May 8, 2020

Tara Arko
Director, Technical Services
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Sent via e-mail to: info@nirb.ca

Re: NIRB File No.: 11MN034
Request for comments on Agnico Eagle Mines Limited's 2020 Saline Discharge Strategy Proposal and the Saline Effluent Discharge to Marine Environment Amendment for the Meliadine Gold Mine Project

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Dear Ms. Arko,

In response to the Nunavut Impact Review Board's (NIRB) request for comments, Nunavut Tunngavik Inc. (NTI) is providing the following submission regarding Agnico Eagle Mines Limited (AEM) proposals, specifically the 2020 Saline Discharge Strategy Proposal and the Saline Effluent Discharge to Marine Environment Amendment for the Meliadine Gold Mine Project.

<u>2020 Saline Discharge Strategy Proposal</u>

AEM proposes to:

- increase the volume of saline effluent discharged directly into Melvin Bay during the 2020 open water season, which will result an increase in the maximum per day of discharge from the previously approved 800 m3 to 1600 m3; and;

- increase the amount of truck traffic on the all-weather road required to transport the additional volume of saline effluent groundwater between the Meliadine site and approved Itivia Harbour facility, which will result in an increase in the maximum daily trips from the previously-approved 16 round trips (32 one-way trips) per day to a maximum of 44 one-way trips per day.

NIRB acknowledges that public support of the 2018 Saline Effluent Discharge Project was contingent on two key commitments made by AEM, which are the current limits on both truck traffic and daily volumes of release of saline water into Melvin Bay. These limits are found in Commitment #13 and Commitment #20. NIRB further acknowledges that it relied on these key Commitments in determining that the potential for ecosystemic and socio-economic effects could be appropriately managed, mitigated and monitored.

NTI agrees that public support for 2018 Saline Effluent Discharge Project is directly linked to the previous maximum discharge level (800 m3) and maximum truck traffic (32 one-way trips). Both the Kangiqliniq Hunters and Trappers Organization and the Kivalliq Wildlife Board have expressed their concern about the proposed increases in the saline effluent discharge levels into Melvin Bay and the increased truck traffic. NTI is of the view that the new proposed discharge level and increased truck traffic, which surpass Commitments #13 and #20, changes the scale of activities to a level that may result in impacts that are not adequately mitigated. For this reason, the proposed modification constitutes a significant modification to the project as previously assessed.

NTI supports a NIRB assessment of the 2020 Saline Discharge Strategy Proposal that allows for concerns raised by Kangiq&linirmiut to be fully canvassed and addressed. In particular, Inuit concerns regarding the impacts of the proposed increases in discharge levels and truck traffic on wildlife, including on caribou, must be considered and resolved.

<u>Saline Effluent Discharge to Marine Environment Proposal</u>

The scope of activities proposed by AEM includes:

- constructing and operating a water line/pipeline to carry saline effluent from the Meliadine mine site to the existing facility at Itivia facility along the all-weather access road and by-pass road specifically and requires:
    - installation of two (2) waterlines of 16-inch diameter, running alongside the existing roads and within the easement of the existing roads,
    - connection of waterlines to a modified pump house/sampling station at the Itivia facility.
- installation, operation and decommissioning of a new pipeline extending from the pump house at the existing Itivia facility to a discharge location in Melvin Bay and requires:
    - a discharge location approximately 250 metres (m) northwest of the existing approved pipeline;
    - use of horizontal directional drilling method to construct an underground corridor for the pipeline;
    - a pipeline that would extend underground from the pump house to approximately seven (7) m depth below the water surface, and continue on the sea floor to an engineered diffuser at 20 m depth; and
    - a pipeline that would remain in place following decommissioning of the facility.
- discharge of saline effluent into Melvin Bay at a rate of 6,000 m3 to 12,000 m3 per day during the open water season.

NTI agrees with other Inuit organizations that this scope of activities constitutes a significant modification to the original project as previously assessed and approved by the NIRB. The main consideration is that the ecosystemic and socio-economic impacts, as well as the potential adverse impacts on wildlife and wildlife habitat from the key proposed activities were not assessed during the previous NIRB review. Proposed activities that have not been adequately assessed and may have

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significant impacts include the construction and operation of a waterline/pipeline from the Meliadine mine site to the Itivia installation, the operation and decommissioning of a new pipeline extending from the pump house at the existing Itivia facility to a new discharge location, and the proposed increased level of discharge of saline water into Melvin Bay.

NTI recommends that all proposed activities that have not been sufficiently reviewed previously be assessed by NIRB. There are numerous Inuit concerns regarding the proposed activities, including issues related to the protection of caribou, other wildlife, as well as reliable access to harvesting areas on a year-round basis supporting community access to country food.

These critical issues require review to ensure activities only proceed in a way that adequately mitigates impacts and simultaneously address Inuit concerns.

Sincerely,

Bert Dean

Assistant Director, Department of Wildlife and Environment

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