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1002259

December 3, 2015

Kristina Benoit
Technical Advisor
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for Agnico Eagle Mines Ltd.'s "Peter, Fox and Parker Lakes" project proposal;

Dear Ms. Benoit,

On November 13, 2015, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Screening the NIRB commenced pursuant to section 86 of the *Nunavut Planning and Project Assessment Act* (NuPPAA) for Agnico Eagle Mines Ltd.'s "Peter, Fox and Parker Lakes" project proposal. Aboriginal Affairs and Northern Development Canada (AANDC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Whether the project proposal is likely to arouse significant public concern; and if so, why;

AANDC cannot offer comments on whether the project is likely to arouse significant public concern as either no consultations with the affected community, regarding these specific project activities, have been conducted by the Proponent, or consultation records have not been made available for review. AANDC recommends the Proponent consult any potentially affected communities prior to the commencement of the project.

Whether the project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);

AANDC is confident that the potential impacts from the proposed project can be limited, reduced or avoided through stringent implementation of mitigation measures. In the NIRB Part 2 form, the Proponent stated that "Normally, flexible berms" are utilised as secondary containment. AANDC requests that the Proponent confirms that this type of secondary containment is being utilised for fuel and hazardous materials, or informs the NIRB if they plan to implement a different form of secondary containment.

AANDC notes that there is no Wildlife Management Plan included with the Proponents application, which assists in mitigating impacts to all wildlife, including those used for country foods. AANDC recommends that the Proponent provides a Wildlife Management Plan which outlines the mitigation measures that are to be implemented for each of the project activities or components being proposed.

During AANDC's review, it was noted that the Spill Contingency Plan states that "peat moss may also be sprinkled on vegetation to absorb films of petroleum products". AANDC requests clarification regarding where the peat moss would be obtained, as in, whether it is to be purchased and brought to the site, or harvested from the area surrounding any potential spills.



Any matter of importance to the Party related to the project proposal.

AANDC noted an error in the Proponent's Aviation fuel calculation on the provided AANDC Land Use Permit application, as the Proponent anticipates using ten 205L containers, there would be a total of 2,050L of aviation fuel stored on site.

- ***Whether any cumulative eco-systemic and socio-economic impacts could result from the impacts of the proposed project combined with those of any other project that has been carried out, is being carried out or is likely to be carried out inside the designated area, or wholly or partly outside the designated area.***

AANDC noted that a cumulative effects assessment was not completed as part of the proposal; therefore, AANDC feels they cannot confidently speak to whether cumulative impacts could result from the impacts of the proposed project combined with those of any other project.

AANDC appreciates the opportunity to provide comments and looks forward to working further with the NIRB and the Proponent, as necessary, throughout any further review related to this project. Should you have any questions, please contact Laura Harris at (867) 975-4567 or by e-mail at laura.harris@aandc-aadnc.gc.ca.

Sincerely,

[Original signed by]

James Neary
Manager, Impact Assessment