September 9, 2020

Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Subject: Comments on Agnico Eagle's IS Addendum submission (File: 11MN034)

Dear Nunavut Impact Review Board,

As per the August 27, 2020 information letter sent by Ms. Evetalegak, I would like to thank the Board for permitting me to respectfully submit multiple information requests to the Proponent, Agnico Eagle Mines Limited, in regards to the current application for the Saline Effluent Discharge proposal, currently before the Nunavut Impact Review Board for consideration.

Sincerely,

Chris Kanaan

(438) 345-2223
chriskanaan@yahoo.com

IR Source:	Christopher Kanaan
IR Number:	IR-01
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Ensuring a proper consultation
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331287&applicationid=125515&sessionid=fucg33bpfpukqqti5b7n0otpr2 Agnico Eagle's Waterline Consultation Report, pages 15 to 38
Issue/Concern:	Agnico Eagle provided many of the questions that they received from Rankinmuit but did not provide answers on behalf of the company to any of the questions in their consultation report
Information Request:	. It would be of utmost usefulness if Agnico Eagle relays the answer to each and every individual question[1] and provide an explanation in the case where they may decline or not answer a question.

IR Source:	Christopher Kanaan
IR Number:	IR-02
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Ensuring a proper consultation
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331287&applicationid=125515&sessionid=fucg33bpfpukqqti5b7n0otpr2, page 5

Issue/Concern:	Agnico Eagle did not provide the transcripts for their radio segments or provide sufficient information to gauge the quality of their community presentation
Information Request:	Agnico Eagle should provide interested parties with full recordings of radio segments for those of us who were unable to tune into Rankin Inlet radio. Agnico Eagle should also provide more information on their community discussions and elder bus tour.

IR Source:	Christopher Kanaan
IR Number:	IR-03
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Ensuring a proper consultation
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331287, page 14 & 37
Issue/Concern:	Agnico Eagle says they made attempts to reach multiple parties who left comments throughout the NIRB commenting process but left out several parties altogether, such as myself and did not note how they made attempt to reach others unsuccessfully. On the "Radio Show 2" it seems rather clear AEM was in discussion with Brian Zawadski but also claims they were not able to reach him for two months. Agnico Eagle should clarify how they attempted to reach all parties and confirm or deny they made contact with Mr. Zawadski.
Information Request:	To provide disclosure on what and how attempts were made to reach commenting parties.

IR Source:	Christopher Kanaan
IR Number:	IR-04
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Ensuring a proper consultation
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331287, page 5
Issue/Concern:	Agnico Eagle states they received 19 expressions of support for the saline effluent pipeline project but did not note how many expressions of opposition they received.
Information Request:	Agnico Eagle should provide disclosure as to how much opposition they received to the project in a statistical form just as they have noted how much expressions of support they received. Agnico Eagle should also clarify whether individuals who provided favourable feedback received any type of remuneration such as gift certificates.

IR Source:	Christopher Kanaan
IR Number:	IR-05
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Demanding accountability on terminology
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331287
Issue/Concern:	Agnico Eagle continues to portray their saline effluent pipeline as simply a waterline, thereby eliminating two words "saline" and "pipeline" which will both raise more curiosity and controversy if locals find out the contents of the pipeline is not simply harmless water. Many people in Nunavut lack the scientific background to decipher misinformation provided by a mining company on project proposals, using misleading terminology does not help.
Information	Agnico Eagle should resubmit documentation properly and properly describe

Request:	the project for what it is rather then use deceptive terminology that may confuse Nunavut Inuit. If Agnico Eagle is not willing to this, can the company explain their reasoning why they refuse to do so?

IR Source:	Christopher Kanaan
IR Number:	IR-06
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Saline water appears to be insurmountable
Reference:	http://aemnunavut.ca/news-spill-report-saline-water-discharge/ https://laws-lois.justice.gc.ca/eng/regulations/sor-2002-222/FullText.html
Issue/Concern:	On Sept. 2, 2020, Agnico Eagle reported a large volume spill on out of compliance water dating back to August 23, 2020 according to the Nunavut spill line. It was the second consecutive year of a TSS exceedance. At 46 mg/L TSS, it appears to be 3x above MDMER allowances under Schedule 4.
Information Request:	Agnico Eagle should clarify whether the dysfunctional saline water treatment plant or any other dysfunctional water treatment plants may have contributed to this massive spill of out of compliance water. Agnico Eagle has not satisfied questions from various intervenors on their ability to treat saline water.

