



Tara Arko
Director Technical Services, Nunavut Impact Review Board

May 7, 2020

**Re: 2020 Saline Discharge Strategy” Proposal related to the Meliadine Gold Mine Project, and
“Saline Effluent Discharge to Marine Environment” Amendment for the Meliadine Gold Mine
Project**

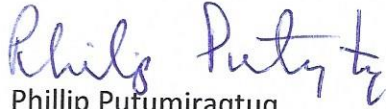
The Baker Lake HTO appreciates the opportunity to comment on Agnico’s proposed changes to managing groundwater at the Meliadine mine. The HTO agrees with the concerns expressed in the Kivalliq Wildlife Board’s submission and would like to add:

- 1) Effects of the water pipeline on caribou. The HTO is concerned that the proposed pipeline might have serious negative effects on the Qamanirjuaq caribou herd. The pipeline crosses a major caribou migration route and post-calving ground of the herd shared by members of the Baker Lake HTO and 4 other Kivalliq communities. The HTO is worried that caribou, especially newborn calves, might have difficulty crossing the pipeline. Significant disturbance to caribou during the post calving and spring migration seasons will negatively affect our members’ abilities to exercise our treaty rights to hunt.
- 2) Effects of the water discharge on marine ecosystems. The HTO is concerned that the proposed increased volume of saline water being dumped into Itivia Harbour might negatively affect marine ecosystems in ways that have not been assessed. Many of our members travel to coastal areas to harvest marine mammals and fish. Any effect to the marine ecosystem might affect our members’ abilities to exercise our treaty rights to hunt and fish.

In the opinion of the HTO, Agnico’s proposed changes constitute a significant modification under section 146 of the *Nunavut Planning and Project Assessment Act*.

The HTO also believes the proposed changes to Agnico Eagle’s project may have significant negative impacts on Nunavut’s ecosystems and will cause significant public concern throughout the Kivalliq region. The proposed changes also involve technology that has not yet been tested in Nunavut. According to section 12.4 of the *Nunavut Land Claims Agreement* and section 89 of the *Nunavut Planning and Project Assessment Act*, these factors usually trigger a full

environmental review with significant public engagement. The HTO therefore strongly recommends any reconsideration of the project certificate for the Meliadine mine involve a public consultation process that includes public meetings organized by NIRB in all potentially affected communities, as well as an in-person public hearing. Further, the Baker Lake HTO requests participant funding to participate in the process.



Phillip Putumiraqtuq

Chairperson, Baker Lake Hunters and Trappers Organization