

TABLE 1. RESPONSE TO PARTY COMMENTS, 22EN057

ID #	SUBJECT	PARTY CONCERN	PARTY RECOMMENDATION	PROPONENT RESPONSE
DFO-01	Fish and their habitat	<p>Your proposal has been reviewed to determine whether it is likely to result in the death of fish by means other than fishing and the harmful alteration, disruption or destruction of fish habitat which are prohibited under subsections 34.4(1) and 35(1) of the Fisheries Act; and, effects to listed aquatic species at risk, any part of their critical habitat or the residences of their individuals in a manner which is prohibited under sections 32, 33 and subsection 58(1) of the Species at Risk Act.</p>	<p>Fisheries and Oceans Canada recommends the proponent review the Interim Code of Practice for End-of-pipe fish screens (https://www.dfo-mpo.gc.ca/pnw-ppe/codes/screen-ecran-eng.html), the Code of Practice for Ice bridges and snow fills (https://www.dfo-mpo.gc.ca/pnw-ppe/practice-pratique-eng.html), and the Measures to Protect Fish and Fish Habitat (http://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures-eng.html). If the project is able to comply with the conditions and measures set out in the Interim Code of Practice, the Fish and Fish Habitat Protection Program (the Program) is of the view that your proposal will not require an authorization under the Fisheries Act or the Species at Risk Act; however, we recommend that a Notification Form be submitted. Should your plans change, if you have omitted some information in your proposal, or if the project is unable to comply with the Interim Codes of Practice or the Measures to Protect Fish and Fish Habitat, we recommend that the proponent submit a Request for Review (http://www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/forms-formes/request-demand-eng.pdf) of the project. It remains the responsibility of the proponent to remain in compliance with the Fisheries Act, avoid prohibited effects on listed aquatic species at risk, any part of their critical habitat or the residences of their individuals, and prevent the introduction of non-indigenous species.</p> <p>It is the proponent's Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat. Such notifications should be directed to FisheriesProtection@dfo-mpo.gc.ca or 1-855-852-8320.</p>	<p>Viridis has reviewed the Interim Code of Practice for End-of-pipe fish screens and is confident that its water intakes will comply and not require an authorization under the <i>Fisheries Act</i> or the <i>Species at Risk Act</i>.</p> <p>Viridis understands its responsibility to comply with the <i>Fisheries Act</i> and its Duty to Notify DFO if they have caused, or are about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption or destruction of fish habitat.</p>
DAdjun-01	<p>Wildlife conservation Mining companies Harvesting Declines Employment/Unemployment Habitat disruptions Further declines in species</p>	<p>I am very unhappy with the website comment sections as I could not even submit my concerns online after filling out all of the sections to voice my concerns. (Please see attachment). It doesn't allow me to submit, therefore I am writing this email.</p> <p>I am an Inuk from Kugluktuk Nunavut.</p> <p>My recommendation is for the project not to be done in our area. I do not support this project.</p>		<p>Viridis appreciates Ms. Adjun's consideration of the project application and related comments. It respectfully submits the following responses to comments applicable to the South Kitikmeot Gold Project.</p> <p>Caribou disturbance and camp location: Viridis appreciates and respects the importance of caribou to Nunavumiut. While Viridis is proposing a small camp, the camp will be located approximately 200 km from Kugluktuk. The nearest camp that it is aware of is that at Lupin Mine and the outpost camps on Contwoyto Lake, also located approximately 100 km away Further, Viridis is</p>

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		<p>The caribou are already so declining in recent years. More noise and disturbances are just going to continue to effect our efforts for getting caribou near home, which is why they shouldn't be doing more small camps close to home.</p> <p>As an Inuk, I feel that the mining industry is barely even helping us in the North. Minerals should just be left for the future generations to mine on their own. We need our future generations to be able to mine them themselves when they will have the education for those paths. Hardly any Inuit are ever being hired for the managerial or hire up positions, and we are just giving more jobs and all of our minerals to the South for their benefits, while were also dealing with so much caribou and other wildlife declining in our area. The mines are barely helping our economy. So many in our communities are still unemployed.</p> <p>I am very concerned about more of mining industry coming to our Territory and extracting our minerals. When I calculated one time that Hope Bay was giving Nunavut (not Kitikmeot) 2.2 million, it was divided from the population of 26000 and it was only \$90 per person, which to me is basically only enough for one breakfast meal of ingredients at the Northern/Coop store. Honestly, not that much in comparison to what the billions of dollars the mines makes and give to their employees, which are always southerners making the most. Honestly, Id rather wait until the next generations overcome the residential school survivors hardships to enable the future generations to become educated and have those CEO, owner, geologists, managerial position jobs that can be possible with encouragement and proper educational support. With all of the drastic changes in how we are allowed to harvest our caribou and char over the years and everyone in the community being effected by the declines, it makes me feel very unsupportive of the mining industries at the moment. I read a few articles of Inuit in the East that are closest communities to the mining industry noticing declines in their fish populations and other mammals. Many elders do nit know of these projects and do not use social media to voice their concerns also. Our community of Kugluktuk has noticed more so in recent years that more mining and of course the noise of helicopters and drills will bring more</p>		<p>proposing to limit its activity on the land, including helicopter and drill activity, when caribou are in the area, to minimize noise and disturbance.</p> <p>Employment, training and benefits: While Viridis is a company based in Australia, it has hired Aurora Geosciences (Aurora) to advise and carry out its exploration program. Aurora is based in Yellowknife, is the only exploration team based in northern Canada, is owned and operated by northerners, and has been working in the North for over 30 years. Where there is interest and availability, Aurora hires and trains workers from Nunavut communities for its programs, including labour and technical positions.</p> <p>Viridis and Aurora are committed to maximizing benefits to Nunavummiut through direct employment and on the job training, as well as contracting with Inuit- and Nunavut resident-owned companies, to the greatest extent possible.</p>

