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Building *Nunavut* Together
Nunavut liuqatigiingniq
Bâtir le *Nunavut* ensemble

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Government of Nunavut
Nunavut Kavamat
Gouvernement du Nunavut

March 31, 2020

Karen Costello
Executive Director
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Notice of Screening for the 5530 Nunavut Inc.'s "Precious Metal Property" Project Proposal (17EA020)

Dear Ms. Costello,

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on 5530 Nunavut Inc.'s "Precious Metal Property" Project proposal. The GN reviewed the proposed project and has prepared three (3) comments for your consideration (see Appendix), as well GN Department of Environment's overview presentation as supplement to this submission.

The GN looks forward to further information on this project from NIRB. Should there be any concerns or need for follow-up, please do not hesitate to contact me by phone at 867-975-7828 or by email at asimonfalvy@gov.nu.ca.

Qujannamiik,

[Original Signed By]

Agnes Simonfalvy
Avatilirinirq Coordinator
Government of Nunavut

Appendix

GN-01: Environmental Management Plan	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Environmental Management Plan – Caribou Mitigation & Monitoring and Cumulative Impacts
References	<ul style="list-style-type: none"> • Apex Geoscience Ltd. on behalf of 5530 Nunavut Inc. – “Environmental Management Plan” • Government of Nunavut – “Spatial Screening for “5530 Inc.’s “Meadowbank Precious Metal Property”, March 31, 2021 • NIRB Notice of Screening for 5530 Nunavut Inc.’s “Precious Metal Property” Project Proposal
CONCERNS	
<p>The GN is concerned with some of the language used in the Environmental Management Plan (EMP) and seeks clarification from the Proponent. Specifically, in section 5.2.2: Caribou Mitigation and Monitoring of the EMP, the Plan states that:</p> <p style="padding-left: 40px;"><i>“During the spring pre-calving migration (April 15 – June 1), fall post-calving migration (June 15 – August 1) and pre-breeding rut migration (August 1 – November 10) periods, the shores of water bodies within proximity of the Meadowbank Precious Metal Property will be surveyed. 5530 Nunavut Inc. will suspend all operations within 10 km of any caribou crossing until the caribou have safely crossed.”</i></p> <p>The GN seeks additional detail surrounding the monitoring and mitigation of caribou in the Project area. The above language seems to imply that only “the shores of water bodies” will be surveyed prior to Project activities taking place. Further, the GN is uncertain what methods will be used to survey and monitor for caribou presence.</p> <p>It is apparent that the Proponent is using out-of-date data to inform the Caribou Mitigation and Monitoring procedures. The caribou herd annual ranges that overlap with the Project area are those of the Ahiak, Wager Bay, and Lorillard herds. The seasonal periods of these herds, as determined by GN-DOE Wildlife Research based on collar data, differ from those presented above. Use of out-of-date data in the development of management or work plans is not advisable and may result in undue impacts or disturbances.</p> <p>A complete environmental or wildlife management plan should outline the monitoring and mitigation measures that a Proponent will carry out during project operation. This type of plan is essential for reviewers, such as the GN, to understand how wildlife will be monitored during project activities, what specific actions will take place when wildlife is sighted, and what measures will be taken to mitigate any negative impacts or disturbances to wildlife from project</p>	

activities. Without this plan, the GN is unable to complete its screening of the Project as proposed.

The Project area overlaps with the annual ranges and migratory corridors of several caribou herds. Telemetry data show that caribou movements overlap with the Project area during the spring migration, summer, fall migrations, breeding/rutting, and winter seasons. Migratory routes are of critical importance for maintaining healthy caribou herds and herds are especially vulnerable to disturbance during the migration period. Habitat modification through permanent works or infrastructure could be detrimental to caribou and impact overall health and productivity. Consistent and cumulative disturbance may result in serious negative impacts to herd demography or population size.

The GN is also concerned with the potential for significant cumulative ecosystemic impacts due to the Project, the active Agnico Eagle Meadowbank and Amaruq Mines, and the All-Weather Access Road (AWAR) in the area. As noted above, three caribou herds inhabit and breed in the area surrounding the Project. These herds have already experienced disturbance from development and activity in the area, and as a result shifts in migratory corridors and changes in distribution have occurred. Further development and activity in this area will likely cause further distributional changes and range shifts.

