

Environmental Protection Operations Directorate
Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 196/002
NWB File: 2BE-YAT



March 26, 2025

via email at: licensing@nwb-oen.ca

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0

Dear Robert Hunter:

RE: 2BE-YAT – Generation Uranium – Yath Project – Type B Water Licence

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Water Board (NWB) by Generation Uranium regarding the above-mentioned Type B Water Licence

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental emergencies preparedness and responses. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation

The following comments are provided:

1. Analyzing for Non-Radiological COPCs

Reference(s)

- GEN Yath Property Comments Response
 - Response to Environment and Climate Change Canada – *ECCC #1*

Comment

The Proponent has indicated that future analyses will be used to determine if there are non-radiological contaminants of potential concern in drill cuttings and sludge/return water. However, no details regarding those proposed analyses have been provided.



ECCC Recommendation(s)

ECCC recommends that the Proponent clarify the follow-up monitoring required to identify any non-radiological contaminants of potential concern in drill cutting and sludge/return water and how that information will be reported

2. Flowing Out of Suspended Solids

Reference(s)

- GEN Yath Property Comments Response
 - Response to Environment and Climate Change Canada - *ECCC #3*

Comment

It is understood that the drill cuttings after centrifuge dewatering would quickly harden and be resistance to fluidization. However, it is not clear whether the drill cuttings would be protected from exposure to precipitation, dew, etc., as well as whether there will be any follow-up to detect leaching or potential breakup by precipitation of the hardened drill cuttings.

ECCC Recommendation(s)


ECCC recommends that the Proponent provide clarification on how the potential for precipitation/dew/snow to leach or liberate contaminants from drill cuttings, which could lead to total dissolved solids and total suspended solids in the surface water, is being assessed.

ECCC recommends that the Proponent provide clarification on how the water coming out of the centrifuge process is being disposed of, and if disposal is in surface water, if it is being analyzed for contaminants of potential concern prior to disposal.

If you need more information, please contact Maja Crawley at Maja.Crawley@ec.gc.ca

Sincerely,

**Crawley,
Maja**

 Digitally signed by
Crawley, Maja
Date: 2025.03.27 12:47:33
-05'00'

Maja Crawley
Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)