

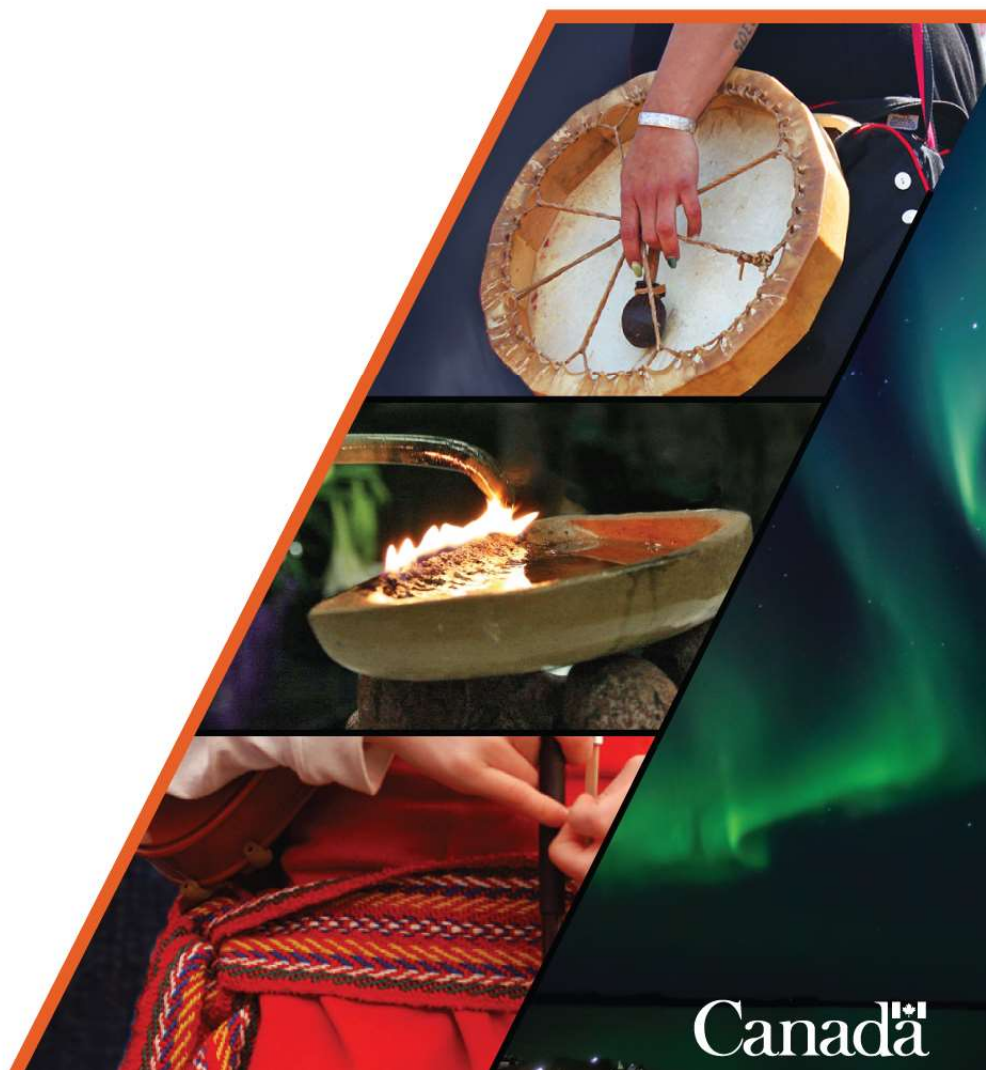


CIRNAC Comments to NIRB

Re: Notice of Screening for 5530 Nunavut Inc.'s
“Precious Metal Property” Project Proposal



GCDPCS # 92599456



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

Your file - Votre référence
17EA020

Our file - Notre référence
92599456

March 31, 2021

Francis Emingak
Junior Technical Advisor
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 5530 Nunavut Inc's "Precious Metal Property" Project Proposal

Dear Francis Emingak,

On March 10, 2021, the Nunavut Impact Review Board (NIRB) invited parties to comment on 5530 Nunavut Inc.'s "*Precious Metal Property*" *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 proposal is likely to arouse significant public concern; and if so, why;

CIRNAC # 1: Potential for positive effects to Inuit through employment and training opportunities

CIRNAC recommends that the Proponent prioritize the employment and training of local Inuit when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. Members of the community of Baker Lake, the community in closest proximity to the project, should be prioritized in any project-related employment and training opportunities that may be made available.

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CIRNAC # 2: Consultation with interested parties.

CIRNAC recommends that the Proponent maintain open communication with the Hamlet of Baker Lake and local community organizations including the Baker Lake Hunter and Trappers Organization which may have an interest in the project's activities. Issues that should be considered as part of any consultation activities include:

- Incorporation of Inuit knowledge or Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities in close proximity to the project area;
- Training and employment opportunities for community members;
- Regular updates on the status of project activities.

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

CIRNAC #3: Conflicting information on temporary camp capacity

CIRNAC notes that there is conflicting information about the capacity of the temporary exploration camp among the supporting documents for the proposed amendment. The NIRB's scope of the amendment states that the Proponent is proposing to establish a temporary twenty (20) person exploration camp while other application package documents (e.g., *NIRB Application for Screening # 125589, Abandonment and Restoration Plan, Environmental Management Plan*) mention a twenty (20) to forty (40) person camp. It is unclear if the Proponent intends to construct a 20 or 40 person camp. This information is vital as it will proportionally affect the scope of camp operations and activities related to the project, including the use of water and the deposit or discharge of waste.

CIRNAC recommends that the Proponent clarify if it intends to increase the temporary camp capacity to forty (40) persons in the future and if yes, scope the amendment request accordingly.

CIRNAC #4: Conflicting information on the start date and duration of Orbit Garant fuel storage container establishment at AWAR

CIRNAC notes there is a conflicting information on the start date and duration of the Orbit Garant fuel storage container establishment at All Weather Access Road (AWAR). The information in the Meadowbank Project Non-Technical Summary (NIRB ID# 210226-17EA020), states that the installation will start on April 1, 2021 and run for 12 weeks (84 days) while the Non-Technical Summary section of the *NIRB Application for Screening # 125589* states that the start date will be May 1, 2021 and run for 8 weeks (56 days). This apparent inconsistency makes it difficult to determine the temporal scale of potential impacts of the proposed activities.

CIRNAC recommends the Proponent clarify the actual start date and duration of the Orbit Garant fuel storage container installation at the AWAR.

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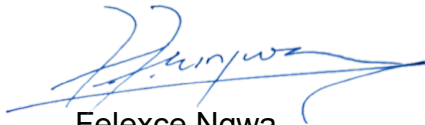
CIRNAC #5: Spill Contingency and Fuel Management Plan Update

The Spill Contingency and Fuel Management Plan (SCFMP) shows the total fuel usage and storage as up to 4,000 litres. The SCFMP issued on January 1, 2021 does not present a clear strategy to manage the increased fuel volumes (up to 46, 125 litres) envisaged for the current amendment.

CIRNAC recommends that the Proponent update the SCFMP to show a clear strategy to manage up to 46, 125 litres of fuel envisaged for the current amendment.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further phases related to this project. Should you have any questions, please contact Vincent Okonkwo at (867)975-4552 or by e-mail at vincent.okonkwo@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment