



NIRB File No.: 17EN020
NPC File No.: 148482

April 13, 2017

Tara Gunson
Apex Geoscience
2205-1211 Melville Street
Vancouver, BC V6E 0A7

Sent via email: tgunson@apexgeoscience.com

Re: Opportunity to address comments received regarding 5530 Nunavut Inc.'s "Meadowbank Precious Metal Project" proposal

Dear Ms. Tara Gunson:

On February 17, 2017 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen 5530 Nunavut Inc.'s (5530 Nunavut or Proponent) "Meadowbank Precious Metal Project" proposal from the Nunavut Planning Commission (NPC or Commission). On March 20, 2017 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by April 10, 2017.

On or before April 10, 2017 the NIRB received comments from the following interested parties:

- **Government of Nunavut – Department of Environment (GN-DoE)**
- **Environment and Climate Change Canada (ECCC)**
- **Fisheries and Oceans Canada (DFO)**
- **Indigenous and Northern Affairs Canada (INAC)**

On April 13, 2017 the NIRB received a revised comment from the GN-DoE.

All comment submissions received by the NIRB relating to this project proposal can be obtained from the NIRB's online public registry at www.nirb.ca by using any of the following search criteria:

- Project Name: Meadowbank Precious Metal Project
- NIRB File No.: 17EN020
- Application No.: 125086

A *summary* of the public concerns reflected in the comment submissions relate to the following:

- Lack of information on the type or caliber of firearm to be stored for the use as bear deterrents at the site. Recommended that bear monitors be armed with 12 gauge shot

guns for the purposes of firing non-lethal deterrents, with lethal rounds only being used in defense of life or property;

- Reminded the Proponent that polar bears are protected under the *Nunavut Wildlife Act* and that 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;
- Concern regarding the use of satellite fuel caches in unsuitable locations and that they may be forgotten or abandoned. Recommended the Proponent only set up fuel caches in locations that are suitable, at level ground at least 30 metres from a water course, which should be decommissioned at the end of activities in a specific location or at the end of the working season;
- The Environmental Management Plan (EMP) lack information and needs to be updated:
 - Include reference to the *Migratory Birds Convention Act (MBCA)* as applicable to the proposed project;
 - Update Section 5.2.3 to include eggs in addition to birds and their nests, and correct all instances of “Red-necked Phalarope” to “Red-necked Phalarope”;
 - Update Section 5.2.3 to include Barren-ground Caribou (Threatened) and Transverse Lady Beetle (Special Concern) in the Committee on the Status of Endangered Wildlife in Canada list in the EMP;
- The Proponent should be aware that the Migratory Bird Regulations do not provide for authorizations or permits regarding incidental take of migratory birds or their nests or eggs in the course of industrial or other project-related activities pursuant to the *Migratory Birds Convention Act*;
- Concern noted regarding the potential of migratory birds, the nests and/or eggs be inadvertently harmed or disturbed by the activities;
- Update the Spill Prevention and Response Plan with the appropriate contact information;
- The Proponent reminded to comply with the *Fisheries Act* during project activities, and ensure that the project do not cause any harm to fish and fish habitat;
- The Proponent reminded to submit a new review form should project plans and activities change with respect to serious harm to fish, or if the Proponent omitted some information in the proposal such that the proposal meets the criteria for a site specific review;
- Lack of information on community engagement/consultation activities undertaken by the Proponent and any associated community concerns regarding the proposed new activities. Recommended the Proponent conduct community consultations prior to submitting the project proposal, and at the start of any new project activities; and
- Reminded the Proponent that all archaeological and palaeontological sites in Nunavut are protected by law and recommended:
 - The Proponent hire a qualified archaeologist to conduct archaeological assessment and inventory survey of the three targeted Areas;
 - The Proponent work 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;
 - The Proponent confine transportation activities to the existing road;
 - 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;

- No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site; and
- The building of inuksuit is not recommended.

The NIRB would like to provide 5530 Nunavut with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **April 27, 2017**.

If 5530 Nunavut determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require clarification, feel free to contact the undersigned at (867) 983-4603 or at samuno@nirb.ca.

Sincerely,



Solomon Amuno, PhD
Technical Advisor II
Nunavut Impact Review Board

cc: Distribution List
Fabio Capponi, 5530 Nunavut Inc.
Karén Kharatyan, Nunavut Water Board
Luis Manzo, Kivalliq Inuit Association
Maria Serra, Kivalliq Inuit Association
Brenda Osmond, Kivalliq Inuit Association
Tracey McCaie, Indigenous and Northern Affairs Canada