

February 28, 2023

Keith Morrison
Manager, Impact Assessment
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

RE: NIRB File No. 11MN034: Government of Nunavut Comments to supplemental information for the NIRBs Review of the Agnico Eagle Mines Ltd.'s "Meliadine Extension" project proposal.

Dear Mr. Morrison,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to review and provide comment on the supplemental information provided by Agnico Eagle for the Final Environmental Impact Statement (FEIS Addendum) submission for the Meliadine Extension Project proposal.

The GN has reviewed the documents and information provided by the company in response to their commitments from the November 2022 Technical Meeting. On February 2, 2023 NIRB requested parties provide the following:

Whether parties are satisfied with the supplemental information and can complete their assessment;

Which technical review comments and commitments have been resolved and how, and which remain outstanding;

Any other issues the parties consider need to be addressed.

A table is attached listing the GN technical comments and recent commitments, identifying which ones have been resolved and which ones remain outstanding. In addition, the following GN submission provides detailed comments that reflect these outstanding concerns. These comments are related to the mandates of the GN's departments and agencies.

The GN looks forward to the continued participation in the review of the Environmental Impact Statement for Agnico Eagle Mines Ltd.'s Meliadine Extension Project. If you have any questions pertaining to this submission or regarding the GN participation in the Review process, please contact Dianne Lapierre at dlapierre1@gov.nu.ca

Qujannamiik,

A handwritten signature in black ink, appearing to read 'Dianne Lapierre', with a stylized, flowing script.

Dianne Lapierre

On behalf of

David Kunuk, Deputy Minister
Economic Development and Transportation

GN Summary of Resolved/Unresolved Technical Review Recommendations and Commitments

Comment ID	Resolved/unresolved	Notes
GN-TRC-01	Resolved	GN COMMITMENT 26 RESPONSE
GN-TRC-02	Resolved	Need AEM to agree that all future information be clear, concise and found in one place. Our experts needed to do extra work of confirm AEM's conclusions.
GN-TRC-03	Resolved	Need AEM to agree that all future information be clear, concise and found in one place. Our experts needed to do extra work of confirm AEM's conclusions.
GN-TRC-04	Resolved	Need AEM to agree that all future information be clear, concise and found in one place. Our experts needed to do extra work of confirm AEM's conclusions.
GN-TRC-05	Unresolved	Temporary DSSA Needed
GN-TRC-06	Unresolved	
GN-TRC-07	Conditionally Resolved	Need to incorporate GN-ENV commitment language.
GN-TRC-08	Conditionally Resolved	Need to incorporate GN-ENV commitment language.
GN-TRC-09	Unresolved	Temporary DSSA Needed
GN-TRC-10	Unresolved	
GN-TRC-11	Unresolved	Temporary DSSA Needed
GN-TRC-12(1)	Unresolved	
GN-TRC-12(2)	Resolved	
GN-TRC-13	Resolved	With the elimination of the airstrip from the scope of the project, this comment is no longer relevant.
GN-TRC-14	Unresolved	
Commitment #34	Resolved	

Detailed Comments

GN-R01 - GN COMMITMENT 26 RESPONSE – CALCULATION OF CHEMICAL RISK ESTIMATES	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Calculation of Chemical Risk Estimates (GN-TRC-01)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Commitment 26 (GN-TRC-01) and Commitment 31 (HC-HHRA-04) - Meliadine Extension Proposal. January 19, 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
SUMMARY	
<p>The Meliadine Extension Final Environmental Impact Statement (FEIS) Addendum included an assessment of potential health risks to members of the general public exposed to air quality impacts related to the Extension components and activities. Aspects of the information in the FEIS Addendum were challenging to interpret and clarification on the approach was requested.</p>	
IMPORTANCE OF ISSUE TO IMPACT ASSESSMENT	
<p>Clear methods, assumptions and model inputs are necessary to allow stakeholders to correctly understand risk assessment approach and conclusions. Clarification related to age groups being assessed, selection of toxicity reference values and use dose averaging was requested to confirm local community members will be adequately protected if exposed to air quality impacts. A sensitivity analysis was also requested to understand if any of the information requested by the clarification would result in changes to the predicted general public health risks.</p>	
DETAILED REVIEW COMMENT	
<p>The commitment response confirmed families may be present at the discrete receptor locations for up to 30 days a year throughout the operations phase of the mine. The sensitivity assessment incorporated updated toxicity reference values and provided calculations relevant to understanding risks associated with chronic exposure to the air contaminants. The results of the sensitivity analysis indicated risks to all age groups were below the risk-based targets selected for the Human Health Risk Assessment (HHRA).</p>	

