



December 17, 2015

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**Re: NIRB file 15EN049, Response to comments received for Agnico Eagle Mines Ltd's "Parker, Peter and Fox" Project Proposal.**

AEM appreciates the opportunity to provide answers and precisions to the comments received during the file screening, and to use the occasion to include a short summary of the information contained in the application documents and management plans

Should you have any questions or require further information, please contact me.

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## **Regional exploration works, Parker, Peter and Fox lakes, Project Summary**

### **Location**

Agnico Eagle Mines Limited (AEM) acquired in 2015 mineral claims located on Crown and Inuit Owned Land in the area located between 40km and 140km north-west of the Rankin Inlet community. The exploration activities are for gold mineralization and include drilling and field exploration works. The works are planned to start in 2016 and be conducted annually within a period of 30 days between May and October. The works will include ground or aerial geophysical surveys, prospection and diamond drilling. These exploration works are intended to be low scale, using existing facilities resulting in a low impact exploration program.

### **Logistic**

No camp is planned to be set up on crown land with the current application and the existing facilities located on IOL (Meliadine exploration camp) will be used to support these exploration works. For the diamond drilling, Agnico Eagle plans to use up to 2 drills on the claims related to this application. Helicopters will be used to move the drills, equipment and workers.

### **Inuit Heritage**

To ensure Inuit heritage protection AEM conducts annual archaeological works on various exploration sites and these works are permitted by the Government of Nunavut. These works include office and field investigations conducted by Archaeologists to find, identify and report Archaeological sites. Annual reports are submitted to the Government of Nunavut and include details of the completed investigations. These investigations help AEM to reduce the risk of damaging an archeological site during its exploration works. During a first stage exploration project, as for this permit application, archaeological sites are protected with protection buffers that are established with the archaeologist and in compliance with the regulations.

## Caribou protection

To limit the impact on the caribou, AEM will apply the protection measures that are described in the Keewatin Regional Land Use Plan and also in the Wildlife Protection and Response Plan (Appendix 1). The protection measures include avoidance of some areas during certain defined periods and the Wildlife Protection and Response Plan describes procedures to apply when caribous are approaching an exploration area.

## Spill contingency

A Spill Contingency Plan was developed for the exploration projects, and designates lines of authority and responsibility, and establishes proper reporting and detailed action plans in the event of a spill (Appendix 2). This plan is applicable to all AEM employees and any contractors associated with the AEM exploration projects

## **Answers to comments received by NIRB**

### **General**

- Require confirmation on the specific drill locations and associated layout locations including the number of drill holes per location/area.
- **AEM: Please find attached the shapefile associated to the drilling area. The number of drill sites is highly dependent on the results obtained from the core analysis. Approximately 30 holes per year are planned under this application in the areas included in the shapefile, but the number could be adjusted depending on the results obtained.**
- No record of public consultation and public concerns provided for the proposals.
- **AEM will do consultation with HTO and stakeholders on this proposal before the start of the work.**
- 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.
- **AEM: A work cessation is applied when the caribou herds are close to an exploration area as described in the Wildlife Protection and Response Plan Appendix 1, section 2.2.9). Applying the caribou protection measures, AEM believes that there will be no significant impact on the caribou herds.**

- No information provided on the crew numbers that would be operational at any one time during the exploration activities.
- **AEM: Up to 10 people, during 30 days, between May and November could work in these areas.**

#### ***Culture, Heritage and Inuit Land Use:***

- Proposal may pose a threat to recorded and unrecorded archaeological resources.
- **AEM conducts annual archaeological works on various exploration sites and these works are permitted by the Government of Nunavut. These works include office and field investigations conducted by archaeologists to find, identify and report archaeological sites. Annual reports are submitted to the Government of Nunavut and include details of the works completed. These investigations help AEM to reduce the risk of damaging an archeological site during its exploration works. During a first stage exploration project, as for this permit application, archaeological sites are protected with protection buffers. AEM will continue the archaeology assessment of the areas not covered by the past field works.**
- Proposal would require an archaeological permit; request AEM consult with the Department of Culture and Heritage regarding project proposals.
- **AEM will continue to work with the Department of Culture and Heritage in regard to fulfill its obligations and protect the Inuit Heritage. AEM will submit the archaeological permit in Q1 2016 for the work in 2016.**
- Request AEM have a professional archaeologist and/or paleontologist perform functions associated with specific types of activities listed.
- **AEM is using an archaeologist to perform the works included in its permit.**
- 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.
- **AEM conducts annual archaeological works on various exploration sites and these works are permitted by the Government of Nunavut. These works include office and field investigations conducted by archaeologists to find, identify and report archaeological sites. Annual reports are submitted to the Government of Nunavut and include details of the works completed. These investigations help AEM to reduce the risk of damaging an archeological site during its exploration works. During a first stage exploration project, as for this permit application, archaeological sites are protected with protection buffers.**

