**Environment Canada** **Environnement Canada**

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March 1, 2010

Our file: 4703 001 106
NIRB file: 2BE-GOO0510

Phyllis Beaulieu
Manager of Licensing
Nunavut Water Board
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via email: *licensing@nunavutwaterboard.org*

**RE: 2BE-GOO0510 - Goose Lake Renewal & Amendment of Water License "B"**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act,* and the *Species at Risk Act*.

Sabina Gold & Silver Corporation filed an application for the renewal and amendment of their water license to the Nunavut Water Board for their Goose Lake Camp. The camp will be used as the base of operations for exploration drilling activities occurring on the Goose Lake, Boot Lake and Boulder Pond claim groups, the southern portion of the Wishbone Trend (the Malley, Lovechild and portions of the Wishbone claim groups) and the Del Lake claims. Drilling will occur in several of these areas although specific location have not yet been determined and are subject to further exploration drilling. The proponent has requested a license which allows a maximum daily use of 155 $m^3$ of freshwater per day. Approximately 10% (15 $m^3$) of this water will be used for domestic purposes and 90% (140 $m^3$) for drilling operations.

Based on the information presented at this time, EC has no real concerns with the re-issuance of this water license. Environment Canada provides the following additions to the proposed terms and conditions for the NWB's consideration:

**General**

- No disturbance of the stream bed or banks of any definable watercourse should be permitted.
- Suitable erosion control measures should be implemented at all stream/lake crossings.

**Waste Disposal**

- The application states that sewage will be incinerated. Sewage should not be burned in batch incinerators that are typically used in the north. Sewage sludge has high moisture content and low heat content that will increase operating costs dramatically and lead to poor incinerator performance. It is unlikely that the sewage will be completely combusted and could lead to the release of pathogens into the environment. The high moisture materials can leak from the incinerator hearth and

lead to equipment damage and present health hazards to workers. Sewage sludge should only be burned in incineration equipment designed for this type of waste. EC recommends that all human waste be packed out in barrels or other sealed containers. If Sabina Gold & Silver Corporation decides to pursue sewage sludge incineration, it should provide the Board with the design specifications of the incinerator and a letter from the manufacturer stating that this equipment is suitable for burning this type of waste.

- The application also states that garbage will be incinerated. Please note that EC has developed a Technical Document for Batch Waste Incineration, and is available at the following web link:
  http://www.ec.gc.ca/drgd-wrmd/default.asp?lang=En&n=82401EC7-1
  The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting.

**Fuel storage/Spill Contingency Plan**

- Drip pans, or other similar preventative measures, should be used when refueling equipment on site.

**Wildlife and Species at Risk**

- Section 6 (a) of the Migratory Birds Regulations states that no one shall disturb or destroy the nests or eggs of migratory birds. If active nests are encountered during project activities, the nesting area should be avoided until nesting is complete (i.e., the young have left the vicinity of the nest).
- Environment Canada recommends that food, domestic wastes, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) be made inaccessible to wildlife at all times. Such items can attract predators of migratory birds such as foxes, ravens, gulls, and bears. Although these animals may initially be attracted to the novel food sources, they often will also eat eggs and young birds in the area. These predators can have significant negative effects on the local bird populations.
- Section 5.1 of the *Migratory Birds Convention Act* prohibits persons from depositing substances harmful to migratory birds in waters or areas frequented by migratory birds or in a place from which the substance may enter such waters or such an area.
- In order to reduce aircraft disturbance to migratory birds, EC recommends the following:
  - Fly at times when few birds are present (e.g., early spring, late fall, winter)
  - As flight times cannot be schedules when few birds are present, plan flight paths that minimize flights over habitat likely to have birds and maintain a minimum flight altitude of 650 m (2100 feet).
  - Minimize flights during periods when birds are particularly sensitive to disturbance such as migration, nesting, and moulting.
  - Plan flight paths to avoid known concentrations of birds (e.g., bird colonies, moulting area) by a lateral distance of at least 1.5 km. If avoidance is not possible, maintain a minimum flight altitude of 1100 m (3500 feet) over areas where birds are known to concentrate.
  - Avoid the seaward side of seabird colonies and areas used by flocks of migrating waterfowl by 3 km.
  - Avoid excessive hovering or circling over areas likely to have birds.
  - Inform pilots of those recommendations and areas known to have birds.

