

Appendix

GN-01: Key Caribou Habitat	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvesting activities
References	<ul style="list-style-type: none"> • NIRB Notice of Screening • Main Application Document and Project Description
CONCERNS	
<p>The GN is concerned about the timing of project activities due to the project location. From the Main Application Document and Project Description, b. exploration activities: <i>“Exploration activities are planned to start in 2018 and continue periodically between April and October annually.”</i></p> <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 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>	

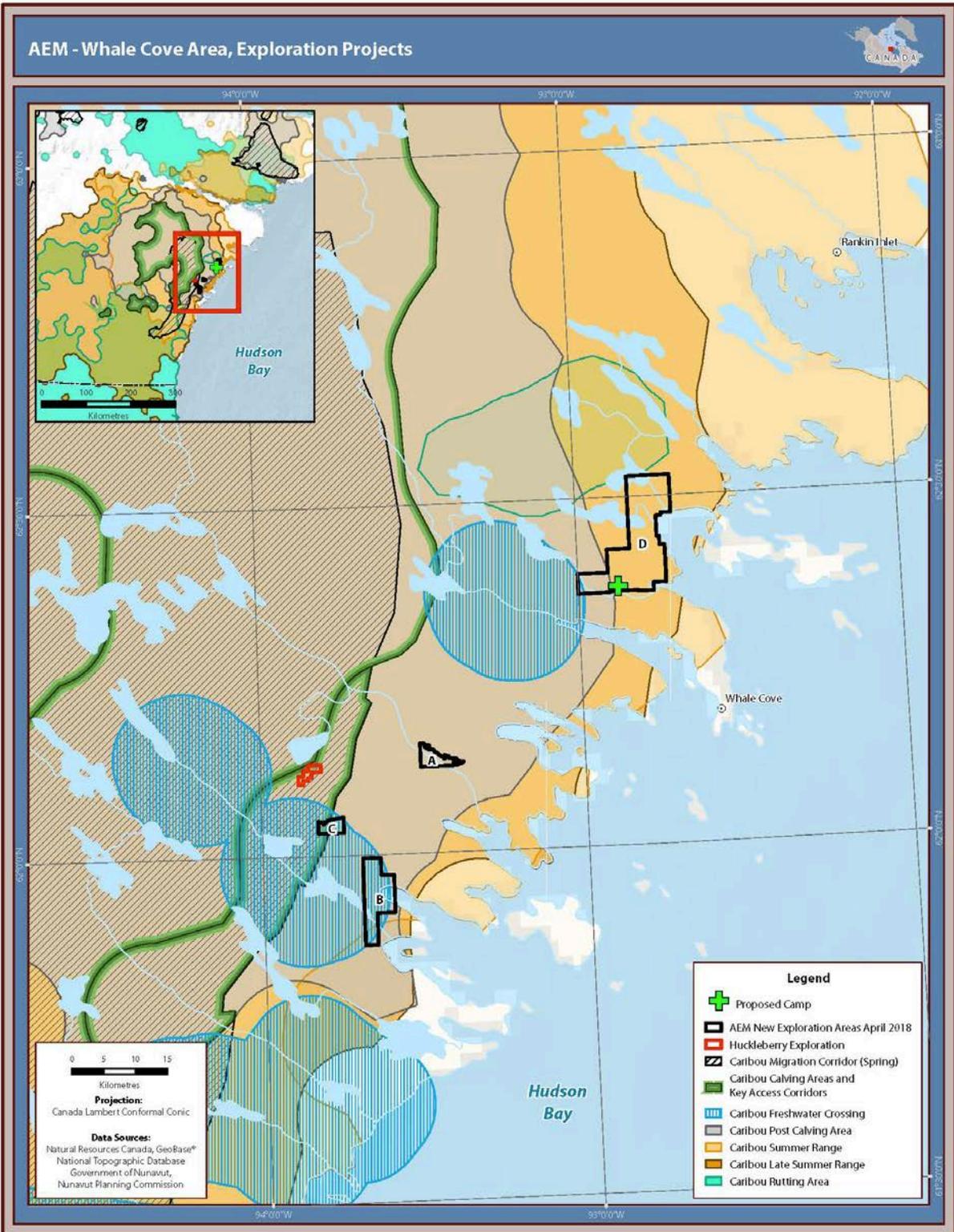
SUGGESTIONS AND RECOMMENDATIONS

The GN strongly recommends that no activities associated with the proposed project take place within calving areas and key access corridors and in a buffer of at least 14 km around these areas during the period of June 9 to June 22. Proposed activities in post-calving areas 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



GN-02: Spill Contingency Plan	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Spill Contingency Plan
References	<ul style="list-style-type: none"> • NIRB Notice of Screening • Whale Cove Area Exploration Projects – Spill Contingency Plan (May 2018)
CONCERNS	
<p>There is a lack of information regarding remediation in the Spill Contingency Plan. For example, the Proponent outlines how it will handle contaminated soil and snow, but not what it plans to do with the contaminated soil or snow.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends the Proponent update the Spill Contingency Plan to include a section on remediation.</p>	
ADDITIONAL COMMENTS	
<p>N/A</p>	

GN-03: Waste Management	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Waste Management
References	<ul style="list-style-type: none"> • NIRB Notice of Screening • Whale Cove Area Exploration Projects – Waste Management Plan (May 2018) • Whale Cove Area Exploration Projects – Spill Contingency Plan (May 2018)
CONCERNS	
<p>There is a lack of information included in the Waste Management Plan:</p> <ul style="list-style-type: none"> • Disposal of incinerator ash in natural depressions and the potential environmental impacts associated with this • Detailed landfill information 	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends the Proponent update the Waste Management Plan to include more information on the items listed above.</p>	
ADDITIONAL COMMENTS	
N/A	

GN-04: Polar Bears	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Polar bear management
References	<ul style="list-style-type: none"> • NIRB Notice of Screening • Main Application Document and Project Description
CONCERNS	
Polar bears are mentioned as a concern but the Project Proposal does not contain information regarding how the Proponent will manage encounters with polar bears.	
SUGGESTIONS AND RECOMMENDATIONS	
The GN recommends the Proponent update the Project Proposal to include more detailed information on polar bear awareness, including monitoring and reporting encounters to the GN.	
ADDITIONAL COMMENTS	
N/A	