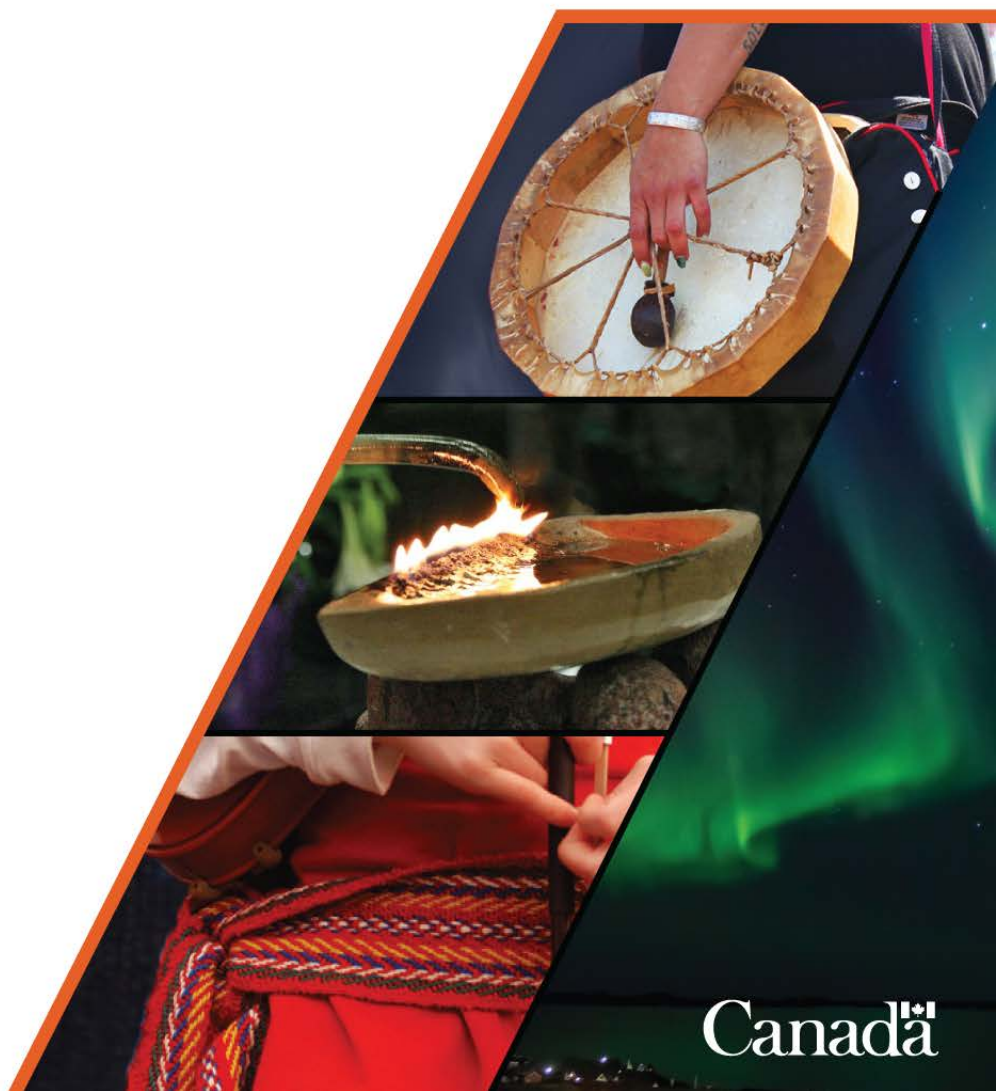




CIRNAC Comments to NIRB

Re: Notice of Screening for Canarc Resource Corp.'s "Hard Cash" Project Proposal



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

Your file - Votre référence
20EN010
Our file - Notre référence
CIDMS # 1284885

May 5, 2020

Keith Morrison
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via NIRB public registry

Re: Notice of Screening and Comment request for Canarc Resource Corp.'s "Hard Cash" Project Proposal

Dear Keith Morrison,

On April 14, 2020 the Nunavut Impact Review Board (NIRB) invited parties to comment on Canarc Resource Corp.'s "Hard Cash" Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the Project Proposal and supporting documents 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:

- Drip pans or other equivalent device should be used when refueling equipment. Secondary containment or a surface liner (e.g., self-supporting instaberms and fold-a-tanks) to be used at all refueling stations;
- All fuel and chemicals should be stored so as to be inaccessible to wildlife;
- All fuel and other hazardous materials should be stored a minimum of thirty-one (31) metres away from the high water mark of any water body and in such a manner as to prevent their release into the environment;
- Re-fuelling of all equipment should occur a minimum of thirty-one (31) metres away from the high water mark of any waterbody;
- No land based drilling or mechanized clearing within thirty-one (31) metres of the normal high water mark of a waterbody;
- Do not locate any sump within thirty-one (31) metres of the normal high water mark of any water body;



- Do not allow drilling wastes to spread to the surrounding lands or waterbodies;
- If an artesian flow is encountered, the drill hole should be immediately plugged and permanently sealed;
- Minimize the environmental footprint of the drill site; and,
- Ensure sumps are properly backfilled to account for settlement and prevent ponding of water on or adjacent to the sump location to prevent permafrost degradation.

Any matter of importance to the Party related to the project proposal:

Environmental Impact Table

In the NIRB application, the Proponent does not indicate any potential impact to Permafrost in the Environmental Impacts Table. CIRNAC recommends that the Proponent provide rationale for leaving this section empty, given that the Proponent proposes to drill for samples in a zone known for extensive continuous and extensive discontinuous permafrost.

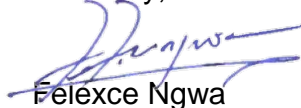
Communications with Land Users

CIRNAC recommends that the Proponent maintain open communication with the community of Arviat and affected Manitoba and Athabasca Denesuline communities. This will allow for their familiarization with planned activities and respect for their interests (e.g., protection of wildlife resources and economic development opportunities). In particular, the following considerations should be explored to promote the participation of local community members in project activities:

- Incorporation Inuit knowledge or Inuit Qaujimajatuqangit in the project design;
- Incorporation of Manitoba and Athabasca Denesuline traditional knowledge in the project design;
- Briefing community members on planned activities;
- Briefing community members on project results; and
- Training and employment opportunities for community members.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases 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,



Felelxe Ngwa
Manager, Impact Assessment

