



Kelli Gillard  
a/Director, Technical Services  
Nunavut Impact Review Board  
P.O Box 1360  
Cambridge Bay, NU X0B 0C0

**RE: Comment Request for John Tugak’s “Huckleberry Exploration” project proposal (NIRB File No. 17EA068)**

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on John Tugak's "Huckleberry Exploration" project proposal.

Should you have any concerns with our comments, please contact me by phone at 867-975-7830 or by email at [ezell@gov.nu.ca](mailto:ezell@gov.nu.ca).

[Original Signed By]

Erika Zell  
*Avatiliriniq Coordinator*  
*Government of Nunavut*

GN-01: Project timing and caribou disturbance	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Project Timing and Dates, and Caribou Disturbance
References	Project_application_125187_as_of_2017-12-12
CONCERNS	
<p>The Proponent has listed the start, end, and proposed authorization dates all as “2017-11-23”. This is the same as the application date of the proposal and has already past.</p> <p>Further, the Project location is within calving and post calving habitat for the Qamanirjuaq caribou herd. The Proponent should be aware that calving and post calving grounds are of critical importance for maintaining healthy caribou herds, and are especially vulnerable to disturbance during the calving period. Habitat modification through permanent works/infrastructure could be detrimental to calving caribou and impact overall health and productivity. Consistent disturbance or cumulative fragmentation of these habitats may result in serious negative impacts to herd demography or population size. The Proponent should be aware that projects within calving and post calving grounds will be subject to increased scrutiny as they proceed through the regulatory process.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN requests that the proponent provide clarification for the dates that it intends to conduct project operations. Additionally, due to the location of this Project, the Government of Nunavut recommends project activities take place outside the dates of June 9 to July 3 each year to prevent disturbances to calving Qamanirjuaq caribou during the sensitive calving and post-calving period.</p> <p>The GN also recommends that no permanent camp infrastructure be installed in calving grounds, including roads, trails, airstrips, permanent buildings, and/or other site modifications. All exploration materials should be completely removed and remediated upon the completion of the currently proposed project schedule.</p>	
ADDITIONAL COMMENTS	
N/A	

<b>GN-02: Wildlife deterrence</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Wildlife Deterrence
<b>References</b>	Wildlife protection and response plan_PKL-PTL-FXL-CH-HB_V5
<b>CONCERNS</b>	
<p>Section 3.2.2.3 of the Proponent's wildlife protection and response plan states: <i>"When firearms are to be used there will always be two individuals, one person with a firearm (12 gauge) for deterrent use, the other as back up having a rifle with lethal force or a 12 gauge with lethal rounds... Shoot with the intention of stopping the threat, using the buckshot or 1-ounce lead slugs or with the rifle as appropriate, to kill the animal."</i></p> <p>The only mechanism(s) that the GN recommends for the purposes of euthanizing wildlife larger than small game is an open-choked 12 gauge shotgun with 1oz lead slugs or a 30-06 caliber rifle. The Proponent's wildlife protection and response plan does not differentiate what types of ammunition will be used for which species. Additionally there should be no circumstances where buckshot shells are utilized as a euthanizing method.</p> <p>See Section 80, sub-section (2) of the <i>Nunavut Wildlife Act</i> for a list of prohibited means to destroy large game.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN requests that the proponent clarify that for all medium and large game a 1oz lead slug or 30-06 rifle will be used as the euthanizing ammunition. For small game (fox) a minimum of .22 caliber or .22 magnum ammunition should be used.</p>	
<b>ADDITIONAL COMMENTS</b>	
N/A	

<b>GN-03: Waste management</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Wildlife and Waste Managment
<b>References</b>	Wildlife protection and response plan_PKL-PTL-FXL-CH-HB_V5
<b>CONCERNS</b>	
<p>Section 2.2.3 of the Proponent's wildlife protection and response plan outlines "General recommendations directed to minimize wildlife interactions related to food wastes and garbage."</p> <p>There is a failure to address how grey water and/or sewage will be stored and what measures will be taken to exclude wildlife from said storage areas and/or how airborne scent from these storage areas will be minimized.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN requests that the proponent outline how grey water and/or waste water will be managed in order to minimize the chances of said waste being a significant attractant for wildlife.</p>	
<b>ADDITIONAL COMMENTS</b>	
<p>Ideally, a physical barrier will prevent wildlife from accessing waste water storage areas and location of storage of grey water/waste water would be as far from areas where workers are present as infrastructure allows. Predominant wind direction should be factored into this decision.</p>	

<b>GN-04: Food and water service</b>	
<b>Department</b>	Health
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Food and Water Service
<b>References</b>	Eating or Drinking Places Regulation; Public Water Supply Regulation
<b>CONCERNS</b>	
<p>The camp food services and drinking water system have not yet undergone review by the Department of Health Environmental Health Officer (EHO). A lack of adequate review may lead to issues with these systems going unrecognized and unmitigated.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN recommends the Proponent contact the regional EHO regarding the review of food and water services in the camp prior to operation of the camp.</p>	
<b>ADDITIONAL COMMENTS</b>	
<p>The regional EHO is located in Rankin Inlet:</p> <p>Gary Nelson  Rankin Inlet Wellness Center  Bag 72, Rankin Inlet, NU X0C 0G0  Phone (867) 645 8071  Fax (867) 645 8272  <a href="mailto:GNelson@GOV.NU.CA">GNelson@GOV.NU.CA</a></p>	