REVIEWER'S RECOMMENDATIONS/REQUEST

The Government of Nunavut recommends the following:

- The most up-to-date and relevant screening criteria and toxicity reference values should be used in each application and clearly referenced.
- Tabulated summaries of final exposure point concentrations for each contaminant evaluated should be provided within the text for ease of clarification and review.
- Exposure scenarios need to be scrutinized to determine if dose-averaging is appropriate. Support rationale should be provided if dose-averaging is incorporated into the exposure models.

GN-R02 - GN COMMITMENT 27 RESPONSE – RECEPTOR IDENTIFICATION	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Receptor Identification (GN-TRC-02)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> • Agnico Eagle. Meliadine Extension. Response to Commitment No. 27. December 16, 2022. • Agnico Eagle. Meliadine Extension. Response to Commitment No. 30. December 9, 2022. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> • Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
SUMMARY	
<p>In the Meliadine Extension Final Environmental Impact Statement (FEIS), the Proponent identified several human receptor locations within the Meliadine Expansion area including hunter/trapper cabins, locations within the territorial park and locations in Rankin Inlet. Clarification was requested to confirm locations assessed in the Addendum and to better understand how the locations were being used, the duration of visit at each location, and what ages of people were assessed at each location.</p>	
IMPORTANCE OF ISSUE TO IMPACT ASSESSMENT	
<p>Clearly identifying how receptors have been identified and where they are located within the assessment areas is a key component to appropriately assessing risk and ultimately to protecting the local community. If only certain age groups are expected to participate in given activities or if receptor locations differ according to exposure type, the traditional knowledge and/or assumptions used to inform these scenarios should be clearly stated. Furthermore, if receptor locations have changed since previous submissions, the changes should be detailed and the implications on potential risks discussed.</p>	
DETAILED REVIEW COMMENT	
<p>The commitment response confirmed the discrete receptor locations evaluated in the FEIS Addendum were hunter/trapper cabin locations or other areas of interest used by the local community for practicing traditional hunter and trapping activities or for leisure. Reference was made to a map provide in response to Commitment 30 to clarify the receptor locations evaluated in the Human Health Risk Assessment (HHRA). This information clarified that the locations referred to as the “2021 Noise Receptor Locations”, “2014 HHERA Receptor Locations” and “2021 Air Quality Receptor Locations” in Figure 10.3-2 of the FEIS Addendum were each evaluated as receptor locations in the HHRA. Each of these locations may be used</p>	

by members of the entire family (infants through adults) up to 30 days a year (the distribution of these 30 days may vary based on family).

REVIEWER'S RECOMMENDATIONS/REQUEST

The Government of Nunavut recommends the following:

1. Receptor locations evaluated in each document should be clearly identified using terminology relevant to the current assessment rather than relying on terminology or figures from previous assessments (e.g., use of "2014 locations" for a 2021 assessment). Unless very clearly defined, the use of terminology from previous assessments is confusing if it is date-specific or if it is based on information irrelevant to the current receptors/locations.
2. If different receptor locations overlap (e.g., noise and air quality receptors vs HHRA receptors), map symbols that clearly identify the presence of each receptor at the location should be used.
3. If all age groups are relevant to a given exposure pathway at a given discrete receptor location, risks should be calculated for each age group.