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		<p>disruption to the areas that have always been without that noise and fear with those disturbances.</p> <p>Discription of the concerns indicated above: Elders concerns Wildlife conservation Mining companies Harvesting Declines Employment/Unemployment Habitat disruptions Further declines in species</p>		
CIRNAC 1	Waste Management, Grey Water Treatment	The Environment and Heritage Resources Protection Plan, section 4.1.3 Waste Management indicates that "Grey water sumps are periodically dosed with bleach or lye to reduce odours and attractants".	CIRNAC notes that this sump treatment method may require confirmation with the Nunavut Water Board to ensure appropriate measures are used for sump treatment.	Viridis look forward to addressing this with the Inspector and the NWB during the water licence process.
CIRNAC 2	Trenching and Pitting Activities and Locations	The Proponent indicates that exploration activities may at some point include trenching and test pitting activities, but does not clarify any potential mitigation measures specific to trenching and pitting activities. CIRNAC understands that trenching and pitting activities may be expanded on when applying for bulk sampling permits.	CIRNAC recommends that the Proponent ensure no trenching or pitting occurs within thirty-one (31) metres of the highwater mark of any water body.	Viridis confirms that no trenching or pitting will occur within thirty-one (31) metres of the highwater mark of any water body
CIRNAC 3		-	<p>CIRNAC recommends that the Proponent continue to consult with the relevant interested Indigenous peoples and organizations. Issues that should be considered as part of any consultation activities should include, but not limited to:</p> <ul style="list-style-type: none"> • Incorporation of traditional knowledge 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 northern community members; • Procurement opportunities for local businesses; and • Regular updates on the status of project activities. 	Viridis confirms that engagement has been ongoing throughout the NIRB screening process and will continue in accordance with the <i>Engagement Plan</i> . As mentioned above, Viridis is committed to realizing benefits for Nunavummiut to the greatest extent possible.

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KitIA1		<p>The Kitikmeot Inuit Association (KitIA) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Viridis Mining and Minerals' "South Kitikmeot Gold Project" application. Please note that, in relation to land use licensing, KitIA will work with the Proponent to address any concerns that may arise separately from the NIRB screening.</p> <p>At this time, KitIA has no further comments for this file.</p>	-	Noted. Viridis looks forward to working with the KitIA.
GN-01	Archaeological Considerations	<p>The proponent intends to carry out a multi-year (2023-2029) drilling program on seven properties spreading over 11, 000 hectares. The project is located approximately 424 km southeast of Kugluktuk along the border with NWT. The proposed land use activities include the building of a temporary camp (25-60 people) and associated components; drilling, trenching, mapping, sampling and, geophysics studies; the use of airplane and helicopters to transport personal to and from exploration sites to camp; the use of ground vehicles (snowmobiles, all-terrain vehicles, utility-terrain vehicles, Bobcat) and; potentially the use of the Tibbit-Contwoyto Winder Road for supplies/material transportation.</p> <p>A search of the Nunavut Archaeological Site Database indicates that there are 296 recorded archaeological sites within the boundaries of the proposed project area. This however does not preclude the presence of unidentified sites or cultural features as to this day no systematic archaeological reconnaissance has been conducted in this specific area. Several archaeological sites are also reported on exploration properties nearby.</p> <p>The project area may potentially yield significant archaeological/cultural resources as it geographically overlaps three caribou herds: the Beverly, Ahik and Bathurst herds.</p> <p>CH also notes that the proponent will be mobilizing and demobilizing equipment and supplies during the snow-covered period. This constitutes a concern as not only snow cover might mask unrecorded archaeological sites but the likelihood of vehicles impacting unidentified (unrecognized)</p>	<p>A Class 2 Archaeological Permit is required.</p> <p>On the basis that the presence of archaeological sites in the Project Area is high, that no systematic archaeological survey has been conducted and, that the Project Area overlaps with three caribou ranges, the Department of Culture and Heritage considers that there are reasonable grounds to believe that there could be sites of archaeological significance on the lands affected by the current project (NA 33.5.12). The Department of Culture and Heritage recommends that a field archaeological assessment program be initiated prior to any land disturbance activities.</p> <p>CH recommendations are the following:</p> <ol style="list-style-type: none"> (1) A qualified archaeologist must apply for a Class 2 permit in order to conduct a field archaeological assessment of any areas subject to ground disturbance activities (camp and associated components); (2) Assessment of any drilling locations (50 m radius) and water-hose route to the closest water intake; (3) Assessment of any trenching locations; (4) Assessment of any proposed transportation route/track (including winter routes). The proponent must adhere strictly to these routes during the duration of their activities; (5) The Department of Culture and Heritage recommends that the applicant avoids conducting activities in the vicinity (50 m buffer zone) 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. <p>All archaeological and palaeontological sites in Nunavut are protected by law. The applicant must understand that it is their</p>	Viridis plans to conduct an archaeological impact assessment prior to any new land disturbances. Viridis understands its responsibilities in relation to protecting archaeological and palaeontological sites.

