

GIBSON MACQUOID PROJECT (COMMENTS RECEIVED DURING THE NIRB PUBLIC SCREENING)

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD COMMENTS (BQCMB) COMMENT AND RESPONSE TRACKING TABLE

Comment	Source of comment	North Country Gold Corp. (NCGC) Response
<p>Particularly alarming to the BQCMB is the proposal to expand mineral exploration activities into the core calving and post--calving habitats of the Qamanirjuaq caribou herd.</p>	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>The comment is understood. Numerous mitigations, accommodations and adaptive management efforts (detailed in a response below) have been incorporated into the program. For clarity, activities are not being expanded, the same low impact early stage photography and soil sampling by foot, during select timing windows, is proposed as undertaken previously in calving ranges. The change from previous programs is to utilize a temporary camp outside of caribou calving ranges to reduce helicopter flights and potential associated impacts to wildlife.</p>
<p>Although proposals for industrial activities on calving and post-calving areas are always of concern to the BQCMB, this is of even greater concern at this time when the Qamanirjuaq caribou herd is declining. Sustainability of the herd is critically important to the food security and cultures of thousands of Indigenous peoples from Nunavut, Manitoba, Saskatchewan and the Northwest Territories.</p> <p>We acknowledge that caribou herds decline as a result of both the cumulative negative effects from various factors as well as the natural cycle of abundance. However the BQCMB believes it is crucial to minimize the level of cumulative effects resulting from industrial development activities to which declining herds are subjected.</p>	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>With respect to the reference to “industrial activities” and “industrial development activities”, the company wishes to clarify that its proposal on calving ranges is for temporary soil sampling (by foot) and photography, incorporating timing windows, environmental monitors, adaptive management and other best practices (detailed further below). The company’s activities will have no impact on the status of the herd.</p>
<p>As you know, the BQCMB has been actively involved for many years in discussions and policy and planning exercises about mineral exploration and development on caribou calving and post-calving areas, including recent long-term involvement in development of the Nunavut Land Use Plan. Through these processes and during regular board meeting discussions, board members from across the Beverly and Qamanirjuaq caribou ranges have restated their perspective that mineral exploration and development should be excluded from caribou calving and post-calving areas.</p>	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>We understand your perspective. NIRB is best placed to consider and respond to this comment.</p>

<p>The project proposal is likely to arouse significant public concern as a result of activities proposed in the core calving and post-calving areas of the Qamanirjuaq herd, due both to the nature of the activities and because the objective of these activities is to locate mineral resources that would justify further exploration and ultimately development of a mine and associated infrastructure.</p>	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>The response below describes the activities and how any potential impacts to caribou will be avoided. With respect to the comment regarding mine development and associated infrastructure, the proposal at hand and related regulatory decision is for the most early stage, low impact and innocuous exploration activities (not mine development). Potential public concerns about hypothetical developments that may or may not ever materialize should not influence the decision on the company's application.</p>
<p>The project proposal is likely to cause significant adverse eco-systemic and socio-economic effects because:</p> <ul style="list-style-type: none"> a) proposed activities could produce disturbance to caribou cows and calves during late summer and early fall, which is a vulnerable period when they need to be undisturbed to maximize their energy intake in preparation for the demands of winter; b) permitting exploration on the core calving and post-calving areas would set a precedent for allowing other exploration and development projects to occur elsewhere in these areas, initiating a situation in which negative cumulative effects on the herd from disturbance will accelerate over time; and c) increasing the level of cumulative effects experienced by the herd by increasing human-caused disturbance will contribute to continuing the decline of the herd, which could have severe ramifications for the food security of people who have traditionally harvested barren-ground caribou, should the herd decline to levels below which harvest is no longer sustainable. 	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>NCGC does not believe the proposed activities could cause significant adverse effects at an ecosystem or socio-economic level. For clarity, the proposed activities are very non-invasive and low impact and consequently highly unlikely to have a negative impact on caribou or their habitats. Based on past community discussions and feedback from the Kivalliq Inuit Association (KivIA), we have proactively incorporated numerous accommodations to plans and activities in order to address potential impacts to caribou. In addition to meeting all environmental regulations and permit conditions, these accommodations include:</p> <ul style="list-style-type: none"> • Planning the majority of exploration activities to occur outside of caribou calving and post-calving ranges, • Re-scheduling activities in caribou calving and post-calving ranges to occur after August 1, which exceeds and is more conservative than the timing windows proposed by the Government of Nunavut (June 9 – July 3) and the Keewatin Land Use Plan timing window (May 15 – July 15), • Reducing exploration activities in caribou calving ranges to only the most innocuous regional surveys (soil sampling by foot and drone imagery) which are very low risk and low impact, • Utilizing adaptive management including adoption of the Mobile Caribou Conservation Measures produced by the KivIA for the entire project area which includes procedures such as:

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| | | <ul style="list-style-type: none"> ○ If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within the thirty (30) km early warning zone from work areas, 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). ○ If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the work areas, then the Lessee shall monitor within a five (5) km buffer zone around the work area on a daily basis, and shall immediately suspend work that has the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone. ● Undertaking daily wildlife monitoring, wildlife observation logs and annual wildlife monitoring reporting, ● NCGC has offered and remains open to hiring of approved Inuit wildlife monitors during our recent community consultations, ● Utilizing a temporary camp, located outside of caribou calving ranges, to reduce potential impacts to wildlife associated with helicopter flights, ● Minimizing the duration of activities in caribou calving ranges to approximately 8 weeks, ● Full reclamation so that any minor disturbances are restored to original conditions so there is no impact to habitat. |
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<p>The project proposal is likely to lead to significant adverse impacts on crucial caribou habitat if results lead to development of a mine and also as a result of the precedent it would set for allowing other projects to occur on core calving grounds of this and other caribou herds, leading over time to development of one or more mines and/or other infrastructure on caribou calving grounds in Nunavut.</p>	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>Comments related to potential impacts from hypothetical proposals (ie the development of one or more mines) that may not ever materialize and in any event are not the subject of the company's application should not have a bearing on the subject decision at hand.</p>
<p>We acknowledge that the Proponent has made commitments in its permit amendment application to follow the Kivalliq Inuit Association's Mobile Caribou Conservation Measures and other measures intended to reduce disturbance to caribou. However, it is the Board's view that while these measures may <i>reduce</i> disturbance, the only certain method for <i>avoiding</i> negative effects on calving and post-calving caribou is to exclude those activities from these crucial areas. Furthermore, because the effectiveness of these measures for significantly reducing disturbance to caribou has not been tested, their use remains experimental. Therefore the Board believes these measures should not be used on a declining herd that is vital to the food security of so many people from Nunavut and beyond when there is another option that provides greater certainty for protecting caribou and habitat – namely to exclude development from the most crucial areas.</p>	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>We understand the perspective. See response above with respect to the comment about potential for negative effects from the proposed activities. NCGC would be happy to share monitoring reports with BQCMB in regards to the comment about the effectiveness of the Mobile Caribou Conservation Measures.</p>
<p>In the absence of any legislated protection for Qamanirjuaq caribou calving and post-calving areas, and with the territorial land use planning process stalled, the environmental review process continues to be the primary means by which the potential impacts of exploration and development on calving grounds and post-calving areas for this herd can be avoided. It is therefore critical that the NIRB apply a precautionary approach and not allow this project to conduct mineral exploration activities on the core calving and post-calving areas of the Qamanirjuaq caribou herd.</p>	<p>May 29, 2018 letter from Earl Evans, Chairperson BQCMB</p>	<p>NIRB is best placed to consider and respond to this comment with respect to its statutory authority.</p>