

January 30, 2017

Solomon Amuno
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Comment Request on Department for 5530 Nunavut’s “Meadowbank Precious Metal” Project Proposal.

Dear Mr. Amuno,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on 5530 Nunavut's "Meadowbank Precious Metal" project proposal.

The GN has reviewed the proposed “Meadowbank Precious Metal” project and provides our comments in the attached Appendix.

Should you have any concerns with our comments, please contact me by phone at 867-975-7765 or by email at Arobinson@gov.nu.ca.

Qujannamiik

[Original Signed By]

Amy Robinson

A/Manager, Land Use and Environmental Assessment

APPENDIX (2 comments)

Screening comment # 1 of 2	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Predator Deterrence
References	Meadowbank Environmental Management Plan Section 5.2.5 Firearms
CONCERNS	
<p>The Proponent has indicated that they will be utilizing firearms for the use of bear deterrents at the project site.</p> <p><i>“Registered firearms will be located in camp and at drill sites to ensure the safety of all personnel on the Property. All firearms in camp will be stored unloaded and be regulated by the Project Supervisor. Firearms at drill sites will be stored unloaded in gun cases.”</i></p> <p>The proponent has not indicated what type or caliber of firearm will be stored. The Government of Nunavut recommends the use of 12 gauge shotguns for the purposes of bear deterrence as they are capable of firing non-lethal deterrents.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>Bear monitors should be armed with 12 gauge shotguns. These are the standard bear deterrent firearm in Nunavut because they can be used to fire non-lethal deterrents and lethal rounds. Non-lethal deterrents should be used whenever possible to deter problem wildlife with lethal rounds only being used in defense of life or property.</p> <p>Polar bears in Nunavut are protected by the Nunavut Wildlife Act: no person shall otherwise molest, harm, or destroy a bear without a Government of Nunavut permit except in exceptional circumstances including clear and present threat to human safety.</p>	
ADDITIONAL COMMENTS	
NA	

Screening comment # 2 of 2	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Fuel Cache at Meadowbank
References	Meadowbank Environmental Management Plan
CONCERNS	
<p>On page 2 and 3 of the Environmental Management Plan it states:</p> <p><i>“A fuel cache of less than 4,000 L (approximately 19 drums) will be established on stable ground near the camp, primarily to store diesel and jet fuel. Small quantities of gasoline and propane will also be stored. Small temporary fuel caches (less than 4,000 L), may also be required to supply the drilling and exploration programs. Within 30 days of the establishment of any temporary fuel cache, the appropriate agencies will be notified of the details of the cache including: GPS location, fuel type, container sizes, method of storage and proposed date of removal. The temporary fuel cache GPS locations will also be included in the annual reports submitted to the INAC, NWB and NIRB.”</i></p> <p>It is understandable that the proponent does not yet know all the locations that fuel caches will be required. There is a concern however that satellite caches will be set up in unsuitable locations and that they may be forgotten or abandoned.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The DOE recommends that the proponent only set up fuel caches in locations that are suitable; level ground at least 30 m from a water course. Furthermore, satellite caches should be decommissioned at the end of activities in a specific location or at the end of the working season.</p>	
ADDITIONAL COMMENTS	
NA	