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		protruding cultural features is high (inuksuit, caches, dwellings, etc.).	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. Moreover, the building of inuksuit is not recommended. Pending a Class 2 Archaeological Permit. Deadline for permit application is March 31, 2023.	
GN-02	Project Scope Uncertainty - Description	<p>The scope and scale of the Proposal varies based on a series of conditional statements. For example, the project may be 25 people or more than double – up to 60, satellite camps may or may not be utilized at unspecified drilling locations, winter overland travel may or may not be employed, a cat train resupply may or may not be used. The Proposal also indicates that camp and activities on the land will happen at different times throughout the year, depending on weather and caribou use of the area, without describing how activities would change Under differing conditions. This ambiguity creates challenges for reviewers in assessing the nature of the Proposal, its potential impacts and mitigation plans.</p> <p>The Proponent states in the Project Description, “Based on a currently unknown rate of the Program expansion, typical materials and equipment used and waste generation are estimated based on the maximum program magnitude and duration.” However, this maximum program model is not readily described in the Description or supporting documents. No details about satellite camps or cat train use are provided, nor are estimates about project activity, such as expected helicopter use, expected spatial-temporal intensity of aerial surveys, or the frequency of fixed-wing resupply runs.</p>	<p>The GN recommends that the Proponent clearly identify the range of activities required to support the “maximum program magnitude” and include relevant information which details each component and its scale/intensity, its anticipated environmental impacts, and proposed mitigation measures.</p> <p>Should certain conditions not allow for a project component to proceed, e.g., the Lupin Mine winter road is not built this year and the cat train is not used, reviewers and stakeholders need to have a clear understanding of how the Proponent would proceed (e.g., what is being transported, in what quantity, what safety measures are in place, etc.) should conditions allow for that component to proceed in the future.</p>	<p>Mineral exploration programs evolve over time largely in response to drilling and sampling results, and in the north in particular, in response to weather and seasonal conditions which can vary throughout the year, and from year to year. It is common for an exploration program to start small (1 drill, 1 helicopter and a small geology crew) and occur for a short duration (1-2 months), but expand over time (up to 6 drills, a bigger camp and multiple helicopters for 6 months). For regulatory efficiency and operational flexibility, Viridis scoped its application to include the maximum program extents reasonably foreseeable over the project life; its anticipated environmental impacts, and proposed mitigation measures are include with the application.</p> <p>For clarity, Viridis provides the following further discussion on its planned scope.</p> <p>A main tent camp is typically set up in location that makes sense for fixed wind access year round, is proximal to drilling targets and where possible, within the footprint of a historic disturbed area. Given the distance between Viridis’s claim blocks, it may be safer for field crews carrying out mapping or sampling far away from the main camp to stay in a satellite tent for a short duration. Photos of what a satellite camp may look like were included with the application, as well as photos of what the main camp may look like.</p> <p>Viridis plans to access its project, including mobilizing all supplies, by fixed wing from Yellowknife. In the event that the winter road to Lupin is built, it is expected that this will likely be available for one season, and use may extend from February to April. Viridis may consider this option for mobilizing supplies, mostly comprised of drummed fuel, and depending on timing in relation to project activities, it may mobilize drill and camp components as well.</p>

