



COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Rae Copper Exploration Project	
Proponent: White Cliff Minerals Ltd.	
Location: (Kitikmeot Region)	
Comments Due By: October 30, 2024	NIRB #: 24EN047

Indicate your concerns about the project proposal below:

<input type="checkbox"/> no concerns	<input type="checkbox"/> traditional uses of land
<input type="checkbox"/> water quality	<input type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain	<input type="checkbox"/> community involvement and consultation
<input type="checkbox"/> air quality	<input type="checkbox"/> local development in the area
<input type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input type="checkbox"/> birds and their habitat	<input type="checkbox"/> other: _____
<input checked="" type="checkbox"/> fish and their habitat	_____
<input type="checkbox"/> heritage resources in area	_____

Please describe the concerns indicated above:

The Notice of Screening for White Cliff Minerals Ltd.'s "Rae Copper Exploration Project" Proposal, file number: 24EN047, documents briefly outline the water withdrawal activities from unidentified waterbodies near the project which has the potential to impact fish and fish habitat. The proposal does not discuss water withdrawal locations, if the works will occur within Nunavut's restricted activity timing windows, or the pumps water withdrawal intake rate.

Direct fish mortality can occur during pumping activities through entrainment/impingement. Entrainment occurs when a fish is drawn into a water intake and cannot escape. Impingement occurs when a fish is held in contact with the intake screen and is unable to free itself. DFO developed a code of practice to provide national guidance on the design, installation and maintenance of small end-of-pipe water intake fish screens to prevent entrainment and impingement of fish. This code of practice is for small-scale water intakes (e.g. irrigation, construction, municipal and private water supplies, mining exploration) where the water intake flow rate is up to 0.150 m³/s, or 150 litres per second (L/s). In addition, excessive amounts of water withdrawn from ice-covered waterbodies can impact fish through oxygen depletion, loss of over-wintering habitat and/or reductions in littoral habitat.

Do you have any suggestions or recommendations for this application?

DFO recommends that the Proponent follow DFO's protective measures for fish and fish habitat and standard codes of practice which can be found on DFO's website (<https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html> and <https://www.dfo-mpo.gc.ca/pnw-ppe/practice-pratique-eng.html>) in order to comply with the Fisheries Act.



The proponent should review and implement any relevant DFO's protective measures for fish and fish habitat and standard codes of practice (<https://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html> and <https://www.dfo-mpo.gc.ca/pnw-ppe/practice-pratique-eng.html>) and respect the NU in-water works restricted activity timing windows ([Projects Near Water - Nunavut Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat \(dfo-mpo.gc.ca\)](https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html)). By doing so, works, undertaking or activities where impacts to fish and fish habitat can be avoided.

The Proponent should refer to DFO's Interim code of practice: End-of-pipe fish protection screens for small water intakes in freshwater available at <https://www.dfo-mpo.gc.ca/pnw-ppe/codes/screen-ecran-eng.html> when using fish screens, if water intake flow rate is up to 0.150 m³/s, or 150 litres per second (L/s). The proponent should also follow the Framework for Assessing the Ecological Flow Requirements to Support Fisheries In Canada and the DFO Protocol for Winter Water Withdrawal in the NWT (2010).

Based on the information that was submitted, DFO recommends the proponent to complete and submit a request for review form (<https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-004-eng.html>) if the application meets the criteria for a site specific review (e.g., will occur during the Restricted Activity period), as described on DFO's website (<https://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/request-review-demande-d-examen-003-eng.html>).


It is also the proponent's *Duty to Notify* DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat. Such notifications should be directed to (DFO.ARCEMTriage-TriageGEARC.MPO@dfo-mpo.gc.ca).

Do you support the project proposal? Yes ☒ No ☐ Any additional comments?

DFO does not have any additional comments.

Name of person commenting: Anna-Maija LaFlamme **of** Department of Fisheries and Oceans Canada

Position: FFHPP Biologist **Organization:** DFO

Signature:  **Date:** 10/29/2024