

## NIRB 17EN020: Proponent response to comments

5530 Nunavut Inc. has reviewed the comments provided from the Government of Nunavut – Department of Environment (“GN-DoE”), Environment and Climate Change Canada (“ECCC”), Fisheries and Oceans Canada (“DFO”) and Indigenous and Northern Affairs Canada (“INAC”) regarding the Meadowbank Precious Metal Property (“the Property”) project proposal and would like to express our appreciation for the time these agencies spent reviewing the project proposal and providing their comments.

### Response to the GN-DoE

#### Concerns of Predator Deterrence

The GN-DoE expressed concerns regarding the type and caliber of firearm that will be stored at the project and recommended the use of 12 gauge shotguns for the purposes of bear deterrence as they are capable of firing non-lethal deterrents and lethal rounds. Section 5.2.5 of the Environmental Management Plan (“EMP”) has been updated to indicate that firearms at the Property will be 12 gauge shotguns and that non-lethal deterrents will always be used whenever possible to deter problem wildlife with lethal rounds only being used in defense of life or property.

#### Concerns with Satellite Fuel Caches

5530 Nunavut Inc. will only establish fuel caches in locations that are suitable, which includes stable and level ground that is at least 30 m from any water course. All satellite fuel caches will be decommissioned at the end of activities in that specific location or by the end of the working season.

#### Concerns with Archaeological and Paleontological Sites

The GN-DoE indicated that there are approximately 290 recorded archaeological sites along the Meadowbank road, of which 9 sites are located in exploration Area A, 13 in Area B and 1 in Area C. 5530 Nunavut Inc. understands that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. 5530 Nunavut Inc. has commissioned Golder Associates Ltd. (“Golder”) to complete an Archaeological Overview Assessment of the project area. The assessment will include:

- Acquirement of a licence to access the Nunavut Archaeological Sites Database to conduct a search of previously recorded resources in the project area.
- A review of relevant literature pertaining to previous archaeological, historical and cultural studies completed in the project area.
- Use of the results of the Nunavut Archaeological Sites Database search in conjunction with landscape data provided by satellite imagery and NTS topographic maps to evaluate the historical resources potential of the study area.
- Preparation of a report summarizing the results of the review.

The Archaeological Overview Assessment will provide 5530 Nunavut Inc. with information of known sites in the project area and where there is a high potential for the discovery of undocumented sites. This report will be used to assist in the project planning for the 2017 exploration as well as future programs.

5530 Nunavut Inc. has also authorized Golder to acquire a permit to conduct archaeological/palaeontological ground surveys and inventory at the project. Prior to any drilling the target areas will be surveyed by a professional archaeologist.

Additional actions will be taken to ensure that any known or undocumented archaeological or palaeontological sites or artifacts are not disturbed. These include, but are not limited to:

- All recorded archaeological and/or palaeontological sites provided to Golder and 5530 Nunavut Inc. by The Department of Culture and Heritage (“CH”) as part of the Archaeological Overview Study will be avoided (5530 Nunavut Inc. understands that the list of recorded sites provided by the CH was provided solely for the purpose of the Meadowbank Precious Metal Property land use activities as described in the land use application, and will otherwise be treated confidentially).
- No 5530 Nunavut Inc. staff, contractors or project visitors will operate any vehicle over a known or suspected archaeological or palaeontological site.
- No 5530 Nunavut Inc. staff, contractors or project visitors will remove, disturb, or displace any archaeological artifact or site, or any fossil or palaeontological site.
- 5530 Nunavut Inc. will immediately contact CH at (867) 934-2046 or (867) 975-5500 should an archaeological site or specimen, or a palaeontological site or fossil, be encountered or disturbed by any land use activity. A report will be prepared documenting the discovery and sent to CH and INAC. Reports will include GPS coordinates, a brief description of the site and/or artifact and photos (if possible).
- 5530 Nunavut Inc. staff, contractors or project visitors will immediately cease any activity that disturbs an archaeological or palaeontological site if encountered during the course of a land use operation until permitted to proceed with the authorization of CH.
- 5530 Nunavut Inc. staff, contractors or project visitors will follow the direction of CH in restoring disturbed archaeological or palaeontological sites to an acceptable condition. As these conditions will be attached to a Class A Permit under the Territorial Lands Act, INAC’s directions will also be followed.
- 5530 Nunavut Inc. staff, contractors or project visitors will provide all information requested by CH concerning all archaeological sites or artifacts and all palaeontological sites and fossils encountered in the course of any land use activity.
- When conducting till sampling, geological mapping, prospecting and/or ground geophysical surveys all relevant field personnel will have maps with known sites marked.

- Before commencing any work where ground disturbance may occur, the area will be surveyed for any archaeological or paleontological sites.
- The building of inuksuk will be prohibited.
- 5530 Nunavut Inc. will ensure that all persons working under its authority are aware of these conditions concerning archaeological sites and artifacts and palaeontological sites and fossils.

#### Response to the ECCC

##### Concerns with Listed Legislation

As per the recommendations provided by the ECCC, section 2.1 of the EMP has been updated to include the Migratory Birds Convention Act ("MBCA") in the list of Applicable Legislation and Guidelines.

##### Concerns with Species at Risk

Section 5.2.3 Species at Risk of the EMP has been updated and now specifically states that " Raptor, Red-necked Phalarope and Owl nests, as well as all birds, their nests and eggs will always be avoided during exploration activities." In addition, all references to the Red-necked Phalarope have been corrected to Red-necked Phalarope.

The Transverse Lady Beetle has been added to the list of species that are of special concern to the Committee on the Status of Endangered Wildlife in Canada ("COSEWIC").

##### Concerns with the Incidental Take of Migratory Birds, Nests or Eggs

5530 Nunavut Inc. understands that there is risk that migratory birds, their nests or eggs can be inadvertently harmed or disturbed as a result of activities, including mineral exploration, and will take every effort to reduce the chances of incidental take. Appropriate mitigation measures will be utilized and compliance enforced with strict penalties for those who do not adhere to the proper operating procedures including, but not limited, to termination of employment.

##### Concerns with Spill Contingency

Table 2.1 of the Spill Prevention and Response Plan has been updated and the ECCC 24-hour pager number has been removed.

#### Response to the DFO

In order to ensure that the company, its employees and contractors are acting in compliance with the Fisheries Act, 5530 Nunavut Inc. will read and follow the DFO guidance tools found at (<http://www.dfo-mpo.gc.ca/pnw-ppe/mesures-mesures/index-eng.html>).

## Response to INAC

### Concerns of Lack of Evidence of Public Consultation

5530 Nunavut Inc. acknowledges the proximity of the project to resources that play vital roles in Aboriginal peoples' culture and livelihoods and understands the importance of consulting with community members. 5530 Nunavut Inc. is currently organizing community consultations in order to incorporate any Inuit Qaujimajatuqangit into the project planning and design and to address any outstanding issues or concerns. Consultations will be held in Baker Lake, but may also be held in other communities or via telecommunications if requested. In the future 5530 Nunavut Inc. will endeavor to perform consultations prior to submitting project proposals.

In addition to consulting with community members, whenever possible, 5530 Nunavut Inc. will attempt to hire local residents to assist in many aspects of the project such: as wildlife and environmental monitors, camp management assistants, core cutting/processing technicians and geo-technical assistants to not only utilize their skilled labor, but extensive knowledge of the land and wildlife.

28-Apr-2017    Jenny Klengenberg    Public