



**NIRB File No.: 17EN059**  
NPC File No.: 148574  
KIA File No.: KTL113B001

July 26, 2017

Thomas Hart  
Transition Metals Corporation  
410 Falconbridge Road, Unit 5  
Sudbury, ON P3A 4S4

Sent via email: [trhart@transitionmetalscorp.com](mailto:trhart@transitionmetalscorp.com)

**Re: Opportunity to address comments received regarding Transition Metals Corporation's "Arcadia Bay Property" Project Proposal**

Dear Thomas Hart:

On May 19, 2017 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Transition Metals Corporation's (Transition) "Arcadia Bay Property" project proposal from the Nunavut Planning Commission (NPC or Commission). On July 4, 2017 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by July 25, 2017.

On or before July 25, 2017 the NIRB received comments from the following interested parties:

- Government of Nunavut (GN)
- Environment and Climate Change Canada (ECCC)
- Fisheries and Oceans Canada (DFO)
- Indigenous and Northern Affairs Canada (INAC)

All comment submissions received by the NIRB relating to this project proposal can be obtained from the NIRB's online public registry at [www.nirb.ca](http://www.nirb.ca) by using any of the following search criteria:

- Project Name: Arcadia Bay Property
- NIRB File No.: 17EN059
- Application No.: 125155

A *summary* of the public concerns reflected in the comment submissions relate to the following:

- Proponent to comply with the *Fisheries Act* during project activities, and ensure that the project do not cause any harm to fish and fish habitat by following DFO's guidance tools;
- The Proponent's Environmental Management Plan (EMP) lacks sufficient information regarding waste management planning. Information requested as follows:

- Specify whether the onsite incinerator is able to handle sewage/blackwater from the pacto toilets and clarify that the incineration equipment selected for onsite use is specifically designed to handle incineration of black water;;
- Incineration of black water and sludge is discouraged unless the incinerator is specifically designed to handle this waste stream, and the manufacturer's operating instructions are strictly followed to achieve appropriate combustion;
- Lack of information within the Abandonment and Restoration Plan:
  - Include a commitment to backfill or cap all drill holes prior to the end of each field season and upon completion of the project, in order to reduce the impacts to wildlife habitat and to prevent the introduction of contaminants from the surface to the sub-surface.

The NIRB would like to provide the Proponent with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **August 9, 2017**.

If the Proponent determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at [info@nirb.ca](mailto:info@nirb.ca), or through the online public registry at [www.nirb.ca](http://www.nirb.ca).

If you have any questions or require clarification, please contact the undersigned directly at (867) 983-4982 or [samuno@nirb.ca](mailto:samuno@nirb.ca).

Sincerely,



Solomon Amuno, PhD  
Technical Advisor II  
Nunavut Impact Review Board

cc: Distribution List  
Karén Kharatyan, Nunavut Water Board  
Geoff Clark, Kitikmeot Inuit Association  
Wynter Kuliktana, Kitikmeot Inuit Association  
Melissa Pinto, Environment and Climate Change Canada  
Gabriel Bernard-Lacaille, Environment and Climate Change Canada  
Veronique D'Amours-Gauthier, Fisheries and Oceans Canada  
Kathleen Buck, Fisheries and Oceans Canada  
Felexce Ngwa, Indigenous and Northern Affairs Canada  
Julia Prokopick, Indigenous and Northern Affairs Canada