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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

February 25, 2022

Francis Emingak
Junior Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Notice of Screening for Canada-Nunavut Geoscience Office's "Izok Lake Targeted VMS Mineralization in the Slave Craton" Project Proposal (22YN003)

Dear Francis Emingak,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Canada-Nunavut Geoscience Office's "Izok Lake targeted VMS mineralization in the Slave craton" Project proposal.

The GN has reviewed the proposed project and the Department of Environment and Culture and Heritage offers the following comments as it pertains to Wildlife Disturbance, Predator Mitigation, as well, Heritage Resources in Areas, as further described in the attached Appendix.

The GN appreciates participating in the screening of this project through the NIRB process. 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,

Agnes Simonfalvy
Avatiliriniq Coordinator
Government of Nunavut

Appendix

GN-01: Wildlife Disturbance	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Disturbance - Aircraft
References	<ul style="list-style-type: none"> • 220210-22YN003-Project Application-IA2E • NIRB Notice of Screening for “Izok Lake targeted VMS mineralization in the Slave craton” Proposal • NIRB Project Certificate No. 005, 2014
CONCERNS	
<p>The Proponent intends to utilize aircraft for the purpose of travel to and from Project sites. These aircraft include a Bell206LR helicopter and chartered Twin Otter plane. The use of fixed and rotary winged aircraft has the potential to cause disturbance to terrestrial wildlife species such as caribou, and to species such as migratory birds.</p>	
RECOMMENDATIONS	
<p>The GN recommends all aircraft maintain a minimum altitude of 610 meters during point-to-point travel, as well as a minimum vertical distance of 1000 meters and horizontal distance of 1500 meters from any observed concentrations of migratory birds. These distances are in keeping with previously approved project certificates such as NIRB Project Certificate No. 005 Term and Condition 59, for the Baffinland Iron Mines Mary River Project.</p> <p>All altitudes and distances are subject and secondary to the safety of the aircraft and its occupants.</p>	
ADDITIONAL COMMENTS	
N/A	

GN-02: Predator Mitigation	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Predator Mitigation
References	<ul style="list-style-type: none"> • 220210-22YN003-Project Application-IA2E • NIRB Notice of Screening for “Izok Lake targeted VMS mineralization in the Slave craton” Proposal • <i>Scientists Act</i>
CONCERNS	
<p>The Proponent intends “to look at the regional geology around the Izok Lake deposit and have quick visits to the neighboring Gondor and Hood deposits” (Lebeau, 2022). During this time the Proponent intends to utilize “small individual sleeper tents” (Lebeau, 2022).</p> <p>The GN has concerns with the Proponent’s lack of predator deterrence plan or designated bear monitors. The region in which the Proponent plans to conduct activities has active populations of both Polar and Grizzly bear. Both populations have a history of aggressive action towards humans.</p> <p>The GN acknowledges that the equipment listed to be used by the Proponent includes 2-3 12-gauge shotguns for the purpose of predator defense. The Proposal does not mention if non-lethal defense options will be available, nor does it mention if there will be a designated bear monitor on site during Project activities. Shotguns are an active defense measure and only work if a bear can be sighted well in advance of coming into contact with humans.</p> <p>If the Proponent is intending to utilize tents as opposed to hard walled structures for accommodation, then there should be passive measures in place for predator defense during periods such as sleeping. Passive predator deterrents include such things as electric fencing and dogs.</p>	
RECOMMENDATIONS	
<p>The GN recommends the Proponent invest in passive predator defense measures such as electric fences, use of dogs, or other measures for deterrence that do not rely on active bear monitoring. If this cannot be accomplished, the GN recommends that project personnel accommodations be hard walled shelters that will provide greater protection from predators.</p>	

The GN also recommends the Proponent produce a predator deterrence plan and submit this to NIRB for inclusion on the public registry. This plan should include specifications on devices to be used for defense and deterrence, the use of qualified bear monitors, and how personnel's sleeping accommodations will deter bears.

ADDITIONAL COMMENTS

The GN also advises the applicant to submit a Scientific Research License application, as required of the proposed research under the *Scientists Act*. The Nunavut Research Institute (NRI), which administers this, recommends the Proponent complete any public consultation activities prior to the NRI research licensing.

GN-03: Archaeological Impact Assessment

Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological Impact Assessment
References	<ul style="list-style-type: none"> • 220210-22YN003-Project Application-IA2E • NIRB Notice of Screening for “Izok Lake targeted VMS mineralization in the Slave craton” Proposal

CONCERNS

The proponent is proposing to conduct research activities focusing on the re-examination of old drill cores left by MMG Resources Inc. and to examine and map the geology of the surrounding area. The project is located approximately 275 km south of Kugluktuk. Specifically, the research will focus on three deposits: the Izok Lake Gondor, and Hood deposits. A helicopter will be used to transport the 3-4 people team from the Izok Lake camp to the Gondor and Hood deposits where small tents will be erected. No land disturbance activities are planned.

A search of the Nunavut Archaeological Site Database indicates that there are several recorded archaeological sites near the project location. There are currently no known sites within the Gondor and Hood properties, although several sites are found around them and throughout the area. Several sites are identified in the south/southeast section of the Izok Lake Property. This however does not preclude the presence of unidentified sites or cultural features.

The Department of Culture and Heritage has no concerns with the current project proposal as no ground disturbance activities are planned.

RECOMMENDATIONS

On the basis that no ground disturbance activities are planned during the proposed project the department of Culture and Heritage recommends that:

- (1) The proponent exercises caution in their movements in the area specifically with regards to aircraft landings and the placement of temporary campsites. It is recommended that landing areas be visually inspected prior to landing and take off, and that camp be erected away from any archaeological/historical sites or features.
- (2) The proponent should avoid conducting activities in the vicinity (50 m buffer zone) of archaeological/historical sites or features. If archaeological sites or features are encountered, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Territorial Archaeology Office.

All archaeological and palaeontological sites in Nunavut are protected under the Nunavut Act. The Proponent must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site without the proper authorizations. Moreover, the building of inuksuit is not recommended.

ADDITIONAL COMMENTS

Culture and Heritage recommends the proponent completes the application for an Archaeology Class 2 permit.