



Information Requests

AEM's FEIS Addendum for the "Saline Effluent Discharge to Marine Environment, Meliadine Gold Mine" Project Proposal



Nunavut Regional Office
P.O. Box 100
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September 25, 2020

Shannon Evetalegak
Environmental Administrator
Nunavut Impact Review Board
P.O. Box 1360, Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Your file - Votre référence
11MN034
Our file - Notre référence
CIDMS # 1286089

Dear Ms. Evetalegak,

Re: Information Requests (IRs) for Technical Review of Agnico Eagle Mines Limited's FEIS Addendum for the "Saline Effluent Discharge to Marine Environment, Rankin Inlet, Meliadine Gold Mine, Nunavut" Project Proposal

On August 27, 2020, as per 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 determined that the revised Final Environmental Impact Statement Addendum (FEIS Addendum) as submitted by Agnico Eagle Mines Limited (AEM) for the "Saline Effluent Discharge to Marine Environment" Project Proposal, conforms with the minimum Environmental Impact Statement (EIS) requirements to the level which would enable the assessment to proceed. Thus, the NIRB has formally initiated the public technical review of the FEIS Addendum and invited interested parties to provide the NIRB with Information Requests (IRs) directed to the Proponent and/or other parties involved in the assessment on or before September 25, 2020.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has conducted a review of the revised FEIS Addendum and related documents as submitted by AEM in areas under CIRNAC's mandate pertaining to environmental and socio-economic impact assessment. On this basis, CIRNAC would like to provide the IRs below for NIRB's consideration.

CIRNAC appreciates the opportunity to review AEM's FEIS Addendum related to the above-mentioned Project Proposal and looks forward to working with NIRB and AEM throughout the next steps of the assessment process. Should you have any questions, please do not hesitate to contact Amal Roy at 867-975-4741 or by email at amal.roy@canada.ca.

Sincerely,



Alexandre Chaikine
A/Manager, Impact Assessment



IR Source/Number:	CIRNAC-IR #1
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Scope of Treated Groundwater Effluent Discharge into Marine Environment
Reference:	Water Management Plan (March 2020, Version 9) FEIS Addendum S.3.5.1 (Source Water and Discharge Volumes) FEIS Addendum - Appendix B (Groundwater Management Plan) FEIS Addendum - Appendix F (Ocean Discharge Monitoring Plan, S 2.1 – Discharge Review) FEIS Addendum - Appendix H (Water Balance)
Issue/Concern:	There is a lack of clarity within the FEIS Addendum regarding the discharge of treated groundwater effluent to the receiving environment of Melvin Bay. For example, page vi of the FEIS Addendum states: “ <i>Agnico Eagle is proposing to increase the discharge volume of treated groundwater effluent to the ocean to 6,000 to 12,000 m³/day and to complete it as a direct discharge via waterlines</i> ”. Similar statements are made throughout the FEIS Addendum and its Appendices. However, references are also made to future potential uses of the waterlines, including the conveyance and discharge of surface contact waters. There is ambiguity regarding whether those future potential uses of the waterlines have to be incorporated into the scope of the amendment, as described in the FEIS Addendum.
Information Request:	CIRNAC requests that: <ul style="list-style-type: none"> a) AEM confirm if only treated saline groundwater will be conveyed through the waterlines and discharged directly from the treatment facilities into the waterlines for conveyance to and discharge within Melvin Bay; b) Alternatively, AEM should provide information on other additional arrangements.

