



NIRB File Nos.: 15EN049; 10EN020
NPC File No.: 148149

December 10, 2015

David Frenette
Agnico Eagle Mines Ltd.
CP 87, 765 chemin de la mine Goldex
Val-d'Or, QC J9P 4N9

Sent via email: david.frenette@agnicoeagle.com

Re: Opportunity to address comments received regarding Agnico Eagle Mines Ltd.'s "Peter, Fox and Parker Lakes" project proposal

Dear David Frenette:

On October 21, 2015 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Agnico Eagle Mines Ltd.'s (AEM) "Peter, Fox and Parker Lakes" project proposals from the Nunavut Planning Commission (NPC or Commission). On November 13, 2015 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by December 4, 2015.

On or before December 4, 2015 the NIRB received comments from the following interested parties:

- Government of Nunavut (GN)
- Indigenous and Northern Affairs Canada (AANDC)
- Fisheries and Oceans Canada (DFO)
- Aqigiq Hunters and Trappers Organization (Aqigiq HTO)
- Baker Lake Hunters and Trappers Organization
- Kivalliq Wildlife Board (KWB)

All comment submissions received by the NIRB relating to this project proposal can be obtained from the NIRB's online registry at the following location:

<http://ftp.nirb.ca/01-SCREENINGS/ACTIVE%20SCREENINGS/15EN049-AEM-Peter,%20Fox,%20Parker%20Lakes/>.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

General

- Require confirmation on the specific drill locations and associated layout locations including the number of drill holes per location/area.
- No record of public consultation and public concerns provided for the proposals.
- No cumulative effects assessment completed as part of the proposals. Baker Lake Hunters and Trappers Organization (HTO) and the Aqigiq HTO believe that the projects may already be having cumulative impacts on caribou migrations and these impacts would worsen unless new and stricter terms and conditions are applied.
- No information provided on the crew numbers that would be operational at any one time during the exploration activities.

Culture, Heritage and Inuit Land Use:

- Proposal may pose a threat to recorded and unrecorded archaeological resources.
- Proposal would require an archaeological permit; request AEM consult with the Department of Culture and Heritage regarding project proposals.
- Request AEM have a professional archaeologist and/or palaeontologist perform functions associated with specific types of activities listed.
- Recommendations provided related to culture and heritage sites.
- Project areas located in areas of important historic land use for Inuit. Recommended AEM provide a summary of the known heritage resources in the area, its knowledge of Inuit land use in/near the project area and explain how it has changed project activities to mitigate impacts on heritage resources and Inuit land use.

Wildlife and Fish and Fish Habitat

- Disturbances from the proposals such as noise may have the potential to impact sensitive life history stages for caribou. No information provided on how the Proponent will avoid the potential impacts of their operations on caribou calving grounds and how they would address key issues regarding caribou and caribou habitat.
- The Parker Lake survey blocks spatially and temporally overlaps core calving and post-calving habitat. Recommended removing the portion of the proposed Parker Lake Project area that extends into core calving grounds.
- Recommended seasonal restrictions be put in place on project activities to avoid risks to migrating and calving caribou with all project activities ceasing when caribou migrate through the area. An activity suspension plan should be provided.
- Potential disturbance to wildlife (caribou, muskoxen and birds) from aerial traffic and recommended raising flight altitudes and the development of a caribou mitigation and monitoring plan to reduce impacts to wildlife.
- Potential interaction of muskox with project activities with potential displacement from calving areas could have negative effects on muskox breeding.
- High probability of encounters with grizzly bears in the project area with bears attracted to human installations. Recommended proponent put in place plans to avoid human-bear conflicts, meet with local hunters to discuss local traditional knowledge of bears and ensure staff are aware and trained in human-bear conflicts.
- Wildlife mitigation and monitoring plan(s) were not provided for review of the potential impacts to wildlife from the proposals. This is to assist impacts to all wildlife, including those used for country foods.

- Potential disturbance of raptors and nesting raptors by project activities. Avoidance of raptors nesting during critical periods is required with a minimum distance of at least 100 metres from a nest site recommended.
- No assessment provided on whether the project(s) are likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities.
- Proposal did not provide specific dates for exploration/drill activities making it difficult to adequately assess the total impacts to caribou. Recommended proponent provide an activity suspension plan which outlines the means for detecting concentrations of caribou, chain of commands for suspension of work, length in time to implement activity suspensions etc.
- Proposal located in or near the Qamanirjuaq caribou herd calving grounds and noted that any future resulting development may lead to disturbances on calving ground which may have consequential long-term cumulative impacts to the caribou herd.
- Noted the Qamanirjuaq caribou herd may already be impacted due to disturbance to its migration routes affecting harvesting activities by the Baker Lake Inuit and Chesterfield Inlet Inuit.
- Additional mitigation measures provided to avoid the potential of serious harm to fish and their habitat that should be included in AEM's plans

Fuel and Chemical Storage

- Information required regarding the use of “normally, flexible berms” as secondary containment facilities.
- Clarification needed on the source of peat moss which would be used to absorb film of petroleum products (as noted in the Spill Contingency Plans).

The NIRB would like to provide AEM with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **December 28, 2015**.

If AEM determines that the time required to supply a written response is significantly greater than 2 weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca or via fax at **(867) 983-2594**.

If you have any questions or require clarification, please contact the undersigned directly at (867) 983-4607 or kbenoit@nirb.ca.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kristina Benoit".

Kristina Benoit
Technical Advisor
Nunavut Impact Review Board

cc: Distribution List
 Phyllis Beaulieu, Nunavut Water Board
 Luis Manzo, Kivalliq Inuit Association
 Tracey McCaie, Indigenous and Northern Affairs Canada