



NIRB File No.: 05MN047 & 12MN001
NWB File No.: 2AM-DOH1323
Transport Canada Permit: 2018-600006

April 9, 2021

To: Oliver Curran
Senior Advisor Environment and Permitting, Western Nunavut
TMAC Resources Inc.
c/o Agnico Eagle Mines Limited
145 King St East, Suite 400
Toronto, ON M5C 2Y7

Sent via email: oliver.curran@agnicoeagle.com

RE: Determination for TMAC Resources Inc.'s Roberts Bay Discharge System – Revised Discharge Point

Dear Oliver Curran:

On February 19, 2021, the Nunavut Impact Review Board (NIRB or Board) received TMAC Resources Inc.'s (TMAC or Proponent) notice of a necessary change in the location of the discharge point of the Roberts Bay Discharge System (RBDS) due to an event in the fall of 2020 which required the discharge pipeline be cut 1.4 kilometers from the shore or 800 meters from the end of the RBDS. Since this event, TMAC has not been discharging from the Tailings Impoundment Area (TIA) and all mine water has been diverted to the TIA for temporary storage; however, this additional water must be released prior to freshet to ensure TIA capacity for the meltwater and ensure optimal geotechnical conditions for the dams and operations of the facility. In March 2021 TMAC is proposing to commence discharging appropriately tested TIA water through the RBDS without a diffuser until approximately August 2021. In August, TMAC anticipates attaching a diffuser to the shorter pipeline and discharging mine and TIA water from this new location (1.4 kilometers from shoreline and 20 metres depth) for the life of the infrastructure as well as the retrieval of the 800 metres of disconnected pipeline.

TMAC submitted a description, self-assessment, and supporting documents for the “Change to Roberts Bay Discharge System Discharge Location”, indicating that the proposed change is consistent with the scope of the Project Certificate No. 003 Amendment 1 and Project Certificate No. 009 and did not represent a significant modification to the Doris North Project nor would it create a significant impact on the receiving environment. TMAC also identified that installation of the new diffuser and removal of the abandoned pipeline would require an amendment to

Transport Canada’s existing Navigable Waters Permit and require public notice to land users of the new discharge location.

All materials pertaining TMAC’s submission can be obtained from the NIRB’s online Public Registry at www.nirb.ca/project/123632 and www.nirb.ca/project/124148 or by searching for the Document ID numbers.

Document ID No.		Document Title
05MN047	12MN001	
333886	333916	Saline Discharge Location Change and Supporting Reports
333887	333917	Saline Discharge Location Change Summary - English
333888	333918	Saline Discharge Location Change Summary - Inuinnaqtun

On March 11, 2021, the Board requested that interested parties review the TMAC submission regarding the change in discharge location and provide comments with respect to their jurisdiction and/or area of expertise by March 22, 2021 and indicate any significant concerns.

By March 22, 2021, the following parties and the summaries of their responses were received:

Crown-Indigenous Relations and Northern Affairs Canada

- Engage Inuit Environmental Advisory Group and ensure TMAC incorporates IQ, trains local people and gives regular updates on the project.
- TMAC should engage the Hunter and Trapper’s Organization on interaction of the project with Traditional activities including fishing and harvest of molluscs.

Fisheries and Oceans Canada

- The activity would require a new request for review of any placement of new in-water works for this project.

Environment and Climate Change Canada

- No comments on proposal.

Government of Nunavut

- No comments on proposal.

Kitikmeot Inuit Association

- Requested information be included in the 2021 Monitoring report Re: Removal of unused portion of pipe;
- Ensure updates are given to the Inuit Environmental Advisory Group; and
- Requested additional modelling for giant kelp which can be completed after the new diffuser is installed in August 2021.

CONCLUSION

After reviewing the Proponent's self assessment and parties' comments, the NIRB notes that there was no disagreements from interested parties or regulators with TMAC's conclusion that this is not a significant modification to the project as previously assessed; therefore the NIRB has determined that the proposed modifications do not require further assessment by the NIRB. The proposed modification can proceed to the next stage in the regulatory process and looks forward to receiving copies of any amended permits, licences, or authorizations that may be necessary to authorize the planned works.

The NIRB expects that TMAC will provide details on the implementation of these activities in its annual monitoring report to the Board, including the results of consultation and any changes to monitoring requested by parties or commitments made to parties to respond to parties requests. The NIRB notes in TMAC's submission that the new location of the pipe end may result in saline effluent reaching ice during the winter season. Should consultation with the Inuit Environmental Advisory Group indicate observations of changes to ice thickness which could result in risks to hunters or changes to traditional land use, the Board would expect TMAC to provide additional mitigation and monitoring measures for the Board to consider.

Should you have any questions or require further clarification regarding the NIRB's consideration and approach to this matter, please contact undersigned directly at (867) 983-4617 or kmorrison@nirb.ca.

Sincerely,



Keith Morrison
Manager, Impact Assessment
Nunavut Impact Review Board

cc: Doris North Distribution List
Hope Bay Phase 2 Distribution List
Karén Kharatyan, Nunavut Water Board
Ikaluktutiak Hunters and Trappers Organization
Daniel Coombs, Fisheries and Oceans Canada
Fisheries Protection Program, Fisheries and Oceans Canada
Transport Canada