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				<p>Helicopter use varies with drill program size, duration and location, and may occur at any time of day as long as there is daylight. An average of two hrs of flying per day per drill is standard for crew change and drill support, if drilling occurs within a few kms of camp.</p> <p>Aerial geophysical surveys are typically carried once in an area; once an area is surveyed, it typically doesn't need to be surveyed again. Surveying may be spread out over time with some areas surveyed in one year and other areas surveyed the next year. Geophysical surveys are typically carried out when there are no caribou in the area and the weather conditions are predictable and stable. Based on Aurora's experience, airborne geophysical surveys can be carried out any time of the year although summer time is typically preferable for surveying in the Kitikmeot.</p> <p>Frequency of fixed wing resupply runs to and from the main camp can vary based on available aircraft and workforce size. It's typical for an exploration camp to have a weekly supply flight, with extra flights as needed.</p>
GN-03	Project Scope Uncertainty - Extent	<p>The revised NIRB Application for the Proposal does not provide drilling locations or the extent of activity. Some Proposal documents describe a single drill being used (Project Description), while others (Environmental & Heritage Resources Protection Plan) cite "drills" plural, and the Proponent provides a statement indicating that drilling areas may change and claim boundaries may change, based on future prospecting results.</p> <p>The project application does not contain sufficient information about the level of activity in the current claim blocks, and without a clearer picture of what is being proposed in this application, additional activity in other claim blocks (not yet acquired) may constitute a significant modification of scope, requiring additional assessment and review.</p>	<p>The GN recommends that the Proponent provide greater clarity on the extent of activity within the project area for current claims, and a description of expected activities and intensity on future claim blocks, with an aim to describe the total level of expected activity over the project lifespan.</p>	<p>The total level of expected activity over the project lifespan is as described in the project application form and section 5 of the Project Description.</p> <p>Drilling may only occur where Viridis has subsurface tenure; drilling is limited to the existing claim blocks. While subsurface tenure acquisition can follow prospecting success, Viridis cannot predict future subsurface tenure acquisition.</p>

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GN-04	Waste Management Plan additional information	<p>The waste management plan requires greater detail and emphasis on secure storage of wastes and certain materials. Segregation and disposal are cited both at camp and drill sites, however instructions /procedures for secure storage or containment of waste prior to disposal at these sites are not included. Secure storage of waste is needed up to the completion of incineration and/or backhaul. This is particularly important for the proposed satellite camps, which have reduced infrastructure and will most likely backhaul all waste to the main camp for subsequent handling.</p> <p>Other project description resources describe use of Pacto toilets, which eliminates blackwater production, though blackwater is still included in the definition of domestic wastewater.</p>	<p>The GN makes the following recommendations:</p> <ul style="list-style-type: none"> All petroleum products and hazardous materials should always be stored within secondary containment; The secondary containment vessel/structure should be 110% of the total capacity of all the primary containers stored within it; Certain petroleum products including greases and lubricants can be wildlife attractants and should be placed in secure storage; All food, food waste, domestic waste, pacto bags, and any other potential wildlife attractants should be placed in secure storage up to the point of incineration or backhaul. List procedures for secure storage of waste for drill sites, main camps, and satellite camps. Clarify if sewage (blackwater) will be generated at the project sites at any point during its lifetime. If so, provide supporting details on the quantity and handling of sewage <p>The Waste Management Plan and Spill Containment Plan should cross-reference each other where waste handling is concerned, as spills generate waste that requires specific handling, and unintended effluent release from waste storage areas may require spill response and cleanup.</p>	<p>Viridis commits to storing materials in secondary containment to the satisfaction of the Inspector.</p> <p>Regarding secure storage: this may vary based on the waste stream, volume, terrain and location . Secure waste storage vessels are typically metal with a lid or door that latches. Secure storage may also involve the use of permitter wildlife fencing (ie. electric bear fence).</p> <p>Regarding blackwater/Sewage: Yes, sewage will be generated. Volume of sewage generated depends on the number of workers in camp and is typically 0.1 m³/day per person, as described in the Table 2 of the Waste Management Plan. Sewage will either be incinerated or backhauled.</p> <p>Viridis commits to updating the Waste Management Plan and Spill Response Plan prior to the start of operations where required.</p>
GN-05	Spill Response Plan additional detail	<p>The GN has identified a range of issues and deficiencies within the Spill Response Plan ranging from the stated definition of a spill to the handling and storage of certain materials.</p> <p>The Project's Spill Response Plan does not contain a clear definition of a spill. Appendix A instead refers to volumes of material that trigger reporting requirements. While such reporting requirements do exist, the GN recommends that all spills are reported, regardless of volume. This approach is identified on pg. 23 of the Spill Response Plan, in the Spill Response Procedures, which state to call the Nunavut spill line if the spill is reportable.</p> <p>Section 3.2 of the Spill Response Plan lacks details as to what constitutes secondary containment. Secondary containment is an integral component of spill prevention. Inspection details along with roles and responsibilities are also not included in this section.</p>	<p>The description of a spill should be defined as "A spill is any release of a substance that may pose harm to the environment". All spills regardless of size should be reported to the Nunavut spill hotline as it permits comprehensive spill tracking in the territory.</p> <p>Section 3.2 Material Storage and Inspection should include more information on secondary containment:</p> <ul style="list-style-type: none"> All petroleum products and hazardous materials should be stored within secondary containment The secondary containment vessel/structure should be 110% of the total capacity of all the primary containers stored within it. <p>Section 3.2 Additional information on inspections and accountable positions should be identified for:</p> <ul style="list-style-type: none"> Who conducts inspections within the materials storage areas; Where inspection records will be kept; Who will be notified if a problem is found; and Who is responsible for each storage area and resolving any problems? 	<p>Viridis accepts these recommendations and commits to updating and Spill Response Plan prior to the start of operations where required.</p> <p>Viridis commits to storing hazardous materials in secondary containment to the satisfaction of the Inspector.</p> <p>The Project Manager or designate carries out inspections.</p> <p>Inspection records are maintained in the Camp office and online.</p> <p>Workers discovering an issue report to the Project Manager. The Project Manger reports internally to Aurora's Operations Manager and externally to the Inspectors and the Spill Report line, as needed.</p> <p>The Project Manger is ultimately responsible for each storage area and resolving any problems. Each worker is responsible for their own actions and immediate work area.</p>