- The following comments are pursuant to the Species at Risk Act (SARA), which came into full effect on June 1, 2004. Section 79 (2) of SARA, states that during an assessment of effects of a project, the adverse effects of the project on listed wildlife species and its critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This section applies to all species listed on Schedule 1 of SARA. However, as a matter of best practice,

Environment Canada suggests that species on other Schedules of SARA and under consideration for listing on SARA, including those designated as at risk by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), be considered during an environmental assessment in a similar manner.

| Terrestrial Species at Risk [1] | COSEWIC Designation | Schedule of SARA | Government Organization with Primary Management Responsibility [2] |
|---|---|---|---|
| Peregrine Falcon[3] (*tundrius* subspecies) | Special Concern | Schedule 3 | Government of Nunavut |
| Short-eared Owl | Special Concern | Schedule 3 | Government of Nunavut |
| Barren-ground Caribou (Dolphin and Union population) | Special Concern | Pending | Government of Nunavut |
| Grizzly Bear | Special Concern | Pending | Government of Nunavut |
| Wolverine (Western population) | Special Concern | Pending | Government of Nunavut |

1 The Department of Fisheries and Oceans has responsibility for aquatic species.
2 Environment Canada has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the *Migratory Birds Convention Act* (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of the Territorial Government. Thus, for species within their responsibility, the Territorial Government is best suited to provide detailed advice and information on potential adverse effects, mitigation measures, and monitoring.
3 The *anatum* subspecies of Peregrine Falcon is listed on Schedule 1 of SARA as threatened. The *anatum* and *tundruis* subspecies of Peregrine Falcon were reassessed by COSEWIC in 2007 and combined into one subpopulation complex. This subpopulation complex was listed by COSEWIC as Special Concern.

Impacts could be disturbance and attraction to operations.
Environment Canada recommends:

- Species at Risk that could be encountered or affected by the project should be identified and any potential adverse effects of the project to the species, its habitat, and/or its residence noted. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk registry at www.sararegistry.gc.ca for information on specific species.
- If Species at Risk are encountered or affected, the primary mitigation measure should be avoidance. The proponent should avoid contact with or disturbance to each species, its habitat and/or its residence.
- Monitoring should be undertaken by the proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested
- For species primarily managed by the Territorial Government, the Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize effects to these species from the project.
- Mitigation and monitoring measures must be taken in a way that is consistent with applicable recovery strategies and action/management plans

Previous comments and recommendations submitted by J. Fitzgerald on February 16, 2009 and by D. Abernathy on March 24, 2006, relating to the Goose Lake Project would still apply (see attached). If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca

Yours truly,

***Original signed by***

Paula Smith
Environmental Assessment Coordinator
Environmental Assessment – North
Environmental Protection Operations

Cc: Carey Ogilvie (Head, EA-North, EPO, Yellowknife, NT)
Carrie Spavor, (Environmental Assessment Coordinator, Iqaluit, NU)
Ron Bujold (Environmental Assessment Technician, EPO, Yellowknife, NT)

**Environment Canada** **Environnement Canada**

Environmental Protection Operations
5204 - 50th Avenue Suite 301
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February 16, 2009

Our file: 4703 001 106
Your File: 2BE-GOO0510

Phyllis Beaulieu
Manager of Licensing
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*licensing@nunavutwaterboard.org*

**RE: NWB 2BE-GOO0510 – Amendment – Dundee Precious metals Inc. – Goose Lake Project**

On behalf of Environment Canada (EC), I have reviewed the information submitted with the above-mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities arising from *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Environment Canada recommends that the following conditions be applied throughout all stages of the project:

1. The proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes, drill cuttings or sediment into any water body. According to the *Fisheries Act*, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.

2. For any "on-ice" drilling, return water released must be non-toxic, and not result in an increase in total suspended solids in the immediate receiving waters above the Canadian Council of Ministers for the Environment Guidelines for the Protection of Freshwater Aquatic Life (i.e. 10mg/L for lakes with background levels under 100 mg/L, or 10% for those above 100mg/L).

