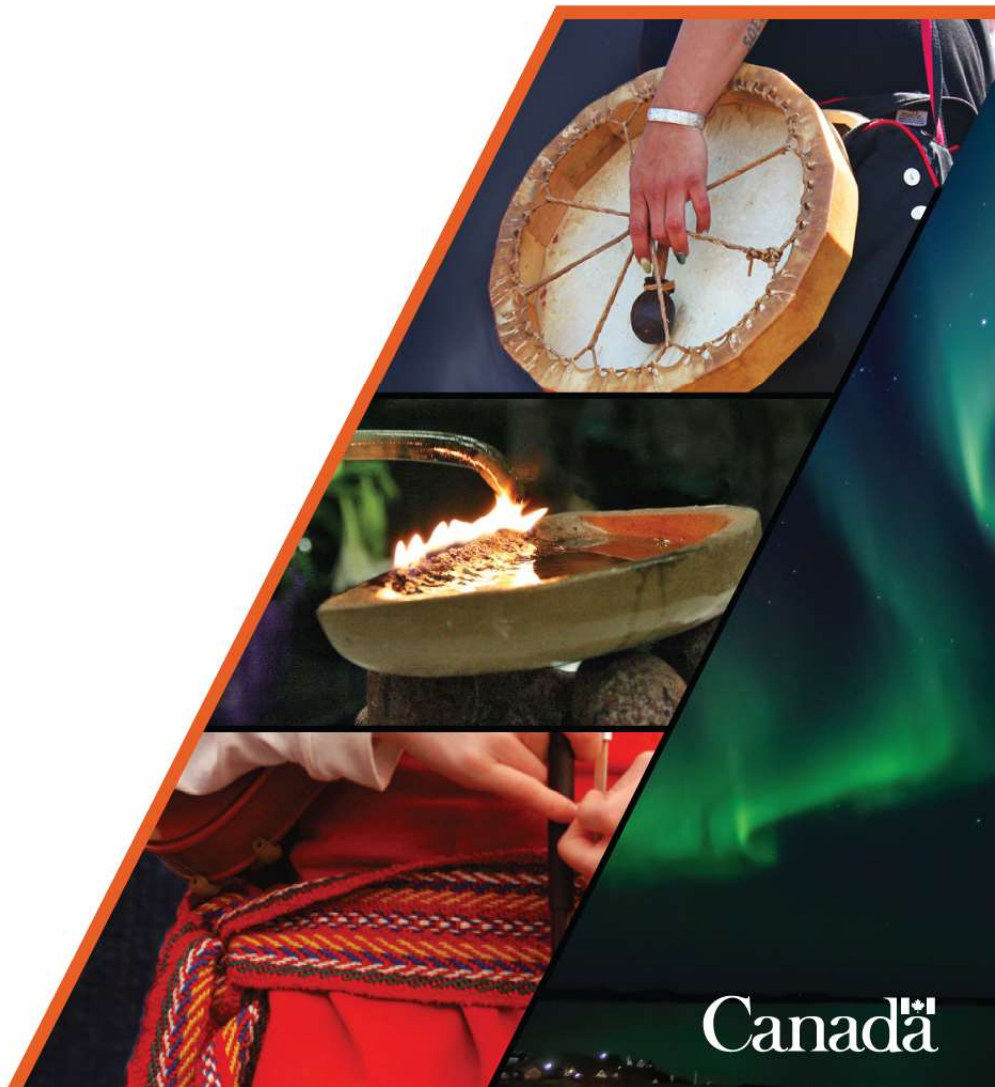




CIRNAC Comments to NIRB

Re: Notice of Screening for Leeward Capital Corp.'s "Pistol Lake" Project Proposal



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

Your file - Votre référence
21EN013
Our file - Notre référence
93286908

April 8, 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 Leeward Capital Corp.'s "Pistol Lake" Project Proposal

Dear Francis Emingak,

On March 18, 2021 the Nunavut Impact Review Board (NIRB) invited parties to comment on Leeward Capital Corp.'s "Pistol Lake" 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 #1: Hazardous Materials Management

CIRNAC notes that the Proponent does not indicate where hazardous materials, other than fuel, would be stored. CIRNAC recommends that the Proponent ensure that any hazardous materials are stored a minimum of 31 meters away from the high water mark of any waterbody, in such a way to prevent their release into the environment. Further, CIRNAC recommends that the Proponent ensure there is adequate on-site storage facility(ies) to accommodate any generated hazardous waste prior to shipment to the appropriate destination.

CIRNAC #2: Identification of Environmental Impacts Matrix

CIRNAC notes that the Proponent has indicated that the potential impacts of project activities on water quality will be positive, but did not provide any rationale to substantiate this assertion.



CIRNAC recommends that the Proponent provide rationale for indicating that potential impacts to the water quality will be positive.

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

CIRNAC #3: 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 Kugluktuk, the community in closest proximity to the project, should be prioritized in any project-related employment and training opportunities that may be made available.

CIRNAC #4: Consultation with Interested Parties

CIRNAC recommends that the Proponent maintain open communication with the Hamlet of Kugluktuk, residents of Bathurst Inlet, and local community organizations including the Kugluktuk Hunters and Trappers Association, the Burnside Hunters and Trappers Association (Bathurst Inlet | Qinquat), and the Omingmaktok Hunters and Trappers Association (Bay Chimo | Omingmaktok) 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; and
- Regular updates on the status of project activities.

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,



Felexce Ngwa
Manager, Impact Assessment

