



Gibson MacQuoid Project

Response to NIRB Screening Comments

June 4, 2018

North Country Gold Corporation (“NCGC”) has reviewed the comments provided from Fisheries and Oceans Canada Protection Program (“DFO-FPP”), the Government of Nunavut Department of Environment (“GN-DOE”), Environment and Climate Change Canada (“ECCC”), Indigenous and Northern Affairs Canada (“INAC”) and the Lutsel K’e Dene First Nation (“LKDFN”) regarding the Gibson MacQuoid Gold Project (“the Project”) screening and would like to express our appreciation for the time these agencies spent reviewing the project proposal and providing their comments.

Response to the DFO

NCGC will ensure all employees and contractors review and follow the DFO’s ‘*Freshwater Intake End-of-Pipe Fish Screen Guidelines*’ to mitigate any potential hazards to marine life around intake structures.

NCGC will notify the DFO-FPP at <http://www.dfo-mpo.gc.ca/pnw-ppe/violation-infraction/index-eng.html> if any operations have caused, or have the potential to cause, serious harm to fish.

The location of the water source used for the camp will be included in the Annual Reports submitted to INAC, Nunavut Water Board (“NWB”) and the Kivalliq Inuit Association (“KivIA”). NCGC will ensure that the capacity of the watercourse or waterbody will be sufficient enough to allow for camp water usage and will have no impact on lake level or flow.

Response to the GN

Concerns for adverse effects to caribou associated with proposed project activities

NCGC recognizes that caribou calving, and post calving grounds are of critical importance for maintaining healthy caribou populations and that special care and consideration needs to be made for cows and calves before, during and after calving to ensure these critical life periods are not impacted. NCGC will therefore ensure that exploration activities will follow the KivIA *Mobile Caribou Conservation Measures* which includes, but is not limited to:

- Hire wildlife monitoring personnel to be present at the Property who will monitor and report the location and estimated numbers of caribou immediately to the KivIA.
- No activities will occur **between May 1st and July 31st** (the closure period) on Inuit Owned Land (“IOL”) within designated calving grounds.
- **Between August 1st and September 30th** on IOL, within designated calving grounds, NCGC will conduct monitoring and if:

- there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within a thirty (30) km early warning zone from the boundary of the work area, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).
 - there are twenty-five (25) or more caribou within five (5) km of the work area boundary, then a five (5) km buffer zone around the work area will be monitored on a daily basis, and will immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities, aircraft traffic below 300 m above ground level (except as necessary for emergency purposes) and non-essential ground movements and camp activities until caribou numbers are below the threshold within the buffer zone.
- **Between October 1st and April 15th** on IOL, within designated calving grounds, NCGC will conduct monitoring and if:
 - there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary of the work area, then monitoring within a five (5) km buffer zone will be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).
 - there are fifty (50) or more caribou within two and a half (2.5) km of the work area, then NCGC will immediately reduce activities that have the potential to disturb caribou, including non-essential ground movements, operations and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), until caribou numbers are below the threshold within the buffer zone.
- **Between April 16th and April 30th** on IOL, within designated calving grounds, NCGC will conduct monitoring and if:
 - there are one (1) or more collared caribou or twenty-five (25) or more caribou within fifty (50) km of the boundary of the work area that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).
 - there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the work area, then NCGC will conduct monitoring within a five (5) km buffer zone on a daily basis, and will immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities, aircraft traffic below 300 m above ground level (except as necessary for emergency purposes) and non-essential ground movements and camp activities until caribou numbers are below the threshold within the buffer zone.

- **Between June 1st and July 15th** on IOL, outside of designated calving grounds, NCGC will conduct monitoring and if:
 - there are one (1) or more collared caribou or ten (10) or more caribou observed within the fifty (50) km early warning zone for the work area, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land, road surveys, snow track counts (if appropriate), remote camera surveys).
 - there are an estimated ten (10) or more caribou within the five (5) km buffer zone for the work area, then NCGC will conduct monitoring within a five (5) km buffer zone on a daily basis, and will immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities, aircraft traffic below 300 m above ground level (except as necessary for emergency purposes) and non-essential ground movements and camp activities until caribou numbers are below the threshold within the buffer zone.
- **Between July 16th and September 30th** on IOL, outside of designated calving grounds, NCGC will conduct monitoring and if:
 - there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within thirty (30) km of the work area, then monitoring within a five (5) km buffer zone will be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).
 - there are twenty-five (25) or more caribou within five (5) km of the boundary of the work area, then NCGC will conduct monitoring within a five (5) km buffer zone on a daily basis, and will immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities, aircraft traffic below 300 m above ground level (except as necessary for emergency purposes) and non-essential ground movements and camp activities until caribou numbers are below the threshold within the buffer zone.
- **Between October 1st and April 15th** on IOL, outside of designated calving grounds, NCGC will conduct monitoring and if:
 - there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary of the work area, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).
 - there are fifty (50) or more caribou within 2.5 km of the boundary of the work area, then NCGC will immediately reduce activities that have the potential to disturb caribou, including non-essential ground movements, operations and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), until caribou numbers are below the threshold within the buffer zone.

