



NIRB File No.: 11MN034
NWB File No.: 2AM-MEL1631
NPC File No.: 149337

July 17, 2020

To: Jamie Quesnel
Regional Manager – Permitting and Regulatory Affairs
Agnico Eagle Mines Limited
Baker Lake, NU X0C 0A0

Sent via email: jamie.quesnel@agnicoeagle.com

Re: Further Guidance for Impact Statement Addendum Regarding Agnico Eagle Mines Limited's "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine, Nunavut" Project Proposal

Dear Jamie Quesnel:

On June 15, 2020 the Nunavut Impact Review Board (NIRB or Board) issued correspondence to Agnico Eagle Mines Limited (Agnico Eagle), which provided guidance regarding the preparation of an Impact Statement Addendum (IS Addendum) to support the NIRB's assessment of the potential ecosystemic and socio-economic impacts associated with the "Saline Effluent Discharge to Marine Environment" Project Proposal (the Project Proposal). The NIRB guidance identified specific information requirements expected to be provided in the IS Addendum, requiring Agnico Eagle to update its April 7, 2020 submission.¹ On June 19, 2020 Agnico Eagle provided a response to the NIRB providing clarification on several items and providing supplemental information. Agnico Eagle also expressed their view that the April 7, 2020 submission meets the key information requirements identified by the NIRB.

The NIRB has completed the conformity review of Agnico Eagle's April 7, 2020 submission, as well as all supplemental information provided to date, and has determined that the submissions do not conform to the relevant requirements of the Environmental Impact Statement Guidelines (EIS

¹ Agnico Eagle Mines Limited (2020). *Meliadine Gold Mine – Final Environmental Impact Statement Addendum, Environmental Assessment of Treated Groundwater Effluent Discharge into Marine Environment, Rankin Inlet*. [Public Registry ID: 329232 and 329233]

Guidelines) for the Meliadine Gold Mine Project² applicable to the Board's assessment of the Project Proposal, nor does it meet the minimum EIS requirements as set out under Section 12.5.2 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and s. 101(3) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*). The NIRB has concluded that the scope and content of the information provided to date by Agnico Eagle as the IS Addendum is not sufficient to allow for technical review by the parties and a complete and thorough assessment of the Project Proposal by the Board.

This correspondence is intended to identify the deficiencies in the April 7, 2020 submission (including supplemental information provided to date) which must be addressed to facilitate an efficient technical review of the document by all parties. Until the deficiencies in the submission as identified by the NIRB in [Appendix A](#) of this letter have been addressed and the NIRB subsequently determines that the IS Addendum conforms with the EIS Guidelines and previous NIRB guidance specific to the Project Proposal, the technical review of the submission will not commence. Further to the NIRB's June 15, 2020 correspondence, the IS Addendum should be prepared as a stand-alone document capable of supporting an assessment process. To that end, the NIRB suggests that Agnico Eagle complete a comprehensive update and provide a revised, comprehensive IS Addendum submission, that describes all aspects of the Project Proposal and clearly highlights the updates to the previously-approved Meliadine Gold Mine Project necessary to carry out the Project Proposal.

SUMMARY OF FINDINGS

Areas of non-conformity have been summarized below, and additional details regarding requirements to achieve conformity are also provided in Board's conformity assessment provided in [Appendix A](#).

1) **Supporting evidence:**

The IS Addendum should be a stand-alone document, which ensures that relevant baseline and monitoring data collected, and any other supplemental supporting information that is required to support the analysis and conclusions of the impact assessment are readily available to reviewers of the IS Addendum. As currently presented, there is insufficient information provided in the IS Addendum to allow reviewers to assess the accuracy of impact predictions presented and/or to evaluate the adequacy of Agnico Eagle's proposed mitigation, environmental management and monitoring measures. General references directing reviewers to access documents such as previous annual reports from the NIRB's registry, to refer back to the 2014 Final Environmental Impact Statement (FEIS) for the Meliadine Gold Mine Project, or to the FEIS Addendum for the 2018 Saline Effluent Discharge Proposal, are not sufficient. While the Board recognizes that the assessment of the Project Proposal will necessarily involve references to relevant information from previous assessments, the Proponent should make efforts to ensure summaries of the evidence and supporting information specifically relevant to the assessment of this Project Proposal from

