



Bryan Atkinson  
North Country Gold Corp.  
600-1199 West Hastings Street  
Vancouver BC V6E3T5

**Re: Opportunity to address comments received regarding North Country Gold Corp.'s "Gibson MacQuoid Gold Project" project proposal**

On April 9, 2018 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen North Country Gold Corp.'s (NCGC) "Gibson MacQuoid Gold Project" project proposal from the Nunavut Planning Commission (NPC or Commission). On May 8, 2018 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by May 29, 2018.

- Government of Nunavut
- Environment and Climate Change Canada
- Fisheries and Oceans Canada
- Indigenous and Northern Affairs Canada
- Beverly and Qamanirjuaq Caribou Management Board
- Kangiqliniq Hunters and Trappers
- Lutsel K'e Dene First Nation

- Project Name: Gibson MacQuoid Project
- NIRB File No.: 17EN029
- Application No.: 125337

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

### **Caribou Protection**

- Potential adverse impacts to caribou due to a large portion of the project proposed to be on calving and post calving grounds for the Qamanirjuaq herd.
- Potential decline of the caribou and caribou habitat loss.
- Concerns that habitat modification through permanent works and infrastructure could be detrimental to calving caribou and impact overall health and productivity.
- Concerns that the proposal is to expand mineral exploration activities into the core calving and post-calving habitats of the Qamanirjuaq caribou herd, especially as the herd is declining.
- Crucial to minimize the level of cumulative effects resulting from industrial development activities.
- Mineral exploration and development should be excluded from caribou and post-calving areas even though the Proponent has made commitments to follow measures intended to reduce disturbance to caribou
- Mobile Caribou Conservation Measures have not been tested and remains experimental and should not be used on a declining herd.
- Project proposal is likely to cause significant adverse eco-systemic and socio-economic effects due to:
  - Proposed activities could produce disturbance to caribou cows and calves during late summer and early fall, which is a vulnerable period when they need to be undisturbed to maximize their energy intake in preparation for the demands of winter;
  - Permitting exploration on the core calving and post-calving areas would set a precedent for allowing other exploration and development projects to occur elsewhere in these areas, initiating a situation in which negative cumulative effects on the herd from disturbance will accelerate over time; and
  - Increasing the level of cumulative effects experienced by the herd by increasing human-caused disturbance will contribute to continuing the decline of the herd, which could have severe ramifications for the food security of people who have traditionally harvested barren-ground caribou, should the herd decline to levels below which harvest is no longer sustainable.
- Project proposal is likely to lead to significant adverse impacts on crucial caribou habitat if results lead to development of a mine and also as a result of the precedent it would set for allowing other projects to occur on core calving grounds of this and other caribou herds, leading over time to development of one or more mines and/or other infrastructure on caribou calving grounds in Nunavut.
- The Qamanirjuaq caribou herd requires protection from industrial activity causing noise and traffic during calving.
- The calving and post-calving grounds require protection from industrial activities at all times of the year.
- Recommendation for stringent measures to be put in place during calving and post-calving periods as well as spring migration.

- Recommendation that the project be abandoned and that regulators stop signing mineral exploration agreements with-in critical caribou habitat throughout the Kivalliq.

### **Fish and Fish Habitat**

- Information lacking on the location and volume of the watercourse for camp water usage in order to properly assess the potential impacts to fish and fish habitat.
- Proponent is required to follow Fisheries and Oceans Canada's "Freshwater Intake End-of-Pipe Fish Screen Guideline.

### **Community Consultation and Concern**

- No meaningful consultation with the community of Rankin Inlet has been conducted.
- Appeared that the Proponent provided misinformation regarding the calving grounds were off limits to exploration activities.
- Project proposal is likely to arouse significant public concern as a result of activities proposed in the core calving and post-calving areas of the Qamanirjuaq herd.

### **Inuit Harvesting**

- The Qamanirjuaq herd is critically important to the food security and cultures of thousands of Indigenous peoples.
- Concerns that potential impacts to caribou would negatively affect Inuit harvesting rights throughout the region.
- Harvesting of caribou have decreased due to potential impacts from industrial activity.

### **Socio-Economic Concerns**

- The proposed project would likely cause significant adverse socio-economic effects.
- Concerns that the application did not provide enough detail on the type of accommodations being constructed. The services will require review under the Public Health Act.

### **Spill Contingency Plan**

- Spill Contingency Plan requires updates to include correct contact information.
- Recommend including mitigation measures within the plan regarding re-fueling of any equipment near waterbodies

The NIRB would like to provide North Country Gold Corp. 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 Ministers. The NIRB respectfully requests that a response be provided directly to the NIRB by **June 18, 2018**.

If North Country Gold Corp. 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](mailto:info@nirb.ca), or through the online public registry at [www.nirb.ca](http://www.nirb.ca).

If you have any questions or require clarification, please contact the undersigned directly at (867) 983-4622 or [motokiak@nirb.ca](mailto:motokiak@nirb.ca).

Sincerely,



Mia Otokiak  
Junior Technical Advisor  
Nunavut Impact Review Board

cc:      Distribution List  
         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