



Health Canada Santé
Canada Canada

Environmental Health Program
Regulatory Operations and Enforcement Branch
Health Canada
391 York Avenue
Winnipeg, MB R3C 0P4

September 25, 2020

Karen D. Costello
Executive Director
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, Nunavut X0B 0C0

Sent by email to: info@nirb.ca

**Subject: Health Canada's technical review of Agnico Eagle Mines Limited's Impact Statement (IS)
Addendum for the "Saline Effluent Discharge to Marine Environment" Project Proposal**

Dear Karen D. Costello:

Thank you for your email dated August 27, 2020, requesting Health Canada's technical review of Agnico Eagle Mines Limited's IS Addendum for the "Saline Effluent Discharge to Marine Environment" Project Proposal for the Meliadine Gold Project.

Health Canada participates in environmental assessments as a federal authority under the *Nunavut Planning and Project Assessment Act, 2013*. Health Canada makes available specialist or expert information or knowledge in its possession to review panels and responsible authorities, among others.

The objective of this review was to identify information gaps within the IS Addendum that would need to be addressed in order for a technical review to be completed. Health Canada's comments are included herein for your consideration. These comments pertain to information necessary to evaluate project-related impacts to human health in the areas of air quality, noise, country foods, and human health risk assessment.

Should you have any questions regarding Health Canada's comments, please feel free to contact me at joel.kaushansky@canada.ca

Sincerely,

Joel Kaushansky
Regional Environmental Assessment Specialist
Health Canada
Phone #: 343-550-6213
Email: joel.kaushansky@canada.ca

Canada 



Health
Canada

Santé
Canada

cc: Matt Gale, A/Environmental Health Program Regional Manager, MB/SK/NU, Health Canada
Kathleen Buset, Manager, Environmental Assessment and Contaminated Sites Division, Health Canada
Ninon Lyrette, Senior Environmental Health Specialist, Health Canada
Kitty Ma, A/Environmental Health Program Regional Manager, ON, Health Canada

Attached: 2020-09-25 HC Meliadine Effluent Technical Review Comments.pdf

Meliadine Gold Project - Revised Impact Statement (IS) Addendum for the Saline Effluent Discharge to Marine Environment Project Proposal

Prepared by Health Canada

ID Source	IR Number	IR Directed To	Subject	Reference	Issue / Concern	Information Request
HC	1	Proponent	Noise	<p>Impact Statement Addendum Section 4, Table 6 Pg. 31</p> <p>Guidelines for the Completion of the Impact Statement Addendum for Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal (2020 Impact Statement Addendum Guidelines) Pg. 6-7</p> <p>Noise Abatement and Monitoring Plan – March 2020 v3, Pg. 7</p>	<p>Potential noise-related health risks from the project's pre-construction and construction activities were not adequately characterized.</p> <p>The Noise Abatement and Monitoring Plan (NAMP) in the final Environmental Impact Statement (EIS) Volume 5, SD5-2 (NIRB Public Registry ID: 329357) does not take into account project pre-construction and construction activities and their contribution to ambient noise, as set out in the NIRB's 2020 Impact Statement Addendum Guidelines.</p> <p>The NAMP has not considered traditional land users and residents of Rankin Inlet, within the boundaries of which part of the project will be constructed. Additionally, the noise receptor NPOR017, who is located approximately 150 metres southwest of the all weather access road (Noise Abatement and Monitoring Plan – March 2020 v3, Pg. 7), along which the project will be constructed was not considered in the NAMP.</p> <p>Without this information, Health Canada cannot complete its review of the potential of noise-related health risks from the proposed project and uncertainties as to the potential risks to health remain.</p>	<p>Health Canada suggests that NIRB request the following information from the proponent:</p> <p>Provide an updated version of the NAMP (or an addendum) describing the monitoring and mitigation plans, including a noise complaint mechanism, that will be implemented during the pre-construction and construction phases of the project to address noise-related health risks and concerns.</p> <p>The Proponent should refer to the <i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise</i>. (https://www.ceaa.gc.ca/050/documents/p80054/119378E.pdf)</p>
	2	Proponent	Air quality/dust; Country foods	<p>Impact Statement Addendum Section 8.1.7 Table 16 Pg. 96</p> <p>Impact Statement Addendum Section 7.2 Table 12 Pg. 68</p> <p>Guidelines for the Completion of the Impact Statement Addendum for Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal</p>	<p>Potential air quality-related health risks during the pre-construction and construction phases of this project have not been assessed.</p> <p>The Air Quality Monitoring Plan (AQMP) the in Final EIS Volume 5, SD 5-2 (NIRB Public Registry ID: 329357) and the Dust Management Plan (DMP) version 5 (NIRB Public Registry ID: 323968) does not take into account pre-construction or construction activities of the project as set out in the NIRB's 2020 Impact Statement Addendum Guidelines.</p> <p>The Impact Statement Addendum (Section 7.2, Table 12, p. 68) does not include an updated air quality assessment including the project's emissions from activities during the pre-construction and construction phases and the potential health risks associated with the construction of pipelines adjacent to, and within the, community of Rankin Inlet, a community of approximately 2800 residents.</p>	<p>Health Canada suggests that NIRB request the following information from the proponent:</p> <p>Provide updated versions of the AQMP Plan and the DMP (or two addendums) describing the monitoring and mitigation plans, including a quantification of air emissions emitted from the project pre-construction and construction activities in order to assess potential human health risks related to air quality.</p> <p>The Proponent should refer to <i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality</i>. (https://www.acee.gc.ca/050/documents/p80054/119376E.pdf)</p>

				(2020 Impact Statement Addendum Guidelines) Pg. 6-7	<p>Additionally, issues with dust have also been raised through Inuit Quajimajatugangit engagement and regulatory and community concerns (Impact Statement Addendum, Section 7.2, Table 12, pg. 68). Since the DMP has not been updated, it is uncertain what impact pre-construction and construction dust will have on human receptors in Rankin Inlet, or country foods (i.e., berries) harvested next to the all weather access road (Impact Statement Addendum, Section 6.3, pg. 55), along which the project will be constructed.</p> <p>Without this information, Health Canada cannot complete its review of potential air quality health risks associated with the proposed project and uncertainties as to the potential risks to health remain.</p>	
HC	3	Proponent	Human health risk assessment	<p>Guidelines for the Completion of the Impact Statement Addendum for Agnico Eagle's Saline Effluent Discharge to Marine Environment Proposal (2020 Impact Statement Addendum Guidelines) Pg. 4</p>	<p>Potential health risks during the pre-construction and construction phases of this project have not been evaluated as a human health risk assessment (HHRA) was not completed.</p> <p>The Impact Statement Addendum (Section 7.2, Table 12, p.70) states that there is “no link between the project and human health”, and “no effects are expected with the small-scale proposed project activities than what was assessed in the final EIS (Agnico Eagle 2014)”.</p> <p>Given that an HHRA was not completed for this project's proposed activities, including those occurring during the pre-construction and construction phase, as required by NIRB's 2020 Impact Statement Addendum Guidelines, uncertainties as to the potential risks to health remain, and Health Canada cannot complete its review of the potential human health risks associated with the proposed project.</p>	<p>Health Canada suggests that NIRB request the following information from the proponent:</p> <p>Provide an HHRA in accordance with the requirements set out in the NIRB's 2020 Impact Statement Addendum Guidelines, to allow the assessment of potential human health risks related to this project.</p> <p>The Proponent should refer to <i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Human Health Risk Assessment</i>. https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-risk-assessment.html</p>