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Environmental Health Program (EHP)
Regulatory Operations and Enforcement Branch (ROEB), Health Canada
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June 26, 2024

Leah Klassen
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Sent by email to: info@nirb.ca

Subject: Health Canada's response to the Comment Request for Agnico Eagle Mines Limited's Meadowbank Complex Project 2023 Annual Monitoring Report

Dear Leah Klassen:

Thank you for your letter dated April 29, 2024, requesting comments on the Meadowbank Complex Project 2023 Annual Monitoring Report provided by Agnico Eagle Mines Limited.

Health Canada (HC) participates in environmental assessments as a federal authority under the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14 (*NuPPAA*). HC makes available specialist or expert information or knowledge in its possession to review panels and responsible authorities, among others.

The objective and scope of HC's review is to verify that the potential health impacts of the project are properly identified and to support responsible authorities to prevent, reduce, and mitigate the potential health impacts of project activities.

HC has reviewed the 2023 Annual Monitoring Report, which focused on topics related to Meadowbank Project Certificate Condition #67 (country foods) and Whale Tail Project Certificate Condition #63 (methylmercury monitoring), as well as air quality and noise monitoring. HC's comment is attached.

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Should you have any questions concerning HC's response, please contact Paul Partridge at paul.partridge@hc-sc.gc.ca.

Sincerely,

David Kitchen
Regional Manager, MB/SK/NU Region
Environmental Health Programs
Regulatory Operations & Enforcement Branch
Health Canada

cc: Heather Jones-Otazo, A/Manager, Environmental Assessment and Contaminated Sites (EACS) Division, Healthy Environments and Consumer Safety Branch (HECSB), Health Canada
Paul Partridge, Impact Assessment Specialist, EHP, ROEB, Health Canada
Wendy Wilson, Senior Environmental Health Specialist, EACS, HECBS, Health Canada
Julie Anderson, A/Environmental Assessment Coordinator, EACS, HECSB, Health Canada

Meadowbank Complex Project 2023 Annual Monitoring Report

Health Canada Comments

Comment Number:	HC-01
Subject/Topic:	HHRA problem formulation – exposure pathways
References:	<p><i>2023 Annual Monitoring Report</i>, Section 8.19 – Country Foods (Monitoring), PDF pg. 387</p> <p><i>2023 Annual Monitoring Report</i>, Appendix 40: 2023 Wildlife and HHRA Country Foods Screening Level Risk Assessment Plan Version 9, Section 3.1.1: Exposure Pathways, PDF pg. 29</p> <p><i>2023 Annual Monitoring Report</i>, Appendix 39: 2023 Wildlife Monitoring Summary Report. Appendix G: Hunter Harvest Study (HHS), Section 7.3 & Figure 7.1, pg. 29-30</p> <p>Health Canada. 2023. <i>Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment</i>. Section 7.1.1., Identification of Study Boundaries PDF pg. 14</p>
Comment:	<p>The rationale for exclusion of fish from the <i>Country Foods Screening Level Risk Assessment Plan</i> is insufficient, and may not be protective of human health in future use scenarios.</p> <p>Specific country foods evaluated in the <i>Country Foods Screening Level Risk Assessment Plan</i> are listed in Section 3.1.1 of Appendix 40 and include caribou and Canada goose. Fish consumption remains excluded because of the “no fishing policy” at the project site targeting mine employees and the non-migratory nature of the fish.</p> <p>The current rationale for excluding fish does not appear to consider a non-employee/local harvester exposure pathway. Information on recent and current fishing in lakes near the mine sites (e.g., Wally Lake, 2nd & 3rd Peninsula Lake, Whale Tail Lake, Kangislulik Lake, etc.) would help characterize use and describe the operability of this potential exposure pathway.</p> <p>Relevant information could be obtained from:</p> <ul style="list-style-type: none"> • Creel Surveys (HHS); • Engagement with harvesters; and/or, • Dietary surveys. <p>Consideration of potential future use scenarios during decommissioning, closure and post-closure phases of the project, where infrastructure will remain on-site (e.g., tailings</p>

	<p>impoundment), is also recommended as part of a complete rationale for including/excluding fish consumption from future risk assessments related to country foods.¹</p> <hr/> <p>^{1.} Health Canada. 2023. Guidance for Evaluating Human Health Effects in Impact Assessment: Human Health Risk Assessment</p>
Conclusion/Request:	<ol style="list-style-type: none"> 1. HC recommends including consumption of fish in the potential exposure pathways for the <i>Country Foods Screening Level Risk Assessment Plan</i> or providing data that demonstrates that fish from the lakes near the mine site are not being consumed now and in the future.