

May 13, 2020

Tara Arko  
Director of Technical Services  
Nunavut Impact Review Board  
PO Box 1360  
Cambridge Bay, NU X0B 0C0

**Re: Agnico Eagle's Response to Comments Received for Agnico Eagle's 2020 Saline Discharge Strategy**

Dear Ms. Arko,

Thank you for providing comments received by the Nunavut Impact Review Board (**NIRB**) on or before May 8, 2020 on Agnico Eagle Mines Limited's (**Agnico Eagle**) "2020 Saline Discharge Strategy". Agnico Eagle has summarized these comments by theme in the attached table, and provided its response. Agnico Eagle thanks all interveners and individuals that provided their comments within this process.

As Agnico Eagle has emphasized, it plans to implement the 2020 Saline Discharge Strategy as soon as possible. Should you have any questions or require further information, please contact the undersigned.

Regards,



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Regional Manager - Permitting & Regulatory Affairs

## Summary of Agnico Eagle Responses to Comments to NIRB on the 2020 Saline Discharge Strategy

Themes	Intervenors/General Public	Primary Themes	Responses
<b>Caribou</b>	GN BLHTO KHTO KivIA KWB Public	Potential for increased traffic to have effects on caribou.	<p>Current practices and requirements will continue to be protective of caribou during the 2020 Saline Discharge Strategy. The TEMP already includes stringent monitoring such as behavior monitoring and review of collaring data to assess effect of the project on caribou population. Agnico Eagle continues to be committed to updating the TEMP where indicated to address any issues which are identified through the monitoring program.</p> <p>The TEMP already includes detailed caribou protection measures, including provisions to close the AWAR during caribou migration. Implementation of this mitigation has been done since approval of the Project Certificate and has been successful and completed in close collaboration with KivIA, GN and HTO.</p>
<b>Dust</b>	ECCC	Question regarding enhanced dust mitigation measures	<p>Agnico Eagle is required to comply with very strict dust suppression measures, which will continue to apply during the 2020 Saline Discharge Strategy. These measures include applying dust suppressant on the AWAR. Lessons learned have been integrated into dust application techniques. For example, in 2020, Agnico Eagle has assessed dust suppressant effectiveness following application and additional suppressant was placed in areas that were missed/misapplied/showed higher dust emissions. During the 2020 Saline Discharge Strategy, applicable dust guidelines will continue to be met. As a longer term strategy, implementation of the water line will during 2021 will eliminate all traffic on the AWAR relating to saline water transport.</p>
<b>Marine</b>	KivIA ECCC BLHTO Public	Potential for effects of saline discharge on the marine environment	<p><b>Federal Jurisdiction over Marine Discharge</b></p> <ul style="list-style-type: none"> <li>Overall, discharges under the 2020 Saline Discharge Strategy will continue to comply with all applicable requirements.</li> <li>The MDMER are a complete regulatory framework which provides for protective discharges to the marine environment in compliance with the MDMER and the <i>Fisheries Act</i>. Discharge criteria and volumes are not set by the Project Certificate. Discharge criteria and reporting criteria with respect to volumes are set by the MDMER and are a legal requirement which Agnico Eagle will follow. This will ensure there are no negative effects to marine ecosystems or ability of Inuit to fish.</li> <li>As confirmed by ECCC, the federal regulatory authority with jurisdiction over discharge to the marine environment, the 2020 Saline Discharge Strategy is within the previously assessed scope for the Meliadine Gold Mine.</li> </ul> <p><b>Change in flow history</b> The original discharge rate of 800 m3/day presented in the FEIS Addendum was based on a maximum groundwater inflow rate of 420 m3/day (from the 2016 Golder model), TDS reduction and a discharge duration of 365 days per year at 100% availability.</p>
<b>Timeline and Regulatory Process</b>	KivIA	Whether additional NIRB process is necessary with respect to 2020 Saline Discharge Strategy	<p>Given the comprehensive monitoring and mitigation framework (including existing project certificate terms and conditions) that already applies to road traffic and marine discharge activities at Meliadine, as well as the MDMER which stringently regulates discharges to the marine environment and ensures that such discharges would not cause any significant environmental effects, Agnico Eagle does not agree that any further NIRB processes should be undertaken in relation to the 2020 Saline Discharge Strategy.</p>

<b>Other Issues</b>	C. Kanaan, former employee	Operation of the Salt Water Treatment Plant (SWTP) and discharges to Meliadine Lake	<p>Mr. Kanaan is a former employee of the company.</p> <p>Mr. Kanaan raises questions about the operation of the SWTP and discharge criteria to Meliadine Lake. Respecting the SWTP, AEM has reported on the performance challenges which we have encountered. These are outlined in the 2019 Annual Report and in the Groundwater Management Plan included as Appendix B to the FEIS Addendum. The SWTP treats limited volumes of groundwater which is then discharged to CP1 and ultimately Meliadine Lake. The operation of the SWTP and the discharge criteria to Meliadine Lake are not part of the strategy currently under consideration by NIRB.</p>
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