IR Source/Number:	CIRNAC-IR #2
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Water Treatment System Performance
Reference:	FEIS Addendum S.3.5 (Current Groundwater Management Practices) FEIS Addendum Appendix B (Ground Water Management Plan)



	FEIS Addendum - Appendix F (Ocean Discharge Monitoring Plan) FEIS Addendum - Appendix H (Water Balance) Water Management Plan (March 2020, Version 9)
Issue/Concern:	<p>CIRNAC is aware of AEM's position that the broader water management of the Meliadine site is not within the scope of the current assessment. This position is evidenced by Table 16 of the FEIS Addendum which states: "<i>There is no change to the Water Management Plan, as the plan is specific to onsite water management which is outside the scope of the FEIS Addendum</i>". Despite this assertion, CIRNAC notes that the failure of approved onsite water management has resulted in the challenges experienced by AEM under Project Certificate No. 006 and is the basis that triggered the need for the proposed amendment. Any EA or regulatory decisions related to the proposed amendment will influence the future water management practices and environmental impacts at the Meliadine site. As a consequence, CIRNAC suggests that water management practices at the Meliadine site (including treatment) should be included in the scope of the current assessment.</p> <p>There is insufficient information on the public record to explain the water treatment performance issues and mitigation measures implemented by AEM. Further, it is unclear to CIRNAC how the entire water management system will operate if the proposed amendment is approved. Additional information is therefore required on the full water management systems associated with the proposed amendments to Project Certificate No. 006 (Amendment 001).</p>
Information Request:	<p>CIRNAC requests that AEM provide information:</p> <ul style="list-style-type: none"> a) That AEM's current water treatment practices are able to achieve their design intent; b) That reasonable steps AEM have been taking to rectify the situation prior to proposing the amendment; c) If AEM had experienced any prior water treatment / management challenges at the site and how those challenges have been rectified.

IR Source/Number:	CIRNAC-IR #3
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Maximum Proposed Discharge Volume of the Waterlines System
Reference:	FEIS Addendum S.3.3 (Treated Groundwater Effluent Discharge into Marine Environment Project Description)



	<p>FEIS Addendum S.3.4.1 (Melvin Bay Effluent Rate Discharge Alternative)</p> <p>FEIS Addendum - Appendix B (Groundwater Management Plan)</p> <p>FEIS Addendum - Appendix F: (Ocean Discharge Monitoring Plan)</p> <p>FEIS Addendum - Appendix H (Water Balance)</p>
Issue/Concern:	<p>Additional explanations are required to understand the basis for the 12,000 m³/day maximum discharge limit identified in the proposed amendment.</p> <p>Specifically, further explanations are necessary for CIRNAC to understand the information presented in Table 1 of Appendix H (Water Balance). Using year 2022 as an example, a total of 295,650 m³ of groundwater will infiltrate into the mine workings and require management (based on an average of 810 m³/day for 365 days). In addition, AEM anticipates reducing the volume of saline water stored in surface ponds by 226,038 m³ during the same year (based on the surface water inventory reducing from 503,806 m³ in 2022 to 277,768 m³ in 2023). The total volume of saline water requiring discharge to Melvin Bay during 2022 would therefore be 521,688 m³. Based on an 85-day open-water discharge season, this would require discharging at a rate of 6,138 m³/day. This volume is significantly less than the 11,630 m³/day specified in Table 1, as well as the maximum discharge value of the proposed amendment (i.e., 12,000 m³/day).</p> <p>During a teleconference call with CIRNAC on September 18, 2020, AEM stated that the difference between the two values is based on their intent to also discharge surface contact water from the Meliadine Mine Site as part of the 12,000 m³/day discharge rate limit. This is inconsistent with CIRNAC's prior understanding and is also inconsistent with the NIRB letter of September 22, 2020, regarding the finalized scope of AEM's "Saline Effluent Discharge to Marine Environment" Project Proposal. The NIRB letter states that the waterlines would only be used to convey treated saline groundwater for discharge rates between 6,000 m³/day and 12,000 m³/day.</p> <p>While the FEIS Addendum indicates that up to 12,000 m³/day treated saline effluent will be conveyed through two 16-inch diameter waterlines and discharged to Melvin Bay, AEM also states that the system will be designed to accommodate flows up to 20,000 m³/day. Furthermore, in Section 8.1.4 of the FEIS Addendum, AEM states: <i>"In the event that the discharge volume is increased to 20,000 m³/day, it is anticipated that residual effects would remain the same as predicated as the water quality would still be expected to meet MDMER requirements and the water</i></p>



