

GLENCORE

June 30, 2022

Jonathan Savoy
Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, Nunavut X0B 0C0
Email: jsavoy@nunavut.ca

Re: Draft Nunavut Land Use Plan Pre-Hearing Questions

Dear Mr Savoy,

Glencore Canada Corp. (Glencore) is submitting questions related to the Draft Nunavut Land Use Plan (DNLUP). These questions follow Glencore's comments submitted to the Nunavut Planning Commission (NPC) on April 15th, 2022 and relate to Glencore's significant concerns that the currently proposed DNLUP will result in termination of the Hackett River Project (the Project) and forfeiture of more than US\$100 million dollars invested in the Project to date.

In light of this, and in alignment with the NPC's requested comment submission format, Glencore asks the NPC the following three questions of critical relevance to our existing interests in Nunavut.

From: Glencore	To: NPC
Comment Number	1
Subject/Topic	Land access corridors
References to 2021 DNLUP and O&R documents/maps	The DNLUP does not recognize and protect proposed road corridors and associated Potential Development Areas for many existing projects, including Hackett River.
References to Written Submission	
Importance of question to the Nunavut Land Use Plan Process	Critical impacts to on-going mineral exploration and development projects. The failure of the DNLUP to recognize proposed road corridors will isolate/maroon projects located within 'limited use' areas that prohibit linear development or other associated activity. Without roads, such sites will be unable to transport infrastructure, construction materials, fuel, or concentrate from the mine sites. Concentrate transport from mine sites to logistics chain is a necessity for base metal and many critical mineral projects; volumes are and cannot feasibly be transported by air. For projects which have not completed construction, flexibility is also required in road routing sufficient to allow adjustments based on environmental or archaeological concerns, engineering considerations, quarry characterization/selection, environmental review and permitting inputs, and other field-fitting decisions.

Question	Is the NPC aware that mines need land access to transport infrastructure and materials to the mine site and mine products and wastes out of the mine site?
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From: Glencore	To: NPC
Comment Number	2
Subject/Topic	Cessation of all activity for periods of time
References to 2021 DNLUP and O&R documents/maps	The DNLUP proposes 'limited use' areas which prohibit any activity whatsoever, except that related to activities such as " <i>research and tourism related to caribou conservation</i> ". These areas overlap existing projects and mining is recognized as a key contributor to Nunavut's economy.
References to Written Submission	
Importance of question to the Nunavut Land Use Plan Process	Implementation of Limited Use areas that prohibit any project activity will cause additional environmental impacts and risk for existing projects. During active exploration, construction, mining, and/or closure most of these projects would, at a minimum, need personnel on site during these periods to manage site water, conduct dewatering, and manage critical site infrastructure and utilities including power, water treatment, sewage systems and waste management. If these critical activities are not undertaken, serious consequences to the environment and/or property may result, such as breaching of tailings impoundment facilities or water management structures. It is also noted that temporarily evacuating and closing an entire project, often consisting of hundreds of people, would be a large, expensive, and logistically challenging operation which would also have negative environmental (e.g. air quality and wildlife impacts due to additional flights) and socio-economic impacts (e.g. lost pay).
Question	Is the NPC aware that many mine and exploration projects cannot completely cease operations and vacate site for periods of time, particularly during freshet (June), and that there are significant negative impacts to doing so?

From: Glencore	To: NPC
Comment Number	3
Subject/Topic	Prohibiting Project Development
References to 2021 DNLUP and O&R documents/maps	
References to Written Submission	
Importance of question to the Nunavut Land Use Plan Process	Without an ability to undertake necessary management and mitigation measures for periods of time, or the ability to transport materials to or from a project, projects, including Hackett River, would be sterilized. Such projects not only have hundreds of millions dollars already invested in them, but also represent billion(s) of

	dollars of future investment in supplies and labour required to take such a project through the mining phase, the hundreds or thousands of jobs such a project represents (routinely with preferential northern hires), and the hundreds of millions of dollars that would be generated in government taxes and royalties.
Question	Is the NPC aware that the current DNLUP will result in the direct loss of all investments in, future prospects for, and the substantial socio-economic benefits of mineral exploration projects, including Hackett River? Has the full socio-economic impact of this DNLUP been fully and accurately and reviewed?

In addition to addressing the above, Glencore respectfully asks that the NPC also review, consider, and respond to the comments submitted by Glencore on April 15th, 2022 where further detail and reference to the DNLUP was provided.

Respectfully,



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