

## **BQCMB Closing Statement for the NIRB's Final Hearing on the Kiggavik Project Proposal (14 March 2015)**

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) has appreciated the opportunity to participate in the NIRB's review of the Kiggavik Project Proposal, including this Final Hearing. The Caribou Board would like to thank all the other intervenors and community representatives for explaining their perspectives, and the translators for allowing us to communicate with each other. Thanks also to Baker Lake for hosting everyone and sharing your community with so many of us.

The BQCMB would like to thank the NIRB Board and Staff for their hard work on this review, including all the logistical arrangements required. We appreciate your efforts to accommodate our limited capacity to participate in both the technical meetings on the Draft Environmental Impact Statement and the Final Hearing's technical session. Despite these limitations we believe that we have made our concerns clear through our written submissions and our participation in the Pre-hearing and Final Hearing.

The Caribou Board would like to acknowledge that the Proponent took measures to respond to some issues we raised in our review of the Draft Environmental Impact Statement, most notably by:

- reviewing and learning from assessments for other mines and
- including energetics and population modeling of the Qamanirjuaq caribou herd.

This and other work improved their project and cumulative effects assessment for caribou in the Final EIS.

However, the BQCMB disagrees with the Proponent's conclusions concerning non-significance of cumulative effects on caribou. This disagreement results primarily from:

- considerable uncertainties in the assessment, due in part to the lack of current information about status and trends of the caribou herds, and
- uncertainty in planning for mitigation and monitoring, including for proposed project roads.

The BQCMB remains concerned about cumulative effects on caribou because we have concluded that those effects will be significant and will likely result in reduced sustainability of one or more caribou herds. The Board is particularly concerned about the future of the Qamanirjuaq caribou herd and its harvesters, including transboundary effects resulting from reduction of harvesting opportunities outside Nunavut.

We encourage the NIRB to take the BQCMB's concerns and recommendations into account and to strongly apply the precautionary principle to make the best determination on this proposed Project. Should the NIRB recommend that this Project be approved, key BQCMB recommendations include the following.

- 1) The all-season road should not be approved. This would help reduce potential effects in at least three areas: unsustainable caribou harvest, dust levels and induced development.
- 2) An independent advisory committee or technical working group should be established to work with the Proponent on monitoring and mitigation for both incremental and cumulative effects on caribou in cooperation with wildlife agencies and caribou harvesters from across the caribou ranges. The BQCMB could play a role in providing input from communities outside Nunavut and facilitating inter-regional communications.
- 3) If there is a significant change in project design or a substantial delay in project start-up a new assessment should be required to incorporate updated information about caribou, harvest rates and ongoing and planned exploration and development projects.

Thank you.