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		<p>Table 2 of the Spill Response Plan is lacking details regarding storage, secondary containment, security, and should be expanded to include items used by the Project in lower volumes, but still pose an environmental hazard e.g. batteries and cleaning supplies.</p>	<p>Table 2 Petroleum and Chemical Products</p> <ul style="list-style-type: none"> • Certain petroleum products including greases and lubricants can be wildlife attractants and should be placed in secure storage • Coolants, particularly ethylene glycol, can be highly toxic to wildlife in small quantities, and can be an attractant. <ul style="list-style-type: none"> ○ Any ethylene glycol should be placed in secure storage; ○ Any spills (however small - e.g., leaking coolant hose drips on snow) should be cleaned up immediately; and ○ Where possible, less toxic propylene glycol should be used in place of ethylene glycol. • Salt is a wildlife attractant, particularly for ungulates (caribou, muskox). To avoid increased wildlife interactions, salts should also be placed in secure storage • Waste oil and related products should be stored in a similar manner as their parent materials. E.g., Waste oil (un-mixed) should be collected in a barrel designated for that purpose and subsequently stored in secondary containment prior to backhaul. • Spent spill response materials should be stored in a similar manner as the material they were used to clean up. E.g., used spill mats and soil or snow contaminated with diesel fuel should be stored in secondary containment. While not necessary for all spilled materials, storing spent spill kit materials in secondary containment is considered a best practice. • Hazardous materials and hazardous waste should be stored within secondary containment with an emphasis on preventing the accumulation of precipitation as these materials may not be easily separated (e.g., via oil/water separator), thus potentially creating additional hazardous waste (contaminated water) which must then be treated or backhauled. <p>•Table 2 should be expanded to include other materials used for equipment and machinery, including hydraulic fluid, batteries, solvents used for cleaning and maintenance of equipment, etc.</p> <p>Section 4 Spill Response</p> <ul style="list-style-type: none"> • This section should reference a step for inventory and replacement of used spill kit materials, as described in 	<p>Wildlife attractants and chemicals that are not immediately in use will be stored securely.</p> <p>In the event of a spill, the Spill Response Plan will be activated.</p> <p>If required, ethylene glycol use will be minimized or avoided.</p> <p>Waste and spent spill response materials will be stored and handled appropriately.</p> <p>Table 2 will be revised accordingly.</p> <p>Section 2.2 identifies Managers and Supervisors as persons responsible for spill kit maintenance. Practically speaking, this is the Camp or Program Manager for camp spill kits and the drill foreman for spill kits located at the drills.</p> <p>Section 4.5 indicates that spill kits are inspected at the start of each field season and following each spill response to ensure contents are sufficient.</p> <p>Section 4.5 includes additional shovels. Section 4.5 will be revised to include lined megabags or similar suitable vessels for snow and soil.</p> <p>Viridis will carry out spill reporting pursuant to its authorizations and will update the Spill Response Plan to reflect this as required.</p> <p>Section 2.2 indicates that managers and supervisors are responsible for ensuring adequate training is provided and maintaining training records.</p> <p>Material inventory will vary on site over time. Current SDS sheets are maintained for each product and made available to the Inspector upon request.</p> <p>Spill kits employed throughout all work areas and are appropriately sized for the activity, materials type and container size. Once its facilities are set up. Viridis looks forward to confirming spill kit suitability with the Inspector.</p>

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			<p>Section.4.5, as well as the position or individual responsible for inspecting spill kits and resupplying them.</p> <ul style="list-style-type: none"> • Parts of Section 4 - Spill Response reference the use of tools and equipment that are not available in the spill kits (shovels, chainsaw, plastic sheeting, etc.). In addition to the supplies listed in s.4.5, all kits should include shovels and lined quatrex bags /mega bags (or similar) for the storage of contaminated snow or soil. • Spill kits and materials brought along during the transportation of materials which may cause environmental harm should be scaled to address the volume of containers or bundles of containers for the material being transported. E.g., if transporting multiple fuel drums (208L each) by helicopter sling load, a typical large spill kit designed to clean up 220L will not be sufficient in the event of an unplanned load release. <p>Section 5.2 - Spill Reporting</p> <ul style="list-style-type: none"> • For a reportable spill, the Project Manager should complete and submit the Spill Reporting Form to the Inspector within 48 hours of the incident not the 7 days currently listed.. <p>Section 6 - Training</p> <ul style="list-style-type: none"> • A training log should identify and track which training site staff have received, and how recently. <p>The Materials SDS list is limited to:</p> <ul style="list-style-type: none"> ○ Jet A, Jet B ○ Diesel ○ Gasoline ○ Propane <ul style="list-style-type: none"> • Additional SDS should be provided for products expected to be utilized on site; at a minimum, the materials listed in Table 2 should be included. See the comment above re: Table 2 expansion. 	

