

From: avativut.nunavut
To: [Phyllis Beaulieu](mailto:Phyllis.Beaulieu@info@nirb.ca); info@nirb.ca; hunter@qiniq.com; htogioa@qiniq.com; kugaarukhto@netkaster.ca
Subject: Re: 2BE-GRA---- New Application, Indicator Minerals - Torp Lake Project - Request for reveiw and comments
Date: Monday, January 18, 2010 1:52:45 PM

Hello,

I am of the opinion that there should be a public hearing on this water license because (a) the public is concerned about use of water in the indicator minerals application and (b) there is a duty for the water board to fully consult the Taloyoak HTO on potential harvesting impacts from this operation and (c) there are unresolved waste issues in this application.

The project is within 20 miles of significant walrus, polar bear and narwhal habitat with the river the project is located on draining directly into that habitat. The environmental procedures document states that "Effective communication and a close liaison **will** be maintained with nearby communities and regulatory authorities." This is not adequate to discharge the duty to consult. The duty requires that this communication and consultation take place **prior to the approval of the water licence**. it further states "Any stakeholders of the land that will be explored will be notified. Relevant approvals from stakeholders and regulatory authorities will be obtained before exploration commences."

This too is inadequate, the proponent **MUST** commence consultation NOW for this project with HTOs. Notification is not adequate, there must be consultation and accommodation of Inuit harvesters.

The document also states "Low-level flying should be avoided when possible. If a concentration of caribou is encountered an altitude of at least 610 m above ground should be maintained." This is **illegal** - it is **illegal** to fly below 1000m in this situation and this must be reflected in the water licence. If the water board approves this it is aiding and abetting a transport canada offense.

The document does not commit to comply with the Migratory Birds Act which requires that no bird be harassed.

Waste issues: there is no commitment to secondary containment of fuel, this is inadequate. It also states that waste and hazardous waste will be disposed of at an approved facility. The proponent must name the facility and consult the affected community on their willingness to take waste from this operation. The proponent must fully explain **how** they plan to dispose of the waste at a **licensed** facility capable of safely storing hazardous waste. The proponent must also provide the details of what the hazardous waste might be.

Alice

On Thu, Jan 7, 2010 at 3:26 PM, Phyllis Beaulieu
<licensing@nunavutwaterboard.org> wrote:

Please see attached letter and notices regarding the above. The deadline for comments is February 7, 2010.

It is noted that an NPC conformity is not required for this file and NIRB are in the process of screening. All organizations with a bulletin board are respectfully requested to post the Notices on our behalf.

Regards,

Phyllis Beaulieu

Manager of Licensing

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