² Guidelines for the Preparation of an Environmental Impact Statement for Agnico-Eagle Mines Ltd.'s Meliadine Project (NIRB File No. 11MN034). Issued by the Nunavut Impact Review Board, February 20, 2012. [Public Registry ID: 286775].

previously-filed sources is provided. Adequate and accessible evidence should be presented to show how conclusions were reached (e.g. scientific data, analysis, rationale, community provided knowledge, *Inuit Qaujimaningit*, *Inuit Qaujimajatuqangit*, etc.) that allows parties to assess the adequacy of the impacts assessment.

2) Project Description and Scope:

While the current submission describes aspects of the Project Proposal in detail, key information necessary to fully understand how the proposed project would be carried out is missing. In order to understand the scope and scale of the Project Proposal, more information and detail should be provided, including:

- Labelled maps and figures of appropriate scale and resolution;
- Design specifications for all project components;
- Outline of all activities and project phases;
- Identification of future foreseeable development; and
- An alternatives assessment that considers and assesses the impacts of alternatives to the Project Proposal.

3) Public Engagement and Incorporation of *Inuit Qaujimaningit* and *Inuit Qaujimajatuqangit*:

The application states that one (1) open house in Rankin Inlet was held in March 2020 to consult with the community specific to the current project proposal. While the NIRB recognizes that additional meetings took place with key stakeholders and regulatory authorities, these meetings should not be considered a substitute for public engagement with members of the affected communities. The Proponent should consider more opportunities for public engagement with affected communities specifically with respect to the Project Proposal and the IS Addendum. The NIRB's assessment process should not be relied upon by Agnico Eagle to fulfill public engagement obligations in respect of the Project Proposal.

The NIRB acknowledges that Agnico Eagle has made efforts to provide a response (May 13, 2020) to the concerns of the community and regional organizations that were raised in response to the NIRB's initial request for comment about the Project Proposal. Additionally, the NIRB acknowledges Agnico Eagle's submission on July 15, 2020, detailing further community consultation events held about the Project Proposal including a booth at the Northern store, a "coffee and chat" held within the Agnico Eagle Rankin Inlet office and Facebook posts.

However, as made clear in the Board's IS Guidelines, the Board expects that community concerns, *Inuit Qaujimaningit* and *Inuit Qaujimajatuqangit* will be incorporated throughout the revised IS Addendum, including providing information regarding how this feedback has informed the project design, selection of valued components (VCs), determination of impact significance, conclusions of the effects assessment, proposed mitigation measures, and updates to relevant management and monitoring plans. The IS Addendum should also show how the potential for impacts on VCs identified through public engagement as significant to the community, were assessed in a manner that reflects their importance to the community. A complete summary of public engagement which shows how affected communities have been consulted and how their information has been

considered by the Proponent in the development of the Project Proposal, the assessment of potential impacts and the design of any proposed mitigation, management and monitoring measures is required.

4) **Environmental Management System**

While some of the updates to management and monitoring plans that would be required to support implementation of the Saline Effluent Discharge to Marine Environment Proposal are provided, there are additional plans that are required to be updated and submitted as part of the revised IS Addendum.

Within its June 19, 2020 letter, Agnico Eagle has summarized that their approach to updating management and monitoring plans under this Project Proposal will be the same as the approach to developing management and monitoring plans employed during the previous assessment of the Saline Effluent Discharge to Marine Environment Proposal:

Agnico Eagle followed the approved approach from the 2018 FEIS Addendum in which two plans were submitted (Groundwater Monitoring Plan and the Ocean Discharge Monitoring [sic] Plan). Additional plans were provided with this Addendum to address the proposed change to the project.