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GN-06	Changes and additions to the Environment & Heritage Resources Protection Plan	The GN has identified a range of issues and deficiencies within the Environment & Heritage Resources Protection Plan (EHRPP) ranging from Project Design and camp layout to the need for additional information about the roles and responsibilities of site staff related to wildlife. The issues and recommended solutions are provided below.	<p>Site Managers and Supervisors and/or Wildlife Monitors should contact the local GN Conservation Officer and Wildlife Biologist based in Kugluktuk to report wildlife incidents and mortalities per Section 2.2 and 2.3.</p> <p>Section 2.4 - Pilots, where safe to do so, are also responsible for diverting around observed wildlife, particularly wildlife congregations, to minimize disturbance.</p> <ul style="list-style-type: none"> • As a general approach and where safe to do so, Pilots should maintain a minimum altitude of 610m (2000ft) above ground level (AGL). Exceptions to this general approach include low ceilings, takeoffs and landings, and low altitude maneuvering required to support operations (e.g., handling external loads by helicopter/drill moves) • As with other staff and contractors, Pilots should undergo site orientation and wildlife awareness training and regularly report wildlife observations to the Camp Manager per Section 2.1. <p>Section 4.1.1 Policy on prohibition of hunting on site by project personnel must be consistent with Inuit hunting rights as set out in Article 5 of the Nunavut Agreement.</p> <p>Section 4.1.2 Project Design - in addition to camp layout, building construction (tent platforms, cook shack, dining/common areas, etc.) should be designed and constructed to prevent wildlife ingress and from sheltering/living under them. Skirting, fencing, and on-ground construction can prevent wildlife access under project buildings.</p> <ul style="list-style-type: none"> • Sources of wildlife attractants (e.g., BBQs, grease traps, dry and cold food storage areas, food and domestic waste storage) should all be secured to prevent wildlife access. • Proposed schedules for construction, drill setups, air access and locations should be provided to GN wildlife biologists to identify potential conflicts between site activity/operations and sensitive wildlife activity <p>Section 4.1.3 Waste Management - the GN has recommended changes to the <i>Waste Management Plan</i> and <i>Spill Response Plan</i> regarding waste handling and secure storage (see GN Comments-03, 04).</p>	<p>Viridis will update section 7.1.3 of the Environment & Heritage Resources Protection Plan (EHRPP) to clarify wildlife reporting.</p> <p>Sec 2.4 will be revised to require pilots to divert around observed wildlife. Pilot participation in site orientation and training is addressed in section 2.1.</p> <p>Maintaining flying heights of 610 m, where applicable, is addressed in section 4.1.6.</p> <p>Section 4.1.1 is not intended to limit Article 5 rights, but rather mitigate effects to wildlife from hunting and to support safe management of firearms on the project.</p> <p>Sections 4.1.2 and 4.1.3 will be revised for clarity regarding camp design and attractant management.</p> <p>Drill moves and related setups can occur at any time of day or night as drills run 24 hrs per day. Further, drill move occurrence is somewhat unpredictable, given drill progress and conditions in the subsurface, along with weather and other constraints affecting heli-support for drill moves. Similarly, local flight paths and destinations vary by shift and throughout the workday based on weather, task and activity. Accordingly, the GN's request for advance notice for construction, drill setups and air access is not practical or necessary, is overly conservative, would result in an impractical administrative burden and would limit the ability of Viridis to carry out its exploration program in an effective manner. Rather, accepted standard and site specific mitigation measures enshrined in a management plan, along with expected terms and conditions are intended to achieve the same result and be adequately protective of sensitive wildlife activity.</p> <p>Restricted Access Area buffers for wildlife are listed in Table 2, based on precedent observed on other projects and discussion with relevant authorities and professional biologists.</p> <p>As mentioned in Sec 2.3, the Wildlife Monitor confirms and establishes Restricted Access Areas.</p> <p>As mentioned in Section 4.1.4, Restricted Access Areas are maintained until the nest or den is no longer in use, or the wildlife have moved on.</p>

