meadowbank Gold Mine Project from October 2017 to September 2018 and the Whale Tail Pit Project from March 2018 to September 2018.

Based upon the Board's review of the monitoring report and other materials related to both the Meadowbank Gold Mine Project and the Whale Tail Pit Project, the Board has issued recommendations in order to assist in achieving compliance with the Whale Tail Pit Project Certificate (No. 008). Three (3) of these recommendations issued by the Board have been directed to Environment and Climate Change Canada and will ensure the NIRB has all the information necessary to adequately discharge its mandate with respect to provisions within Section 12.7 of the *Nunavut Agreement* and s. 135 of the *NuPPAA* as they pertain to both the Meadowbank Gold Mine Project and the Whale Tail Pit Project.

RECOMMENDATIONS FOR THE MEADOWBANK GOLD MINE PROJECT

All materials pertaining to the NIRB's ongoing Monitoring program for the Meadowbank Gold Mine Project can be accessed online from the NIRB's online public registry at www.nirb.ca/project/124588.

Suppression of surface dust – Term and Condition 74

Term and Condition 74 of Project Certificate No. 004, Amendment 2 directs the Proponent to employ environmentally protective techniques to suppress any surface road dust. As noted in previous NIRB annual reports, in review of annual reports and during site visits (see Appendix I for the 2018 site visit report), Agnico Eagle has limited its dust suppression techniques to haul roads at the mine site, between the Meadowbank gatehouse (at the airstrip) and Exploration Camp site, between the Baker Lake marshalling facility and the Baker Lake gatehouse and the airstrip. Agnico Eagle utilizes calcium chloride at most of the aforementioned sites; however, it uses water on the mine site haul roads (including the Vault road) and the airstrip. Dust suppression is only applied at five (5) key areas identified by the community of Baker Lake along the all-weather access road (AWAR) between Baker Lake and Meadowbank, and monitoring results in 2017 indicated that rates of dustfall were effectively reduced in those locations.

In its response to the Board's 2017 recommendations Agnico Eagle noted that six (6) locations were identified to have high priorities for dust suppression. As such, clarification is required to determine whether it is five (5) or six (6) locations that have been identified along the AWAR as high priorities for dust suppression. In addition, Agnico Eagle maintained that it is meeting Term and Condition 74 of Project Certificate No. 004, Amendment 2 and that the approach where chemical suppressants are used in an intermittent fashion along a long-distance roadway in priority areas only is similar to other project sites in Nunavut. No references to the other project sites were provided to be able to compare methodologies.

The NIRB acknowledges the efforts made by Agnico Eagle to suppress dust around the Meadowbank and Exploration Camp sites, and further recognizes the dustfall monitoring program conducted along the AWAR since 2012 and the additional studies that are ongoing since 2016. With the exception of continuing the dustfall monitoring along the AWAR and applying dust suppressants along the high priority areas, Agnico Eagle has not indicated any further commitment to apply dust suppressant to the whole AWAR in the future. Term and Condition 74, requires the application of dust suppression measures along all project roads including the AWAR [emphasis added]. The Proponent has not fully met the requirements of Condition 74, as dust suppression techniques were not being applied along the AWAR from Baker Lake to the mine site. The NIRB stresses that Term and Condition 74 applies to all mine roads including the AWAR. The NIRB notes that Agnico Eagle has been in non-compliance with this condition since the Project entered operations, as no dust suppression measures have been employed along the AWAR from Baker Lake to the mine site with the exception of the five (5) areas since 2017 as identified by the community to be of importance.

In 2017 the Board made two (2) additional recommendations to Agnico Eagle related to dust suppressants and monitoring: 1) provide a submission which describes its assessment of the effectiveness of dust suppression efforts using water to date and demonstrates its consideration for the use of alternative dust suppressants (e.g., TETRA flakes, Dust Stop®, EnviroKleen®) and more frequent application; and 2) report on the quality assurance and quality control protocols used to ensure data reliability and proper functioning of the dust monitoring equipment used for

the dust sampling program along the all-weather access road. In response to these recommendations, Agnico Eagle noted that the monitoring data indicated that dust is effectively being controlled onsite, that application of alternative dust suppressants is not considered onsite and that the dust sampling methodology along the all-weather access road is more effective compared to the methods employed at other mine sites.

