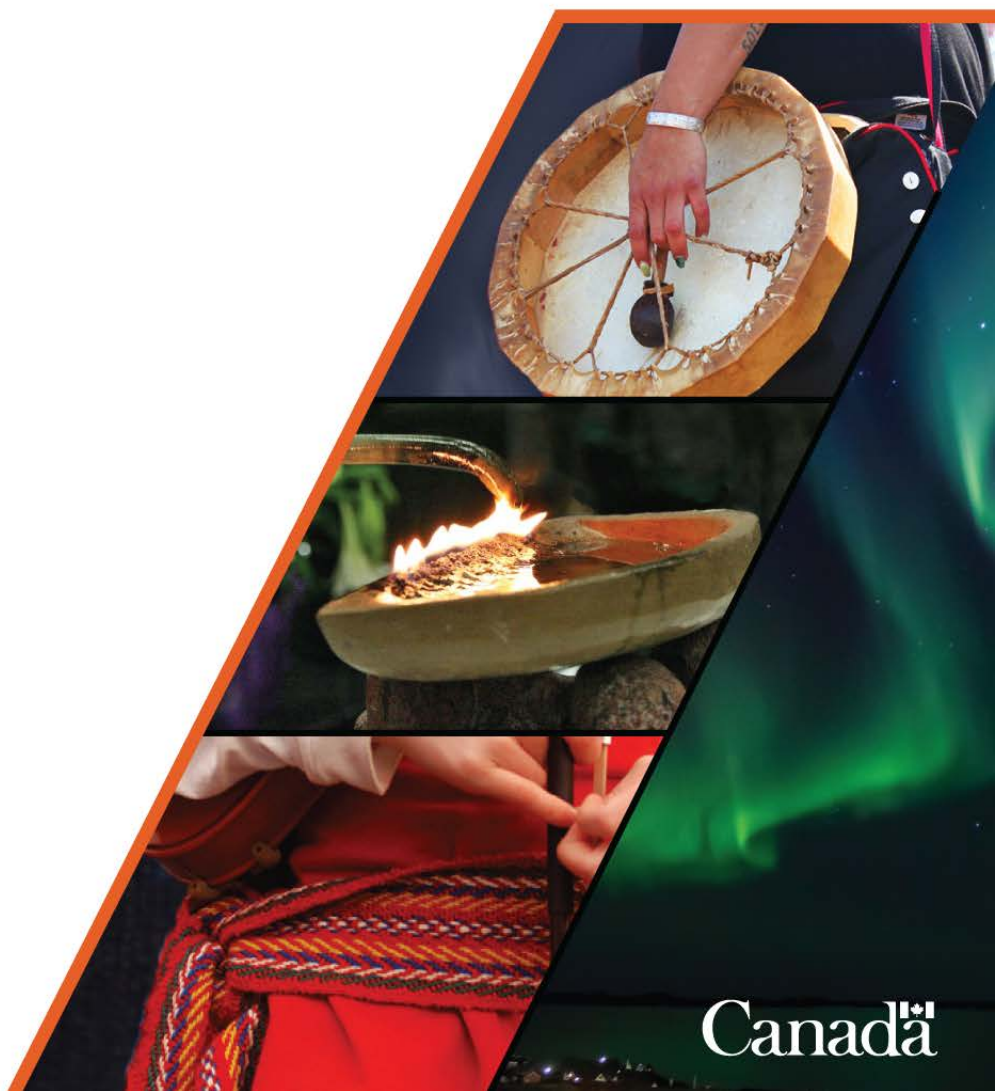




CIRNAC Comments to NIRB

Re: Notice of Screening for Blue Star Gold Corp's "Ulu Gold Project" Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
NIRB # 20EN001
Our file - Notre référence
CIDM # 1280157

March 2, 2020

Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for Blue Star Gold Corp's "Ulu Gold Project" Project Proposal;

Dear Jaida Ohokannoak,

On February 3, 2020, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Blue Star Gold Corp's "Ulu Gold Project" Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Whether the Project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);

CIRNAC is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

Some common practices include:

- Select winter routes that maximize the use of frozen water bodies;
- Test the lake ice thickness to ensure ice is capable of fully supporting the equipment or vehicles;
- Do not disturb the stream bed or banks of any definable watercourse. No mechanized clearing to be carried out immediately adjacent to any watercourse;
- Avoid disturbance on slopes prone to natural erosion; seek alternate locations for routing;



- Ensure a sufficient thickness of snow and ice is present on the winter road to prevent erosion of the ground surface and impact on vegetation;
- Minimize approach grades at winter lake/stream crossings and construct approaches entirely of ice and snow materials. Ice or snow free of sediment should be the only construction materials for temporary crossings over any ice-covered watercourse;
- Implement a clean-up and reclamation plan which includes re-vegetation and/or stabilization of exposed soil in road bed;
- Upon closure of the winter trail, remove all trail markers, grease and oil marks; remove or flatten any snow banks or drifts; divert water away from erosion-prone areas; and note any areas suffering from damaged vegetation (due to gouging, etc.);
- Do not erect camps or store materials on the surface ice of lakes or streams;
- Analyze collected water in accordance with the Nunavut Water Board water licence discharge criteria before discharging into the environment;
- All personnel who will work with explosives will be trained and competent on the procedures for handling explosive materials;
- Do not use ammonium nitrate-based explosives in or near water due to the production of by-products that may impact water quality;
- Personnel will be trained on spill containment and emergency procedures relevant to explosives;
- Site personnel should be designated to routinely inspect storage containers, containment areas, drip trays, valves and conveyance lines for leaks and punctures; and,
- Fuel storage areas and fuel lines/valves should be clearly marked to avoid accidental breaks and punctures.