All Plans will continue to be updated if and when there are significant changes to the management and monitoring for the Meliadine Mine.³

The NIRB highlights that the context of the Board's assessment of the 2018 Saline Effluent Discharge to Marine Environment Proposal was different than the Board's assessment of the current Project Proposal. It is expected that the benefit of experience and monitoring following the implementation of the previously-approved Saline Effluent Discharge to Marine Environment Proposal should inform Agnico Eagle's revisions to existing management and monitoring programs as required to reflect the current context of the Project Proposal. The Board is not limited to the approaches to updates and information requirements that were adopted in the Board's previous assessments, and the Board is entitled to select the information requirements and appropriate process necessary to conduct an assessment of this Project Proposal, reflecting the scale and scope of the Project Proposal and the up-to-date context. Therefore, it is expected that in the revised IS Addendum Agnico Eagle will clearly identify the changes/updates to existing management and monitoring plans that are being proposed by the Proponent to reflect the Project Proposal. In the Board's view, this information is required to ensure that the Board and interested parties are able to understand Agnico Eagle's approach and are able to comment on the changes/updates during the technical review of the Project Proposal.

³ Agnico Eagle Mines Limited Letter to Nunavut Impact Review Board, Re: Notice and Guidance Regarding the Nunavut Impact Review Board's Processing of Agnico Eagle Mines Limited's "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine, Nunavut" Project Proposal; Guidance for Impact Statement Addendum Regarding Agnico Eagle Mines Limited's "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine, Nunavut" Project Proposal. June 19, 2020.

5) General Comments

Although under the NIRB's Rules of Procedure (September 2009)⁴, the NIRB normally would require submission of a hard copy version of the IS Addendum prior to the commencement of the technical review of the Project Proposal, recognizing current public health restrictions involving travel and shipping from outside the territory, the Board will accept an electronic copy of the revised IS Addendum submission as long as it meets the following parameters:

- 1) The IS Addendum submission shall be in an accessible format so that a reviewer can search for text within the document(s), can copy structured text, images, document information, and the document(s) are not password protected.
- 2) Documents may be submitted in Microsoft Word, Microsoft Excel or PDF formats.
- 3) Agnico Eagle is encouraged to use different types of media (e.g., tables, figures, pictures, three-dimensional modeling, videos, etc.), in addition to text materials, to present project information to help a wider audience understand project information in different ways.
- 4) The IS Addendum submission shall be uploaded to the NIRB's public registry (at www.nirb.ca/project/125515) for public review and shall respect the limited broadband of the north:
 - Each individual document size shall not be greater than 25 GB. If a document is required to be divided to meet this limitation, the separate parts to the document shall be developed in an accessible format as described in point #1 so that a reviewer can find the material(s) they are searching for.
- 5) A copy of the full IS Addendum submission (in accessible format) on a USB drive shall be mailed directly to the NIRB, care of Emily Koide.

CONCLUSION

The NIRB requests that Agnico Eagle review the enclosed appendix and advise the Board of its anticipated submission date for a revised IS Addendum to address the identified deficiencies and in conformity with the EIS Guidelines and specific guidance of the NIRB provided to date. Following receipt of Agnico Eagle's IS Addendum, the NIRB will conduct an internal check to confirm the submission received contains the necessary components, is provided in a format that allows parties to readily access relevant content, and fulfills the requirements of the NIRB directions. Following acceptance of the Proponent's IS Addendum, the Board will initiate a public technical review of the proposal, commencing with requests for information and formal technical review.

The NIRB appreciates the feedback provided by parties to date regarding recommended process and assessment timelines. As noted by several parties, as the Board's assessment of the Project Proposal continues as a reconsideration of the terms and conditions of Project Certificate, the Board's typical approach to reconsiderations may be modified as necessary to reflect the public health restrictions in place to prevent the spread of COVID-19. The Board is actively working to identify modifications to existing processes that may be necessary to comply with these restrictions while still fulfilling the Board's mandate and allowing for public engagement. Additional project-specific guidance will be provided when the Board accepts the revised IS Addendum.

⁴ <https://www.nirb.ca/rules-of-procedure>.

If you have any questions or require additional clarification, please contact the undersigned directly at kcostello@nirb.ca.

