



Government of Nunavut (GN)

September 12 – 20, 2023

Rankin Inlet

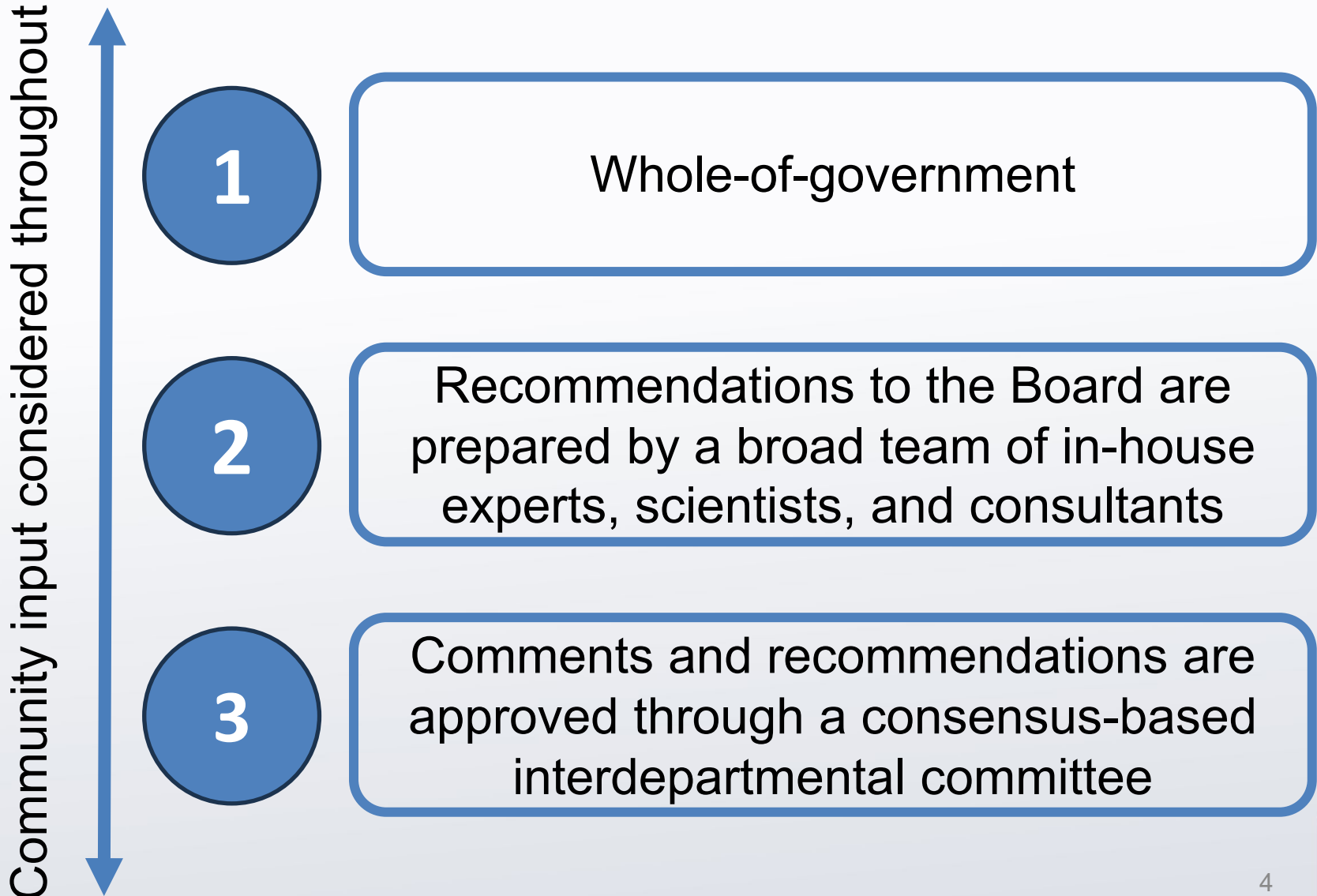
KATUJJILUTA – THE GN’S MANDATE

- Katujjiluta priorities include reinvesting in education and diversifying local economies
- To support these priorities, the GN is committed to preparing Nunavummiut for participation in economic opportunities and supporting local employment and training.
- Further, Pillar 4 of Parnautit, the GN Mineral Exploration and Mining Strategy, seeks to ensure that environmental impacts resulting from exploration and mining are minimized and mitigated.
- The Government of Nunavut is mandated to protect wildlife and wildlife habitat.

PUBLIC ENGAGEMENT & INUIT QAUJIMAJATUQANGIT

- GN staff attend NIRB and community engagement sessions and read all written comments submitted.
- The GN listens carefully to the position and opinions of intervenors and community participants.
- The GN will continue to work with other intervenors, particularly potentially impacted hamlets, HTOs, and other community organizations.