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			<p>Section.4.1.4 Nesting, Denning, and Calving - details are lacking on roles and responsibilities related to designating a Restricted Access Area:</p> <ul style="list-style-type: none"> • What metrics or criteria are used to determine a Restricted Access Area, and who makes that determination? • Where is the documentation of a Restricted Access Area kept? Is this documentation shared or reported? If so, to whom? • Who maintains the Restricted Access Area status and who determines that a Restricted Access Area is no longer warranted? <p>Section 6 - Training - A training log should identify and track which training site staff have received, and how recently.</p> <p>Section 7 - Monitoring and Reporting - Additional detail regarding roles and responsibilities is needed in this section:</p> <ul style="list-style-type: none"> • Within 7.1.1, the Wildlife Monitor is tasked with the weekly review of reports to identify risks to wildlife, who is responsible for mitigating any risks or problem areas? (See GN Comment-06 re: Wildlife Surveillance Monitoring Procedures, below) • 7.1.3 indicates that the Wildlife Monitor handles wildlife observations and incidents; who is responsible for collecting, managing, and storing other environmental logs and reports (e.g., equipment maintenance logs, water use and waste disposal, etc.)? • Per 7.1.3, the Wildlife Monitor reports internally to the Camp or Operations Managers; who is responsible for reporting and communicating wildlife incidents to GN wildlife staff (Conservation Officer, Wildlife Biologist)? 	<p>Reporting occurs in accordance with project authorizations.</p> <p>Section 2.2 indicates that managers and supervisors are responsible for ensuring adequate training is provided and maintaining training records.</p> <p>Sec 2.3 describes the Wildlife Monitor's roles, including implementing mitigation measures.</p> <p>Section 2.2 indicates that managers and supervisors are responsible for maintaining records regarding inspections, personnel training, equipment testing and maintenance. Aspects of waste tracking are dealt with in the Waste Management Plan (see Sec 3.2).</p> <p>Sec 2.3 indicates that the Wildlife Monitor is responsible for internal and external wildlife reporting.</p>
GN-07	Wildlife Surveillance Monitoring Procedures	There are inconsistencies between the Environment & Heritage Resources Protection Plan and the Wildlife Surveillance Monitoring Procedures which should be resolved to support staff comprehension and compliance. The GN also notes that additional detail within the Procedures would increase their efficacy.	<p>The GN has the following recommendations for the Wildlife Surveillance Monitoring Procedures:</p> <ul style="list-style-type: none"> • The Procedures should indicate an increase in survey frequency based on the presence of caribou in the Early Warning Area and/or Zone of Influence (as evidenced by observations from site staff or collar data). • Increased survey frequency is also be recommended where the safety of site staff is in question (e.g., grizzly bears are denning or foraging in the vicinity of the camp or work sites). • The Procedures seem to indicate that the Wildlife Monitor would communicate any risks, problem areas, or other 	<p>Further to the <i>Wildlife Surveillance Monitoring Procedures</i>, systematic monitoring occurs daily in the camp and at each drill. Sec 4.1.6 of the EHRPP indicates that observations of caribou in the early Warning Zone and Zone of Influence are based on incidental observations by project personnel (including field crews and pilots), which is essentially an ongoing survey of all actively work areas, in addition to the daily surveillance. Further, one of the mitigation measures listed involves engaging with GNWT ENR to develop a project-specific plan should caribou move into the Zone of Influence, additional surveillance may reasonably form a component of a project-specific plan. Viridis considers the above</p>