Sincerely,



Karen Costello
Executive Director
Nunavut Impact Review Board

Enclosures (1) Appendix A: NIRB Review of Agnico Eagle's April 7, 2020 submission for the Saline Effluent Discharge to Marine Environment Project Proposal.

cc: Meliadine Distribution List
Manon Turmel, Agnico Eagle Mines Limited
Michel Groleau, Agnico Eagle Mines Limited
Stephanie Autut, Nunavut Water Board
Karén Kharatyan, Nunavut Water Board
Carson Gillis, Nunavut Tunngavik Inc.
Luis Manzo, Kivalliq Inuit Association
Natalie O'Grady, Government of Nunavut
Amy Robinson, Government of Nunavut
Saba Qazi, Northern Projects Management Office
Adrian Paradis, Northern Projects Management Office
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs Canada
John Olyslager, Environment and Climate Change Canada
Daniel Coombs, Fisheries and Oceans Canada
Anita Gudmundson, Transport Canada

APPENDIX A: NIRB CONFORMITY REVIEW OF AGNICO EAGLE'S APRIL 7, 2020 SUBMISSION FOR THE "SALINE EFFLUENT DISCHARGE TO MARINE ENVIRONMENT" PROJECT PROPOSAL

The following table provides an evaluation of Agnico Eagle's submission for the "Saline Effluent Discharge to Marine Environment" project proposal to determine whether it addresses the applicable requirements of the EIS Guidelines issued for the Meliadine Gold Mine Project⁵.

Item	Location			Conformity	Deficiencies
	Document	Section	Page		
Introductory Sections					
Concordance table	Agnico Eagle Letter NIRB (June 19, 2020)	Schedule B	12	Concordance table provided of Project Proposal (April 7, 2020) with NIRB Guidance (June 15, 2020) - Appendix A: Guidelines for the Completion of the IS Addendum for Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal.	
Executive Summary - English & Inuktitut <i>Available as a separate document that contains sufficient details for the reader to learn and understand the Project, potential ecosystemic and socio-economic impacts, mitigation measures, significance of residual effects and follow-up program</i>	Project Proposal (April 7, 2020)			Not provided	Provide summaries as described in first column.

⁵ Guidelines for the Preparation of an Environmental Impact Statement for Agnico-Eagle Mines Ltd.'s Meliadine Project (NIRB File No. 11MN034). Issued by the Nunavut Impact Review Board, February 20, 2012. [Public Registry ID: 286775].

Item	Location			Conformity	Deficiencies
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(Presented in English, French, Inuktitut)					
Popular (Plain language) Summary - English & Inuktitut <i>Non-technical summary for public review that provides an overview of the project being proposed and highlights information in the IS.</i>	Project Proposal (April 7, 2020)		i-v	Presence of information verified. Quality of information to be assessed during technical review.	
Proponent Information <i>Interests, management structures, operational experience, record of compliance, corporate policies, etc. The posting of performance bonds.</i>	Project Proposal (April 7, 2020)	1.1	1	Partial information provided.	Provide information on past experience with respect to saline effluent discharge, development of waterline/pipeline, and/or other relevant project components.
Regulatory Regime <i>Identification of requirements of all relevant environmental and socio-economic standards, laws, regulations, policies, guidelines and fiscal regimes relating to Project approval and all phases of the Project.</i>	Project Proposal (April 7, 2020)	2	3-4	Presence of information verified. Quality of information to be assessed during technical review.	Terms and Conditions # 28, 128, 129, 130, 131 are identified as relevant to the proposed project. Please note that the Proponent has not identified any terms and conditions related to terrestrial environment valued components that could be potentially affected by the proposed project activities.
Land Tenure <i>The interests in land and waters that the Proponent has acquired or seeks to acquire.</i>	Project Proposal (April 7, 2020)	1.1.1	1-2	Presence of information verified. Quality of information to be assessed during technical review.	
Project Components and Activities					
Project Design	Project Proposal			Partial information provided.	Provide more detail on how these factors have influenced the project design, with a focus on community concerns to date.

