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September 25, 2020

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

Sent via e-mail to:

## Re: Response to the Revised Project Proposal, Consultation Process, and Request for Information Requests for the review of Agnico Eagle Mines Limited's 2020 Saline Effluent Discharge to Marine Environment Project Proposal

Dear Ms. Costello,

Nunavut Tunngavik Inc. (NTI) is providing a response to the Nunavut Impact Review Board's (NIRB) recent finalization of the project scope, the consultation process, as well as the request for Information Requests (IRs) related to the Saline Effluent Discharge to Marine Environment project proposal.

NTI urges NIRB to adjust the review process to ensure that Inuit are able to meaningfully participate in the review process.

As you are aware, Agnico Eagle Mines Limited's (AEM) revised Impact Statement Addendum (IS Addendum) as submitted to NIRB has continued to evolve and resulted in NIRB requesting that AEM clarify their project scope. NIRB only made available the final project scope on September 22, 2020. This final project scope includes important new components and AEM has not provided adequate information on the potential impacts of these new components.

NTI is troubled that NIRB has not extended the September 25<sup>th</sup> deadline for the submission of IRs, meaning that communities and Inuit intervenors have been left with only three days to respond to the final project scope.

The ability for Inuit to participate fully in this process should not be compromised by AEM's unsystematic approach to the development of the project scope. The deadline for submitting IRs should be extended to allow Inuit adequate time to fully consider the final scope and prepare considered IRs.

In the August 27<sup>th</sup> notice, NIRB explained that the technical review process is meant to allow for a detailed review of the IS Addendum to analyse the quality of the information presented by the AEM. The NIRB timelines should be adjusted to allow for a full analysis to take place.

Nunavut Tunngavik Timingat Titiqqilvia 280, Kangiqhiniq NU XOC 0G0 Canada Nunavut Tunngavik Incorporated P.O. Box 280, Rankin Inlet NU XOC 0G0 Canada In addition, NTI is aware that there are a number of community members that are dissatisfied with AEM's consultation process regarding the project proposal.

Given that the final project scope was finalized only on September 22<sup>nd</sup>, NTI recommends that AEM participate in the upcoming NIRB community information sessions to present and to answer questions from community members regarding the finalized project scope.

Alternatively, AEM should be conducting additional community consultations on the finalized project scope.

NTI also notes that participant funding will play an important part in ensuring meaningful participation by Inuit in this review process. Participant funding applications to the Crown-Indigenous Relations and Northern Affairs Canada's Northern Participant Funding Program were due on September 11<sup>th</sup>, and it remains unclear when these funds will be made available to successful applicants. NIRB's timelines should be adjusted to allow adequate time for successful applicants to receive funds and prepare fully for next steps in the review process.

Lastly, NTI recommends that NIRB coordinate its review process with the Nunavut Water Board (NWB) according to the NIRB/NWB Coordinated Process Framework as this review process is related to the NWB's review of discharges into Meliadine Lake. Coordination will allow for a better understanding of the full scope of proposed AEM activities, potential impacts and mitigation.

Given the short time frame to respond, NTI will send an Inuktut translation of this correspondence as soon as it available. We look forward to your response.

Yours sincerely

Hannah Uniuqsaraq Chief Administrative Officer