GN-R03 - GN RESPONSE TO COMMITMENT 28 (GN-R02) – RISK CONCLUSION RATIONALE	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Risk Conclusion Rationale (GN-TRC-04)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Extension. Response to Commitment No. 28. January 25, 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
SUMMARY	
<p>In the Meliadine Extension Final Environmental Impact Statement (FEIS) Addendum, the Proponent identified residual risk associated with the use of Saline Pond B7 as a drinking water source. However, Table 10.3-27 of the Addendum provided the conclusion that the “<i>overall residual impacts are not considered to be significant</i>” given that Saline Pond B7 is unlikely to be used as a drinking water source because recreational use is unlikely (i.e., fish will not be present) and that Meliadine Lake provides a more favourable source of drinking water. Additional information was required to support these conclusions.</p>	
IMPORTANCE OF ISSUE TO IMPACT ASSESSMENT	
<p>If risk estimates calculated in the Human Health Risk Assessment (HHRA) are greater than the pre-determined risk-based targets but a conclusion is made that the residual impact is insignificant, the rationale for this conclusion should be detailed and supported by additional information and / or risk calculations (as necessary). If risk calculations are updated, rationale for exposure assumptions should be clear and the toxicity reference value needs to align with the exposure scenario to adequately assess risk to the public.</p> <p>The conclusion of insignificant residual risk made in the FEIS Addendum relied partially upon the results of risk estimate calculations conducted to evaluate an alternative exposure scenario. Although the final risk estimate values were provided, details of the calculations were not. This information was requested so the conclusions could be adequately reviewed.</p>	
DETAILED REVIEW COMMENT	
<ul style="list-style-type: none"> People in the community reportedly hunt close to their cabins and tend to travel on the existing trail network. 	

- There are currently no cabins on or near Saline Pond B7 and the existing trail network does not access the pond.
- Saline Pond B7 was not identified as drinking water source during a tea tasting event with the local community; larger waterbodies were generally identified by the community for this purpose.
- If hunters venture of the trails during a hunting trip, these trips are usually not longer than 14 days and it was assumed that the individuals would not stay in one spot for the entire time.
- Although primary use is not expected, detailed risk estimate calculations indicate that water from Saline Pond B7 can safely be consumed for 7 days during a one-time emergency use scenario.

REVIEWER'S RECOMMENDATIONS/REQUEST

The Government of Nunavut recommends the following for future applications/amendments:

- Information from community engagement activities is extremely valuable to appropriately evaluating risk. Knowledge from these events that inform the evaluated exposure scenarios and any maps that support the assumptions made in the risk assessment should be included in the report.
- Details rationalizing toxicity reference value selection in relation to the exposure period should be provided in the Toxicity Assessment section of the HHRA, ideally in the tables that also outline the basis and source of the selected value.
- If conclusions on residual risk rely upon additional risk calculations, the inputs and details of these calculations should be provided.