Item	Location			Conformity	Deficiencies
	Document	Section	Page		
<i>Explanation of how the Project design has been influenced by the biophysical environment, climate change, impacts to humans and communities, impacts to wildlife, socio-economic conditions, archaeological resources, public consultation, etc., and show how the Project has been designed to contribute to ecosystemic integrity and sustainable development.</i>	(April 7, 2020)				
Conservative or precautionary approach description	Project Proposal (April 7, 2020)	1.2.1	2	Presence of information verified. Quality of information to be assessed during technical review.	
Analysis of Need and Purpose (Rationale) of the Project <i>The purpose of the project and the need for the project. Should include why previous Commitments 13 and 20 were unachievable.</i>	Project Proposal (April 7, 2020)	3.2	8-9	Partial information provided.	Provide more discussion on the reasons why groundwater inflows are exceeding predictions, and why the already approved discharge volumes are not sufficient (including why Commitments 13 and 20 were unachievable). Provide rationale for the proposed discharge volume of 6,000 to 12,000 m ³ /day, and the reason for the range in volume. What has changed from the groundwater modelling provided during the Board's prior assessment of the Saline Effluent Discharge to Marine Environment Proposal versus the modelling for the current Project Proposal to justify the need for increased discharge volumes?
Project Description and Project Phases <i>Detailed project description and timelines. Provide context/visualizations and illustrations for community understanding.</i>	Project Proposal (April 7, 2020)	3.1-3.3	5-16	Partial information provided.	Provide more detail regarding the Project Proposal to clearly describe the scope of what is being proposed (e.g. spacing between the waterlines, inner and outer diameter, any other design specifications). Provide the proposed location and design of the wildlife crossings and traditional land use crossings for the waterline along the all-weather access road. Provide details on the treatment of the groundwater prior to discharge, including a description of the current process and how the treatment process will be scaled to accommodate the increased volumes proposed. Provide more details on proposed timelines for construction, operation and closure, including details of closure and reclamation of project components. Provide either within this section and/or within

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					Introductory Sections of the IS Addendum illustrations and visualizations of project components to provide context to the scale and scope of the proposal.
Future Development <i>Conceptual design of foreseeable development to ensure no "project splitting".</i>	Project Proposal (April 7, 2020)			Not provided.	Provide information regarding foreseeable future developments. For example, what contingency plans are being considered if groundwater inflows are higher than predicted in the current project proposal and/or discharge criteria cannot be met. Additionally, is there any other foreseeable development of the Meliadine Gold Mine Project or in a regional context that would affect or interact with the project proposal.
Alternatives Assessment <i>The options for carrying out the project that are technically and economically feasible and the anticipated ecosystemic and socio-economic impacts of such options.</i>	Project Proposal (April 7, 2020) Agnico Eagle Letter NIRB (June 19, 2020)	3.4; Table 1	16-22; 20	Partial information provided.	Options for alternatives to discharge rates, conveyance mode (truck vs. waterline, waterline size and number), discharge location, timing of discharge, construction method for discharge pipe. Very limited assessment of the anticipated ecosystemic and socio-economic impacts of alternatives is provided. Provide any high-level/overall alternatives to the Project Proposal including a "no-go" scenario. As well, provide details of alternative construction schedules, on-site storage or treatment options and discharge rates and volumes with an analysis at a level of detail which would allow parties to compare proposal with alternatives in terms of economic and environmental costs, as well as impacts or benefits (e.g. the application notes that the project components were designed to accommodate a maximum discharge rate of up to 20,000 m ³ /day. If this is considered as a viable future option, provide the analysis of the potential impacts associated with this volume). Reference to "Golder. 2019a. Meliadine Ocean Discharge - High Level Alternatives Assessment. Dated 4 February 2020." not provided with application. Provide the relevant reference material for the assessment of alternatives. Greater detail should be provided regarding alternatives to the Project Proposal that have been considered by the Proponent if the 2020 timeline for construction of the pipeline proposed by Agnico Eagle in the application is not met.
Economic and Operating Information <i>Project development and closure costs, employment opportunities, contracting, employment benefits and programs, communities of</i>				Incomplete or not found	Provide more details on project development and closure costs/economics, and employment and contracting opportunities associated with the Project Proposal.

