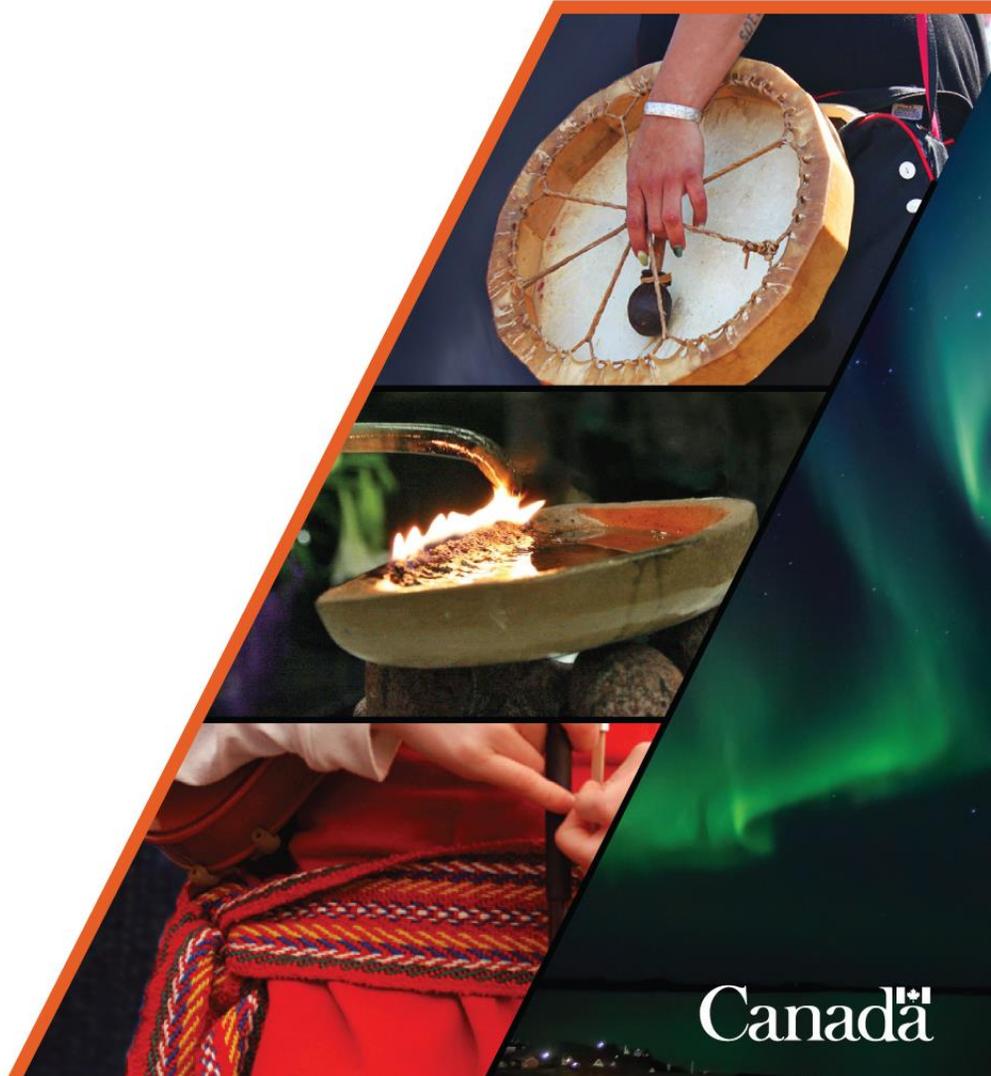




# CIRNAC Comments to NIRB

Re: Notice of Screening for Generation Uranium Inc.'s "Yath Property" Project Proposal



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

Your file - Votre référence  
24EN039  
Our file - Notre référence  
GCdocs#129746022

October 15, 2024

Francis Emingak  
Screening Officer  
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 Generation Uranium Inc.'s "Yath Property" Project Proposal**

Dear Francis Emingak,

On September 20, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on Generation Uranium Inc.'s "Yath Property" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) 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: Impacts to Groundwater Quantity and Quality**

The Proponent identified that surface water quality may be affected by fuel and toxic material spills and greywater disposal. CIRNAC notes that potential impacts from drilling on groundwater quantity and quality (e.g., disruption of flow, contamination from spills, increased concentration of total suspended solids, metals, etc.) are not described. CIRNAC recommends that the Proponent describe potential impacts associated with drilling activities on groundwater quantity and quality and proposed mitigation measures.

**CIRNAC 2: Waste Management Plan**

The Proponent provided a summary of anticipated non-hazardous and hazardous wastes in Table 1 and 2, respectively, and Section 3 describes waste classification and disposal plans. CIRNAC notes that some waste classifications in Table 1 are not consistent with those described in Section 3. For example, waste oil, radioactive drill cuttings, and contaminated soils are classified as non-hazardous wastes in Table 1, but are classified as hazardous wastes in Section 3.1. Accurately classifying wastes would provide greater clarity to personnel handling wastes on the site, which could minimize potential impacts resulting from the mismanagement of waste. CIRNAC recommends the Proponent update the Waste Management Plan to reflect the accurate classification of wastes.



### **CIRNAC 3: Spill Contingency Plan**

Section 5.5 describes that the hazards of chemical spills can be assessed by consulting with Material Safety Data Sheet(s), which are included in Appendix IV. CIRNAC notes that, while it is informative to have this material available to assess the hazard of spills, there is a substantial amount of information in Appendix IV, and the manner in which information is currently presented may delay personnel in promptly retrieving information necessary to respond to spills on-site. Improving the findability of information (e.g., table of contents for Appendix IV) could assist with the facilitation of prompt spill action responses. CIRNAC recommends that the Proponent improve the findability of information in the Spill Contingency Plan required by personnel to respond to spills.

### **CIRNAC 4: Potential for Positive Effects to Inuit through Employment, Training, and Contracting Opportunities**

CIRNAC recommends that the Proponent prioritize the employment, training, and contracting of local Inuit and Inuit firms when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. Members of the Kivalliq Region communities, including Baker Lake and Rankin Inlet, should be prioritized in any project-related employment, training, and contracting opportunities that may be made available.

### **CIRNAC 5: Consultation with Interest Parties**

CIRNAC recommends that the Proponent maintain open communication with the Kivalliq Wildlife Board, the communities of Baker Lake and Rankin Inlet, their respective Hunters and Trappers Organizations, as well as community members and relevant organizations regarding its project proposal. As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujimajatuqangit 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 6: Mitigation Measures Designed to Prevent any Disturbance to Wildlife and the Environment**

CIRNAC recommends that the Proponent adhere to applicable regulatory requirements and accepted best practices to prevent, mitigate, and manage any potential environmental impacts that may result from its project proposal. Meaningful efforts should be made to work with interested parties, especially those who represent the communities of Baker Lake and Rankin Inlet, in the development of environmental management practices. In particular, attention should be directed toward ensuring helicopters, fixed wing aircraft, snow machines, and drill rigs are operated in ways that avoid the possibility of causing negative impacts to wildlife through sensory (visual and sound) disturbance.



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 me or David Abernethy by e-mail at [john.macinnis@rcaanc-cirnac.gc.ca](mailto:john.macinnis@rcaanc-cirnac.gc.ca) or [david.abernethy@rcaanc-cirnac.gc.ca](mailto:david.abernethy@rcaanc-cirnac.gc.ca).

Sincerely,



John MacInnis  
Sr Environmental Assessment Specialist