GN-R04 - GN COMMITMENT RESPONSE – CARIBOU EFFECTS STUDY AREA	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Caribou Effects Study Area (GN-TRC-05)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> 11MN034-Agnico Eagle Meliadine Extension Additional Technical Comment Responses-GN. February 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
DETAILED REVIEW COMMENT	
<p>The Proponent's response does not address the GN-ENV concerns. The assessment will most accurately reflect current and future conditions when only the most recent data is used. Incorporating data that are decades old in some cases has the effect of inflating the size of the caribou seasonal ranges and therefore artificially reducing the potential effects on direct and indirect habitat losses. The GN-ENV is asking: If you were to look at the recent or present seasonal ranges of the Qammanirjuaq herd using the last 5-10 years of data to define recent or present, what would be the habitat losses attributable to the Meliadine project? This would be the most conservative approach to minimize risks. Without conducting this assessment, there is no confidence in the Meliadine Extension Final Environmental Impact Statement (FEIS) Addendum predictions. In addition to redefining the seasonal ranges, GN-ENV has also requested that the Proponent apply zones-of-influence that reflect more recent and/or more relevant studies. Case in point are the studies conducted by the GN-ENV of Agnico Eagle Mines' Meadowbank-Whale Tail project. By not using the results of these studies but instead relying on older or less relevant literature, the assessment is ignoring pertinent information. It should also be noted that the GN-ENV's request was for a revised assessment of direct and indirect habitat losses for calving, post-calving and summertime ranges. The Proponent's response does not discuss summer range.</p> <p>GN-TRC-05 remains unresolved.</p>	
REVIEWER'S RECOMMENDATIONS/REQUEST	
<p>The Government of Nunavut recommends the following to reach resolution:</p> <ul style="list-style-type: none"> The Proponent provide seasonal ranges of the Qammanirjuaq herd using 2012 to 2022 years of data to define: <ul style="list-style-type: none"> Recent and present possible habitat losses attributable to the Meliadine project. Direct and indirect habitat losses for calving, post-calving, and summer-time ranges. The Proponent apply zones-of-influence from more recent and relevant studies. 	

- Use GN-ENV studies of AEM's Meadowbank-Whale Tail project.
- The Proponent complete the recommendations outlined in GN-TRC-05, GN-TRC-09, GN-TRC-11
- The Proponent accept a temporary Data and Sample Sharing Agreement for data solely for the purpose of producing products to support the Nunavut Impact Review Board assessment.

GN-R05 - GN COMMITMENT RESPONSE – LOCATION OF PROPOSED INFRASTRUCTURE IN RELATION TO CARIBOU TRAILS	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Location Of Proposed Infrastructure in Relation to Caribou Trails (GN-TRC-06)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> 11MN034-Agnico Eagle Meliadine Extension Additional Technical Comment Responses-GN. February 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
DETAILED REVIEW COMMENT	
<p>Potential impacts of the wind farm should be addressed during the Nunavut Impact Review Board's Reconsideration process of the Meliadine Extension Project Proposal. Therefore, the GN-ENV does not support the removal of GN-TRC-06 or transferring this technical comment to the Meliadine Terrestrial Advisory Group to be dealt with on a future date.</p> <p>GN-ENV acknowledges that Agnico Eagle Mines' (AEM) ability to address this GN-TRC-06 is conditional on access to GN-ENV data. Currently the Data and Sample Sharing Agreement (DSSA) negotiation between AEM and the GN-ENV is on-going. Therefore GN-ENV is open to providing collar data under a temporary DSSA that will allow AEM to use the data solely for the purpose of producing products to support the Nunavut Impact Review Board (NIRB) assessment. This type of agreement and transfer of data could be accomplished within days. GN-ENV is still of the opinion that before and after heat maps are still necessary as part of the current assessment and believes a temporary DSSA will provide data to complete this request.</p> <p>GN-TRC-06 remains unresolved</p>	
REVIEWER'S RECOMMENDATIONS/REQUEST	

The Government of Nunavut recommends the following to reach resolution:

4. The Proponent accept a temporary DSSA for data solely for the purpose of producing products to support the NIRB assessment.
5. The Proponent update the 'heat' map showing collared caribou walk-line densities.
6. The Proponent provide walk-line densities during the calving, post-calving, and summer seasons for each of the approved project's phases (preconstruction, construction, and operation).
7. The Proponent complete the recommendations outlined in GN-TRC-06.