IR Source:	Christopher Kanaan
IR Number:	IR-07
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Saline water treatment plant problems and TSS exceedances
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331124&applicationid=125515&sessionid=fucg33bpfpukqgti5b7n0otpr2, page 22
Issue/Concern:	Agnico Eagle has reported that they performed an internal audit in May 2019 to determine why the SWTP was underperforming. In August 2020, Agnico Eagle brought that information to CIRNAC upon questioning, more than one year after the company was aware the SWTP was working at a significantly reduced capacity. According to page 22 information provided by Agnico Eagle, the SWTP was supposed to reduce TSS as well as TDS.
Information Request:	Agnico Eagle should clarify the operational status of the saline water treatment plant and inform concerned parties whether its “underperformining” status may have contributed to the September 2, 2020 spill or other exceedances under MDMER such as TSS or provincial water permit guidelines for TDS.

IR Source:	Christopher Kanaan
IR Number:	IR-08
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Saline water treatment storage inventory
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331124&applicationid=125515&sessionid=fucg33bpfpukqqti5b7n0otpr2, page 23
Issue/Concern:	Agnico Eagle reports that due to the unreliability of the saline water treatment plant, the company will run out of storage by May 2021. With the current spill forcing Agnico Eagle to block-in discharges, it seems likely that water storage at Meliadine may be an imminent risk which could result in emergency permits being sought again
Information Request:	Has Agnico Eagle taken any steps to mitigate a repeat of March 2020 in which the company waited until said emergency conditions prior to notifying regulators? What action is Agnico Eagle taking to reduce water inventory given the company cannot seem to reduce saline water to levels acceptable for discharge on a reliable basis?

IR Source:	Christopher Kanaan
IR Number:	IR-09
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Saline water forecasts from 2014 to 2020
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331124&applicationid=125515&sessionid=fucg33bpfpukqqti5b7n0otpr2, page 23
Issue/Concern:	Agnico Eagle reports saline groundwater inflows are “similar” to predictions made in the 2014 FEIS and “somewhat” higher than predictions made in intermediate model updates completed between 2014 FEIS and 2019 model update/calibration. In other documentation, Agnico Eagle has confirmed saline water inflows have been higher than predicted by as much as 30% on 6-month averages.
Information Request:	If the groundwater inflows are similar to the 2014 FEIS predictions, can Agnico Eagle explain why the requirement to discharge such a dissimilar amount of saline water considering the company claims saline groundwater inflows are similar and whether the troubled saline water treatment plants poor operating results have led to the company pursuing the waterline proposal?

IR Source:	Christopher Kanaan
IR Number:	IR-10
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Greenhouse gases and the impact to global warming
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331124&applicationid=125515&sessionid=fucg33bpfpukqqti5b7n0otpr2, page 22
Issue/Concern:	Agnico Eagle states the waterline will reduce greenhouse gases but did not include the upstream consideration of manufacturing the pipe or the increased operational impact at the mine from heavy truck activity
Information Request:	Agnico Eagle should provide scientific input similar to what was provided for trucks being removed off the road for upstream emissions due to the increased mining activity the pipeline would allow. Agnico Eagle should also provide specifications on how much greenhouse gases were responsible during construction of the pipe and shipping the pipe which arrived by barge.

IR Source:	Christopher Kanaan
IR Number:	IR-11
IR Directed To:	Jamie Quesnel, Agnico Eagle
Subject	Questioning Groundwater Alternatives
Reference:	https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=331124&applicationid=125515&sessionid=fucg33bpfpukqqti5b7n0otpr2, page 22
Issue/Concern:	Agnico Eagle is seeking to increase saline effluent discharge to 12,000 m3/day with the option to go up to 20,000 m3/day. Agnico continues to speak of environmental efficiencies while reducing various impacts. Agnico Eagle is currently discharging 1600 m3/day, up from 800 m3/day and now wants to go to 12,000 m3/day with the option to get up to 20,000 m3/day. The volumes desired by Agnico Eagle are not legally or logistically possible under a realistic scenario by truck. The volumes sought by Agnico Eagle are more than ten times above originally guidelines.
Information Request:	Agnico Eagle should clarify that the saline effluent pipeline project is a necessity or merely being applied for as an environmental assessment. Can Agnico Eagle inform interested parties what the repercussions will be to the Meliadine gold project if the company's request is rejected by the Board and a pipeline is not allowed?