THE GN'S REVIEW PROCESS APPROACH



GN REVIEW OF THE MELIADINE EXTENSION

PROPOSAL SUMMARY

- Meliadine gold mine was first approved in 2015. It's owned and operated by Agnico Eagle.
- This proposal is for an extension to the existing mine that includes the following activities:
 - Expansion of underground mining;
 - Access changes to the Tiriganiaq-Wolf underground mine;
 - New windfarm to power the mine;
 - Changes to tailing storage; and
 - Extension of life of mine by 11 years (to 2043)

Of these activities, the construction and operation of the windfarm is the focus of most Government of Nunavut comments for this proposal.

SOCIOECONOMIC BENEFITS

- The proposed project provides significant local employment and training opportunities for Nunavummiut.
- The windfarm offers an opportunity for renewable energy and reducing on-site CO2 emissions.
- Agnico Eagle has addressed the GNs comments regarding a focus on reducing barriers to female employment and supporting career advancement and job retainment.

STATUS OF GN COMMENTS

The Government of Nunavut originally submitted 7 Technical Review Comments identifying a range of GN concerns for Agnico Eagle to address during NIRB review.

Four of these Technical Review Comments (GN TRC #s 7, 8, 9, 10) are still not resolved. These comments relate to two issues:

1. Changes needed in the Wind Farm Management Plan
2. Changes needed in Caribou Group Size and Distance Thresholds

The Government of Nunavut is concerned that the proposed project could have adverse effects on caribou access to calving, post-calving or summer foraging habitat, as well as Inuit access to caribou.

1. PROTECTION OF CARIBOU

Concern: *Proposed* protection measures require revision to effectively mitigate project impacts to caribou.

- The current protection measures have not been updated since 2014 when fewer caribou interacted with the mine.
 - Example: When the project was originally assessed (2014), less than 1% of the Regional Study Area overlapped with post-calving caribou range. This has increased to 37% and is expected to continue to grow.
- Proposed shutdown triggers, including Caribou Distance and Group Size Thresholds (i.e., when operations should be shut down due to location and number of caribou) are not evidence-based and should be derived from relevant data and observations.

1. PROTECTION OF CARIBOU:

IMPACTS ON QAMANIRJUAQ CARIBOU

- The proposed project may result in changes to Qamanirjuaq caribou range use. This is a concern for access to caribou and food security.
- This is the first time that Qamanirjuaq caribou will encounter wind turbines.
- Limited research has been conducted on the potential effects from turbines on wild caribou populations in open tundra areas.
- **The effect on caribou from the proposed windfarm is unknown.**

1. RECOMMENDATION FOR CURRENT PROTECTION OF CARIBOU

Summary of Government of Nunavut Recommended Terms and Conditions:

1. Set interim Group Size and Distance Thresholds as recommended by the GN:
 - i. Develop evidence-based caribou Group Size Thresholds using current data.
 - ii. Increase the Distance Thresholds to align with evidence-based studies.
2. Conduct caribou behavioral and movement studies (done by AEM).
3. Conduct a review of the interim thresholds using study results (done by the TAG).

2. WINDFARM MANAGEMENT PLAN

Concern: Windfarm Management Plan requires revision to effectively mitigate proposed project impacts to caribou.

- More evidence is required to determine adequate Group Size Thresholds and Distance Thresholds.
- Monitoring and mitigation measures need to take a precautionary approach to prevent impacts and rapidly respond to impacts if they occur.
- The caribou Group Size Threshold for windfarm shutdown should be reviewed immediately with existing data and updated annually as new data are collected.
- The GN is recommending a more cautious, interim shutdown threshold of 10km instead of 5km, as currently proposed.

2. RECOMMENDATION FOR WINDFARM MANAGEMENT PLAN

Summary of GN Recommended Terms and Conditions:

1. Wind turbines should be shut down when caribou are within 10km. Distance to be updated based on recommendations from TAG.
2. Establish seasonal, evidence-based group size thresholds for shutdown of windfarm.
3. Windfarm Management Plan should adjust windfarm shutdown thresholds up or down based on monitoring results.
4. AEM should commit to collecting data to ensure impacts on caribou are adequately assessed. This should be implemented within 3 years of windfarm operation.

CONCLUSION

- GN acknowledges the socio-economic benefits that would be provided to Nunavummiut by extending the life of mine.
- GN also recognizes the efforts by the proponent to implement renewable energy sources at the project site.
- GN continues to be concerned with the proposed protection measures for caribou during sensitive seasons, especially in the context of the extended mine life.
- GN believes that these issues should be resolved with NIRB via the project certificate terms and conditions.
- The GN will continue to support the Nunavut Impact Review Board's impact assessment process and work collaboratively with all stakeholders.

**Thank you
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