GN-R06 - GN COMMITMENT RESPONSE - IMPACTS OF THE ALL-WEATHER-ACCESS-ROAD (AWAR) ON CARIBOU	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Impacts of the All-Weather-Access-Road (AWAR) on Caribou (GN-TRC-07)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> 11MN034-Agnico Eagle Meliadine Extension Additional Technical Comment Responses-GN. February 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
DETAILED REVIEW COMMENT	
<p>The requirement for an updated caribou road crossing memo (as per Term and Condition #44) could be replaced if Agnico Eagle Mines (AEM) commits to conduct an alternative study of the movements of caribou in relation to the Meliadine mine (not just its road) using collar data. This was the conclusion reached by the Meliadine Terrestrial Advisory Group (TAG) at its recent December 2022 meeting.</p> <p>TAG members were clear that they wanted:</p> <p>(a) This to be a collaborative analysis whereby the TAG was involved at each stage of the study including objectives selection, study design and analytical methods, review, and interpretation of results.</p> <p>(b) That for each of the stages identified above, consensus should be reached if possible.</p> <p>GN-TRC-07 is conditionally resolved.</p>	
REVIEWER'S RECOMMENDATIONS/REQUEST	
<p>The Government of Nunavut recommends the following to reach resolution:</p> <ul style="list-style-type: none"> Provided that written commitment is made by AEM, as part of the Meliadine extension review that reflects the TAG notes, (a) and (b). Alternative study must have a 1-year completion timeline from the receipt of the caribou collar data from GN-ENV. 	

GN-R07 - GN COMMITMENT RESPONSE - IMPLEMENTATION OF CARIBOU PROTECTION MEASURES	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Implementation of Caribou Protection Measures (GN-TRC-08)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> 11MN034-Agnico Eagle Meliadine Extension Additional Technical Comment Responses-GN. February 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
DETAILED REVIEW COMMENT	
<p>The commitment provided by Agnico Eagle Mines (AEM) in its February 2023 response requires more detail, and the Proponent should specify what is meant by "additional information".</p> <p>GN-TRC-08 is conditionally resolved.</p>	
REVIEWER'S RECOMMENDATIONS/REQUEST	
<p>The Government of Nunavut recommends the following to reach resolution:</p> <ul style="list-style-type: none"> That AEM commits to: <ul style="list-style-type: none"> (a) Record all observations of caribou collected during Project-related surveys (by AEM employees or contracted personnel), and incidental reports (from AEM employees, contracted personnel, or members of the public); and (b) Report these observations in the same format as that used in Appendix A (Tables A-1 and A-2) of the Meadowbank and Whale Tail 2021 Wildlife Monitoring Summary Report. 	

GN-R08 - GN COMMITMENT RESPONSE - WINDFARM EFFECTS ON CARIBOU HABITAT USE	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Windfarm Effects on Caribou Habitat Use (GN-TRC-09)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> 11MN034-Agnico Eagle Meliadine Extension Additional Technical Comment Responses-GN. February 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
DETAILED REVIEW COMMENT	
<p>Potential impacts of the wind farm should be addressed during the Nunavut Impact Review Board's assessment process of the Meliadine Extension Project Proposal. Therefore, the GN-ENV does not support the removal of GN-TRC-09 or transferring this technical comment to the Meliadine Terrestrial Advisory Group (TAG) to be dealt with on a future date.</p> <p>GN-ENV recognizes that the Proponent's ability to address a part of this technical comment are to some extent dependent on having access to GN-ENV collaring data.</p> <p>GN-TRC-09 remains unresolved.</p>	
REVIEWER'S RECOMMENDATIONS/REQUEST	
<p>The Government of Nunavut recommends the following:</p> <ul style="list-style-type: none"> The Proponent complete GN-TRC-06 recommendations (updated ranges using last 10 years collar data, revised zone-of-influence, and revised disturbance coefficients etc.). The Proponent accept a temporary Data Sample and Sharing Agreement (DSSA) for data solely for the purpose of producing products to support the Nunavut Impact Review Board assessment. The Proponent complete recommendations for GN-TRC-11 and GN-TRC-05 and GN-TRC-09. 	