	<i>would still be required to achieve the appropriate dispersion at the edge of the mixing zone.” This last statement appears to imply that AEM considers the current Environmental Assessment process to include the consideration of maximum discharge flows of up to 20,000 m³/day.</i>
Information Request:	<p>CIRNAC requests that AEM:</p> <ul style="list-style-type: none"> a) Clarify whether it is proposing a maximum discharge rate of 12,000 m³/day or 20,000 m³/day; b) Explain the design basis and calculations supporting its proposed maximum discharge rate; c) Confirm whether the current effects assessment has considered impacts associated with discharge rates of up to 20,000 m³/day; and d) Clarify the rationale of using 16-inch diameter pipes and provide calculations demonstrating the maximum carrying capacity of these two 16-inch diameter waterlines.

IR Source/Number:	CIRNAC-IR #4
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Water and Load Balance Conceptual Model
Reference:	<p>Water Management Plan (March 2020, Version 9)</p> <p>FEIS Addendum - Appendix B (Groundwater Management Plan)</p> <p>FEIS Addendum - Appendix D (Roads Management Plan)</p> <p>FEIS Addendum - Appendix H (Water Balance)</p>
Issue/Concern:	<p>The proposed amendment involves changing multiple aspects of the water management strategy for the Meliadine Gold Mine Project. For example, in addition to the discharge of up to 12,000 m³/day of treated groundwater effluent, it is CIRNAC's understanding that the following changes may occur if the proposed amendment is approved: 1) reduced reliance on the Saline Water Treatment Plant (SWTP); 2) increased groundwater processing by the Saline Effluent Treatment Plant (SETP); 3) potential changes to Meliadine Lake discharges; 4) elimination of saline effluent trucking; and 5) modifications to the operation of water management infrastructure components at the Meliadine site.</p> <p>In an effort to understand how these and other changes will affect the overall water management strategy under Project Certificate No. 006 (Amendment 001), a Water Quality and Load Balance Conceptual Model should be included in the FEIS Addendum. This model, which would include water management operations flow</p>



	<p>diagrams (including surface contact water and contact water from underground stopes/sumps), is necessary to systematically identify, assess, and manage potential environmental impacts from mining operations. Without such a model, there is ambiguity regarding project changes that are associated with the proposed amendment. There is also uncertainty with regard to potential environmental interactions and impacts.</p> <p>Based on a review of the revised FEIS Addendum and supporting documentation (including Appendix H – Water Balance), AEM's submission does not include Water and Load Balance Conceptual Models. As a consequence, CIRNAC is unable to identify potential interactions between the project and environment and any associated environmental impacts that might occur.</p>
Information Request:	CIRNAC requests that AEM provide a conceptual Water Quality and Load Balance Model. The model should indicate all proposed changes relative to the currently approved project.

IR Source/Number:	CIRNAC-IR #5
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Process Modifications to Avoid Non-Compliance Issues
Reference:	<p>FEIS Addendum S.6.1.3 (Water Quality)</p> <p>FEIS Addendum - Appendix B (Ground Water Management Plan, S 3.4.2.1)</p> <p>FEIS Addendum - Appendix H (Water Balance, S.2.1)</p> <p>Water Management Plan (March 2020, Version 9, S 3.9.4 and S 3.9.5)</p>
Issue/Concern:	<p>In regard to Treated Saline Groundwater Effluent discharge operations under Amendment 001, it is CIRNAC's understanding that treated effluent is stored and sampled prior to release to the environment to confirm that effluent is compliant with applicable requirements. Nonetheless, in 2019, AEM experienced several non-compliance events including two acute lethality test failures. AEM determined that the failures were attributable to residual chlorine from the ammonia removal treatment stage which occurred as a result of saturated Granular Activated Carbon filters.</p> <p>While this particular non-compliance situation was addressed through changes in the treatment protocols, it is unclear to CIRNAC what additional controls have been put in place to prevent other potential non-compliance events. In particular, it is unclear why effluent was discharged prior to confirming it complied with all</p>



	applicable requirements.
Information Request:	CIRNAC requests that based on AEM's previous experiences, AEM describe how potential non-compliant events will be detected and proactively mitigated in the future.

