



CIRNAC Comments to NIRB

Re: Notice of Screening for White Cliff Minerals Ltd.'s "Rae Copper Exploration Project" Proposal



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

Your file - Votre référence
24EN047
Our file - Notre référence
GCdocs#130233269

October 30, 2024

Tundra Kuliktana
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 White Cliff Minerals Ltd.'s "Rae Copper Exploration Project" Proposal

Dear Tundra Kuliktana,

On October 8, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on White Cliff Minerals Ltd.'s "Rae Copper Exploration 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 Quality and Quantity

CIRNAC notes that the Proponent did not identify potential impacts from drilling on groundwater quality and quantity (e.g., disruption of flow paths, contamination from spills, increased concentrations of total suspended solids, metals). CIRNAC notes that the Proponent failed to propose mitigation measures related to these potential impacts. CIRNAC recommends that the Proponent update applicable management plans to describe potential impacts of drilling on groundwater quality and quantity and proposed mitigation measures.

CIRNAC 2: Spill Response Measures

CIRNAC understands that drilling will be conducted primarily on land and on-ice drilling may occur to demonstrate continuity within the mineralization. Section 6.2.2 in the Spill Contingency Plan (the Plan) describes that seasonal conditions (i.e., open-water, freeze-up, break-up, frozen) are considered when conducting spill response operations on water. CIRNAC notes that the spill response measures described consider spills on ice and snow, but do not appear to explicitly address how the Proponent would respond to spills during on-ice drilling activities that result in spillage into the underlying water column.



CIRNAC also notes that, while it is informative to have Material Safety Data Sheets available to assess the hazard of spills, there is a substantial amount of information in Appendix C of the Plan, 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 in the Plan (e.g., table of contents for Appendix C) could assist with the facilitation of prompt spill action responses.

CIRNAC recommends that the Proponent update the Plan to clarify which measures would be implemented in responding to potential spills during ice-covered periods and consider improving the findability of information in the Plan to facilitate prompt spill action responses.

CIRNAC 3: 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 Kitikmeot regional communities, including Kugluktuk, should be prioritized in any project-related employment, training, and contracting opportunities that may be made available.

CIRNAC 4: Consultation with Interest Parties

CIRNAC recommends that the Proponent maintain open communication with representatives of the Kugluktuk Hunters and Trappers Organization, the Kitikmeot Regional Wildlife Board, the Nunavut Wildlife Management Board, the Hamlet of Kugluktuk, as well as community members and other 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 (including the Bluenose East caribou);
- 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.

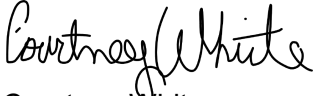
CIRNAC 5: Mitigation Measures Designed to Prevent any Disturbance to Wildlife and the Environment

CIRNAC recommends that the Proponent adhere to applicable regulatory requirements and accepted practices as it carries out its project activities so as to prevent, mitigate, and manage any potential negative environmental impacts. Attention must be exercised when operating helicopters, fixed wing aircraft, snow machines, and drill rigs to prevent sensory disturbance to wildlife (visual and sound), particularly to Bluenose East caribou. The Proponent should work with interested stakeholders, including the Kugluktuk Hunters and Trappers Organization and the Government of Nunavut's Department of Environment to ensure acceptable management practices are applied.



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 John MacInnis or David Abernethy by e-mail at john.macinnis@rcaanc-cirnac.gc.ca or david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Courtney White
A/Manager, Impact Assessment

