



March 20th, 2017

Kofi Boa-Antwi
Technical Advisor - Nunavut Impact Review Board
29 Mitik St P.O. Box 1360
Cambridge Bay, NU
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Re: NIRB File No. 15EN049 – Response to: Additional Information requested for Agnico Eagle Mines Ltd.'s "Parker Lake Temporary Exploration Camp and Airstrip and Cone Hill Exploration Project" Project Proposal

AEM appreciates that NIRB has provided AEM with the opportunity to provide additional information regarding the submitted application.

The following responses are intended to address the information requested in the NIRB letter dated March 6th, 2017.

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

Regards,

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

Project Details

- Information lacking regarding drilling operations such as the potential number of drill targets, the types of drills used and the timing of operations at the Cone Hill exploration project which limits parties ability to understand the impacts of the proposed activities; please provide the information outlined. If drilling is proposed over waterbodies during winter, Proponent should use reverse circulation drill to avoid deleterious substances from entering water.
 - *For 2017, 20 drilling sites are planned to be realized during the summer period in the Cone Hill exploration project area. No drilling is planned on waterbodies during winter at this time. The use of a reverse circulation drill on ice is not a possibility unless there is ice up to the bottom of the waterbodies and in such case, there is no expected additional risks in using a standard drill. With good management practices, standard drilling on ice has limited potential impact on the environment.*
- Information lacking on the number of tents/structures that would be on site, the heating source for each tent.
 - *9 tents are planned to be installed and these tents include a core shack, a core splitting room, a medical room, a kitchen, a dry, dormitories and a sanitary tent. For the heating sources, we plan to have a mix of furnaces and electric heating. The fuel tanks and drums will be installed in secondary containments.*

Hazardous and Waste Management

- Conflicting information presented in application regarding location and methods of waste incineration noted in application; recommend clarification on location of incineration, and if new incinerator to be used at Parker Lake camp, provide information on types of wastes to be incinerated, the model and the location of the incinerator(s) to be used.
 - *Conflicting information is due to reference by ECCC to the Waste Management Plan submitted with the initial screening. With this amendment application, the proposition is to install a double chamber incinerator A400X at the future Parker Lake camp (specs submitted to NIRB on January 30th, 2017) to dispose of the domestic waste and to continue to have the possibility to use the existing waste management facility at the Meliadine site if needed. An updated version of the*



Waste Management Plan will be created to include the waste management modifications related to this amendment.

- Information lacking on the availability of secondary containment at the camp location; require details be provided on how fuel drums and other dangerous goods would be stored including storage practices.
 - *Secondary containment for the main fuel storage will be constructed using wood and HDPE liner. Plastic secondary containment will also be used in a different area on the camp site for the storage of dangerous goods.*

Wildlife Impacts

- Concerns regarding potential impacts from the proposal on the migratory bird breeding season and to Species at Risk.
 - *Before starting drilling activities, a verification of the area will be conducted to verify the presence of migratory birds and nests in the area. If nests containing eggs or young of migratory birds are located or discovered, all activities in the nesting area will be halted until nesting is completed (i.e. the young have left the vicinity of the nest).*
- Information lacking in the proposal on impacts to caribou, muskoxen and wolf hunting in the area from the project proposal.
 - *In regard to limiting the impact on the wildlife during its exploration activities Agnico Eagle applies many mitigation measures and these include, but are not limited to: giving the right-of-way to wildlife, prohibiting feeding wildlife, prohibiting wildlife harassment, prohibiting destruction of wildlife nests/eggs/dens/burrows and prohibiting hunting and fishing.*
 - *As described in the Parker Lake, Peter Lake, Fox Lake and Cone Hill Exploration Projects, Wildlife Protection and Response Plan, a protocol is applied when Caribou and Muskoxen migration is occurring. During migration of Muskoxen (10 or more animals) or Caribou (50 or more animals) herds, AEM implements the work suspension protocol when the caribou herd is moving in the direction of the activities. The protocol for off-site drilling and/or helicopter activity will commence once a herd is 5 km away of such activities.*
- Information lacking to support an assessment of potential project impacts to wildlife.