IR Source/Number:	CIRNAC-IR #6
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Deposition of Total Suspended Solids Inside Waterlines
Reference:	FEIS Addendum S.3.3 ((Treated Groundwater Effluent Discharge into Marine Environment Project Description) FEIS Addendum - Appendix A (Meliadine Mine Bay Diffuser Conceptual Design)
Issue/Concern:	Total Suspended Solids (TSS) can settle inside waterlines if the flow speed is below the applicable deposition velocity. Depending on conditions, this can result in excessive deposition that may compromise the conveyance system performance. Table 10 of FEIS Addendum Appendix A identifies typical outfall pipe deposition velocities of the effluent for TSS concentrations that are representative of the proposed project. The deposition velocities range from 0.41 to 0.61 m/s. In the case of the proposed system, CIRNAC calculates that the in-line velocity would be approximately 0.55 m/s when operating at the maximum proposed discharge rate of 12,000 m ³ /day (assuming both waterlines are used). On this basis, there is a potential for TSS deposition in the waterlines when the system is operated at 12,000 m ³ /day. This potential increases when the system is operated at lower discharge rates.
Information Request:	CIRNAC requests that AEM clarify if and how the potential for in-line deposition of TSS factored into the design of the proposed amendment. This should include: 1) operational conditions, 2) design velocities, 3) accumulation in topographic depressions and 4) residual sediments removal.

IR Source/Number:	CIRNAC-IR #7
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Discharge Season for Treated Groundwater Effluent at Melvin Bay
Reference:	FEIS Addendum S.3.3 (Treated Groundwater Effluent Discharge into Marine Environment Project Description) FEIS Addendum S 6.1.1 (Oceanography)



Issue/Concern:	<p>The FEIS Addendum (S.3.3) states: “<i>Treated groundwater effluent will be conveyed through waterlines from the treatment plant at the Mine to the discharge facility at the Itivia Fuel Storage Facility for discharge during the open water season (May to October).</i>” This represents a discharge season of approximately 180 days.</p> <p>Other sections of the FEIS Addendum indicate that the discharge season would be significantly shorter. For example, Table 1 of FEIS Addendum Appendix H indicates that the discharge season is assumed to be 85 days long.</p> <p>Clarification is required regarding the assumed discharge season for the proposed amendment.</p>
Information Request:	CIRNAC requests that AEM clarify the assumed duration of the ice-free season and the number of days in the design for discharges to Melvin Bay.

IR Source/Number:	CIRNAC-IR #8
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Incremental Marine Impacts from Treated Groundwater Effluent Discharge and Monitoring
Reference:	FEIS Addendum S.8 (Effects Assessment)
Issue/Concern:	<p>AEM is proposing to discharge significantly increased amount of treated groundwater effluent to Melvin Bay. Despite the magnitude of this increase, the FEIS Addendum concludes that the impacts of the approved project and proposed amendment are similar. Specifically, as shown in Table 13 of the FEIS Addendum, the Pathway Analysis is classified as “Minor” for all marine components. AEM reached the same conclusion for Amendment 001. In both instances the “Minor” classification resulted in the potential impacts to the marine environment not being carried forward through the effects assessment. Additional details are necessary to support AEM’s conclusion that the pathway is minor.</p> <p>CIRNAC notes AEM’s conclusion that the significant increase in discharges and potential contaminants to Melvin Bay does not justify any changes to monitoring activities. For example, Table 16 of the FEIS Addendum states: “<i>There is no change to the Water Quality and Flow Monitoring Plan, as there is no new discharge or water storage facility requested in the FEIS Addendum.</i>” The FEIS Addendum contains insufficient information that the pathways and impacts associated with the proposed project are effectively the same as the approved project. CIRNAC would like more information to assure that the proposed amendment does not warrant any changes to the monitoring of water quality in the</p>



