

Screening comment # GN-01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	General – Lack of Information Required for Assessment of the Project
References	<ul style="list-style-type: none"> <li>• Attachment 2 - Ege Bay Project Proposal</li> <li>• Project_application_125336_as_of_2018-04-27</li> <li>• Project shapefiles provided in the application</li> </ul>
CONCERNS	
<p>The GN is concerned with a general lack of information about Project activities. There are numerous instances of conflicting or missing information that is required to assess the level of activity proposed in the application, and understand the potential impacts to wildlife and the environment of that activity. Examples include the following:</p> <ul style="list-style-type: none"> <li>- There is uncertainty regarding the spatial extent of the Project. Figure 2 in “Ege Bay Exploration Program Project Proposal, April 2018” shows a large area encompassing all lease access lands, which total over 860km<sup>2</sup>, but shapefiles and descriptions in the proposal suggest that exploration is limited to a portion of IOL Parcel IG-03 that is approximately 11.5km<sup>2</sup>.</li> <li>- There is uncertainty regarding the temporal extent and level of Project activity. The Proponent states, <i>“The camp will be capable of being operated year-round.”</i> Later in the Project proposal document, pg. 7, <i>“Baffinland expects to maintain a small care and maintenance staff year-round during most years...”</i>. In section 3.2, the Proponent states, <i>“Ultimately the exploration program could grow to up to nine (9) diamond core drills operating year-round.”</i> These conflicting statements cause ambiguity with regard to the temporal extent of the proposed Project.</li> <li>- There is uncertainty regarding the length and use of the access road. The Proponent states that this road will be 4km long, but shapefiles provided in the application show it to be over 8km. Additionally, the Proponent has not provided information on potential traffic volume or addressed possible impacts regarding fuel consumption, noise generation of blasting, quarrying, crushing, transporting quarried materials, and overall construction and use of the road.</li> <li>- Baseline environmental studies have not been developed for the Project, nor are they planned. Aside from archaeological surveys and basic quantification of Project water supplies, the Proponent states that <i>“baseline studies are not planned at this time.”</i> A lack of baseline environmental information hinders the ability to monitor Project effects.</li> <li>- There is uncertainty related to the size of the Project footprint, Potential Development Area</li> </ul>	

(PDA), impacted vegetation areas, and habitat disturbance/loss. The Proponent states that the removal of vegetation is “*negligible*” but also indicates that vegetation surveys have not been completed in the exploration area.

**SUGGESTIONS AND RECOMMENDATIONS**

The GN suggests that the Proponent review the application for inconsistencies and missing information.

Due to the spatial and temporal extent of the project proposal, the GN recommends that the Proponent conduct wildlife and vegetation baseline studies on species abundance and distribution, as well as monitoring levels of disturbance from Project activity. See comment # GN-04 for specific recommendations related to caribou.

**ADDITIONAL COMMENTS**

N/A

<b>Screening comment # GN-02</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	General – Mitigation and Monitoring Plans from the Mary River Project
<b>References</b>	Attachment 2 - Ege Bay Project Proposal
<b>CONCERNS</b>	
<p>The GN is concerned that the Proponent has cited multiple environmental management plans developed for the Mary River Project without specifying which elements of these plans are applicable to the Ege Bay Project.</p> <p>The GN is also concerned that there are no steps or indications of how the Mary River management plans will be implemented within the context of the Ege Bay Project.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN recommends that the Proponent separate the portions of its Mary River management plans that are applicable to Ege Bay into a single or multiple documents that can be assessed within the context of the Ege Bay proposal.</p> <p>The GN recommends that the Proponent provide the completed management plans within this application, and that Project screening not be considered complete until these plans have been reviewed by stakeholders.</p>	
<b>ADDITIONAL COMMENTS</b>	
N/A	

<b>Screening comment # GN-03</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	General – Management Plans Under Development
<b>References</b>	Attachment 2 - Ege Bay Project Proposal
<b>CONCERNS</b>	
<p>The GN is concerned that several management plans are still under development at the time of this review. The Proponent lists three plans as unfinished:</p> <ul style="list-style-type: none"> <li>- Spill Contingency and Prevention Plans</li> <li>- Closure and Reclamation Plan</li> <li>- Monitoring and Inspection Plan</li> </ul> <p>Without this information provided within the application, it cannot be reviewed or assessed at this time. The lack of assessment of these sections leaves information gaps in the GN's assessment of this Project Proposal.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN recommends that the Proponent provide the completed management plans within this application, and that Project screening not be considered complete until these plans have been reviewed by stakeholders.</p>	
<b>ADDITIONAL COMMENTS</b>	
N/A	

