

Environmental Protection Operations  
Qimugjuk Building 969  
P.O. Box 1870  
Iqaluit, NU X0A 0H0  
Tel: (867) 975-4631  
Fax: (867) 975-4645

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Sophia Granchinho  
Technical Advisor  
Nunavut Impact Review Board  
29 Mitik, PO Box 1360  
Cambridge Bay, NU X0B 0C0

Via email: [info@nirb.ca](mailto:info@nirb.ca)

**RE: Comment Request for Potential 12.4.3 Exemption to Uranium North's "Mining Exploration and Campsite at Amer Lake" project proposal**

Environment Canada (EC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above mentioned potential exemption. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act 1999*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Uranium North Resources is proposing to amend its Indian and Northern Affairs Canada (INAC, now Aboriginal Affairs and Northern Development Canada) Land Use Permit N2007C0024 to include additional project components. The original project components include uranium exploration activities including on-land drilling, potential on-ice drilling, ground-based mapping, prospecting, sampling and geophysics, as well as a temporary camp on Amer Lake. The proposed additional activities would include the preparation and use of an approximately 150 km winter trail to bring in supplies from Baker Lake to Amer Lake using a cat train. The trail would be used annually in March for the life of the permit.

Based on a review of the proposed exemption, EC provides the following comments for the NIRB's consideration:

**General**

- The proponent shall not deposit, nor permit the deposit of chemicals, sediment, wastes, or fuels associated with the project into any water body. According to the *Fisheries Act*, Section 36 (3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.
- The proponent shall not erect camps or store materials on the surface ice of lakes or streams, except that which is for immediate use.

## Spill Contingency Planning

- A spill kit, including shovels, barrels, absorbents, etc. should be readily available at all locations where fuel is being stored or transferred and should accompany transport vehicles in order to provide immediate response in the event of a spill (i.e. cat trains, snowmobiles, etc.) and should accommodate 110% of the capacity of the largest fuel storage container.
- Refuelling shall not take place below the high water mark of any water body (i.e., not on ice) and shall be done in such a manner as to prevent any hydrocarbons from entering any water body frequented by fish. EC recommends that drip pans, or other similar preventative measures, should be used when refuelling equipment.
- EC recommends the use of secondary containment, such as self-supporting insta-berms, for storage of all barrelled fuel rather than relying on natural depressions to contain spills.
- On page 6 of the Fuel Spill Contingency Plan, please update the EC contact information to read: Environment Canada Phone (867) 975-4644  
The EC emergency pager numbers should be removed as they are no longer in service.
- Spills are to be documented and reported to the NWT/NU 24 hour Spill Line at (867)920-8130. EC recommends that all releases of harmful substances, regardless of quantity, are immediately reported where the release:
  - is near or into a water body;
  - is near or into a designated sensitive environment or sensitive wildlife habitat;
  - poses an imminent threat to human health or safety; or,
  - poses an imminent threat to a listed species at risk or its critical habitat.

## Transportation

- The proponent states that transportation will be via equipment travelling over snow-covered and groomed winter trails. EC recommends that travel should only be conducted on frozen, snow packed ground. Transport to site should cease if early warming occurs, and/or if the program has not been completed by spring. Travel via tracked vehicles on soft ground may disturb the vegetative mat, compact and rut the soils and damage the permafrost areas. Off-road traffic activity should not occur outside of winter months. The duration of transport activity should be kept as short as possible to minimize overall impact and should be suspended if rutting occurs.
- In order to lessen the overall footprint of project activities, EC strongly urges the proponent and Boards to look at minimizing the width of transportation corridors. The creation of trails, access roads and camps impact the Arctic and subarctic environment: the vegetative mat may be damaged, soils may be compacted and permafrost may melt, resulting in subsidence and erosion.

## Waste Disposal

- The proponent states that combustible garbage will be incinerated daily in a burn barrel with ashes disposed of at an approved disposal site. In principal, EC does not encourage the open burning of waste as a means of disposal. However, considering the constraints at the Amer Lake camp, EC recommends the proponent heed the following guidance:
  - Solid wastes that are conditionally suitable for open burning are paper products, paperboard packaging and untreated wood. Plywood, painted wood or other treated wood should not be disposed of in this manner.
- EC recommends the use of an approved incinerator for the disposal of combustible camp wastes. EC has developed a Technical Document for Batch Waste Incineration, and is available at the following web link:  
<http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1>  
The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting. This information should be incorporated into an incineration management plan for the camp. EC would like the opportunity to review this plan prior to implementation.

- If the proponent ships garbage and ashes off-site for disposal, EC suggests that confirmation and authorization be obtained from the intended community landfill (i.e., Baker Lake) prior to shipment.

Comments previously submitted on behalf of EC by C. Parker on 9 August 2007 and by C. Spavor on 27 July 2009 would still apply to this project. If there are any additional proposed changes to the project EC should be notified, as further review may be necessary. Please do not hesitate to contact the undersigned with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at [Paula.C.Smith@ec.gc.ca](mailto:Paula.C.Smith@ec.gc.ca).

Yours truly,



Paula C. Smith  
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Environmental Assessment-North, EPO, Yellowknife, NT)  
Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT)  
Allison Dunn (Sr. Environmental Assessment Coordinator, EPO, Iqaluit, NU)