



Sophia Granchinho  
Manager, Impact Assessment  
Nunavut Impact Review Board

**RE: Technical Comments for NIRB File No. 16MN056**

Thank you for providing the Baker Lake Hunters and Trappers Organization (HTO) with the opportunity to comment on Agnico-Eagle Mines' proposed Whale Tail Pit Expansion.

The HTO supports Agnico-Eagle's plans to extend the life of the Meadowbank/Amaruq project with this expansion. Many Baker Lake residents are employed by Agnico-Eagle. Agnico-Eagle has also done a very good job communicating with the HTO in recent years. The HTO hopes to continue to work closely with Agnico-Eagle as their projects in Nunavut continue to evolve. Our comments and submissions are intended to help minimize the negative impacts and maximize the local benefits of a project we support.

Our submission summarizes our concerns and recommendations for Agnico-Eagle's proposed mine expansion. The HTO has also included a list of questions the HTO will be asking at the June technical meetings. These questions are addressed to Agnico, as well as other organizations with responsibilities related to this project, including the Nunavut Impact Review Board, Kivalliq Inuit Association, Nunavut Tunngavik Incorporated, the Government of Nunavut, Environment and Climate Change Canada, and Canadian-Indigenous Relations and Northern Affairs Canada.

Thank you very much for considering our submission.

Richard Aksawnee

Chair, Baker Lake Hunters and Trappers Organization

cc:

Jamie Quesnel, Agnico-Eagle Mines Ltd. [jamie.quesnel@agnicoeagle.com]  
Luis Manzo, Director of Lands, Kivalliq Inuit Association [lmanzo@kivalliqinuit.ca]  
Paul Irngaut, Director of Wildlife & Environment, Nunavut Tunngavik Inc. [pirngaut@tunngavik.com]  
Chris Spencer, Department of Environment, Government of Nuanvut [cspencer@gov.nu.ca]  
Rachel Theoret-Gosselin, Northern Affairs Canada [rachel.theoret-gosselin@canada.ca]  
Georgina Williston, Environment and Climate Change Canada [georgina.williston@canada.ca]



### **Baker Lake Hunters and Trappers Organization Technical Comments on Agnico Mines' Proposed Whale Tail Expansion**

The Baker Lake Hunters and Trappers Organization (HTO) held an evening workshop with hunters and Elders that have expertise in the project area. The HTO also considered other information and concerns our members have brought forward at public meetings, as well as in conversations with HTO board members, staff, and consultants.

Most of the people we spoke to supported Agnico's mining operations in the Baker Lake area. They told us that the Meadowbank/Amaruq project has provided badly needed employment for the community. However, they also want to ensure that our hunting way of life is protected. Some hunters and Elders raised several concerns with the Meadowbank/Amaruq project that the HTO will discuss at the upcoming technical meeting in June.

#### Impacts of the Meadowbank/Amaruq Project on Caribou

The Baker Lake HTO has heard complaints from many hunters and Elders that caribou have changed their migration routes north of Baker Lake. We have heard reports that caribou have shifted their seasonal migrations and no longer come as close to our community as they once did. The GN has also shown the HTO data from satellite-collar monitoring that show that caribou have shifted their migration further north, away from the community of Baker Lake and some of our preferred hunting grounds.

Some hunters and Elders have told us that they believe mining activity is responsible for this change in caribou migration. They are concerned that the mine development and



associated infrastructure and activities (access roads, quarries, exploratory drilling, helicopters, etc.) have disturbed caribou. They told us that Inuit have always known that noise, smells, and changes in the landscape can impact caribou migrations – our traditional laws all took these types of disturbance into account. For example, it was a traditional law to not hunt the first group of caribou during a seasonal migration. Inuit were also taught to keep important migration routes and water crossings very clean. Traditionally we would remove any carcasses or remains from migration routes, even blood on the ground was removed or buried. We were also very careful about where we camped or disposed of human waste.

The HTO has also spoken to some Elders that warned us not to jump to conclusions about this issue. They told us that caribou naturally change their migration routes every so often. This is because caribou will eat up most of the lichen in one area, and then leave it alone until it regenerates. These Elders also told us that some Inuit hunters may be a part of the problem as well. They said that some hunters no longer respect our traditional laws about protecting caribou migration routes. They also mentioned that Inuit hunting is a lot more disruptive than it used to be, because we use noisy technology (e.g. ATVs and rifles) which disturb caribou as well.

There seems to be evidence that a change in migration is occurring. This is a major concern for our community, as it can affect our access to country food, and therefore our food security. The HTO board believes it is possible that several factors may be responsible for this change in migration. It seems likely that mining activity is playing some role in this issue.

The HTO believes it may be time to consider stricter mitigation measures, especially during fall migrations. A lower threshold for road closures may be necessary. The development of other seasonal restrictions during the migration period may also be necessary. The HTO recommends that Agnico consider options to ensure that it does not disturb the lead group of caribou during seasonal migrations.

### Dust

One of the most common complaints the HTO hears about the Meadowbank/Amaruq project has to do with dust. The HTO has heard concerns that dust from this project may be one cause of the change in caribou migration routes. The HTO has also heard that many residents are frustrated with the levels of dust, because they disrupt their enjoyment of important hunting grounds and heritage sites.

The HTO recommends Agnico Eagle be prepared to discuss its current approach to dust control management at the technical meeting, including options to improve dust control near important caribou migration routes and hunting grounds.

#### Reports of non-compliance

The HTO has received complaints from some of our members, alleging the Agnico has failed to comply with some of its promises and commitments. For example, we have received a complaint that Agnico recently conducted blasting when caribou were nearby, which caused the caribou to run away. Some Elders told Agnico that they were promised that there would be no blasting with caribou nearby.