Screening comment # GN-04	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Terrestrial Mammals
<b>References</b>	<ul style="list-style-type: none"> <li>• Attachment 2 - Ege Bay Project Proposal, Section 5.4, pg. 13</li> <li>• Jason Prno Consulting Services Ltd. 2017. Results of Community Workshops Conducted for Baffinland Iron Mines Corporation's Phase 2 Proposal. Report prepared for Baffinland Iron Mines Corporation. January 2017.</li> </ul>
CONCERNS	
<p>The Proponent describes caribou in the Project area as follows, <i>“Caribou are expected to remain at low numbers for the next couple of decades. However, there is evidence that caribou do occur throughout the entire region. While some populations of caribou migrate between preferred habitats in summer and winter, North Baffin caribou appear to be non-migratory and are likely to be found relatively equally in many locations throughout the Project area.”</i></p> <p>Work done by the GN in the area, as well as IQ collected in a report conducted for BIMC, indicates that North Baffin caribou do exhibit dynamic migratory pathways and have preferred seasonal habitats. In addition, low caribou populations have resulted in congregations of small groups in key habitat and areas containing the best forage, which means these populations do not exhibit uniform distribution across the Project area.</p> <p>While little is known about these populations, the Proponent has provided an inaccurate description of caribou behaviour and population distribution in the Project area.</p> <p>Aside from noting general impacts, such as noise disturbance, the Proponent has not provided sufficient information to characterize the spatial or temporal extent of its activities or the possible impacts of Project activity on caribou populations in the vicinity of the Project area.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends that the Proponent complete caribou baseline monitoring studies, a review of appropriate literature, and consult with local IQ holders and subject matter experts on this issue. Once these baseline studies are concluded conclusions on impacts to caribou can be derived.</p>	

In addition to providing more detail on expected impacts to caribou, the GN recommends that the Proponent begin collecting baseline disturbance data to assess the impacts to caribou from the Project. This will be important if the Project undergoes expansion in the future.

The GN recognizes that caribou populations are low, and that the most effective means to monitor Project impacts to caribou is through a regional caribou population monitoring effort. Such a program could take the form of contributions to an existing GN effort. The GN is willing to advise or collaborate with the Proponent on this issue.

The Proponent should review the IQ and caribou work it completed for Phase 1 of the Mary River Project, as well as working directly with IQ holders in Igloodik and Hall Beach to better understand caribou habitat use and occupancy patterns in the Ege Bay Project area.

**ADDITIONAL COMMENTS**

N/A

<b>Screening comment # GN-05</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Air Traffic and Noise
<b>References</b>	Attachment 2 - Ege Bay Project Proposal
<b>CONCERNS</b>	
<p>In describing sensitive wildlife locations, the Proponent states, "<i>Air traffic will avoid this area and will be mindful of the possible presence of other walrus haul-outs as well as caribou in the area. Other key mitigation measures to minimize noise emissions include adherence to minimum flight altitudes specified in land use licenses.</i>"</p> <p>The GN is concerned that there is significant potential for disturbance impacts to sensitive wildlife species from air traffic.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN recommends developing and sharing approach and departure vectors for fixed and rotary wing aircraft that respect minimum flight altitudes and provides adequate offset distances from sensitive wildlife resources that are known and discovered through the course of the Project. This would include flights in and out of camp, as well as point-to-point personnel shuttling and drill repositioning throughout the Project area on an as-needed basis.</p> <p>The GN also recommends implementing the flight log and pilot awareness protocols utilized in the Mary River Project, to improve compliance and support tracking of impacts.</p>	
<b>ADDITIONAL COMMENTS</b>	
N/A	

<b>Screening comment # GN-06</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Polar Bears
<b>References</b>	N/A
<b>CONCERNS</b>	
<p>The Proponent does not address polar bears within its proposal application. Polar bears are a key species within the Arctic, as well as a Valued Ecosystem Component (VEC), and listed as a species of Special Concern by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC).</p> <p>The ecological impact of seasonal shipping and exploration activities related to this Project has not been evaluated for polar bears and no ecological monitoring or mitigation measures have been proposed in the current application. As such, further assessment is necessary.</p> <p>The GN is concerned that bears are not discussed within wildlife impacts, waste management, or bear safety and response plans.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN recommends that the Proponent describe how its activities occur within bear habitat and how bears may be impacted by the proposed activities, including denning, sows and young cubs, etc.</p> <p>The Proponent should describe specific measures within its waste management plan related to bears.</p> <p>The Proponent should describe any and all measures taken to train, prepare for, and protect site-based workers during bear encounters, for both their safety and that of the bears.</p> <p>The GN has a variety of resources available to support training and bear awareness, and is willing to advise or collaborate with the Proponent in doing so.</p>	
<b>ADDITIONAL COMMENTS</b>	
<p>Working in a remote area in proximity to the coast places Project site staff in polar bear habitat, specifically within the Foxe Basin sub-population. Site staff should expect bear encounters and be trained and prepared to deal with them.</p> <p>Not only can bears be impacted by project activities (e.g. aircraft over flights, additional energy expenditure through avoidance of ground-based activity), but poorly managed waste can serve as an attractant to bears, leading to injury or death to the bears, damage to equipment, and possible injury</p>	

or death to Project staff on-site.