3. Drilling additives or muds shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or are demonstrated to be non-toxic.

4. The proponent shall not store materials on the surface ice of lakes or streams, except that which is for immediate use.

5. Land based drilling should occur a sufficient distance from the high water mark of any water body, to ensure that no deleterious substances enter any water bodies. Drilling wastes from land based drilling shall be disposed of in a sump, such that the contents do not enter any water body.

6. Environment Canada would like to inform the proponent that the *Canadian Environmental Protection Act* has listed CaCl as a toxic substance. If CaCl is to be used as a drill additive during land based drilling, the proponent shall ensure that sumps containing CaCl are properly constructed and located in such a manner as to ensure that the contents will not enter any water body.

7. If an artesian flow is encountered, the drill hole shall be immediately plugged and permanently sealed upon project termination.

8. The proponent should follow and comply with Canada Wide Standards for Dixons and Furans, and the Canada Wide Standards for Mercury emissions with respect to burning or incineration. In order for these guidelines to be met, at a minimum, an incinerator with dual chamber and forced air to allow for sufficient residence time and temperature to maximize combustion should be used.

9. Environment Canada recommends the use of sumps for the disposal of drilling cuttings and sludges, camp greywater and sewage, including sludge. All sumps shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish. Further, all sumps shall be backfilled upon completion of the field season and contoured so as to match the surrounding landscape.

10. The proponent should be aware that any spill of fuel or hazardous materials, adjacent to or into a water body, **regardless of quantity**, shall be reported immediately to the NWT 24-hour Spill Line, (867) 920-8130.

11. Comments and recommendations provided by the Canadian Wildlife Service (CWS) relating to the *Migratory Birds Convention Act*, the *Migratory Birds Regulations*, and the *Species at Risk Act* in the letter submitted by David Abernethy on behalf of Environment Canada on March 24, 2006 for the amendment 2BE-GOO0150/GA, would also apply to this amendment.

12. Once available, please forward the locations of any drill holes.

Environmental Protection Operations (EPO) should be notified of changes in the proposed or permitted activities associated with this application. Please do not hesitate to contact me at (867) 669-4744 or ron.bujold@ec.gc.ca with any questions or comments.

Yours truly,

Jane Fitzgerald
Environmental Assessment Coordinator

cc: Carey Ogilvie (Head, Assessment & Monitoring, EPO)

**Environment Canada** **Environnement Canada**

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Our file: 4703 001 003

24 March 2006

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**RE: 2BE-GOO0510/GA – Dundee Precious Metals Inc. – Goose Lake Exploration – Amendment – Type B**

On behalf of Environment Canada (EC), I have reviewed the above mentioned application. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities for the enforcement of the *Canadian Environmental Protection Act*, Section 36(3) of the *Fisheries Act,* the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Project Description

Dundee Precious Metals Inc. is applying for a Type B licence for water use and waste disposal associated with exploration and camp operations in its Goose Lake Exploration Project. The proponent has entered a joint venture partnership with Kinross Gold Corp. to conduct mineral exploration within Nunavut and has taken the responsibility of acquiring all necessary permits and approvals. The Goose Lake Exploration water licence was previously assigned to Miramar Bathurst Ltd. who has agreed to transfer its licence to Dundee Precious Metals Inc. The proponent intends to conduct exploration activities within the Goose Lake claim in addition to its Boot Lake and Boulder Lake claims utilizing an established field camp situated in the Goose Lake property. This camp is located southeast of Bathurst Inlet, having a coordinate of 66˚32'40"N, 112˚25'37"W.

The proponent has requested a licence which allows a maximum use of 130 $m^3$ of freshwater per day with an expiration date of December 31, 2030. Approximately 35% (45 $m^3$) of this water will be used for domestic purposes and 65% (85 $m^3$) for diamond drilling operations. A total of 40 people are anticipated to work on the Goose Lake Exploration Project throughout a given field season. Camp gray water will be directed to a sump and sewage will be incinerated in electric toilets. Combustible wastes will be burned and their remaining ashes will be buried along with those ashes produced from the incineration of sewage. Waste oil will be burned on site. Scrap metal waste will be delivered to an appropriate recycling facility.