The HTO recommends Agnico be prepared to discuss its policy for blasting when caribou are nearby.

The HTO would also like an update from all parties responsible for monitoring, regarding Agnico's compliance with the terms and conditions of its project certificates and land use permits.

#### HTO and Community Participation in Project Monitoring

The HTO is now involved in monitoring the Amaruq project. The HTO participates in Agnico's Terrestrial Advisory Group (TAG). Agnico has also provided funding for the HTO to hire a monitor for the Whale Tail haul road.

Unfortunately, the HTO continues to lack the capacity and access to information we need to participate in monitoring in a meaningful way. The HTO hopes that all parties involved in this process – including Agnico, NIRB, the federal government, Government of Nunavut, and Kivalliq Inuit Association – will help find ways to increase the involvement of the community of Baker Lake in project monitoring.

The HTO requires funding for additional staff or consultants to review monitoring reports, conduct Inuit Qaujimajatuqangit workshops, analyze data, and draft submissions to NIRB.

The HTO also requires access to additional information. To meaningfully participate in project monitoring, we require user-friendly access to all site-inspection reports from the federal government and KIA, pertaining to all of AEM's projects North of Baker Lake (i.e. the Meadowbank Mine Project, the Whale Tail Mine Project, and adjacent



exploration projects). The HTO recommends that these reports be uploaded to the NIRB public registry in clearly-marked folders.

One member suggested that NIRB consider holding monitoring meetings in Baker Lake every year or two for this project. These meetings should include presentations by all organizations with monitoring, management, and enforcement responsibilities for this project, include Agnico, NIRB, CIRNAC, Environment Canada, and KIA. Community groups like the Baker Lake HTO and Hamlet of Baker Lake should be provided with funding to allow them to participate.

#### Other Agnico Projects in the Baker Lake Area

Agnico has a significant presence in Nunavut. In addition to the Meadowbank, Whale Tail, and Meliadine Mines, it operates many exploration projects in the Kivalliq region. It is clear that Agnico values its relationship with our community.

In the interests of ensuring that this relationship remains positive, the HTO would like information regarding Agnico's other major projects in the region. There are some projects that may cause significant concern for our membership. It is important for Agnico to understand these concerns to avoid conflicts in the future.

First, the HTO does not support mineral exploration and mining in caribou calving grounds. Inuit Elders and wildlife biologists have both recommended to us that mineral exploration and mining should not take place in caribou calving grounds. Any proposal to open a mine in caribou calving grounds could strain the positive relationship Agnico has developed with our community. The HTO recommends Agnico adopt a policy to stay out of the calving grounds.

Second, the HTO is concerned with Agnico's exploration projects near Whitehills Lake. This is a very important area for Inuit land use. Agnico should be aware that a proposal to mine in this area could create significant public concern. The HTO recommends Agnico update Baker Lake residents on its plans for the Whitehills Lake area.

## **Appendix: Questions for Technical Meeting**

### **Questions for Agnico**

- 1) Has Agnico identified a change in caribou migration/distribution since the development of the Meadowbank project? If so, what is Agnico's explanation for this change?
- 2) How many times has Agnico reduced activity at the mine site or access roads in response to caribou presence? Please provide information for both the Meadowbank and Whale Tail project, for each year since the Meadowbank project began operation in 2010.
- 3) What is Agnico's current approach to dust control?
- 4) What is Agnico's current approach to blasting when caribou are nearby?
- 5) Are there any terms/conditions in your project certificate or land use permits that you have been unable to comply with? If so, please explain your failure to comply. Please provide information for the past 10 years for all mining and exploration projects in the Meadowbank/Amaruq area.
- 6) What is Agnico's position on mining in caribou calving grounds?
- 7) What is Agnico's plans for its Whitehills Lake project?

### **Questions for Nunavut Impact Review Board**

- 1) Has NIRB received information that suggests caribou migrations have shifted north of Baker Lake? If so, what is NIRB's explanation for this change?
- 2) According to NIRB monitoring reports, have there been any problems with Agnico's compliance with the terms and conditions of its project certificates? Please provide information for the past 10 years for all mining and exploration projects in the Meadowbank/Amaruq area.

### **Questions for Kivalliq Inuit Association & Nunavut Tunngavik Incorporated**

- 1) Has KIA or NTI received information that suggests caribou migrations have shifted north of Baker Lake? If so, what is KIA and NTI's explanation for this change?
- 2) According to KIA site inspections, have there been any problems with Agnico's compliance with the terms and conditions of its project certificates? Please provide information for the past 10 years for all mining and exploration projects in the Meadowbank/Amaruq area.
- 3) Please provide copies of all KIA site inspection reports for Agnico's projects North of Baker Lake. Please provide information for the past 10 years for all mining and exploration projects in the Meadowbank/Amaruq area.

Questions for the Government of Nunavut, Department of Environment

- 1) Has the GN received information that suggests caribou migrations have shifted north of Baker Lake? If so, what is the GN's explanation for this change?

Questions for Crown-Indigenous Relations and Northern Affairs Canada

- 1) According to federal site inspections, have there been any problems with Agnico's compliance with the conditions of its land use permits or water licences? Please provide information for the past 10 years for all mining and exploration projects in the Meadowbank/Amaruq area.
- 2) Please provide copies of all federal site inspection reports for Agnico's projects North of Baker Lake. Please provide information for the past 10 years for all mining and exploration projects in the Meadowbank/Amaruq area.

Questions for Environment and Climate Change Canada

- 1) Has Environment and Climate Change Canada received information that suggests caribou migrations have shifted north of Baker Lake? If so, what is the Environment and Climate Change Canada's explanation for this change?