

GLENCORE

February 3, 2021

Richard Dwyer
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

Re: Glencore Canada Corporation's Response to Crown-Indigenous Relations and Northern Affairs Canada's Comments on the Application for Renewal of Water Licence 2BE-HAK1621

Dear Richard,

Glencore Canada Corp. (Glencore) is hereby responding to comments received on the Application for Renewal of water license 2BE- HAK1621 for the Hackett River Project (Project). This application was submitted to the Nunavut Water Board (NWB) on December 9, 2020. The NWB issued a request of review and comments on December 18, 2020, requiring all submissions be submitted by January 18, 2021.

Glencore has reviewed the comments received and posted on the Nunavut Water Board public registry and provides responses below.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

Comment 1: CIRNAC recommends that Glencore confirm that sumps and natural depressions used to deposit any waste will be at least 31 meters from the high-water mark of any water body.

Response: Glencore confirms that all sumps and natural depressions used to deposit waste are at least 31 m from the high water mark of any waterbody.

Comment 2: CIRNAC recommends that Glencore clarify the guidelines and criteria that will be followed for the incineration of wastes.

Response: Incineration practices at Hackett River are outlined in Glencore's Waste Management Plan for the Hackett River Exploration Project¹ available on the NWB registry. This plan outlines the Project waste streams and waste management practices employed as describes the waste management infrastructure, including the incinerator. The Waste Management Plan states waste storage, handling and transport are managed in alignment with the Government of Nunavut's *Environment Environmental Guideline for the Burning and Incineration of Solid Waste*², Environment and Climate Change Canada's *Technical Document for Batch Waste Incineration*² and in accordance with activities permitted in Water Licence 2BE-HAK1621. Glencore confirms that no chlorinated plastics are incinerated and notes that it is routine Project practice to backhaul all recyclable materials to Yellowknife for recycling, which includes plastics.

¹ Glencore 2020. Waste Management Plan Hackett River Exploration Project. November 2020.

² Government of Nunavut 2012. Guideline for the Burning and Incineration of Solid Waste. January 2012

Comment 3: CIRNAC recommends that Glencore refer to the department as Crown-Indigenous Affairs and Northern Affairs Canada (CIRNAC) [as opposed to Aboriginal Affairs and Northern Development Canada in the Hackett River Abandonment and Restoration Plan].

Response: Glencore will make this change on next revision of the Abandonment and Restoration Plan.

Should you have any questions or concerns or require additional information, please do not hesitate to contact me.

Regards,

Pascal Lessard

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