- **Between April 16th and May 31st** on IOL, NCGC will conduct monitoring and if:
 - there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within fifty (50) km of the boundary of the work area that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone will be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).
 - there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the work area , then then NCGC will conduct monitoring within a five (5) km buffer zone on a daily basis, and will immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities, aircraft traffic below 300 m above ground level (except as necessary for emergency purposes) and non-essential ground movements and camp activities until caribou numbers are below the threshold within the buffer zone.

- **Between May 15th and September 30th** on IOL, NCGC will not conduct exploration activities within 5 km of, or construct camps or any other permanent structures within ten (10) km of, designated caribou freshwater water crossings. During this time NCGC will conduct monitoring and if:
 - there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within twenty-five (25) km of the boundary of the work area that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone around the water crossing will be conducted every second day (e.g., height of land surveys, remote camera surveys).
 - there are fifty (50) or more caribou within five (5) km of the boundary of the work area that appear to be moving in the direction of the water crossing, then NCGC will conduct monitoring within a five (5) km buffer zone on a daily basis, and will immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities, aircraft traffic below 300 m above ground level (except as necessary for emergency purposes) and non-essential ground movements and camp activities until caribou numbers are below the threshold within the buffer zone.

- NCGC will ensure that aircraft (fixed-wing and helicopter) flights over occupied calving and post-calving areas will be at least 610 m above ground level and will always avoid areas of known caribou concentrations (subject to pilot discretion regarding aircraft and human safety). In other seasons aircraft will be at least 300 m above ground level.

Concerns with Camp Food and Water Services

NCGC will submit all information regarding the food, water services and facilities provided to the project workers to the GN Department of Health Environmental Health Officer for the Kivalliq Region Gary Nelson. Any additional instructions provided by Mr. Nelson will be adhered to.

Response to the ECCC

Concerns with Environment and Climate Change Contact Numbers

As per the recommendations provided by the ECCC, *Figure 6.1 NCGC Spill Response Action Plan*, in the *North Country Gold Gibson MacQuoid Project Spill Prevention and Response Plan*, has been updated to exclude the Environment and Climate Change Contact Numbers. In case of emergency, the 24-hour NT/NU Spill Report Line will be contacted first and NCGC will leave it to the discretion of the 24-hour NT/NU Spill Report Line team whether to involve the ECCC.

Response to INAC

Concerns of distance for re-fueling from the high-water mark of any water body.

As per the recommendations provided by the INAC, Section 5.2.2. *Transfer Risk Mitigation*, in the *North Country Gold Gibson MacQuoid Project Spill Prevention and Response Plan*, has been updated to include “re-fueling of any equipment should occur at a minimum of thirty-one (31) metres away from the high water mark of any water body.”

Response to LKDFN

Concerns for adverse effects to caribou associated with proposed project activities

Although the comment from the LKDFN was received after the submission deadline, NCGC considers all concerns and comments from interested stakeholders to be a priority. NCGC would like to reiterate that the planned 2018 program consists of activities that are considered to cause extremely low to no disturbance, with absolutely no disruption or destruction to caribou habitat. The 2018 program will comprise basic early-stage reconnaissance level activities such as mapping, prospecting, till sampling, short distance drone flights and ground geophysical surveys. The program is in compliance with the *Keewatin Regional Land Use Plan* (“KRLUP”) and all other current federal and territorial legislation. NCGC is dedicated to working with all interested stakeholders to ensure there are no detrimental effects to caribou (as well all any other flora or fauna). NCGC has agreed to postpone all activities in the Caribou Calving and Post Calving Zones until after August 1st, which exceeds the INAC Caribou Protection Measure (“CPM”) and the KRLUP, which both use a window of May 15th to July 15th, as well as the Government of Nunavut recommend window of June 9th to July 3rd. In addition to the later start, NCGC will also utilize adaptive management including following the *KivIA Mobile Caribou Conservation Measures* (described above in the response to the GN).