



CIRNAC Comments to NIRB

Re: Notice of Screening for Forum Energy Metals
Corp “Nunavut Uranium Project” Project Proposal



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

Your file - Votre référence
22EN032
Our file - Notre référence
GCdocs# 104002051

July 5, 2022

Mia Otokiak
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 Forum Energy Metals Corp.'s "Nunavut Uranium Project" Project Proposal

Dear Mia Otokiak,

On June 14, 2022, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Forum Energy Corp.'s "Nunavut Uranium Project". Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the response below as it pertains to NIRB'S request:

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

CIRNAC 1: Environmental Impacts

The Proponent has not identified the possible negative environmental impacts associated with physical scarring and land disturbance at the camp and drilling sites, use of drilling fluids, and uranium specific impacts (radioactive dust). Additionally, the Proponent has identified positive and negative non-mitigatable impacts on the physical, biological and socio-economic components in the "identification of Environmental Impacts" matrix, but has not provided any commentary justifying how these impacts are classified as "positive" or "non-mitigatable".

CIRNAC recommends that the Proponent identifies, and proposes mitigation measures for, any negative environmental impacts that may result from physical scarring and land disturbance at the camp and drilling sites, generation of radioactive dust, and use of drilling fluids. Additionally, CIRNAC recommends that the Proponent provides a rationale why impacts on some physical components(e.g., designated environmental areas, ground stability, permafrost, water quality) and socio-economic components(e.g., community wellness and human health) are characterized as positive while impacts on most biological components(vegetation, wildlife,



birds, aquatic species, and wildlife protected areas) are classified as “negative and non-mitigable”.

CIRNAC 2: Potential for positive effects to Inuit through employment, training, and procurement opportunities

CIRNAC recommends that the Proponent prioritize the employment and training of local Inuit as well as procurement with Inuit-owned businesses when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. As a result, Inuit and Inuit-owned businesses situated in Baker Lake should be prioritized in any project-related employment, training, and procurement opportunities that may be made available.

CIRNAC 3: Consultation with interested parties

CIRNAC recommends that the Proponent consult with the Hamlet of Baker Lake and the Baker Lake Hunters and Trappers Organization. Issues that should be considered as part of any consultation activities should include, but not limited to:

- Incorporation of Inuit knowledge and 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 within or in close proximity to the project area;
- Training and employment opportunities for community members;
- Procurement opportunities for local businesses, and
- Regular updates on the status of project activities.

CIRNAC 4: Potential identification of archaeological and/or paleontological resources

CIRNAC recommends that the Proponent contact the Government of Nunavut's Department of Culture and Heritage to determine if any actions are needed to ensure the protection of Nunavut's archaeological and paleontological resources. The Department of Culture and Heritage oversees the protection and management of heritage resources in Nunavut, in partnership with land claim authorities, regulatory agencies, and the federal government. It would be able to provide any needed guidance or direction to the Proponent.

CIRNAC 5: Annual Report

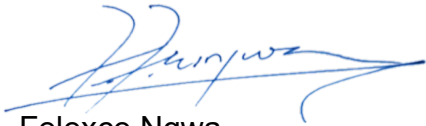
If the project is approved, CIRNAC recommends that the Proponent be required to submit Annual Reports to the NIRB which provide updates on its implementation of project-specific terms and conditions included in a Screening Decision Report, compliance with regulatory authorizations, and community engagement activities, including interactions with the Baker Lake Hunters and Trappers Organization. This practice of providing timely monitoring and reporting information would support the NIRB and interested parties' understanding of the Proponent's management of project activities. It would also provide an opportunity to seek clarification from the Proponent on



its implementation of measures to prevent, minimize, and manage any ecosystemic or socio-economic impacts associated with its project.

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 Courtney White by e-mail at courtney.white@canada.ca or David Abernethy at (867) 222-1610 or email at david.abernethy@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