GN-R09 - GN COMMITMENT RESPONSE - WINDFARMS EFFECTS ON CARIBOU MOVEMENTS	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Windfarms Effects on Caribou Movements (GN-TRC-10)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> 11MN034-Agnico Eagle Meliadine Extension Additional Technical Comment Responses-GN. February 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022. Skarin A, Sandström P, Alam M. 2018. Out of sight of wind turbines – Reindeer response to wind farms in operation. Ecology and Evolution 8:9906–9919.
DETAILED REVIEW COMMENT	
<p>The Proponent's plan to shut down wind turbines when caribou are within 5kms is a positive step. However, the shutdown buffer of 5km is not supported by any evidence that it will be sufficient to prevent disturbance of migrating caribou. Studies of semi-domesticated reindeer in wooded habitat shows they demonstrate avoidance of single wind-turbines at distances of more than 5km when the turbines are in line of sight (Skarin et al. 2018). It is therefore very reasonable to assume that wild, barren-ground caribou in a tree-less tundra environment will react to the 11 wind turbines proposed at a far greater distance than 5km. Therefore, the buffer zone needs to be increased substantially, potentially as far as 30km (approximately twice the zone-of-influence used in the Meliadine Extension Final Environmental Impact Statement Addendum to assess the project), until more data exist (specific to barren-ground caribou). GN-TRC-10 remains unresolved.</p>	
REVIEWER'S RECOMMENDATIONS/REQUEST	
<p>The Government of Nunavut recommends the following:</p> <ul style="list-style-type: none"> The Proponent apply a greater shut down buffer zone for the wind turbine based on consultation with the Meliadine Terrestrial Advisory Group on this phase of the review. 	

GN-R10 - GN COMMITMENT RESPONSE - - Road Effects on Caribou Habitat Use	
Department	Department of Environment (GN-ENV)
Organization	Government of Nunavut
Subject/Topic	Road Effects on Caribou Habitat Use (GN-TRC-11)
References	<p><i>(Commitment Responses)</i></p> <ul style="list-style-type: none"> 11MN034-Agnico Eagle Meliadine Extension Additional Technical Comment Responses-GN. February 2023. <p><i>(Documents in EIS package)</i></p> <ul style="list-style-type: none"> Agnico Eagle. Meliadine Division. Meliadine Mine – Meliadine Extension FEIS Addendum. July 2022.
DETAILED REVIEW COMMENT	
<p>Potential impacts of the wind farm should be addressed during the Nunavut Impact Review Board's Reconsideration process of the Meliadine Extension Project Proposal. Therefore, the GN-ENV does not support the removal of GN-TRC-11 or transferring this technical comment to the Meliadine Terrestrial Advisory Group (TAG) to be dealt with on a future date.</p> <p>The recommendations in GN-TRC-11 (and its resolution) are linked directly to those of GN-TRC-05 and GN-TRC-09 whereby the GN-ENV is seeking a revised analysis of direct and indirect habitat losses that incorporates revised caribou seasonal ranges based on more recent data only (last 10 years), revised zone-of-influence around key infrastructure (i.e windfarm, all weather access road) and revised disturbance coefficients. Since there are currently no Project-specific estimates of zone-of-influence or disturbance coefficients, the GN-ENV is also recommending that the TAG be consulted in making these revisions. The intent is to ensure the analysis is conservative enough to minimize risks due to lack of project-specific estimates.</p> <p>GN-ENV recognizes that the Proponent's ability to address a part of this technical comment are to some extent dependent on having access to GN-ENV collaring data.</p> <p>GN-TRC-11 remains unresolved.</p>	
REVIEWER'S RECOMMENDATIONS/REQUEST	
<p>The Government of Nunavut recommends the following:</p> <ul style="list-style-type: none"> The Proponent accept a temporary Data Sample and Sharing Agreement (DSSA). The data provided should be used solely for the purpose of producing products to support the Nunavut Impact Review Board assessment. The Proponent complete recommendations for GN-TRC-11 and GN-TRC-05 and GN-TRC-09. 	