	vicinity of the proposed effluent pipe outfall in Melvin Bay.
Information Request:	<p>CIRNAC requests that AEM:</p> <ul style="list-style-type: none"> a) Present side-by-side comparisons of effluent dispersion modelling for the approved project and the proposed amendment; b) Describe pathways related to the planned discharges to the marine environment through the effects assessment, even if designated as “Minor” by AEM; c) Submit a revised Water Quality and Flow Monitoring Plan that is commensurate with the significant increase in proposed discharge to the marine environment of Melvin Bay.

IR Source/Number:	CIRNAC-IR #9
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Waterline Failure Modes and Effects Assessment
Reference:	<p>FEIS Addendum S 3.4.6 (Spill Management)</p> <p>FEIS Addendum S.7 (EA Methodology)</p> <p>FEIS Addendum S.8 (Effects Assessment)</p> <p>FEIS Addendum - Appendix C (Spills Contingency Plan),</p> <p>FEIS Addendum - Appendix D (Road Management Plan - S 9)</p> <p>FEIS Addendum - Appendix G (Assessment Methodology)</p> <p>FEIS Addendum - Appendix H (General Response Procedures for Spilled Saline Water)</p>
Issue/Concern:	The FEIS Addendum presents a high-level evaluation of potential impacts from accidents and malfunctions, with a focus on unplanned releases of saline groundwater to the environment (i.e., spills). The FEIS Addendum does not evaluate mechanisms that might cause a planned release or a spill (e.g., vehicle impact, line over-pressure, etc.), nor the potential volume of groundwater that could be spilled if the event occurred. This information is necessary to assess the impacts associated with the proposed amendment.
Information Request:	CIRNAC requests that AEM identify potential failure modes in the system and their causes and effects for the proposed amendment.

IR Source/Number:	CIRNAC-IR #10
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Potential Impacts to Ice-Rich Soils and Permafrost



Reference:	<p>FEIS Addendum S.4 (Project Changes Interactions and Management)</p> <p>FEIS Addendum S.8 (Effects Assessment)</p> <p>Road Management Plan S.4.3</p> <p>FEIS Addendum - Appendix C (Spills Contingency Plan)</p> <p>FEIS Addendum - Appendix D, S 5 (Roads Management Plan)</p> <p>FEIS Addendum - Appendix E (Erosion, Sediments Control Plan)</p> <p>FEIS Addendum - Appendix H (General Response Procedures for Spilled Saline Water)</p>
Issue/Concern:	<p>The proposed waterlines will be constructed on or in the near vicinity of ice-rich soils. Such soils may experience potential adverse impacts when exposed to fluids with elevated salinity. Those impacts can include rapid and extensive degradation of the structural integrity of soils which can, in turn, result in slumping, soil erosion, impacts to surface waters (as TSS/sedimentation) and structural damage to the waterlines infrastructure.</p> <p>The FEIS Addendum does not address the potential environmental impacts that could occur if such soils are exposed to saline water if it is released from the waterlines (e.g., in the event of a planned release or spill). Further information is required to evaluate the potential impacts associated with this scenario.</p> <p>In addition to potential impacts associated with the release or spill of saline groundwater to the tundra, CIRNAC notes that heat exchange between the waterlines and the ground may result in localized permafrost impacts. The FEIS Addendum does not appear to contain an assessment of this potential impact on ice-rich soils and permafrost.</p>
Information Request:	<p>CIRNAC requests that AEM assess the potential adverse impacts:</p> <ul style="list-style-type: none"> a) Of the release or spill of saline water to the terrestrial environment at locations where ice-rich soils are present; b) To permafrost associated with heat transfer from the waterlines.