Scheduled exploration activities include diamond drilling and trenching operations. Drill rigs will be moved to selected work sites by helicopter and possibly cat-train when there is adequate snow cover. Water used to operate the drilling rigs will be acquired from nearby sources and will be re-circulated to minimize consumption. The proponent intends to direct the waste water produced from drilling operations into drill holes upon completion of drilling at each work site. Drill cuttings

and sludge will be removed from work sites to a designated disposal area. A series of trenches will be excavated for bulk sampling purposes. It is anticipated that a total area of one (1) hectare will be trenched in the project's exploration activities.

The proponent will have a fuel cache established within its project area. Liquid fuels will be stored in 205 L steel drums. A total of 18,000 L of diesel (88 drums), 4,000 L of gasoline (20 drums), 41,000 L of Jet-A fuel (200 drums), and two hundred (100) pound tanks of propane will be made available. Soils contaminated by hazardous material spills will be excavated and undergo remediation treatment in a designated area. Following this remediation process, the soil will be returned to excavation areas.

Environment Canada's Comments

Environment Canada requests that the proponent clarify how it intends to remediate contaminated soil. The proponent's reference to a designated remediation area for contaminated soil is characteristic of a landfarm facility. Environment Canada recommends that the proponent provide information related to the operation of such a facility. It is recommended that the following questions be answered:

- Where will this facility be located and what are its planned dimensions?
- Will the land farm be lined and bermed?
- What is the maximum depth of soil that the can be treated within the landfarm?
- Will nutrients be added to the contaminated soil as part of its treatment?
- What is the anticipated moisture content of the landfarm?
- How will surface runoff be treated and contained within the landfarm? A drainage management plan should be included in the landfarm design (e.g., lined sump). Collected runoff water must receive treatment before being released into the surrounding environment.
- Will any microbes be added to the landfarm? If yes, the *New Substance Notification Regulations* under the *Canadian Environmental Protection Act* may be triggered. Please see comment below for further information on these regulations.
- What level of hydrocarbon contamination will the soil be remediated to? What criteria will be adopted?
- How will the proponent monitor the landfarm? Groundwater monitoring wells should be installed up-gradient and down-gradient of the landfarm to ensure that groundwater quality is not diminished by the presence of this facility.
- How often will the landfarm be aerated?
- How will the landfarm be closed / abandoned?

The application makes reference to the potential use of a commercial bioremediation product, i.e., an oil sponge equipped with microbes. If such a product is used, the proponent must ensure that all substances found in the product are on the Domestic Substances List (DSL) under the *Canadian Environmental Protection Act (1999*). If the substances in the product are not listed on the DSL, the proponent may be subject to the *New Substances Notification Regulations* (NSNR). The NSNR requires that before importing or manufacturing any new substance into Canada, notification must be submitted to Environment Canada. This ensures that new substances will undergo proper assessments of their potential effects to the environment and human health. A new substance is one that is not found on the DSL and includes chemicals, polymers and animate products of biotechnology such as micro-organisms, or substances produced by micro-organisms such as proteins, enzymes or biopolymers.

Further information regarding the Domestic Substances List can be found at the CEPA Registry website (http://www.ec.gc.ca/CEPARegistry/) under the "Substances" tab. You can also access the New Substances Program homepage (http://www.ec.gc.ca/substances/nsb/eng/sub_e.htm), which has an online search engine for the DSL, allowing you to type in the CAS number and find out whether the substance is on the DSL.

Environment Canada recommends that the proponent submit a project specific Spill Contingency Plan for review. This Plan should indicate a chain of command for responding to fuel spills, spill response procedures for relevant environmental conditions (i.e., spills on land, water, snow, and ice), a description of the main fuel cache location, a map which displays the fuel cache area in relation to camp facilities, a list of emergency contacts, and an inventory of spill response equipment. All project personnel should be familiarized with this Plan and copies should be made available at the Goose Lake camp and with spill response equipment. It is also advised that appropriate Material Safety Data Sheets be appended to this Plan.

