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Kavamaliqiyikkut

Ministère de l'Exécutif et des Affaires Intergouvernementales

Department of Executive & Intergovernmental Affairs

June 6, 2011

Kelli Gilliard
Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
X0B 0C0

via Email to: info@nirb.ca

RE: NIRB: 11RN017- GN Comments AEM's Response to Comments received for the "All-Weather Road" Project Proposal.

Dear Ms. Gillard:

Thank you once again for the opportunity to provide comments on AEM's proposal to build an all weather road to support their underground exploration and bulk sampling program which is to occur from 2011 to 2013. The Government of Nunavut (GN) provided comments to this proposed project on May 6, 2011 and would like to thank AEM for the response and supplementary information submitted to NIRB on May 23, 2011. We have reviewed the response and have additional comments.

The specific comments from the Department of Culture, Language, Elders and Youth, the Department of Economic Development and Transportation, and the Department of Environment, are included in Appendix 1.

We thank NIRB for providing the GN with the opportunity to review and provide comments regarding AEM's All-Weather-Road project proposal and we look forward to receiving further information on this project from NIRB. Please contact me at (867) 975-6026 or at mduchaine@gov.nu.ca if you have any questions or comments.

Thank you,

Marie Duchaine
Avatiliriniq Coordinator
Executive and Intergovernmental Affairs

APPENDIX A

Culture, Language, Elders and Youth (CLEY)

The Department of Culture, Language, Elders, and Youth (CLEY) notes that AEM has not yet submitted the detailed information providing documentation of all the lands surveyed by a professional archaeologist in comparison with the project's past, current and proposed land use and land disturbance activities. We look forward to receiving this in the future.

Economic Development and Transportation (ED&T)

The Department of Economic Development and Transportation (ED&T) is satisfied with the responses by AEM and would like to confirm that the Government of Nunavut is to have no authority or responsibility for AEM's privately built and operated road that is intended to support the Meliadine underground exploration and bulk sampling project. Furthermore, after reviewing the information that AEM has provided regarding the proposed use, construction, operation, management, and decommissioning of their road, ED&T has no concerns at this time.

Environment (DoE)

The Department of Environment (DoE) would like to remind the proponent that DoE is mandated for the enforcement, and intent of multiple acts, regulations, and ultimately the Nunavut Land Claims Agreement (NLCA) for systemic benefit of Nunavummiut and the environment. As stated in the May 23rd correspondence, DoE believes that there are still inconsistencies within the application that require clarification and additional information such as increased fuel usage and possible cumulative impacts to other future projects in the area.

The proponent has not evaluated the cumulative effects of the road. Although the proponent has identified that the road will only remain for two years, the road is intended to contribute to community infrastructure and access to areas outside the core municipal area. The proponent states that the road will be, "reclaimed and decommissioned," but to what extent and condition has yet to be expressed.

Concerning the caribou guideline mentioned in Part 1 of the proponent's response, DoE is unsure what the proponent is referring to. DoE does not have currently a guideline dedicated specifically to the mitigation of impacts on caribou and caribou habitat.

DOE wishes to raise the issues of traffic noise and dust as issues of both environmental and community concern. In accordance with the Iqalugaarjuup Nunanga Territorial Park Master Plan, we require enhanced noise reduction and dust suppression strategies in advance of project approval as maintaining a healthy environment for wildlife and a peaceful environment, free of traffic noise are identified as key aspects of Iqalugaarjuup Nunanga Territorial Park. The current proposal does not adequately address these

issues. Please also be advised that these issues, if unaddressed by Agnico Eagle in the appropriate manner are subject to enforcement under the *Territorial Parks Act* and the *Wildlife Act*. DOE would be happy to provide advice on developing noise reduction and dust suppression strategies.