<b>Screening comment # GN-07</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Drilling Waste Management
<b>References</b>	Attachment 2 - Ege Bay Project Proposal
<b>CONCERNS</b>	
<p>In describing water use for exploration work, the Proponent states, "<i>For the exploration work, 270 m<sup>3</sup> of water will be pumped daily from Unnamed Lake #1. The estimated water volume is to operate nine (9) exploration drills. ... Opportunities to recycle drill water will be investigated and utilized as the scale of the drilling program increases over time.</i>"</p> <p>The GN is concerned that there is a potential for adverse environmental impacts from disposal of drilling fluids and muds, including effects on vegetation and wildlife.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The GN recommends describing drilling waste management for the exploration program and assessing the potential environmental impacts as appropriate.</p>	
<b>ADDITIONAL COMMENTS</b>	
N/A	

<b>Screening comment # GN-08</b>	
<b>Department</b>	Health
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Eqe Bay Project Proposal – Camp Services and Sewage Disposal
<b>References</b>	<ul style="list-style-type: none"> <li>• NIRB Notice of Screening and comment request</li> <li>• Project application No. 125336 as of 2018-04-27</li> <li>• Eqe Bay Exploration Program Project Proposal – April 2018</li> </ul>
<b>CONCERNS</b>	
<p>The application notes that an initial 50 person camp will be established in fall 2018 to support the exploration program. The camp will be providing food, water, and waste systems to service the camp. The services will require review under the Public Health Act.</p> <p>Additionally, in the Eqe Bay Exploration Program Project Proposal (April 2018) document, Section 2.3, Sewage and Grey Water Disposal that <i>“There is the option that greywater will be directed to an excavated sump rather than to the sewage treatment plant. This option will be considered as a means of improving the quality of the sewage influent into the sewage treatment plant, to optimize treatment performance. The sump will be located more than 31 m from the high water mark of Eqe Bay.”</i></p> <p>Should grey water be directed to an excavated sump or any other wetland discharge without treatment a feasibility study should be completed to ensure the effluent will meet acceptable discharge criteria as per the Government of Nunavut. There is further concern with wetland discharge that communicable disease may be transmitted to humans and/or wildlife.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The Government of Nunavut recommends the Proponent contact the Department of Health Environmental Health Officer, located at Iqaluit Public Health, Box 1000 Iqaluit, (867 645 8071) to provide information regarding the food and water services and facilities that will be provided to the Project workers.</p> <p>Further, the Government of Nunavut recommends that all sewage effluent be directed to the package sewage treatment plant prior to discharge. Should grey water be diverted to an excavated sump, or any other method of discharge that does not undergo treatment, a feasibility study be completed to ensure that the effluent will meet suitable discharge standards and transmission of communicable disease will not occur to humans or wildlife.</p>	
<b>ADDITIONAL COMMENTS</b>	

N/A

<b>Screening comment # GN-09:</b>	
<b>Department</b>	Culture and Heritage
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Archaeological and Palaeontological Sites
<b>References</b>	NIRB Notice of Screening
<b>CONCERNS</b>	
<p>The Proponent is proposing a mineral exploration program in the Qikitqtani region approximately 90km southeast of Steensby Port (Ikpikitturjuaq), and 190 km northeast of the community of Hall Beach. The proposal puts forward the establishment of: a fifty (50) person camp which will subsequently expand to 100 persons and associated infrastructure (greywater and sewage treatment facility, incinerator); the use of a sealift barge landing area and storage areas; the construction of an airstrip and access trails connecting the camp site to the exploration area; the use of water from surrounding lakes/pond; geological mapping, till sampling and a drilling program.</p> <p>A search of the Nunavut Archaeological Site indicates that nine (9) sites are recorded in the proposed exploration area. This however does not preclude the presence of unidentified sites or cultural features as to this day no systematic archaeological reconnaissance has been conducted in this area.</p>	
<b>SUGGESTIONS AND RECOMMENDATIONS</b>	
<p>The Department of Culture and Heritage has no concerns with this proposed project as the Proponent's archaeologist has already filed a Class 2 permit application to conduct the archaeological assessment of the different components associated with the proposed exploration activities in Ege Bay.</p> <p>All archaeological and palaeontological sites in Nunavut are protected by law. The applicant must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site. Moreover, the building of inuksuit is not recommended.</p>	
<b>ADDITIONAL COMMENTS</b>	
N/A	