



Environmental Protection Operations Directorate
Prairie & Northern Region
933 Mivvik Street, 3rd Floor
P.O. Box 1870
Iqaluit, NU X0A 0H0

ECCC File: 6100 000 191/001
NIRB File: 19EA019

May 14, 2019

Via email at: info@nirb.ca

Cory Barker
Technical Advisor I
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Cory Barker:

RE: 19EA019 – Blue Star Gold Corp. – Hood River Gold Project – NIRB Screening

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned screening and is submitting comments via email. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comments are provided:

1. Mitigation Monitoring and No Activity Buffers for Birds and Bird Nests

Reference(s)

- Blue Star Gold Corp. Wildlife Protection Plan – Hood River Gold Project. Section 6.2 Birds and Bird Nests and Table 3 - Bird Species Groups and Recommended No Activity Buffers for Active Nests (Government of Canada 2018). April 2019.

Comment(s)

On Page 16 of the Wildlife Protection Plan, the Proponent states that if active nests are encountered, they will do the following:

- Cease activities in the vicinity immediately to ensure that the nest is not disturbed.
- Establish a No Activity Buffer as outlined in Table 3.
- Ensure the No Activity Buffers is maintained until the Wildlife Monitor confirms the nest is no longer in use (for raptors), or until the end of the breeding season or until the young have fledged (all other active bird nests).
- Record nest coordinates.

It is unclear if the “No Activity Buffers” outlined in Table 3 of the Wildlife Protection Plan will be adaptively managed. ECCC notes that appropriate setback distances are determined on a case-by-case basis based on the distance at which nesting birds react to human disturbance.

ECCC Recommendation(s)

ECCC recommends that the Proponent clarify if the “No Activity Buffers” will be adaptively managed on a case-by-case basis based on the distance at which nesting birds react to human disturbance.

2. Incineration of Sewage

Reference(s)

- Blue Star Gold Corp. Waste Management Plan – Hood River Gold Project. Table 3. Waste Streams, Treatment and Disposal. April 2019.
- Blue Star Gold Corp. Project Application – Hood River Gold Project. April 2019.

Comment(s)

The Waste Management Plan and the Project Application states that sewage from Pacto toilets will be backhauled, discharged to a sump or incinerated. If incinerated, the ash will be backhauled for disposal offsite.

Incineration of sewage is discouraged unless the incinerator is specifically designed to handle this waste and the manufacturer's operating instructions are strictly followed to achieve appropriate combustion. It is unclear from the Waste Management Plan if the incinerator that will be used is specifically designed to handle the incineration of sewage.

ECCC Recommendation(s)

ECCC recommends that the Proponent clarify if the incineration equipment chosen is specifically designed to handle sewage.

Should the Proponent require additional information ECCC has developed a technical document for batch waste incineration that is available at the following link: www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1.

Should you require further information, please do not hesitate to contact me at (867) 975-4981 or Richard.Bingley@Canada.ca.

Sincerely,

[original signed by]

Richard Bingley
Environmental Assessment Coordinator

cc: Georgina Williston, Head, Environmental Assessment North (NT and NU)