
Interested Party:	CIRNAC	Rec No.:	CIRNAC-TRC-02
Re:	In-Pit Disposal of Tailings and/or Waste Rock		

Recommendation Made by Interested Party:

Since the Technical Session, AEM has provided multiple supplemental analyses related to the disposal of tailings and waste rock in mined-out pits. Collectively, AEM concluded these assessments indicate that deposition of tailings and waste rock in pits could occur without resulting in significant environmental impacts. However, AEM also indicated that pit filling would need to occur based on site-specific designs for each pit, taking into consideration source terms, pit properties, fill depths, closure strategies, etc. AEM has committed to implementing such pit-specific designs through the NWB process.

Based on this commitment and the findings of the supplemental analyses since the Technical Session, CIRNAC generally supports AEM's conclusion that deposition of tailings and waste rock in mined-out pits is unlikely to result in significant adverse impacts, if appropriate analysis and controls are put in place prior to deposition. To ensure this occurs, CIRNAC recommends that a set of new terms and conditions be incorporated into the Project Certificate and/or an amended Water Licence, if the Meliadine Extension is authorized to proceed. At minimum, the topics that should be addressed by the new terms and conditions should include the following:

- 1) Definition of acceptable environmental quality criteria in pits (water and sediment);*
- 2) Characterization of source terms for specific pits;*
- 3) Analysis and selection of placement methods and quantities/fill depths;*
- 4) Pit-specific closure strategies (e.g., wet or dry covers);*
- 5) Monitoring and adaptive management strategies;*
- 6) Adjustments to authorized volumes to be disposed in terrestrial facilities;*
- 7) Updates to Water Quality and Water Balance models;*
- 8) Review periods for pit-specific designs and associated studies.*

Issue Status: CIRNAC considers the issue to be moving towards resolution, provided that appropriate terms and conditions are developed.

Agnico Eagle's Proposed Term and Condition:

Preamble:

- This term and condition is not intended to limit the discretion of the NWB and other regulatory authorities to determine the process and timelines needed to obtain any licences or permits under their jurisdiction required in order to proceed with the In-Pit Tailings and Waste Rock Disposal alternative.

Proposed new NIRB Term and Condition for Project Certificate No. 006

Term or Condition

Prior to In-Pit Filling of waste rock and/or tailings as described in the NIRB application filed on July 26, 2022, AEM shall submit a request to the NWB for review and approval in accordance with the process set out in the terms and conditions of the Type A Water Licence issued under the Nunavut Waters and Nunavut Surface Rights Tribunal Act. At a minimum, the request for approval shall be accompanied by the information described in items (a) to (d) below:

- a. Thermal study to assess the degradation of permafrost within the in-pit lakes.
- b. Hydrogeological study to assess the groundwater contaminant transport to the receiving environment.
- c. Update the water balance and water quality model, including the source terms with the most current monitoring data considering environmental quality criteria in the pits (water and sediment).
- d. Update the following management plans:
 - i. Water Management Plan including an update of the monitoring sections and an updated water balance; and
 - ii. Mine Waste Management Plan including detailed descriptions and analysis of the placement methods, waste balance adjustments to the authorized quantities of waste to be disposed of in previously approved tailings and waste rock storage facilities, and comprehensive pit closure strategies sections. The pit closure strategies are to be included in regular updates to the Interim Closure and Reclamation Plan.