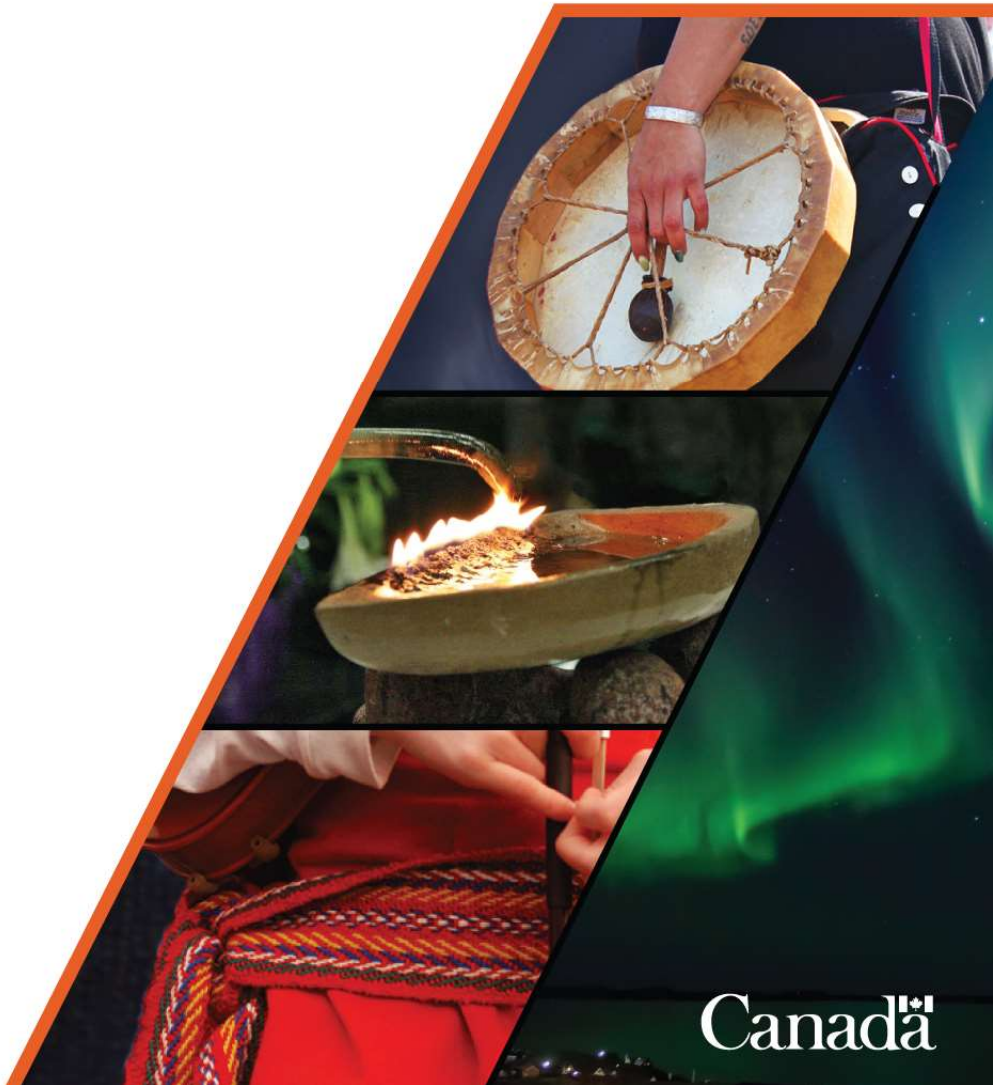




CIRNAC Comments to NIRB

Re: Notice of Screening for Whale Cove Gold Corp's
"Whale Cove Project Camp and Regional Exploration
Expansion" Project Proposal



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

Your file - Votre référence
25EA090
Our file - Notre référence
GCdocs# 144833947

March 31, 2026

Mia Beattie
Impact Assessment 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 Whale Cove Gold Corp's "Whale Cove Project Camp and Regional Exploration Expansion" Project Proposal