Recommendation 8: The Board requests that Environment and Climate Change Canada review and comment on the information provided by Agnico Eagle in response to the NIRB's 2017 Annual Report related to dust, including whether it agrees with Agnico Eagle's conclusions that alternative dust suppressants at the mine site are not required and that the dust methodology using canisters on the ground along the all-weather access road is more effective compared to other methodologies currently used. Limitations on the effectiveness of the current dust suppression employed for the Meadowbank Project (including the all-weather access road) should also be discussed.

The Board respectfully requests that Environment and Climate Change Canada provide a response to this recommendation within *30 days* ' receipt of the Board's correspondence to Environment and Climate Change Canada.

Recommendation 9: The Board requests that Environment and Climate Change Canada confirm whether it agrees with Agnico Eagle's conclusion that based on the dust monitoring results to date along the all-weather access road, it is unlikely that Final Environmental Impact Statement predictions are being exceeded and that impacts to valued ecosystemic components (vegetation community productivity and wildlife) from dust dispersion are not occurring beyond the smallest assumed zone of influence (100 metres).

The Board respectfully requests that Environment and Climate Change Canada provide a response to this recommendation within *30 days* ' receipt of the Board's correspondence to Environment and Climate Change Canada.

RECOMMENDATIONS FOR THE WHALE TAIL PIT PROJECT

All materials pertaining to the NIRB's ongoing Monitoring program for the Whale Tail Pit Project can be accessed online from the NIRB's online public registry at www.nirb.ca/project/124683.

Outstanding Submissions and Updated Plans

As the Whale Tail Project Certificate is in its first year post-issuance, this first recommendation is being made to track reporting required through the first 6 months of it being in place, which was September 2018. Some of the items have been updated by Agnico Eagle; however, due to the number of items still outstanding, a recommendation is being made to track the progress of development and submission for these documents. With respect to updating the existing Dust Management and Monitoring Plan, the Board has noted the following:

Update to existing Dust Management and Monitoring Plan – Term and Condition 2

As required by Term and Condition 2 of Project Certificate No. 008, Agnico Eagle has not provided the updated Dust Management and Monitoring Plan for the Meadowbank Mine site including verification of commitments made to the utilization of dust suppressants along the all-weather access road, the Amaruq haul road and other roads and trails associated with the Project. However, it is noted that Air Quality and Dustfall Management Plan was submitted

by Agnico Eagle in June 2018 but the information within this plan does not appear to address the requirements of the Term and Condition.

Recommendation 2: The Board requests that Environment and Climate Change Canada review the Air Quality and Dustfall Management Plan submitted by Agnico Eagle in June 2018 and provide feedback regarding whether the plan meets the requirements under Terms and Conditions #1 and #2 of Project Certificate No. 008.

The Board respectfully requests that Environment and Climate Change Canada provide a response to this recommendation within *30 days* ' receipt of the Board's correspondence to Environment and Climate Change Canada.

If you have any questions or require further clarification regarding these recommendations in particular or relating to the NIRB's monitoring programs for the Meadowbank Gold Mine Project or the Whale Tail Pit Project, please contact the undersigned directly at (867) 857-4829 or sgranchinho@nirb.ca.

Sincerely,



Sophia Granchinho, M.Sc., EP
Manager, Impact Assessment
Nunavut Impact Review Board

cc: Georgina Williston, Environment and Climate Change Canada
Marie-Pier Marcil, Agnico Eagle Mines Ltd.
Manon Turmel, Agnico Eagle Mines Ltd.
Robin Allard, Agnico Eagle Mines Ltd.
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Nancy Duquet Harvey, Agnico Eagle Mines Ltd.
Ryan Vanengen, Agnico Eagle Mines Ltd.
Jamie Quesnel, Agnico Eagle Mines Ltd.
Meadowbank Distribution List

Enclosure (1): The Nunavut Impact Review Board's *2017-2018 Annual Monitoring Report for the Meadowbank Gold Project [03MN107] & Whale Tail Pit Project [16MN056]*