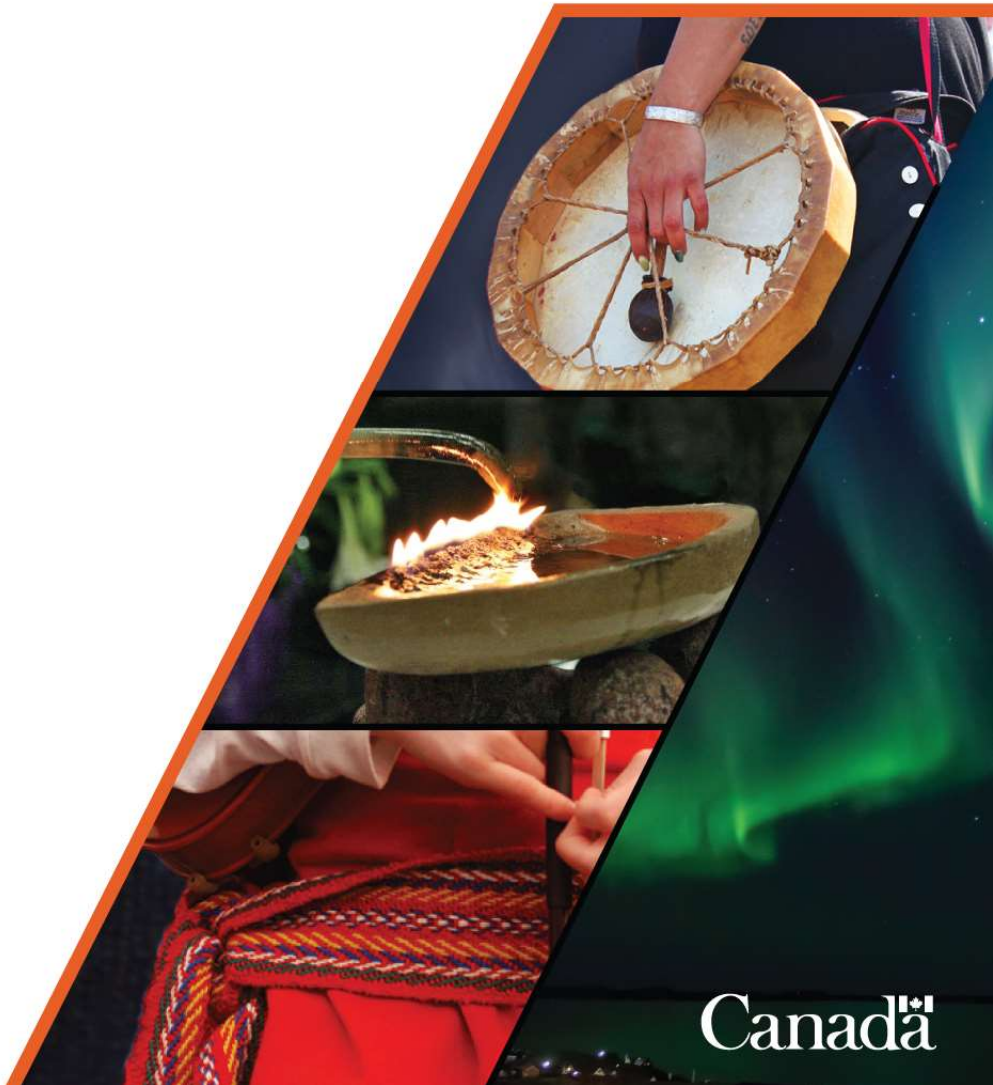




CIRNAC Comments to NIRB

Re: Notice of Screening for Blue Star Corp.'s "Blue Star Corp." Project Proposal



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

Your file - Votre référence
19EA019
Our file - Notre référence
GCdocs# 143337190

February 3, 2026

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 Blue Star Corp.'s "Blue Star Corp." Project Proposal

Dear Francis Emingak,

On January 13, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Blue Star Corp.'s "Blue Star Corp." 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: Downstream Water Quality

The Project indicates recent seasonal acid rock drainage originating from the waste rock pad, with indications of declining downstream water quality during summer melt and rainfall periods. However, erosion and runoff controls associated with roads, pads, and waste rock areas are described at a high level, and there is no description of how contact water from waste rock areas would be segregated from non-contact runoff prior to discharge. In the absence of additional passive controls or treatment capacity, there remains a risk that suspended sediments or dissolved constituents could be mobilized into receiving waters. CIRNAC recommends that the Proponent considers:

- Clarifying how runoff from waste rock pads and other disturbed surfaces are distinguished from non-contact runoff prior to discharge, including whether additional containment or conveyance controls are required beyond upland sumps;
- Expanding erosion and sediment control measures beyond culvert locations to include disturbed pads, road edges, and drainage pathways; and
- Describing how water quality from sump water and runoff collection is evaluated prior to release, particularly for flows associated with waste rock and disturbed pads.



CIRNAC #2: Acid Rock Drainage and Metal Leaching (ARD/ML)

Geochemical investigations indicate that approximately 90% of rock brought to surface at the site is potentially acid-generating. Seasonal acidic runoff has been observed from waste rock areas during summer conditions. Interim mitigation measures, including partial covering and lime application, have been implemented; however, a finalized long-term ARD/ML management plan has not yet been completed. Without engineered containment, ARD/ML could persist beyond active operations. CIRNAC recommends that the Proponent consider providing additional information on how long-term control of acid generation and metal leaching from sulfur waste rock would be achieved.

CIRNAC #3: Post-Closure Landfill Performance

The Proponent has prepared a Waste Management Plan addressing domestic, drill-related, and legacy wastes. Combustible waste is incinerated, non-combustible waste is backhauled, and a non-hazardous landfill constructed in 2021 is used for inert materials, with approximately 250 m³ of remaining capacity. While operational waste handling is well described, the application does not identify post-closure performance criteria for the landfill, including how leachate generation, settlement, or erosion will be assessed following closure. In addition, the Waste Management Plan does not clearly describe how waste segregation effectiveness is verified during operations. CIRNAC recommends that the Proponent considers:

- Clarifying how landfill performance will be assessed following closure, including inspection frequency and indicators of stability; and
- Describing how waste segregation practices are verified during operations to prevent hazardous materials from entering the inert landfill.

CIRNAC #4: Management of Saline Substances

The Project identifies on-site storage and potential use of calcium chloride (~25,000 lbs) for drilling-related or operational purposes, which may be discharged to sumps. While general spill response procedures are described, it does not specifically address the environmental behaviour or soil-related effects associated with releases of saline drilling additives. In tundra environments where natural flushing is limited, spills of highly soluble salts may result in localized soil salinization. CIRNAC recommends that the Proponent consider clarifying whether material-specific considerations for saline substances are addressed within existing spill response and environmental management planning.

CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the Hamlet of Kugluktuk, the Kugluktuk Angoniatit Association / Hunters' & Trappers' Organization, the Kitikmeot Inuit Association, and any other relevant organizations or individuals.

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



- Incorporation of Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional Knowledge (NIRB, 2018), and Community Knowledge, in addition to scientific ways of knowing into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- 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 appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

