

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

KANGIQLINIQ HUNTERS AND TRAPPERS ORGANIZATION (KHTO) COMMENT AND RESPONSE TRACKING TABLE

Comment	Source of comment	North Country Gold Corp. (NCGC) Response
The KHTO does not support and strongly opposes this project	May 25, 2018 email from BSigurdson@GOV.NUV.CA	The comment is understood. Efforts are being made to arrange meetings in early June with KHTO to further clarify and discuss the nature of NCGC’s low impact activities, planned mitigations and to listen to KHTO comments and suggestions.
The project lies within the calving ranges of the Qamanirjuaq herd. The herd is currently the largest herd of Barren ground caribou in Canada but, preliminary results from the 2017 survey indicate a continued decline from 500,000 in 1994 to somewhere inbetween 200-300,00 caribou in 2017.	May 25, 2018 email from BSigurdson@GOV.NUV.CA	The company recognizes that its mineral exploration activities are partly located in caribou calving ranges. NCGC has incorporated a number of changes to its program and plans, including focusing the majority of activities outside of calving ranges. Further detail on mitigations in responses below.
The KHTO notes that the proponent plans on doing the work outside of calving season but, seasonal restrictions do protect from habit loss and habitat modification caused by exploration activities. Habitat loss has been identified as the main reason for declines of caribou across Canada. A continued decline will effect ecosystems across the qamanirjuaq range and will have severe effects on Inuit harvesting activities throughout the region.	May 25, 2018 email from BSigurdson@GOV.NUV.CA	<p>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:<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,

		<ul style="list-style-type: none">• 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.
Also note that the community of Rankin has not been meaningfully consulted regarding the project. While the proponent did come to Rankin, the consultation was very poorly scheduled, and conducted in the smallest venue available in Rankin. It was also conducted at a time when the community was under the impression that calving grounds were off limits to exploration activities.	May 25, 2018 email from BSigurdson@GOV.NUV.CA	The company made efforts to consult with communities prior to filing permit applications. Community meetings were held at Rankin Inlet (April 23, 2018), Chesterfield Inlet (April 24, 2018) and Baker Lake (April 25, 2018). These opportunities were advertised on the community facebook pages, radio advertisements, and through hard copy notices distributed in public places in each community. NCGC is open to planning larger venues for community meetings as necessary, and is open to suggestions from KHTO and other interest groups in that regard. The company is open to further discussions and notes that efforts are being made to arrange meetings with KHTO and other community meetings for early June.
The HTO recommends that the project is abandoned and recommends that regulators stop signing mineral exploration agreements with-in critical caribou habitat through out the Kivalliq.	May 25, 2018 email from BSigurdson@GOV.NUV.CA	NIRB is best placed to consider/respond to this comment.