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May 11, 2015

Kelli Gillard
Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Part 4 Screening for Tundra Copper Corporation's "Coppermine Exploration" project proposal

Dear Ms. Kelli Gillard,

On April 16, 2015 the Nunavut Impact Review Board (NIRB) invited parties to comment on Tundra Copper Corporation's "Coppermine Exploration" project proposal. Aboriginal Affairs and Northern Development Canada (AANDC) has reviewed the project proposal and related documents and offers the following comments for the NIRB's consideration.

Whether the project proposal is likely to arouse significant public concern; and if so, why

AANDC # 1-Inadequate Public Consultation/Inuit Qaujimagatugangit(IQ) incorporation:

The Proponent affirms that they have not yet conducted public consultations (NIRB Screening Part 2 form, bullets # 38 and 39, Page 6) but then goes on to assert that "*the project is not near any sensitive or important habitat area*" (KIA Application, Appendix A, # 10). Existing data, however, suggests that some of the proposed activities could fall within or very close to a critical wildlife area (specifically, the Bluenose caribou calving area). Furthermore, there appears to be significant concern from potentially affected parties within Nunavut and the Northwest Territories regarding the location of the proposed exploration activities on the calving/post-calving grounds of the Bluenose-East caribou herd. The apparent lack of adequate consultation and incorporation of IQ on sensitive wildlife habitats makes it difficult for AANDC to verify the accuracy of the assumptions made by the Proponent regarding the potential impacts of the proposed project activities on wildlife and Aboriginal livelihoods. AANDC recommends that the Proponent consults potentially affected parties and addresses any outstanding issues/concerns regarding the proposed project prior to commencement of the exploration works.



Whether the project proposal is likely to cause significant adverse eco-systemic and socio-economic effects; and if so, why

Projects of this nature typically do not generate significant impacts if appropriately managed, however, the potentially sensitive nature of the proposed project area could result in elevated impacts and a requirement for special protection measures. Furthermore, AANDC's review of the project proposal and related documents has identified the following areas needing improvement:

AANDC #2- Water Sources: The Proponent uses very generic statements (e.g., "*the water sources will be nearby water bodies, either to the camp or the drill sites*", NIRB Screening Part 2 form, Bullet # 20, Page 4) to identify sources of water for various project activities, making it difficult to confirm that the proposed water usage will not generate negative ecosystemic effects requiring some form of mitigation. AANDC recommends that the Proponent clearly identifies sources of water (or the criteria for choosing these sources of water) for its various needs and the amounts to be abstracted from each water source, specifying the potential for impact from such abstractions/uses with accompanying rationale and any necessary mitigation measures.

AANDC # 3-Disposal of drill discharges and camp wastewater: The Proponent proposes to dispose of drill discharges, sewage and grey water into sumps, followed subsequently by burial under the ground at the end of the program. This disposal approach could potentially lead to freshwater pollution if it is not properly managed. AANDC suggests that the Proponent ensures that all wastewater discharge sumps/pits are appropriately sized and the sump/pit soil cover layer appropriately designed in order to prevent contaminant release or runoff into downstream freshwater bodies, especially during warmer months.

AANDC # 4-Description of existing physical environment: The Proponent's description of the existing physical environment is lacking in the detail necessary for a proper assessment of the potential project impacts. This section of the project proposal contains very generic statements such as "*Air and water quality throughout the region is, in general, high*", "*permafrost and other low-temperature, ice-related landforms are most likely present throughout the region in areas susceptible to it*", amongst others (NIRB Screening Part 2 form, page 21). This makes it difficult to ascertain if the Proponent has a sound understanding of the existing environmental baseline at the project site to be able to design and conduct the proposed exploration program in a sustainable manner. AANDC suggests that the Proponent provides a more concise description of the air and water quality, permafrost, and landforms in the project area, a discussion on the potential for the project to impact these baseline levels, and propose any necessary monitoring and mitigation measures.

AANDC # 5 -Spill Contingency Plan: Although the Proponent has committed in its spill contingency plan (Page 1) to reporting all spills of hazardous material based on the amounts set out in Schedule B of the Nunavut Spill Contingency Planning and Reporting Regulations, AANDC would like to add that these spill thresholds notwithstanding, *all releases of harmful substances, regardless of quantity, are to be*



reported to the NWT/NU 24-hour Spill Line (867-920-8130) if the release is near or into a water body, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable".(INAC,2007:

http://www.aadnc-aandc.gc.ca/DAM/DAM-INTER-NWT/STAGING/texte-text/ntr_pubs_SCP_1330712728397_eng.pdf)

AANDC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Felexce Ngwa at (867) 975-4552 or by e-mail at felexce.ngwa@aadnc-aandc.gc.ca.

Sincerely,

[Original signed by]

James Neary
Manager, Impact Assessment