Item	Location			Conformity	Deficiencies
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hire and commuting arrangements.					
Maps and figures that clearly convey the components of the Project. <i>Of appropriate scale and resolution.</i>	Project Proposal (April 7, 2020)			Figures provided, but not of high enough resolution.	Figures 1, 2, 3, 4a, 4b, 5 as currently provided were not of high enough resolution to read text and identify project components. There are no visuals provided that identify the location of existing project infrastructure related to saline discharge at Itivia. Figures, satellite images and maps must be labelled appropriately to identify components. Consider providing a more detailed map showing the route of the waterline and identifying the location of any water crossings, designed wildlife crossings or traditional land use crossings.
Impact Assessment Methodology					
Summary of public consultation, concerns and Proponent response <i>Highlights of public engagement with relevant communities and organizations conducted prior to IS development. Must include a summary of key dialogues and identified concerns from public engagement, as well as any Proponent commitments to the communities. Should consider comments received from community and regional organizations and individuals in determining content and priority of items discussed, as well as within VC sections.</i>	Project Proposal (April 7, 2020)	5.0-5.1	28-35	Partial information provided.	The application states that one (1) open house in Rankin Inlet was held in March 2020 to consult with the community specifically on the current project proposal. A supplemental consultation report was submitted on July 15, 2020, detailing further community consultation events held including a booth at the Northern store, a “coffee and chat” held within the Agnico Eagle Rankin Inlet office and outreach by radio and Facebook posts. The report also indicated a summary of meetings and planned meetings with key stakeholders and regulatory authorities. While the NIRB recognizes that additional meetings took place with key stakeholders and regulatory authorities, these meetings should not be considered a substitute for public engagement with members of the affected communities. The Proponent should consider more opportunities for public engagement with the affected community(ies) that can be incorporated into its resubmission of the IS Addendum, and should not be relying on the NIRB process to form part of its obligations towards public engagement. The Proponent shall provide a summary of the public engagement that shows that the community was adequately consulted and understands the scope and scale of what is being proposed. A complete summary of those engagement sessions is required, as well as any follow-up engagement that is planned and should form part of the IS Addendum submission. The Proponent shall show how community concerns were incorporated throughout the IS Addendum, including within the project design, effects assessment, selection of valued components (VCs), determination of significance of impacts, conclusions, mitigation measures and management and monitoring plans.
Summary of Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional Knowledge and	Project Proposal (April 7, 2020)	5.2	35-36	Partial information provided.	Please provide a complete discussion of all relevant <i>Inuit Qaujimaningit</i> and <i>Inuit Qaujimajatuqangit</i> , Traditional Knowledge and Community Knowledge collected, including for the marine environment that was considered in the development of the Project Proposal, impact assessment and design of

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<p>Community Knowledge collected and how incorporated.</p> <p><i>Discussion of how Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional Knowledge and Community Knowledge was weighted and incorporated in areas such as baseline data collection, impact predictions, significance assessment, development of mitigation and monitoring plans.</i></p>					mitigation, management and monitoring measures. The Proponent should consider updating its studies from 2010, 2011 to reflect contemporary and evolving <i>Inuit Qaujimajatuqangit</i> , especially considering that components of the Meliadine Gold Mine Project, such as the all-weather access road, have been in operation now for several years.
<p>Baseline Information Collection and use of existing information.</p> <p><i>Description of baseline data incorporating latest monitoring data, use of existing information (e.g. "lessons-learned" from previous projects).</i></p>	Project Proposal (April 7, 2020)	6	37-41	Partial summary provided.	Provide all baseline data and monitoring data including any reports or analyses that support the assessment and were used to reach conclusions in respect of this specific Project Proposal. Provide a summary and present major data that is relevant to the assessment when referencing the 2018 FEIS Addendum or other documents such as annual reports. Provide a full summary of the existing environment, (including, if possible, excerpts rather than general cross-references to relevant information in the 2018 FEIS Addendum.) For the existing environment description, there is reference monitoring and analysis that is contained in monitoring and management plans. However, the versions of these monitoring or management plans provided as Appendices to the application, do not contain the raw baseline data, monitoring data and analysis required.
<p>Assessment Boundaries</p> <p><i>Identification of spatial and temporal boundaries.</i></p>	Project Proposal (April 7, 2020)	4; 7.1	24; 42	Partial information provided.	Clearly specify the temporal boundaries for the current Project Proposal. The application states "... <i>approach used to determine the temporal boundaries of potential effects the same as the existing and approved FEIS Addendum (Agnico Eagle 2018).</i> " (p. 42).
<p>Valued Components (VCs)</p> <p><i>Identification of VCs, processes and interactions that are likely to be affected by the Project. Description of method of selection and</i></p>	Project Proposal (April 7, 2020)	4; 7.2	25-27; 47-50	Presence of information verified. Quality of information to be assessed during technical review.	Consider carrying forward all VCs relevant to the current Project Proposal into the effects assessment.

