

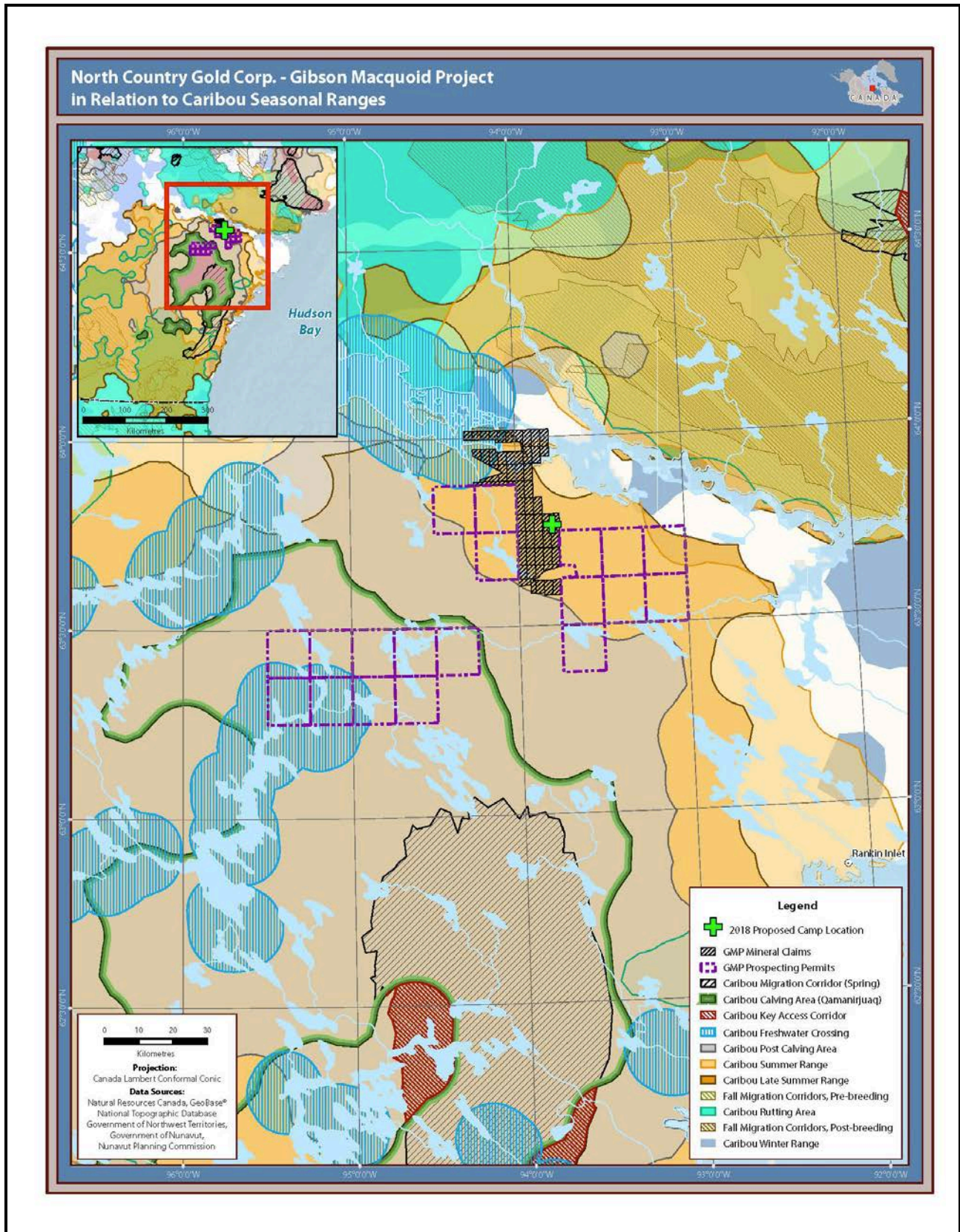
Screening comment # GN-01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Whether the project is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why
References	Project_application_125337_as_of_2018-04-30 NCGC GMB Corporate & Social Responsibility Action Plan 2018
CONCERNS	
<p>The Government of Nunavut (GN) has identified potential significant adverse effects to caribou associated with proposed project activities. The potential for adverse impacts to caribou is due to the project's location in relation to caribou calving grounds and post calving grounds. A large proportion of the project is located within calving and post calving grounds for the Qamanirjuaq caribou herd.</p> <p>The Proponent should be aware that calving and post calving grounds are widely recognized as being of critical importance for maintaining healthy caribou populations. Caribou are especially vulnerable to disturbance due to the high energy costs during the calving period for cows as they give birth and feed the calves. Post calving grounds are used by caribou for nursing and nutrition uptake. Interrupting nursing and access to good forage can both negatively impact caribou body condition and productivity. The Qamanirjuaq caribou herd calving period is from June 9 to 22. The post-calving period is until July 3. These periods are considered critical for caribou productivity and the viability of caribou populations, and stringent measures must be put in place to avoid and minimize caribou disturbance and habitat disruption. Caution is also required during spring migration (April 15-June 8) when females move toward their calving grounds.</p> <p>Habitat modification through permanent works and infrastructure could be detrimental to calving caribou and impact overall health and productivity. Consistent disturbance or cumulative fragmentation of these habitats is at high risk of causing serious negative impacts to herd demography (population size, composition, and distribution). These impacts would negatively affect Inuit harvesting rights under the Nunavut Agreement. The Proponent should be aware that projects within caribou post-calving and especially calving grounds pose much greater risk to wildlife disruption and overall health. Further, the Proponent should be aware that projects within calving and post calving grounds will be subject to increased scrutiny as they proceed through the regulatory process.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN strongly recommends that no activities associated with the proposed project take place within calving grounds and in a buffer of at least 14 km around these grounds during the period of June 9 to</p>	

June 22. Proposed activities in post-calving grounds should be scheduled to take place outside the dates of June 22 to July 3 each year to make sure the post calving period for the Qamanirjuaq caribou herd has passed. The GN recognizes that the Proponent's proposed activities will take place outside these dates in 2018.

Before May 20, Project specific measures should be implemented to avoid interfering with the movements of caribou, especially females. The Government of Nunavut also recommends that no permanent infrastructure be installed in caribou migration corridors, calving grounds, and post calving grounds including roads, trails, airstrips, permanent buildings, and/or other site modifications. All exploration materials should be completely removed and remediated upon the completion of the currently proposed project schedule.

ADDITIONAL COMMENTS

N/A



Screening comment # GN-02	
Department	Health
Organization	Government of Nunavut
Subject/Topic	Food and Water Services
References	NIRB Notice of Screening and Comment Request Project Application 125337 as of 2018-04-30
CONCERNS	
<p>The application notes that a 30 - 40 person temporary camp will be constructed to support the exploration program. The camp will be providing food, water, and waste systems to service the camp. The application does not provide detail on the type of accommodations being constructed. The services will require review under the Public Health Act.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends the Proponent submit information regarding the food and water services and facilities provided to the project workers to the GN Department of Health Environmental Health Officer. The information should be sent to the Rankin Inlet Wellness Centre, Bag 72, Rankin Inlet NU, X0C 0G0.</p>	
ADDITIONAL COMMENTS	
N/A	