### ***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.
- **AEM: The Keewatin Regional Land Use Plan includes protection measures and AEM is committed to respecting these measures. The Wildlife Protection and Response Plan (Appendix 1) includes caribou protection measures inside and outside the areas covered by the Keewatin Regional Land Use Plan (section 2.2.9).**
- 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.
- **In AEM's opinion, exploration works can be conducted with low impact on the caribou by applying the mitigation measures proposed in the Wildlife Protection and Response Plan (Appendix 1, section 2.2.9) and by applying the caribou protection measures described in the Keewatin Regional Land Use Plan.**
- 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.
- **In AEM's opinion, exploration works can be conducted with low impact on the caribou by applying the mitigation measures proposed in the Wildlife Protection and Response Plan (Appendix 1, section 2.2.9) and by applying the caribou protection measures described in the Keewatin Regional Land Use Plan.**
- 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.
- **AEM is committed to respecting altitude protection measures that are to maintain a minimum altitude of 610 meters above ground level in places where there are occurrences of wildlife. In areas where there are observed large concentrations of caribou, muskoxen or birds, flight level is restricted to 1,000 meters vertical distance and 1,500 meters horizontal distance from the birds.**
- Potential interaction of muskox with project activities with potential displacement from calving areas could have negative effects on muskox breeding.
- **AEM: The Wildlife Protection and Response Plan (Appendix 1) includes muskox protection. The muskox herd protection measures are similar to the ones applied for the caribou.**
- 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.

- **AEM: The Wildlife Protection and Response Plan (Appendix 1) describes the training planned for the workers and reactive procedures to be applied in case of encounter with wildlife (section 5).**
- 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.
- **The Wildlife Protection and Response Plan is included in Appendix 1.**
- 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 meters from a nest site recommended.
- **AEM is committed to avoiding any raptor nests and will apply a buffer of 100 meters from a nest site.**
- No assessment provided on whether the project(s) are likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities.
- **AEM: With the Keewatin Regional Land Use Plan protection measures and the procedures described in the Wildlife Protection and Response Plan (Appendix 1), AEM is confident that there will be no significant impact on the caribou herds.**
- 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.
- **AEM: The exploration works would be conducted between May and November. The exact period of exploration, will be determined respecting the caribou protection measures and the Wildlife Protection and Response Plan. For the part of the area that is located in the Keewatin Regional Land Use Plan Caribou Protection area, avoidance required between May 15 to July 15 will be applied.**
- 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.
- **AEM: The Wildlife Protection and Response Plan (Appendix 1) includes protection procedures that are activated when a caribou herd is approaching an exploration site. AEM is confident that the measures described in the Plan will reduce potential impacts on the caribou herds. Any future development (example mining), will have to be assessed in an Environmental Impact Statement (EIS) and cumulative impacts on the caribou herd will be included in the assessment.**

- 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.
- **AEM: AEM is confident that with Keewatin Regional Land Use Plan protection measures and the procedures described in the Wildlife Protection and Response Plan (Appendix 1) the impact on the caribou herds will not be significant.**
- Additional mitigation measures provided to avoid the potential of serious harm to fish and their habitat that should be included in AEM's plans
- **AEM will apply the mitigation measures included in the documents:**
  - **DFO's Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut date June 21, 2010**
  - **Nunavut restricted Activity Timing Windows for the Protection of Fish and Fish Habitat**
  - **DFO's Freshwater Intake End-of-Pipe Fish Screen Guideline**

#### ***Fuel and Chemical Storage***

- Information required regarding the use of "normally, flexible berms" as secondary containment facilities.
- **The AEM: Fuel volume in these exploration areas will be in limited quantity and for immediate use. AEM will use secondary containment for fuel and hazardous material storage. The flexible berms (as instaberm) are one option and another option used on different AEM projects is the rigid berms. These rigid berms can be made of plastic for the smaller ones or be constructed using wood and HDPE liners for larger ones.**
- 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).
- **AEM uses industrial bagged peat moss as a hydrocarbon absorbent. This type of product is provided by spill control material suppliers.**