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April 9, 2021

Karen D. Costello
Executive Director,
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
XOB OCO

Sent via e-mail

Re: Final Written Submission

Dear Ms. Costello,

Nunavut Tunngavik Inc. (NTI) is writing in response to the Nunavut Impact Review Board's (NIRB) request for final written submissions regarding Agnico Eagle Mines Limited (AEM)'s "Saline Effluent Discharge to Marine Environment" Project Proposal (Proposal). NTI is participating in this review process to advocate for Inuit rights and the fulfillment of obligations under the Nunavut Agreement and the *Nunavut Planning and Project Assessment Act* (NuPPAA). NTI is also supporting Inuit organizations that are identifying issues of concern and suggesting solutions, including the Kivalliq Inuit Association (KIA), the Kivalliq Wildlife Board (KWB), as well as the Hunters and Trappers Organizations (HTOs) of potentially affected Kivalliq communities—most notably Rankin Inlet's Kangiqliniq HTO (KHTO).

As noted by NIRB in its Pre-Hearing Conference Report, NTI in this review process has identified concerns regarding:

- the incorporation of Inuit Qaujimajatuqangit in monitoring and management plans,
- the development of a Terrestrial Advisory Group (TAG),
- the capacity of communities and Inuit organizations to meaningfully contribute in the assessment process, the TAG, and in monitoring functions; and
- outstanding Inuit issues regarding the level of potential impacts to the terrestrial, freshwater, and marine environments, and harvesting activities.

NTI supports the agreement to establish a TAG for the Meliadine Gold Project and appreciates that AEM forwarded the draft Terms of Reference (ToR) for the Meliadine Mine TAG to NTI. AEM has included NTI

in the membership list for the Meliadine Mine TAG and NTI can confirm its participation on the TAG. AEM has also included the following organizations as members of the Meliadine Mine TAG: the Government of Nunavut (Department of Environment), KIA, KHTO, Issatik Hunters and Trappers

Organization, Chesterfield HTO, Arviat HTO, Northlands Denesuline First Nation, Sayisi Dene First Nations, and Environment and Climate Change Canada. Given the concerns expressed by the Baker Lake HTO and KWB regarding this Project and their extensive knowledge and experience related to terrestrial issues and mine impacts, NTI recommends that these two organizations also be part of the Meliadine Mine TAG.

Once the final membership of the Meliadine Mine TAG is confirmed, NTI recommends that all the TAG members be given the opportunity to comment on and suggest adjustments to the draft ToR. In its review of the draft ToR, NTI notes that the ToR should be strengthened to:

- emphasize the equal value of scientific information and Inuit Qaujimajatuqangit in monitoring and the review of management issues;
- provide for monitoring programs to collect and use community knowledge and Inuit Qaujimajatuqangit; and
- allow TAG members to provide their advice and recommendations to NIRB when a consensus decision or recommendation on an issue cannot be reached.

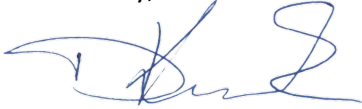
NTI understands that Meliadine Mine TAG will be an advisory group and that the advice, decisions and recommendations of the TAG will be forwarded to NIRB. It is critical for the full understanding of potential impacts and the implementation of appropriate mitigation measures that integrate community knowledge and Inuit Qaujimajatuqangit, as well as for transparency, that when consensus is not reached on an issue, that NIRB be made aware of all views of the TAG members, including those of Inuit organizations.

NTI also recommends that the establishment and functions of the Meliadine Mine TAG be formally set out through the Project terms and conditions as has occurred for the TAG related to Whale Tail Pit Project, Project Certificate No. 008, Amendment 001. The Whale Tail Pit Project Certificate No. 008 directs the TAG to incorporate Inuit Qaujimajatuqangit in the mitigation and monitoring details within the Terrestrial Ecosystem Management Plan and other management plans. In addition, the Whale Tail Pit Project Certificate No. 008 mandates the use of Inuit Qaujimajatuqangit in a number of instances to address terrestrial issues, as well as in monitoring. NTI notes that the current Project Certificate for Meliadine Gold Mine only requires the use of Inuit Qaujimajatuqangit in relation to marine shipping and walrus habitat (Term and Conditions #79, #84, #85). With the establishment of the Meliadine Mine TAG, there should be accompanying requirements for the collection and use of Inuit Qaujimajatuqangit for all terrestrial values in the Project terms and conditions.

NTI supports increasing the level of community and Inuit involvement in monitoring and decision-making for the Meliadine Gold Project generally and anticipates that the Meliadine Mine TAG will be an important tool for identifying and mitigating Project impacts and addressing concerns.

In addition, NTI supports additional Project terms and conditions that address community and Inuit concerns and to ensure appropriate monitoring, mitigation and adaptive management measures are applied for terrestrial, freshwater, marine environments, and harvesting activities in a manner that adequately integrates Inuit views and Inuit Qaujimajatuqangit.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David Kunuk', with a stylized flourish at the end.

David Kunuk
Chief Operating Officer