

July 9, 2020

Dear Andrea Omilgoitok
Nunavut Impact Review Board,

Re: Reconsideration process pertaining to NIRB's assessment of AEM's "saline effluent discharge strategy to marine environment" project proposal.

I am writing to express my opposition and dire concern to Agnico Eagle's recent proposition to expedite their proposal to the Nunavut Impact Review Board to alter their project certificate to grant them permission to build a dual "waterline" system across the Qamanirjuaq caribou migratory route, to discharge a large volume of saline effluent from Meliadine gold project into Melvin Bay's marine environment, in a manner that was not previously proposed nor assessed, nor introduced to affected communities or regulators. Proper time to prepare for such a significant undertaking has not been provided to community members who oppose the project.

Over the past week, I have reviewed an exhausting amount of documentation related to this project and I must say, the findings have been incredibly troubling. I have noticed the "Proponent," Agnico Eagle Mines Limited has demanded a rapid regulatory approval without complimentary evidence to back their desired outcome. The pipeline or waterline project is likely to have a major, adverse and detrimental effect on the Qamanirjuaq caribou herd, which has a vitally important cultural connection to the people of Rankin Inlet and well beyond. It is unrealistic to expect the average resident of Rankin Inlet to be aware of the proposed changes, let alone prepare for a hearing in such a condensed manner as desired by the Proponent.

The Government of Nunavut's recent report in regards to Agnico Eagle's 2019 annual summary should be considered before further proposals from Agnico Eagle are rubberstamped. The findings from the GN on Agnico Eagle's caribou reporting present a clear cut picture of a company that has brazenly violated the terms and conditions of the existing project certificate, even before more potential harmful impacts are installed which could lead to an even worse outcome for the caribou. Below, in this e-mail, I have highlighted focal points which I would like to present to the NIRB in consideration of whether Agnico Eagle should have their way in obtaining a rapid approval for their pipeline system across our caribou migratory route. It seems absolutely necessary for Agnico Eagle to satisfy the existing terms before being granted additional rights to construct a twin waterline across a crucial caribou migratory zone.

As a casual observer who came from the south to love Rankin Inlet, it is crystal clear to me that Agnico Eagle has not fulfilled their promises to the Nunavut

Impact Review Board or community members, nor have they properly proposed their “waterline” to community members in Rankin Inlet. Indeed, they have also failed to properly present meaningful evidence that could convince the community that their waterline proposal will not have adverse, likely significant, impacts on the Qamanirjuaq caribou herd or impact the marine environment with their large volume salty effluent discharge (which may also contain traces of metal and more, according to Agnico Eagle.)

Agnico Eagle ***must*** go back to the bargaining table and re-present their proposal the community of Rankin Inlet with appropriate scientific studies to assure the community that their proposal will not further harm their local wildlife and ecosystem. Gold production scheduling is not senior to the well-being of Rankinmuit or land that has preserved a rich culture for generations.

Thank you,

Leah Wiseman

(Information sourced from Government of Nunavut’s response to Agnico Eagle’s 2019 annual report, posted on the Nunavut Impact Review Board site on July 6, 2020)

GN-01: Carbiou Behavioural Observations

- Government of Nunavut says Agnico Eagle’s Meliadine FEIS, with respects to caribou, may no longer be reliable.
- 72% of the Qamanirjuaq herd interact with Meliadine’s all-weather-access-road .
- That Agnico Eagle is making opinions on the impacts of mine activity towards the Qamanirjuaq caribou herd rather than evidence on data analysis.
- Agnico Eagle is not meeting the standards of caribou monitoring
- The Government of Nunavut has “low confidence” in Agnico Eagle’s conclusions

GN-02: Trends In Caribou Distribution

- Since the project was assessed by the NIRB in 2014, the interaction between the project and the Qamanirjuaq caribou herd has increased *dramatically*.
- Agnico Eagle has refused to acknowledge, studied, reported, or analyzed in detail as required by the project certificate.
- Qamanirjuaq caribou herd residency time in the RSA zone has increased from 4-days to 11-days since the mining project began.
- Government of Nunavut says Agnico Eagle's Meliadine FEIS, with respects to caribou, may no longer be reliable.
- Urgent need to revise TEMMP due to changes in baseline conditions

GN-03: Caribou Sensory Disturbance

- Agnico Eagle has not submitted evidence to support their own findings
- Government of Nunavut finds Agnico Eagle's submissions "impossible" for their technical reviewers to assess.
- Finds Agnico Eagle is not adhering to terms and conditions (56/57) of project certificate

GN-04: Caribou Harvest Along The AWAR

- Government of Nunavut cannot determine if #48 of the terms and conditions of the project certificate were being upheld because Agnico Eagle omitted information.
- Government of Nunavut says Agnico Eagle is out of compliance with the AWAR Road Management Plan and has not been following the rules on reporting requirements.

GN-05: CPM Compliance

- Government of Nunavut cannot verify whether Agnico Eagle have followed caribou monitoring and protection protocols
- Despite multiple requirements to do so (46, 56, 67), Agnico Eagle does not present, analyze or summarize, caribou observation data collected via wildlife surveys alongside the AWAR and incidental observations.
- Government of Nunavut states that Agnico Eagle has demonstrated a lack of transparency and "significant gap" in reporting required caribou monitoring data.

- The insufficient and lack of data provided by Agnico Eagle makes it impossible for the Government of Nunavut to verify whether the company is following the conditions of the project certificate.

- Agnico Eagle's caribou reporting below the standard required for the project certificate