



**NIRB File No.: 22EN032**  
NPC File No.: 149726

July 7, 2022

Richard Mazur  
Forum Energy Metals Corp.  
Suite 615, 800 West Pender St.  
Vancouver, BC V6C 2V6

Sent via email: [mazur@forumenergymetals.com](mailto:mazur@forumenergymetals.com)

**Re: Opportunity to address comments received regarding Forum Energy Metals Corp.'s "Nunavut Uranium Project" Proposal**

Dear Richard Mazur:

On May 24, 2022, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Forum Energy Metals Corp.'s "Nunavut Uranium Project" proposal from the Nunavut Planning Commission (NPC or Commission). On June 14, 2022, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by July 5, 2022.

On or before July 5, 2022, the NIRB received comments from the following interested parties:

- *P. Idviat*
- *B. Ukpatiku*
- *J. Pudnak*
- *K. Aupaluktuq*
- *M. Perkison*
- *P.K. Hughson*
- *Kivalliq Inuit Association (KivIA)*
- *Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)*
- *Environment and Climate Change Canada (ECCC)*
- *Government of Nunavut (GN)*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at [www.nirb.ca/project/125699](http://www.nirb.ca/project/125699).

A *summary* of the public concerns reflected in the comment submissions relate to the following:

## **Wildlife and wildlife habitat**

- Proposed project is located within the Beverly and Qamanirjuaq Caribou herd migration and calving routes;
- Concerns regarding the proposed project effecting caribou calving;
- Stated that one caribou migration is already interrupted by Agnico Eagles project;
- Concerns regarding wildlife that Inuit depend on such as caribou and fish. Seeing changes in their movements already and numbers of caribou are declining;
- Recommend the Proponent consult the Species at Risk registry to obtain the most current information for their operations;
- Recommend the Proponent consult the Government of Nunavut to identify appropriate mitigation and/or monitoring measures to avoid and lessen project effects to species under their management responsibility;
- Recommends that the Proponent carry out all phases of the project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests and eggs;
- Recommends that the Proponent make food, domestic wastes, and petroleum-based chemicals inaccessible to wildlife at all times; and
- ECCC has management responsibilities for migratory birds. ECCC should be contacted for any guidance and in instances involving mortalities or interactions with individuals, nests, or eggs of these species.

## **Traditional Land Use and Harvesting Activities**

- Concerns regarding the proposed project effecting the enjoyment of traditional harvesting activities;
- Noted that this area has been used by Inuit ancestors before colonization and Inuit still travel for traditional land use to this day;
- Elders have always wanted to protect the land surrounding the project because they have used it for hunting for hundreds of years;
- Thelon River and Aberdeen Lake and surrounding area is especially important to Inuit who have family ties to these landscapes, recreation travelers and wildlife who call this home and so much more;
- A search of the Nunavut Archeological Site Database indicates that there are one hundred and sixty-five (165) recorded archeological sites within the boundaries of the proposed exploration areas;
- A class 2 Archeology Permit is required from the Government of Nunavut - Department of Culture and Heritage; and
- The Department of Culture and Heritage recommends that the applicant avoids conducting activities in the vicinity of archaeological/historical sites. 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 our office.

## **Environmental Impacts and Mitigation**

- Concerns regarding the proposed project affecting the quality of water of the Thelon River, which is the main drinking water for Baker Lake and all wildlife surrounding the area;
- Concerns regarding climate change and seeing higher water levels and the melt going into freshwater bodies;

- Concerns regarding the land changing colours more frequently and that having an effect on wildlife migration;
- Concerns regarding the Proponent not properly cleaning up old exploration site. Also noted that other mining companies promised to follow procedures, but evidence shows that they did not follow through. Samples and other equipment left at the sites after the project was complete;
- Stated that there have been many attempts to explore for uranium in the past with no success;
- Concerns regarding damage to the land and that it will never return to its original state;
- When the temporary camp is removed there should be a final inspection report completed and signed off by the project manager, or their designate, and any contractors responsible for the cleanup;
- Recommends 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;
- Recommends that the Proponent provide a rationale why impacts on some physical and socio-economic components are characterized as positive while impacts on most biological components are classified as “negative and non-mitigable”; and
- Potential impacts to heritage resources, proponent to understand their responsibility to ensure that no heritage resources are disturbed throughout project activities.