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<i>assessment of adverse impacts or potential benefits of the Project on the VCs.</i>					
Study Strategy and Methodology <i>Explain how scientific data, Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional Knowledge, Community Knowledge etc., was used to reach IS conclusions.</i>	Project Proposal (April 7, 2020)	8.1	51-57	Presence of information verified. Quality of information to be assessed during technical review.	
Impacts of the Environment on the Project <i>The anticipated effects of the environment on the project, including effects associated with natural phenomena, such as geotechnical hazards, severe weather events such as higher than anticipated precipitation.</i>	Project Proposal (April 7, 2020)	8.1.6	65-66	Partial information provided.	Provide information that considers for example: geotechnical hazards or impacts of climate change on the waterline or project overall; volume of groundwater or discharge needs affected by climate change; impacts of hydrological conditions (low/high precipitation years) on groundwater volumes required to be discharged, etc.
Cumulative effects assessment <i>The cumulative ecosystemic and socio-economic impacts that could result from the impacts of the project combined with those of any other project that has been carried out, is being carried out or is likely to be carried out.</i>	Project Proposal (April 7, 2020)	8.1.3	63	Not provided. The application states "Cumulative effects are only completed for primary pathways. No pathways were identified as primary for this Project. Therefore, a cumulative effects assessment was not completed." (p. 63)	Provide a cumulative effects assessment that considers the potential effects of the current project proposal in combination with the existing approved project activities. For example, consider the cumulative effects of the waterline in addition to the existing AWAR and impacts to wildlife and wildlife harvesting, or the effects of increased volume of discharge to the marine environment and impacts to marine wildlife. Consider that pathways determined as "minor" could combine with other/existing activities to create a "primary" pathway.

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Indicators and Criteria <i>Identification of indicators (measures) and criteria for effects assessment</i>	Project Proposal (April 7, 2020)	8.1.1	51	Presence of information verified. Quality of information to be assessed during technical review.	
Significance Determination <i>Determination of significance and link back to predictions in FEIS (2015) and FEIS Addendum (2018)</i>	Project Proposal (April 7, 2020)	4	25-27	Partial information provided.	Provide or define significance terms/measures for this assessment and how those significance determinations were made. If a VC is considered to have a “minor” linkage, enough data, analysis methods, summary of literature, community provided knowledge, <i>Inuit Qaujimaningit</i> and <i>Inuit Qaujimajatuqangit</i> that factored into the determination of a “minor” linkage should be provided for parties to understand the rationale behind the determination and be able to assess whether they support the conclusion.
Certainty <i>Uncertainty or limitations in effects assessment</i>	Project Proposal (April 7, 2020)	8.1.4	63	Partial information provided.	Provide more detail or discussion. For example, consider uncertainty regarding potential caribou response to the waterline. Consider other aspects of uncertainty related to groundwater inflows, dispersion modelling, climate change, unexpected high precipitation years, etc.
Project Environment and Impact Assessment					
Impact Assessment: Biophysical, Socio-economic, Human Health and Environmental Risk, Accidents and Malfunctions. <i>The anticipated ecosystemic and socio-economic impacts of the project, including those arising from the effects of the environment on the project. Including what effects were or were not previously assessed.</i>	Project Proposal (April 7, 2020)	8.1	51-63	Partial information provided.	Consider carrying forward all VCs relevant to the current project proposal into the effects assessment including those previously assessed. Provide key reference materials if they are used to support or reach the conclusions presented (e.g. ERM 2020?). Provide evidence (scientific, <i>Inuit Qaujimaningit</i> and <i>Inuit Qaujimajatuqangit</i>) for the conclusions of the effects assessment or pathways analyzed. Consider the significance that parties and communities have assigned to specific VCs (e.g. caribou) when making determinations of significance or pathway analysis. Determination of impacts should be considered against baseline data or a pre-disturbed environmental state as much as possible. Human Health and Environmental Risk Assessment is considered relevant and is required. The assessment should consider project-human interactions such as harvesting of marine wildlife, considering the discharge volumes proposed and potential effects to marine environment. Accident and Malfunctions Assessment is considered relevant and is required. The assessment should include a description of any accidents/spills, etc., that could occur as a result of the proposed project activities (e.g. collisions with waterline, accidental release/spill of saline effluent along the AWAR) and a

