

April 12, 2021 Karen D. Costello Executive Director, Nunavut Impact Review Board P.O. Box 1360 Cambridge Bay, NU XOB OCO

On behalf of the Kivalliq Wildlife Board (KWB), I would like to thank the Nunavut Impact Review Board for the opportunity to review Agnico Eagle Mines (AEM) Final Environmental Impact Statement for the proposed pipeline.

Previous assessment activities by the KWB included a review of the Draft EIS and preparation of Information Requests (IR) required to clarify the completeness of the EIS. Technical Comments were also prepared and were to be discussed during the technical meeting. While AEM has worked to address concerns brought forward throughout the process, there remains uncertainty regarding key issues brought forward earlier in the review process and during the community round table.

The KWB understands that outstanding issues include the need for further analysis of caribou data, commitments regarding the creation of a Terrestrial Advisory Group, and commitments to conduct monitoring which will allow for adaptive management. Additional details about these concerns can be seen in the recommendations that follow.

The KWB's concerns remain the same as those expressed in the KWB technical comments. Generally, these concerns are:

- a. The impacts of the proposed pipeline and AWAR on Caribou migrations
- b. The potential impact of spills on freshwater waterbodies along the AWAR
- c. Impacts on Inuit Harvesting

KWB-1 Impacts of the proposed pipeline and AWAR on Caribou migrations

The KWB has heard on multiple occasions that impacts of the all-weather access road (AWAR) on the Qamanirjuaq caribou have been felt by communities throughout the Qamanirjuaq range. This suggests that there is already an impact on caribou which is not being assessed by the current monitoring and mitigation measures. AEM had committed to a regional approach that integrates IQ and science through the creation of a Terrestrial Advisory Group (TAG). While the KWB supports the approach, it should be noted that HTOs and the KWB do not currently have the capacity to participate in the TAG. The KWB also recommends that, if the TAG is created, all correspondence including the terms of reference,



supporting documents, meeting minutes, and participant comments should be made available for the public on the Nunavut Impact Review Board's Public Registry.

KWB-2 Impact of spills on freshwater waterbodies along the AWAR

The KWB is concerned that the probability and impacts of spills are not being properly communicated. During the community roundtable, a question was asked as to what the impacts of a spill would be on vegetation. The answer was that it would kill the vegetation. The follow up to that question was whether or not this was communicated to the women's working group that AEM created. The answer was no. The KWB is concerned that these potential impacts are not being communicated.

KWB-3 Impacts on Inuit Harvesting

The KWB remains concerned about impacts of the project on Inuit harvesting. While the KWB notes that AEM has made commitments to the Kangiqliniq Hunters and Trappers Organization to discuss a no hunting zone, the KWB is concerned that this does not address concerns about AEM internal policy as described by the commentary on term and condition 48 trumping the Nunavut Agreement. The KWB also notes that AEM makes assumptions that Inuit will stop using Melvin Bay without communicating or listing the impacts discharge will have on Inuit harvesters who currently use the area. The KWB recommends that AEM clearly communicate whether or not inuit will be able to safely harvest fish and muscles from with-in the mixing zone around Itivia and the islands in the surrounding area.

These concerns should be addressed prior to the finalization of the regulatory process.

Sincerely,

Clayton Tartak

Research Coordinator

Kivalliq Wildlife Board