### **Community Consultation and Employment**

- KivIA asks that Forum provide written responses to the questions asked at the June 20<sup>th</sup>, 2022, meeting held in Baker Lake;
- KivIA would like a response in regard to the number and size of the sleds and komatiks to be used with the SnowCats, Challengers and Delta’s for the overland hauling during 2023;
- Unclear of the involvement of communities in the project including:
  - Incorporation of Inuit knowledge and Inuit Qaujimajatuqangit in the Project design;
  - Briefing community members on planned activities;
  - Briefing community members on monitoring results; and
  - Training and economic opportunities for community members.
- Recommends that an Annual Report be submitted 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.

### **Cumulative Effects**

- Proposed project combined with other projects in the area may cause cumulative effects on Beverly and Qamanirjuaq Caribou herd abundance and habitat quality.

### **Fuel and Chemical Storage**

- Ensure convoys have sufficient spill response materials in the spill kits, up to 1,000L;
- Ensure drill sites and drill cuttings sumps are located a minimum distance of 31 metres from all nearby water sources; and
- Ensure to use lined berm with all tanks and secondary containments where fuel transfer will be conducted.

## Mining

- Exposure to uranium can result in both chemical and radiological toxicity. Uranium mining has widespread effects contaminating the environment with radioactive dust, radon gas and water-borne toxins;
- The dangers of uranium exploration are too much of a risk for the people of Baker Lake, the wildlife and the environment;
- In addition to before and after pictures, there should be a final inspection sheet signed off by the project manager, or their designate, for each drill hole site;
- The wind will surely pick up the uranium dust and spread it around to the land and water.
- The whole start to finish of this mineral needs proper inclusion community level input and consultation with an Inuit worldview. The footprint of this activity is large and not just the permits or lease site; its from site to shipping and beyond;
- Clarification on handling and disposal of radioactive drill cuttings;
- Clarification on details of measurement techniques available for identifying wastes requiring segregation and disposal due to radioactivity; and
- Recommends that before final inspection of the drill sites, that a gamma scan and radon scan be conducted at the drill holes that encountered uranium mineralization in order to ensure radiation levels do not pose any danger.

## Waste management

- Hazardous waste is to be disposed of at a facility that is capable of this, but it is not outlined where, by what method, or how it will be stored and timeline to leave the community landfill for further storage south.

## Monitoring Reporting Requirements

- In the Wildlife Monitoring and Mitigation Plan please add KivIA contact name and number for Baker Lake and Rankin Inlet for reporting any bear incidents and/or interactions, wolf or fox den sightings and any large herd sightings.

## Aircraft Flight Restrictions

- Have a local monitor to ensure flight rules are followed, in particular, refrain from low level flights near all wildlife, especially caribou; and
- Concerns regarding aircrafts affecting caribou calving and migration routes.

The NIRB would like to provide Forum Energy Metals Corp. with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Ministers. The NIRB respectfully requests that a response be provided directly to the NIRB by **July 21, 2022**.

If Forum Energy Metals Corp. determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at [info@nirb.ca](mailto:info@nirb.ca), or through the online public registry at [www.nirb.ca](http://www.nirb.ca).

If you have any questions or require additional clarification, please contact the undersigned directly at (867) 983-4622 or [motokiak@nirb.ca](mailto:motokiak@nirb.ca).

Sincerely,



Mia Otokiak  
Junior Technical Advisor  
Nunavut Impact Review Board

cc:                    Distribution List  
Richard Dwyer, Nunavut Water Board  
Luiz Manzo, Kivalliq Inuit Association  
Maria Serra, Kivalliq Inuit Association  
Brenda Osmond, Kivalliq Inuit Association  
Ashley Aupaluktuq-Burton, Kivalliq Inuit Association  
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs Canada