



To: Nunavut Impact Review Board

From: Kangiqliniq Hunters and Trappers Organization

Re: Request for Final Written Submissions for the NIRB's Assessment of Agnico Eagle Mine Limited's "Saline Effluent to Marine Environment" Project Proposal

April 12, 2021

To Whom It May Concern:

On behalf of the Kangiqliniq Hunters and Trappers Organization (K-HTO), I would like to thank the Nunavut Impact Review Board (NIRB) for providing the opportunity to provide written comments on Agnico Eagle Mine's "Saline Effluent Discharge to Marine Environment" project proposal.

The K-HTO has concerns about how the project will impact caribou. If the project is approved, it is vitally important that comprehensive monitoring is done at local and regional scales to understand how the road and pipeline impact caribou movements and ability to cross the infrastructure. Reports should be made available regularly. Data from cameras, collars, and other sources should be made available for all interested parties to assess and evaluate.

If the project is approved, the K-HTO wants the proposed pipeline to be buried alongside the All-Weather Access Road (AWAR). The side slope of the pipeline cover should be constructed in a way that allows for caribou herds to pass without difficulty. The Kivalliq Inuit Association has submitted a technical comment citing literature that suggests side slopes between 1:6 to 1:3 (rise:run) facilitate caribou crossing linear infrastructure.

The public of Rankin Inlet is very concerned about the impacts that a leak or rupture in the pipe would have on the land, freshwater systems, vegetation, wildlife, and Inuit land use activities. Immediate shutdown of the pipe in the event of a rupture is an absolute must. The area contaminated by a spill must be minimized. Reports, pictures, and tests of any leak and areas affected by a spill must be made available to the public in a plain language form. Efforts must be made to prevent caribou, other wildlife, and fish from ingesting the spilled material. The land and wildlife must be protected.

Monitoring the discharge is extremely important. If the effluent is out-of-compliance with the regulations, discharge should not happen. The K-HTO and people of Rankin Inlet are very



concerned about fish, marine mammals, and other aquatic life. Monitoring must be done regularly and enforcement of regulations must happen if the effluent levels are not safe.

Impacts on wildlife, the land, and sea will impact Inuit activities including hunting, berry picking, and enjoyment of the land. Inuit use the land, rivers, lakes, and sea around the project footprint for hunting, berry picking, camping, boating, fishing, and other activities. Infringements upon Inuit hunting and harvesting rights must be minimized.

Thank you for your time and consideration.

Sincerely,

Harry Ittinuar
Acting Chairperson
Kangiqliniq Hunters and Trappers Organization