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					description of any contingency, clean-up or restoration of the affected environment that would be required.
Proposed mitigation measures	Project Proposal (April 7, 2020)	8.1.2; 8.1.5	52-63; 64	Presence of information verified. Quality of information to be assessed during technical review.	
Identification & classification of residual effects <i>For each VC, clearly indicating probability; positive vs. negative; magnitude and complexity; geographic extent; frequency and duration; reversibility.</i>				Not provided.	No residual effects identified as there were no primary pathways identified in the pathway analysis. Re-assessment of this section should be done following carry forward of all relevant VCs and re-evaluation of pathway linkages considering input of community concerns, updated <i>Inuit Qaujimaningit</i> and <i>Inuit Qaujimajatuqangit</i> , cumulative effects assessment, etc.
Significance of residual effects				Not provided.	No residual effects identified as there were no primary pathways identified in the pathway analysis. Re-assessment of this section should be done following carry forward of all relevant VCs and re-evaluation of pathway linkages considering input of community concerns, updated <i>Inuit Qaujimaningit</i> and <i>Inuit Qaujimajatuqangit</i> , cumulative effects assessment, etc.
Link back to predictions made in the FEIS or FEIS Addendum (2018) <i>For each VC, indicate what if any changes are predicted in terms of potential effects, residual effects, and significance determination.</i>	Project Proposal (April 7, 2020)	4; 8.1.2	24-27; 51-57	Presence of information verified. Quality of information to be assessed during technical review.	

Item	Location			Conformity	Deficiencies
	Document	Section	Page		
Environmental Management System					
Stand-alone management and monitoring plans or management plan updates. <i>Must include monitoring methodology, sampling locations, frequency and duration, thresholds for adaptive management and mechanism to evaluate the effectiveness of mitigation measures.</i>	Project Proposal (April 7, 2020)	8.1.5; and Appendices B through F	64-65	Provided: <ul style="list-style-type: none">• Groundwater Management Plan (Appendix B)• Spill Contingency Plan (Appendix C)• Roads Management Plan (Appendix D)• Erosion and Sediment Control Plan for the Treated Groundwater Effluent Discharge Project (Appendix E)• Ocean Discharge Monitoring Plan (Appendix F)	<p>Update and provide all management and monitoring plans that are relevant to components and interactions of the project proposal. Plans that were requested but not provided include:</p> <ul style="list-style-type: none">• Air Quality Monitoring Plan• Water Management Plan• Water Quality and Flow Monitoring Plan• Noise Abatement and Monitoring Plan• Dust Management Plan• Greenhouse Gas Reduction Plan• Terrestrial Environment Management and Monitoring Plan• Risk Management and Emergency Response Plan• Interim Closure and Reclamation Plan• And any other plans that are associated with the project proposal <p>If a plan has been recently updated and provided to the NIRB under separate cover, please indicate whether those updates included this project proposal and provide the location of the plan (Document ID on the NIRB Public Registry) for reference, or resubmit the relevant excerpts of the updated plans with the revised IS Addendum.</p>