CIRNAC would like to refer the Proponent to some reference documents which could be of interest, related to the Project activities:

- Federal Guidelines for Landfarming Petroleum Hydrocarbon Contaminated Soils. Government of Canada. 2006 (Editorial Update 2013) (soil treatment facility design and operation);
- Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories. Mackenzie Valley Land and Water Board et al. November 2013;
- Exploration and Mining on Crown Lands in Nunavut Guidebook. Indian Affairs and Northern Development. Ottawa, 2005; and,
- Mine Reclamation Guidelines for the Northwest Territories and Nunavut. Department of Indian Affairs and Northern Development. 2009.



Any matter of importance to the Party related to the Project proposal.

Community Engagement

CIRNAC recommends that the Proponent provide a brief written summary of its discussions about the Ulu Gold Project activities, undertaken in Kugluktuk, Cambridge Bay, or with Omingmaktok Hunters' & Trappers' Organizations, residents of Kugluktuk and other operators in the region, as well as with various local and regional service providers and operators.

This summary should describe meeting dates, types of interaction (e.g., telephone call, email correspondence, in-person visit, etc.), matters discussed, and any agreed upon next steps.

CIRNAC recommends that the Proponent consider how it will involve the communities of Cambridge Bay and Kugluktuk in the Project. The following points should be explored:

- Incorporation of Inuit knowledge and Inuit Qaujimajatuqangit in the Project design;
- Briefing community members on planned activities;
- Briefing community members on monitoring results; and
- Training and economic opportunities for community members.

CIRNAC Contact in Spill Response Plan

In Section 1.4 of the Spill Response Plan, the Proponent indicates that, should any updates be needed, updated documents will be provided Nunavut Water Board. CIRNAC recommends that any updated documents should also be provided to the Nunavut Impact Review Board.

In Section 5.2 Spill Reporting of the Spill Response Plan, the Proponent indicates that, in the event of a reportable spill event, the following parties will be notified:

- Blue Star Project Manager;
- NT-NU 24hour Spill Report Line;
- Kitikmeot Inuit Association;
- CIRNAC Inspector.

CIRNAC recommends that the Proponent remove the CIRNAC Inspector from the reportable spill event contact list. After the Proponent contacts the NT-NU 24-Hour Spill Report Line, the NT-NU 24-Hour Spill Report Line will contact the CIRNAC Inspector.



Updated Manuals and Management Plans

In the Project Description, the Proponent indicates:

“Potential environment effects and suitable mitigation measures have been considered and are presented below in Table 1. Existing management plans acquired through the property transfer are being reviewed, and where necessary, new plans are being drafted and will be made available to parties for review and comment during the NIRB screening process and during water licencing, as required.” (Page 4, Project Description, Ulu Project Proposal January 2020)

CIRNAC notes that if any management plans are to be redrafted and made available later in the screening process, CIRNAC and other Intervenor may not have the chance to review the redrafted material by the end of the screening period.

In the Project Application form, Section A1: Project Info, and Section C1: Pits, CIRNAC notes that the Proponent proposes to provide the Quarry Management Plan and the Winter Trail Management Plan only if deemed necessary.

CIRNAC also notes that, in the NIRB Application document, sections titled Section B7: Waste Rock, Section B8: Stockpiles, Section B10: Geology Section, Section F1: Site Cleanup, and the section titled Miscellaneous Project Information, the Proponent proposes to provide the following documents during the Nunavut Water Board processes in renewal and amendment of the existing water licence:

- Revised Interim Closure and Reclamation Plan;
- Revised Interim Water Management Plan;
- Revised Waste Management Plan;
- Contaminated Soil Excavation and Soil Treatment Facility management Plan;
- Landfill Operations and Maintenance Manual; and,
- Waste Rock and Ore Management Plan.

Further, CIRNAC also notes that Table 1 in the Environment Heritage Resource Management Protection Plan lists that both the Waste Management Plan and the Interim Closure and Reclamation Plan are listed with the publish year 2020 by Blue Star Gold Corp. Neither of these plans are present in the documents supplied to the NIRB for the screening of the Ulu Project Proposal.

The Interim Closure and Reclamation Plan by Blue Star in 2020 is also referenced in sections 3.1 Ground Stability, 3.4 Water Quality, 3.5 Sediment and Soil Quality, 4.1 Vegetation, and 4.2 Aquatic Life of the Environment Heritage Resource Management Protection Plan.


If these documents are not provided to the NIRB for the screening process, CIRNAC notes that the plans will not be reviewed for the screening regulatory process. Therefore



CIRNAC recommends that the Proponent provide these plans for review during the NIRB screening process.

CIRNAC appreciates the opportunity to provide comments and looks forward to working further with the NIRB and the Proponent, as necessary, throughout any further review related to this project. Should you have any questions, please contact Richard Bingley at (867) 975-4556 or by e-mail at Richard.Bingley2@Canada.ca.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Felexce Ngwa', with a stylized flourish at the end.

Felexce Ngwa
Manager, Impact Assessment

