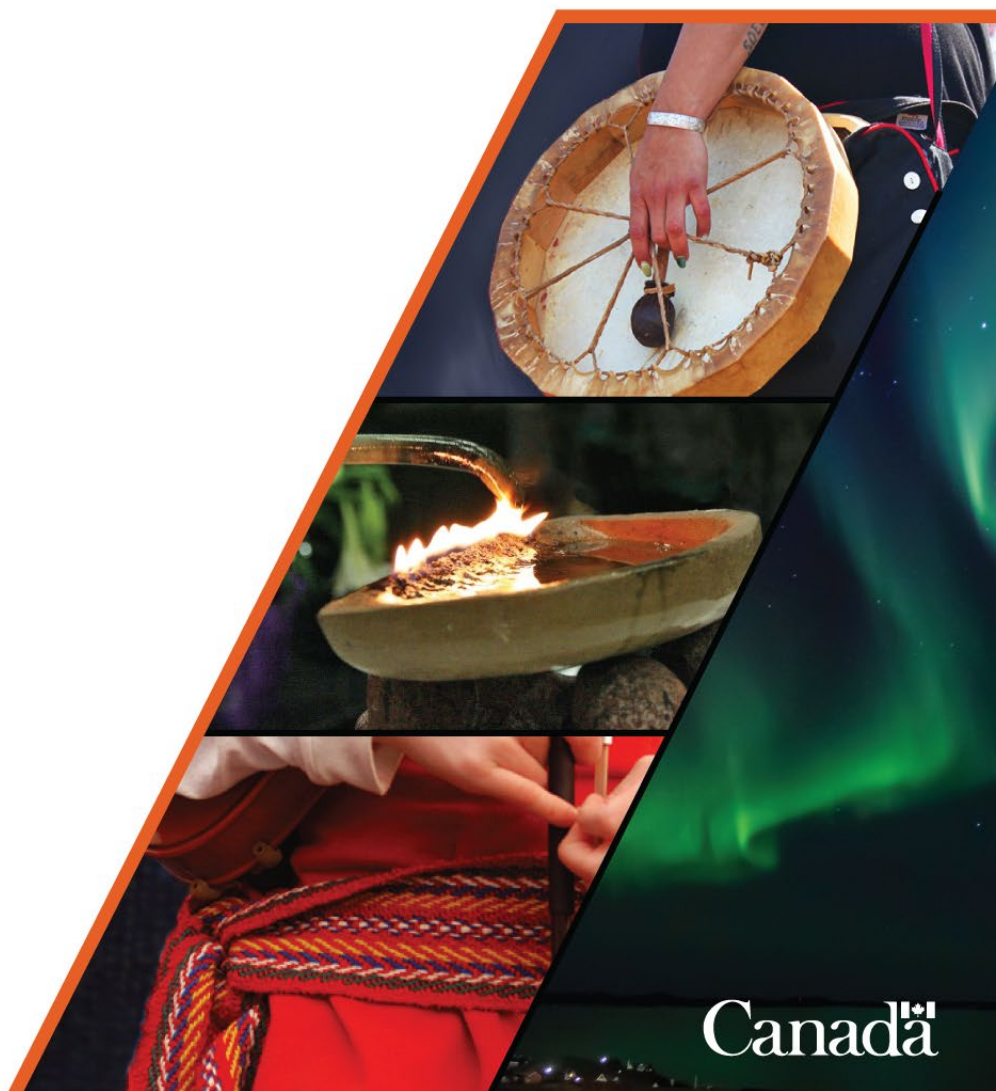




CIRNAC Comments to NIRB

Re: Notice of Screening for Emerald Geological Services' "Epworth" Project Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
23EN073
Our file - Notre référence
GCdocs#121985747

February 6, 2024

Francis Emingak
Technical Advisor I
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Emerald Geological Services' "Epworth" Project Proposal

Dear Francis Emingak,

On January 16, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on Emerald Geological Services' "Epworth" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

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

CIRNAC #1: Storage Considerations of Hazardous Materials

The Proponent indicates that fuel will be stored in berms, and fuel spill kits will be available at fuel sites and at the drill. Further, the Proponent indicates that any drill cuttings will be deposited into depressions with soil covering to mitigate potential runoff into waterbodies. However, the Proponent does not indicate locations of stored fuels and drill cuttings with respect to waterbodies. CIRNAC notes that distance to waterbodies is also a factor to mitigating risk of spills and runoff into water bodies, and should also be mentioned in the environmental plan.

CIRNAC recommends that the Proponent update their plans in the future processes to provide consideration for hazardous material use and storage, to ensure distance from water bodies is identified as a risk and mitigated appropriately.

CIRNAC #2: Consultation with Interested Parties

CIRNAC recommends that the Proponent consult with relevant Inuit and community organizations, including the Hamlet of Kugluktuk and the Kugluktuk Hunters & Trappers Organization, regarding its project proposal. Efforts should also be made to listen to the concerns of individuals who are directly affiliated with an organization but have concerns with the project proposal.



As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qauijimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities within or in close proximity to the project area;
- Mitigation measures designed to prevent disturbance to sites with cultural, archaeological, and/or environmental significance;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC #3: Mitigation Measures for Wildlife and the Environment

The “Identification of Environmental Impacts” table included in the proponent’s November 20, 2023 screening application acknowledges that unknown biological impacts may result from the project proposal in the following subject areas:

- Wildlife, including habitat and migration patterns;
- Birds, including habitat and migration patterns; and
- Aquatic species, including habitat and migration/spawning.

It is unclear to CIRNAC if measures for the mitigation of potential impacts to wildlife has been considered. CIRNAC recommends that the Proponent update their plans to include measures to mitigate potential impacts to wildlife, such as ensuring camp material waste and food particles in kitchen wastewater do not pose a risk to attracting wildlife. Meaningful efforts should be made to work with interested stakeholders, particularly those who represent Kitikmeot Inuit and Kugluktuk community members, in the development of acceptable environmental management practices. In particular, efforts should be made to develop an acceptable approach for the operation of helicopters and drill rigs so as to prevent negative impacts to wildlife within the project area from sensory (visual and sound) disturbances.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further phases related to this project. Should you have any questions, please contact Richard Bingley by e-mail at richard.bingley2@rcaanc-cirnac.gc.ca, or David Abernethy at david.abernethy@rcaanc-cirnac.ca.

Sincerely,



Alexandre Chaikine
A/Manager, Impact Assessment