- *With the application of mitigation measures and protection procedures described in the Wildlife Protection and Response Plan, impacts on the wildlife are expected to be low.*

- Information requested as follows:
 - Details regarding the location of drill targets, the types of drills to be used and the timing of operations to enable an assessment of potential overlap of project activities with migratory bird breeding periods.
 - *Drill targets in the Cone Hill area are planned to be realized with one heliportable diamond drill, during the summer period. Before starting drilling activities, the area will be checked to verify the presence of migratory birds and nests in the area. If nests containing eggs or young of migratory birds are located or discovered, all activities in the nesting area will be halted until nesting is completed (i.e. the young have left the vicinity of the nest).*

 - Requested the Wildlife Protection and Response Plan be updated to include
 - The following statement to be in line with the *Migratory Birds Convention Act* as follows: “The destruction or disruption of wildlife nests, eggs, dens, burrows, and the like, is prohibited at all times”.
 - *The statement in the Wildlife Protection and Response Plan has been modified as proposed.*

 - Include list of species at risk that may be encountered in the project area as noted in the *Species at Risk Act*.
 - *The list of species at risk has been included in the Wildlife Protection and Response Plan as proposed.*

 - Mitigation measures related to potential impacts to wildlife impacts in the area.
 - *Mitigation measures are described in the Wildlife Protection and Response Plan. With these measures, the potential impacts on wildlife are expected to be low.*

Community Consultation

- Information not provided on any detailed records of community engagement/consultation activities undertaken by the Proponent to discuss community concerns regarding the proposed new activities. Parties previously noted, for the original project proposal, similar deficiencies with respect to the consultation approach and recommended that the Proponent consult with any potentially affected communities prior to the commencement of the project. To date, no records or schedules of consultation have been presented to parties. Recommended the Proponent conduct community consultation prior to the start of the new activities.
 - *On May 5th, 2016, a meeting was held between Agnico Eagle and the Rankin Inlet HTO regarding the exploration activities planned. The main HTO's concern was a caribou calving area. Agnico Eagle described the mitigation measures planned in the Wildlife Protection and Response Plan.*
 - *Public meetings were held.*
 - *On June 6th, 2016, 29 persons attended a meeting conducted by Agnico Eagle in Rankin Inlet and on June 7th, 92 persons attended the meeting in Baker Lake.*
 - *Most of the questions from the public were related to the Whale Tail Pit, the Amaruq road and the hovercraft pilot project. Questions related to the exploration projects regarded the period when drilling at Parker Lake was planned to be realized. The concern was related to the possibility of disturbing caribous during the migration. Exploration activities are conducted in compliance with the caribou protection measures described in the Keewatin Regional Land Use Plan and the Wildlife Protection and Response Plan to ensure to limit and reduce potential impact on the caribous.*
 - *Another concern was the protection of archaeological sites. To reduce the risks of disturbing an archaeological site during exploration activities, Agnico Eagle contracts archaeologists to investigate areas where exploration activities are planned. The archaeological sites found are protected and are declared to the Government of Nunavut in an annual report completed by the archaeologist.*
 - *Agnico Eagle will continue to hold public meetings with the communities in regard of its exploration projects.*

Cumulative Effects

- An assessment of potential cumulative impacts of the proposed project was not addressed in the amendment. Recommended that an assessment be completed to address potential cumulative impacts and to consider the project as a whole, including previously approved activities associated with the project, and other past and reasonably foreseeable projects in the area.
 - *The exploration projects associated to this application are expected to be low scale with limited equipment quantity, workers and duration. Exploration activities in the new area (Cone Hill) will be done with the same equipment that is used in the Parker Lake, Fox Lake and Peter Lake areas. Only one drill is planned to be used in 2017. The addition of an exploration camp in the Parker Lake area is needed to improve the safety of the workers. The workers that were based at Meliadine for the exploration in these areas in 2016 will now be based at Parker Lake camp. The fuel volume used is expected to be reduced since travelling between Meliadine and Parker Lake will be optimized by the use of an exploration camp directly in the working area. Mitigation measures and management plans will reduce the potential impacts on the environment. Future development (example mining) would be assessed in an Environmental Impact Statement (EIS).*