Environment Canada recommends that its Environmental Enforcement Officer, Jimmie Noble Jr., be included in a Spill Contingency Plan contact list. Noble can be reached by office telephone (867) 975-4644, cell phone (867) 975-1925, and secure fax-line (867) 975-4594.

The proponent should be advised that drilling wastes, i.e., drill cuttings and sludge, shall either be removed from the project area for proper disposal or be disposed within sumps that prevent their contents from entering any water body. Environment Canada has noted that the proponent intends to place drill cuttings and sludge in a designated disposal area. If such an area will be used, it should be a sump capable of containing the acquired drilling waste and be situated at least 30 m from the normal high water mark of nearby water bodies.

Environment Canada requests that Dundee Precious Metal Inc. provide additional information on its planned trenching operations. In particular, Environment Canada requests that the distance of trenching locations from nearby water bodies and natural drainage areas, their dimensions, the method of conducting trenching operations, and the handling of excavated ground material be submitted for review. It is recommended that trenched areas be contoured to match the surrounding landscape upon completion of the field season.

Environment Canada reminds the proponent that land based drilling should not occur within 30 m of the high water mark of any water body. Waste water produced from drilling operations must be disposed of in such a manner that it will not enter any water body frequented by fish. If drill holes cannot accommodate this waste water, the water should be directed to an appropriate natural depression or man-made sump.

Environment Canada recommends the following conditions be applied throughout all stages of the project:

GENERAL

- The proponent shall not deposit, nor permit the deposit of any fuel, drill cuttings, chemicals, wastes, or sediment into any water body. According to the *Fisheries Act*, Section 36(3), the deposition of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substance, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water, is prohibited.

DRILLING

- Environment Canada would like to inform the proponent that the *Canadian Environmental Protection Act* has listed CaCl as a toxic substance. The proponent shall therefore ensure that if CaCl is used as a drill additive, all sumps containing CaCl are properly constructed and located in such a manner as to ensure that the contents will not enter any water body.
- Drilling additives or muds shall not be used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water, or demonstrated to be non-toxic.
- For 'on-ice' drilling, return water released must be non-toxic, and not result in an increase in total suspended solids in the immediate receiving waters above the Canadian Council of Ministers of the Environment Guidelines for the Protection of Freshwater Aquatic Life (i.e., 10 mg/L for lakes with background levels under 100 mg/L, or 10% for those above 100 mg/L).
- If an artesian flow is encountered, the drill hole shall be immediately plugged and permanently sealed.

CAMPS

- The proponent shall not store materials on the surface ice of lakes or streams, except that which is for immediate use.
- Environment Canada recommends the use of an approved incinerator for the disposal of combustible wastes.
- The proponent shall ensure that any-non combustible waste is disposed of appropriately at an approved facility.
- Ashes produced from the incineration of combustible waste should be raked to remove any material that has not been incinerated (e.g., iron nails and tinfoil). The proponent shall ensure that this material is removed from the project area and disposed of appropriately at an approved facility.
- Any sumps, including those created for the disposal of drill cuttings, shall be located above the high water mark of any water body and in such a manner as to prevent the contents from entering any water body frequented by fish. Further, all sumps shall be backfilled upon completion of the field season and contoured to match the surrounding landscape.

FUEL STORAGE / SPILL CONTINGENCY / HAZARDOUS MATERIALS

- **All spills** are to be documented and reported to the 24-hour Spill Report Line at (867) 920-8130.
- All fuel caches shall be located above the high water mark of any water body. Further, EC recommends the use of secondary containment, such as self-supporting insta-berms, when storing barreled fuel on location rather than relying on natural depressions.
- The proponent shall ensure that any hazardous materials, including waste oil, receive proper treatment and disposal at an approved facility.

The Canadian Wildlife Service (CWS) of Environment Canada has reviewed the above-mentioned submission and makes the following comments and recommendations pursuant to the *Migratory Birds Convention Act* (the *Act*) and *Migratory Birds Regulations* (the *Regulations)*, and the *Species at Risk Act* (SARA).

