

April 13, 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.

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[Original Signed By]

Amy Robinson

A/Manager, Land Use and Environmental Assessment

APPENDIX (3 comments)

Screening comment # 1	
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	
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	

Screening comment # 3	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological resources
References	NIRB Notice of Screening; project location map
CONCERNS	
<p>The proponent is proposing to undertake an exploration program to delineate targets for diamond drilling and explore for gold deposits approximately 100 km northeast of Baker Lake. Three specific areas of interest are targeted along the existing Meadowbank road: Areas 1, 2 and 3 (as per figure provided). The proposal puts forward the establishment of an exploration camp and associated storage areas and water disposal pits as well as exploration activities including: prospecting, core and till sampling, ground geophysical surveys and diamond drilling.</p> <p>A search of the Nunavut Archaeological Site Database indicates that there are approximately 290 recorded sites along the existing Meadowbank road. Of these, nine (9) sites are recorded in exploration Area A; thirteen (13) in Area B and; one (1) in Area C. This however does not preclude the presence of unidentified sites or cultural features as no systematic survey has been conducted in these areas.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The Government of Nunavut recommends that:</p> <ol style="list-style-type: none"> 1 The proponent hires a qualified archaeologist to conduct archaeological assessment and inventory survey of the three targeted Areas. 2 The proponent works closely with the project archaeologist to clearly identify and mark the locations of the archaeological sites that might potentially be affected by development activities. Thus, the potential for adverse impact on archaeological resources will be avoided. 3 The proponent confines transportation activities to the existing road. 4 No activities be conducted in the vicinity (50 m buffer zone) of any archaeological sites. If archaeological sites or features are encountered during the project, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Department of Culture and Heritage. <p>All archaeological and palaeontological sites in Nunavut are protected by law. The applicant must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site. Moreover, the building of inuksuit is not recommended.</p>	

ADDITIONAL COMMENTS
The Department of Culture and Heritage supports the proposal in principle providing that the project archaeologist applies for a Class 2 permit.