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			<p>wildlife concerns to the Project Manager, but it is not clear who is responsible for resolving these concerns.</p>	<p>measures to be adequately protective and proactive for surveillance.</p> <p>Safe work procedures, along with establishment and maintenance of Restricted Access Area around valued wildlife components, as well as other mitigation measures listed in the EHRPP (such as those listed in 4.1.5) precludes worker from remaining in close proximity to wildlife. Further, and practically speaking, should a bear be foraging near a drill or the camp, this activity is highly surveilled by designated personnel to ensure ongoing worker safety; increased survey frequency is implied.</p> <p>Further to Sec 2.3, the Wildlife Monitor is responsible for implementing mitigation measures. Further to Sec 2.2, Managers and Supervisors are responsible for ensuring measures are adhered to.</p>
GN-08	Project disturbance to caribou	<p>The Bathurst caribou herd population has declined by approximately 98% from its historic peak (CMA 2020, Table 3, pg. 29). Barren-ground caribou, including the Bathurst herd were assessed and designated as "threatened" by both COSEWIC and SARC in 2016 and 2017, with industrial development identified as one of several threats, according to traditional and scientific knowledge (CMA 2020, pg. 19).</p> <p>The project area is situated in Area 1 of the Cumulative Land Disturbance Framework (CLDF) of the Bathurst Caribou Range Plan (GNWT ENR 2019, Fig. 15, pg. 43). The project area also exists on the main migration route(s) for the Bathurst herd (ACCWM 2014, Fig. 3, pg. 16). While Area 1 currently experiences low development density, human disturbance results in both direct and indirect habitat loss, and may result in reduced usage of areas near development and a shift in migratory movements (GNWT ENR 2019, pg. 45). Additionally, the project area overlaps with the southern portions of the Bathurst caribou calving area (as defined by CMA 2020, Fig. 1, pg. 18). The placement of the project in critical habitat consisting of the main migratory routes and portions of the calving and post-calving areas warrants both vigilance and caution to reduce disturbance from Project activity as caribou are moving between important habitats and across their range.</p>	<p>The GN has the following recommendations for the Environment & Heritage Resources Protection Plan (EHRPP) specific to caribou mitigation measures:</p> <p>s.4.1.6 - Caribou - Additional detail on implementation of stated mitigation measures is necessary:</p> <ul style="list-style-type: none"> Which staff are responsible for obtaining collar data from the GNWT and at what intervals? Caribou may move up to 80km per day (Alaska Dept. Fish and Game) so daily collar data are required to assess expected caribou presence within the Early Warning Zone; and Which staff are responsible for notifying site staff of changes to operations based on caribou presence in the Zone of Influence? <p>The "Basic Mitigation" should be modified to indicate:</p> <ul style="list-style-type: none"> a minimum flight altitude of 610m should be used, instead of 300m Critical ranges (e.g., water crossings, calving and post-calving areas) should be avoided by work crews and aircraft during periods of known activity. These windows are generally short, calving and post-calving combined last less than a month (EHRPP, Table 3, pg. 12). Caribou presence should be assessed by using multiple detection methods such as collar data or incidental observations made by wildlife monitors or pilots in the event no collared caribou are present in a group. 	<p>Aurora currently has a data sharing agreement with the GNWT to obtain collar information. Under this agreement, collar locations are shared weekly year round with designated project managers and Registered Professional Biologist advisors. One personnel are on the ground, relevant collar information will be transferred to site personnel, in accordance with Aurora's data sharing agreement.</p> <p>The basic mitigation measures include maintaining "610 m above ground level and avoid areas of known caribou concentrations when possible (subject to pilot discretion regarding aircraft and human safety) when flying over calving and post-calving range and near identified caribou water crossings when sites are active". Viridis considers this to adequately address flying heights of 610 m and avoidance of water crossings, calving and post-calving areas.</p> <p>Table 4 includes thresholds based on multiple detection methods being collar data (<i>Collars</i> in the table) and incidental observation (<i>Caribou</i> in the table). Viridis appreciates that this could be clarified to indicate # of Collars reported and # of caribou observed, and commits to updating the EHRPP accordingly.</p> <p>The Additional Mitigation mentioned in the GN's comment is inclusive of drilling and helicopters, as follows: "Delay or alter aerial or drill programs and minimize ground activity, where practical, to avoid initiating or continuing work in areas with</p>

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		Project activities such as use of aircraft have the potential to cause disturbance to terrestrial wildlife. Minimum altitudes should be utilized and enforced in order to minimize this disturbance. Other projects such as the Baffinland Mary River Iron Mine utilize a minimum flight altitude of 610m.	<p>Flying into these areas to assess caribou concentrations increases the possibility of disturbance unnecessarily.</p> <p>The "Additional Mitigation" should clarify that "avoid initiating or continuing work in areas with caribou" means temporary cessation or scaling back project activities that emit high levels of noise (e.g., drilling, fixed- and rotary-wing aircraft use, etc.) when caribou are within the zone of influence around work areas. It's not clear if this is what is intended in the current EHRPP mitigation language (pg. 12).</p>	caribou or helicopter travel over areas with caribou" Viridis feels that no further clarification of this aspect is required.
TC-01			<p>The proponent must identify the location of the proposed screened water intakes and docks at camp sites, as this will determine Transport Canada (TC)'s involvement under the Canadian Navigable Waters Act (CNWA).</p> <p>Intakes and docks are considered "works" under the CNWA. However, they may be considered "minor works" under the CNWA Minor Works Order, which are likely to cause only a slight interference to navigation. The proponent is advised to evaluate each work using the Navigation Protection Program's Project Review Tool - https://npp-submissions-demandes-ppn.tc.canada.ca/projectreviewoutildexamenduprojet.</p> <p>Works on non-navigable waterways do not fall under the CNWA. For works on navigable, non-scheduled waterways, the proponent has two options under the CNWA to address the direct impacts to navigation. The proponent can either:</p> <ol style="list-style-type: none"> 1) voluntarily apply to the Minister of Transport for approval of each work; or 2) seek authorization using the public resolution process set out in the CNWA. <ol style="list-style-type: none"> a. The public resolution process requires a proponent to post on Transport Canada's Navigation Protection Program online registry through a Notification of Work and publish a notice inviting public comments. The notice gives the public 30 days to comment on the proposed work. <ol style="list-style-type: none"> i. If no concerns are raised, the proponent can proceed with the work. ii. If there are concerns, the proponent and the commenter have 45 days to resolve any navigation-related concerns. 	<p>Viridis will update its relevant management plans with figures illustrating its camp water intake location, once the camp is established. Further, it is reasonably expected that it will be required to report this location to the Inspector pursuant to its water licence.</p> <p>Further, Viridis has reviewed the legislation and confirms that its planned works are Minor Works not requiring review or approval.</p>

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			<ol style="list-style-type: none"> 1. If concerns are resolved within that timeframe, the proponent may proceed with the work. 2. If the resolution process is unsuccessful, or with a voluntary application for approval from the proponent, Transport Canada will review the work for approval. 	