- Section 6 (a) of the Migratory Birds Regulations states that no one shall disturb or destroy the nests or eggs of migratory birds. Therefore, CWS recommends that all activities be conducted outside the migratory bird breeding season, which extends from approximately May 15 to July 31. These dates are approximate, and if active nests (i.e.,nests containing

eggs or young) are encountered outside of these dates the proponent should avoid the area until nesting is complete (i.e., the young have left the vicinity of the nest).

- If activities are permitted to occur during the breeding season, CWS recommends that the proponent confirm there are no active nests (i.e., nests containing eggs or young) in the vicinity of their operations before activities commence. If active nests of migratory birds are discovered, the proponent should halt all activities until nesting is completed (i.e., the young have left the vicinity of the nest).

- In order to reduce disturbance to nesting birds, CWS recommends that aircraft used in conducting project activities maintain a flight altitude of at least 610 m during horizontal (point to point) flight.

- In order to reduce disturbance to resting, feeding, or moulting birds, CWS recommends that aircraft used in conducting project activities maintain a vertical distance of 1000 m and minimum horizontal distance of 1,500 m from any observed concentrations (flocks / groups) of birds.

- CWS recommends that camp waste be made inaccessible to wildlife at all times. Camp waste can attract predators of migratory birds (e.g., foxes and ravens) to an area if not disposed of properly. Incineration of camp waste is a recommended option.

- Section 35 of the *Migratory Birds Regulations* states that no person shall deposit or permit to be deposited, oil, oil wastes or any other substance harmful to migratory birds in any waters or any area frequented by migratory birds.

- All mitigation measures identified by the proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the proponents' representatives (including contractors) conducting operations in the field. Environment Canada recommends that all field operations staff be made aware of the proponents' commitments to these mitigation measures and provided with appropriate advice / training on how to implement these measures.

- Implementation of these measures may help to reduce or eliminate some effects of the project on migratory birds, but will not necessarily ensure that the proponent remains in compliance with the *Migratory Birds Convention Act* (the *Act*) and *Migratory Birds Regulations (*the *Regulations)*. The proponent must ensure they remain in compliance with the *Act* and *Regulations* during all phases and in all undertakings related to the project.

The following comments are pursuant to the *Species at Risk Act* (SARA), which came into full effect on June 1, 2004. Section 79 (2) of SARA, states that during an assessment of effects of a project, the adverse effects of the project on listed wildlife species and its critical habitat must be identified, that measures are taken to avoid or lessen those effects, and that the effects need to be monitored. This section applies to all species listed on Schedule 1 of SARA. However, as a matter of best practice, EC asks that species listed on other Schedules of SARA and under consideration for listing also be included in this type of assessment.

| Species at Risk | Category of Concern | Schedule of SARA |
|---|---|---|
| Grizzly Bear | Special Concern | Pending |
| Wolverine (Western Population) | Special Concern | Pending |
| Peregrine Falcon (subspecies tundrius) | Special Concern | Schedule 3 |
| Short-eared Owl | Special Concern | Schedule 3 |

Impacts to these species could be disturbance and attraction to operations.

Environment Canada recommends:

- The primary mitigation measure for each species should be avoidance. The proponent should avoid contact with or disturbance to each species.
- The proponent should consult with the Government of the Nunavut and appropriate status reports, recovery strategies, action plans, and management plans to identify other appropriate mitigation measures to minimize effects to these species from the project.
- The proponents should develop monitoring plans for each species in accordance with any applicable status reports, recovery strategies, action plans, and management plans and in consultation with Government of Nunavut and Environment Canada.

If there are any changes in the proposed project, EC should be notified as further review may be necessary. Please do not hesitate to contact me if you have any questions or comments with regards to the foregoing at (867) 975-4631 or by email via david.abernethy@ec.gc.ca.

Sincerely,

David W. Abernethy
Environmental Assessment Technician

cc. Colette Spagnuolo – Environmental Assessment / Contaminated Sites Specialist, Environment Canada, Iqaluit
Myra Robertson – Environmental Assessment Coordinator, Canadian Wildlife Service of Environment Canada, Yellowknife