Dear Mia Beattie,

On March 10, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Whale Cove Gold Corp's "Whale Cove Project Camp and Regional Exploration Expansion" 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: Fuel and Hazardous Material Storage

The Project proposes large on-site fuel quantities (e.g. 23 propane containers totaling 21,160 gallons, plus thousands of litres of diesel, gasoline, and jet fuel in 205 L drums). Fuel is to be stored in above-ground "Insta-berm" liners, described as "equipped with water drains" and a single "drain cover," with two fuel caches in four berms and fuels including Jet A1 (205 L drums) and propane (100 lb tanks). While Insta-berms provide containment, the presence of drains introduces a release pathway. Potential leaks or ruptures (from drums, hoses, valves, or bund failure) could contaminate soil and groundwater. The use of berms with drains may not meet secondary containment expectations, as open drainage pathways compromise containment integrity. Handling of used oil or fuel is not clearly defined (noting "0 used-oil containers"), and any generated waste hydrocarbons would require containment. CIRNAC recommends that the Proponent considers:

- Specifying secondary containment capacity sufficient to retain at least the largest container volume (e.g., ≥110%), including allowance for snow, ice, and precipitation accumulation;



- Maintaining a regular inspection and maintenance program for containment systems and fuel-handling components;
- Ensuring spill kits are readily available at each fuel storage and transfer location, and maintaining functional drain covers on all berms;
- Maintaining appropriate setbacks from waterbodies for fuel storage and refueling activities; and
- Storing any used oil or fuel-contaminated materials in labelled, sealed containers and backhauling them to an approved facility for disposal or recycling.

CIRNAC #2: Sewage and Solid Waste Management

The Project proposes to manage human sewage via Pacto incinerating toilets (100-person capacity) incinerating wastes daily, and storing ash in 45-gal drums to transport to the Whale Cove landfill, while non-combustible waste is also disposed there. Batch incineration can generate dioxins/furans if mixed or unsuitable wastes are burned or if operation is sub-optimal; ash can contain soluble salts/metals and residual organics. Any incinerator downtime may necessitate interim handling of untreated sewage, increasing contamination risk if not managed. Given that the Whale Cove landfill is reportedly unlined and lacks leachate controls, disposal of ash presents a potential pathway for contaminant migration to surrounding soils or groundwater over time. In addition, any incinerator downtime may require temporary handling or storage of untreated sewage, posing a localized contamination risk. CIRNAC recommends that the Proponent considers:

- Segregating waste streams so only appropriate combustible materials are incinerated (excluding non-combustibles); and
- Confirming ash acceptance requirements with the receiving landfill and testing only if required by the facility prior to disposal.

CIRNAC #3: Land Disturbance and Site Reclamation

The camp expansion would increase the permanent camp from 35 persons to 100 persons and add a 20-person mobile camp within the Whale Cove Project area. Although the footprint is described as being within “already-impacted areas,” some additional site levelling and camp infrastructure would occur on tundra with thin soils over bedrock and scattered wetlands/drainages. In that setting, even limited clearing can remove the insulating vegetative mat, increase erosion, and contribute to permafrost thaw or settlement, while disturbance of drainage features may alter local runoff and transport sediment. The commitment to “clean up and restore” legacy areas is noted, but the closure detail remains limited. Without full inspection and remediation, any debris or contamination, if present, may persist. CIRNAC recommends that the Proponent considers:

- Avoiding expansion into wetlands and drainage lines, and routing activity on durable ground and existing trails;
- Using erosion and sediment controls where clearing/levelling is necessary, and re-vegetating disturbed areas where feasible;
- Monitoring for permafrost settlement in the camp area during and after construction seasons;



- Inspecting the old camp footprint and removing any debris or contaminated soil encountered, with proper disposal and documentation; and
- Restoring natural contours and stockpiling/replacing salvaged organic material for site stabilization and vegetation recovery.

CIRNAC #4: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties on its project proposal. These parties include the Hamlet of Whale Cove, the Issatik Hunters & Trappers Association, the Kivalliq 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 Qauijimajatuqangit and local knowledge in 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

