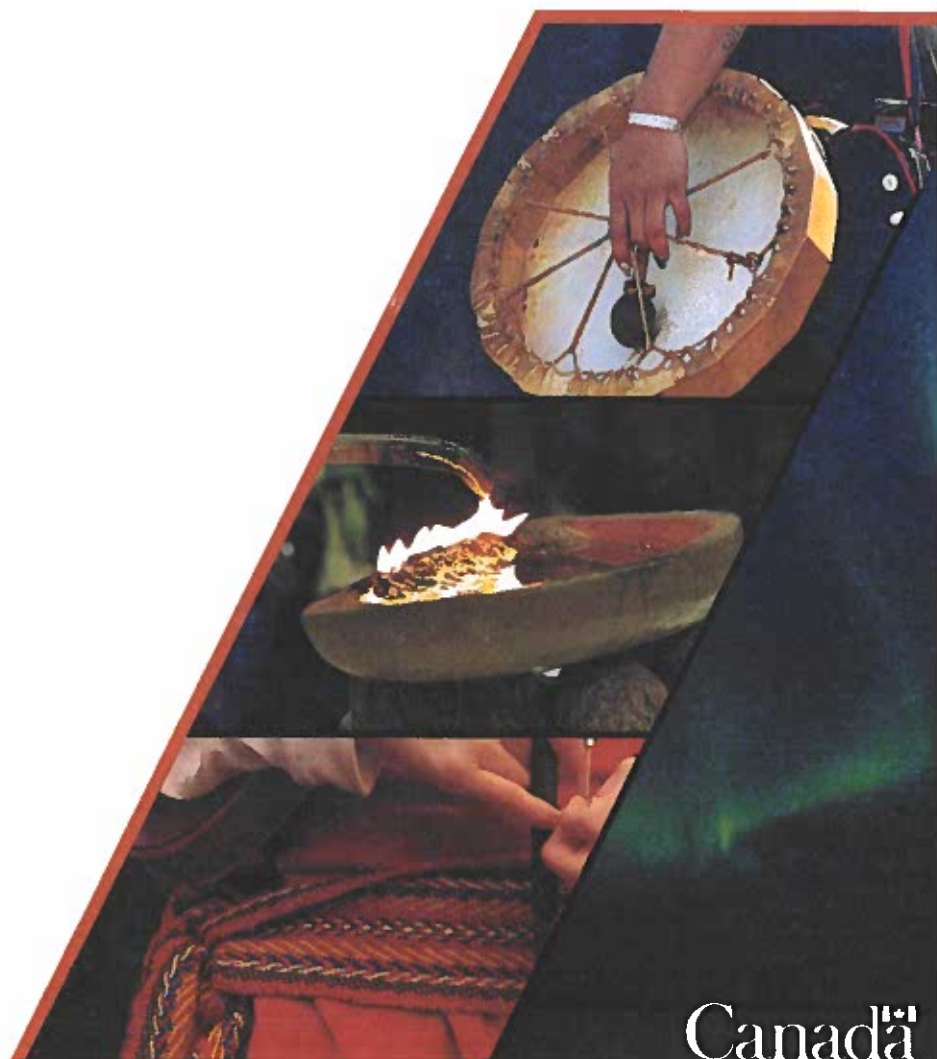




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for “Nahanni Construction Ltd’s Lupin Mine Winter Access” Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
19RN005
Our file - Notre référence
CIDMS # 1239886

February 04, 2019

Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for the Nahanni Construction Ltd's "Lupin Mine Winter Access" Project Proposal

Dear Ms. Ohokannoak,

On January 17, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Nahanni Construction Ltd's "Lupin Mine Winter Access" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the response below as it pertains to NIRB's request.

Any matter of importance to the Party related to the project proposal;

Spill Contingency Plan

The project proposal involves use of significant quantities of fuel and hazardous materials (diesel: 1,557,410 litres, gasoline: 500 litres, propane: 500 lbs, ANFO: 10,400 kgs, lubricants: 80,025 litres and lime: 91,000 lbs). Although, the proponent included a spill contingency plan with the project proposal, the plan lacks the measures that should be followed in regards to preventing water pollution from refuelling and storing of fuel and other hazardous materials. CIRNAC recommends NIRB to include the following additional terms and conditions, should the project proposal be approved to proceed:

- All fuel and other hazardous materials should be stored a minimum of 31 metres away from the high water mark of any water body and in such a manner as to prevent their release into the environment;



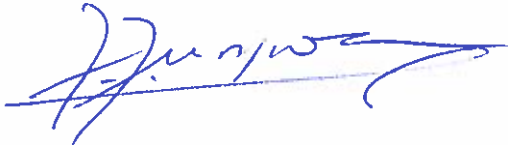
- Re-fueling of all equipment should occur a minimum of 31 metres away from the high water mark of any waterbody;
- Secondary containment or a surface liner should be used when storing fuel and chemicals at all locations;

Negative and Non-Mitigatable Impact in Environmental Impacts Matrix

The Proponent's impact identification matrix indicates that certain project activities (e.g., camp use, and construction, operation and decommissioning of access road) will result in "Negative and non-mitigatable impacts" on ground stability, water quality and vegetation, but there is no explanation as to why these impacts are considered non-mitigatable. CIRNAC recommends that the Proponent provides clarification in this regard.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Amal Roy at (867) 975-4554 or by e-mail at amal.roy@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