RECOMMENDATIONS

The GN recommends the Nunavut Impact Review Board (NIRB) “require the proponent to provide any additional information that it considers necessary to carry out its review or screening or to determine the scope of a project, as the case may be”, pursuant to Section 144 (1) of the Nunavut Planning and Project Assessment Act (NuPPAA).

The GN strongly recommends the Proponent develop a complete suite of Caribou Monitoring and Mitigation measures to be informed by engagement with GN-DOE Wildlife Research as well as other interested stakeholders. The Environmental Management Plan should then be updated with those measures.

The GN also recommends the Proponent obtain the most up-to-date collar data and seasonal ranges in order to inform management and work plans.

ADDITIONAL COMMENTS

N/A

GN-02: Heritage Resources	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Heritage Resources – Thelon Heritage River
References	<ul style="list-style-type: none"> • Government of Nunavut – “Spatial Screening for “5530 Inc.’s “Meadowbank Precious Metal Property”, March 31, 2021 • NIRB Notice of Screening for 5530 Nunavut Inc.’s “Precious Metal Property” Project Proposal
CONCERNS	
<p>Finally, the GN would like to note that the Thelon River, which traverses the Project area in Claim Block C, is culturally significant to Qamani’tuamiut (the Inuit of Qamani’tuaq or Baker Lake). The Thelon River is important to Qamani’tuamiut, who use it regularly for traditional land use activities. The River is also used recreationally by users who praise its wilderness characteristics.</p> <p>For these reasons, the Thelon River was designated a Heritage River, and participates in the Canadian Heritage River System through the Canadian Heritage Management Board. The Thelon River is also a designated River Corridor two (2) kilometres wide, one (1) km on each bank of the river, where heritage resources are managed within. Additionally, an Inuit Impact Benefit Agreement (IIBA) for the Heritage Rivers in Nunavut was signed July 9, 2019 by the Government of Canada (GoC), GN and Nunavut Tunngavik Incorporated (NTI).</p>	
RECOMMENDATIONS	
<p>The GN recommends that no Project activities take place within one (1) km of the shorelines of the Thelon Heritage River.</p>	
ADDITIONAL COMMENTS	
<p>N/A</p>	

GN-03: Consultation & Engagement	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Consultation & Engagement – Community Concerns
References	<ul style="list-style-type: none"> • 5530 Nunavut Inc. – “2020 Consultation Log” • NIRB Public Registry – Various comments submitted by community members of Qamani’tuaq (Baker Lake) • NIRB Notice of Screening for 5530 Nunavut Inc.’s “Precious Metal Property” Project Proposal
CONCERNS	
<p>The GN is aware of significant local concerns from the community of Qamani’tuaq (or Baker Lake). These concerns surround disturbances to harvesting activities (particularly in the area of Whitehills Lake) and the impacts of activities on caribou migrations and presence. Community members are concerned that traditional land use activities, such as hunting and fishing, will be negatively impacted by exploration activities in the area.</p> <p>The GN is also aware that the Baker Lake Hunters’ and Trappers’ Organization (BLHTO) has voiced significant concern about the Project. The GN supports the efforts of the BLHTO in ensuring Inuit harvesting rights are respected.</p> <p>The GN is also concerned that the consultation log lacks sufficient detail as to how community concerns were addressed.</p>	
RECOMMENDATIONS	
<p>The GN recommends the Nunavut Impact Review Board (NIRB) “require the proponent to provide any additional information that it considers necessary to carry out its review or screening or to determine the scope of a project, as the case may be”, pursuant to Section 144 (1) of the Nunavut Planning and Project Assessment Act (NuPPAA).</p> <p>The GN requests the Proponent provide information on how exploration activities will impact traditional land use activities and what measures will be taken to reduce the disturbance to land users in the area. The GN also requests an updated and more detailed consultation log.</p> <p>The GN recommends the Proponent consult and engage meaningfully with the community of Qamani’tuaq and the Baker Lake Hunters’ and Trappers’ Organization in order to address the community concerns.</p>	
ADDITIONAL COMMENTS	

N/A