IR Source/Number:	CIRNAC-IR #11
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Prevention of Waterline Spills
Reference:	<p>FEIS Addendum S.51 and Table 14</p> <p>FEIS Addendum - Appendix C (Spills Contingency Plan),</p>



	FEIS Addendum - Appendix H (General Response Procedures for Spilled Saline Water) Waterline Consultations Report
Issue/Concern:	The FEIS Addendum indicates that a “fiber optic leak detection system” will be installed to monitor the waterlines for potential leaks. No information is provided indicating how this system would work, or how effective it is likely to be in mitigating potential leaks from the waterlines.
Information Request:	CIRNAC requests that AEM provide details regarding the design and function of the fiber optic leak detection system and how emergency response would be actioned. In addition, CIRNAC requests that if available, AEM provide examples of a similar system operating in northern climates.

IR Source/Number:	CIRNAC-IR #12
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Conceptual Waterlines Design and Operation
Reference:	FEIS Addendum S.3.3 (Treated Groundwater Effluent Discharge into Marine Environment Project Description)
Issue/Concern:	The majority of technical descriptions presented in the revised FEIS Addendum relate to the marine environment portion of the proposed amendment (i.e., the saline effluent outfall and diffuser in Melvin Bay). In contrast, the revised FEIS Addendum presents very limited information regarding the design and operation of the ~34 km terrestrial portion of the conveyance system. In the absence of such information, it is difficult to identify potential interactions between the project and the environment and any other associated environmental impacts.
Information Request:	CIRNAC requests that AEM provide descriptions of the terrestrial portion of the conveyance system, including but not limited to: <ul style="list-style-type: none"> • Waterlines basic design parameters (e.g., maximum/minimum pressure, volumes, velocities); • Waterlines operational plan (e.g., one line operates at full capacity and the second serves as a backup, or both lines operate in parallel); • Corridor profile / topography; • Ground preparation (e.g., clearing of rock debris, grading to avoid surface water ponding, localized fill); • Waterlines material and general specifications; • Waterlines anchoring (if required); • Pumping requirements and power supply;



	<ul style="list-style-type: none"> • Conveyance system monitoring (e.g., pressure, flow, temperature); • Conveyance Section isolation (e.g., automated valve control to limit releases; • Annual winterization (e.g., purging of residual saline effluent); and • Waterlines maintenance requirements (e.g, residual sediments removal, descaling). <p>Given the current stage of the design process, detailed designs are not necessary. Instead, CIRNAC simply requires conceptual descriptions of the waterlines design and how it will be operated to ensure that potential adverse impacts on the environment are avoided, prevented, monitored and adequate mitigation measures are in place.</p> <p>In addition, CIRNAC requests that AEM describe the designs and performance of comparable long-distance saline effluent conveyance systems of similar size that operate in arctic environments. This information is necessary to support AEM's conclusion that the proposed amendment can operate without resulting in potential adverse impacts to the environment.</p>
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IR Source/Number:	CIRNAC-IR #13
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Burying/Covering the Waterlines Along the All-weather Access Road
Reference:	<p>FEIS Addendum S.3.3 (Treated Groundwater Effluent Discharge into Marine Environment Project Description)</p> <p>Revised Waterline Consultations Report</p> <p>NIRB letter to AEM Re Scope Clarification (September 9, 2020)</p> <p>NIRB letter to Parties Re Finalized scope of Agnico Eagle's "Saline Effluent Discharge to Marine Environment" Project Proposal related to the Meliadine Gold Mine Project (September 22, 2020)</p>
Issue/Concern:	<p>The FEIS Addendum and all supporting documentation indicates that the two 16-inch diameter waterlines will be placed on the ground surface, without any cover. On that basis, CIRNAC identified multiple potential concerns and impact pathways associated with the waterlines that had not addressed adequately in the effects assessment.</p> <p>On August 28, 2020, AEM issued a revised Waterline Consultations Report which stated: "<i>Agnico Eagle will bury/cover between 80-90% of the waterline and will continue to work with the</i></p>



	<p><i>HTO, KIA, Elders, and the community on site specific locations. This will replace commitment 1 to build crossings if this is the preferred mitigation method."</i> Also, the NIRB letter of September 22, 2020, regarding the finalized scope of Agnico Eagle's "Saline Effluent Discharge to Marine Environment" Project Proposal states that <i>"Approximately 80 to 90 percent of the waterline's length to be buried with remainder to be above ground."</i></p> <p>This represents an important shift in the approach that was presented in the FEIS Addendum and could affect the findings of the assessment process. Clarity is required regarding this change to better understand the potential environmental impacts associated with the proposed amendment.</p>
Information Request:	<p>CIRNAC requests that AEM:</p> <ul style="list-style-type: none"> a) Confirm it intends to cover/bury 80% to 90% of the waterlines length and provide information on which portions of the route the pipelines will not be covered/buried; b) Describe why the concept was changed; c) Describe the revised concept (e.g., will the waterlines be covered by extending the side slopes of the road?); d) Indicate how the change affects the effects assessment presented in the FEIS Addendum; e) Provide information on the incremental borrow requirements associated with covering the waterlines and whether borrow sources will need to be expanded to meet the requirements; f) Confirm whether the change will require other modifications to the waterlines concept (other than the elimination of the previously identified caribou crossings); and g) Indicate how the fiber-optic leak detection system will function on the buried waterlines.

IR Source/Number:	CIRNAC-IR #14
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	Employment and Procurement – Cessation of Groundwater Trucking Operations
Reference:	FEIS Addendum Table 13 (Pathways Assessed and Consistent with Conclusions Presented in the FEIS Addendum (Agnico Eagle 2018). Revised Waterline Consultations Report
Issue/Concern:	The proposed installation of waterlines for the conveyance of treated saline effluent from the mine site to the Melvin Bay will reduce the project's operational workforce requirements because haul trucks will no longer be required. No information has been



	provided on whether new employment and/or contracting opportunities will be made available to existing truck drivers. CIRNAC would like to better understand the impacts of this change to truck drivers, particularly Inuit beneficiaries. This concern was also raised by the Baker Lake Hunters and Trappers Organization and the Kivalliq Wildlife Board in the listing of comments and questions provided in Appendix IV of AEM's revised <i>Waterline Consultations Report</i> .
Information Request:	CIRNAC recommends that AEM provide information on their plan of dealing with the impacted people, particularly Inuit beneficiaries because of cessation of trucking operations for the conveyance of treated saline effluent from the mine site to the Melvin Bay.

IR Source/Number:	CIRNAC-IR #15
IR Directed To:	Agnico Eagle Mines Limited (AEM)
Subject:	IQ and Traditional Land and Resource Use – Wildlife Monitoring Program
Reference:	FEIS Addendum S 8.1.2 (Pathways with Minor Linkage not Previously Assessed).
Issue/Concern:	Section 8.1.2 of the FEIS Addendum makes reference to AEM actively engaging with the Kangiqliniq Hunters and Trappers Organization (KHTO) regarding wildlife monitoring activities along the all-weather access road. Section 10.1 of the <i>Roads Management Plan</i> further elaborates that AEM and the KHTO are in discussions regarding the development of a program “that would see the KHTO provide wildlife monitoring services.” A summary of the KHTO's involvement in wildlife monitoring efforts along the all-weather access road or any other project components cannot be found in the submitted FEIS Addendum and its appendices.
Information Request:	CIRNAC recommends that AEM provide a summary of the KHTO's involvement in a wildlife monitoring program specific to the all-weather access road and any other project components (e.g., marine discharge). The summary should include an overview of existing monitoring results, their relevance to project monitoring plans, and adaptive management considerations.

