



Beverly and Qamanirjuaq Caribou Management Board

3 June 2018

Elizabeth Copland
Chairperson
Nunavut Impact Review Board
Cambridge Bay NU X0B 0C0

Via e-mail: info@nirb.ca

Dear Ms. Copland:

NIRB File No. 17EA068 – Agnico-Eagle Whale Cove Area Project Amendment Proposal

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting screening comments on the application from Agnico-Eagle (AEM) to amend and expand the previously screened Huckleberry Project with new exploration areas and a second camp, described as the Whale Cove Area Projects. Of particular concern to the BQCMB is the proposal to increase mineral exploration activities in an area documented by the Government of Nunavut to be used regularly in recent years by the Qamanirjuaq caribou herd as key access to calving and post-calving habitats.

The proponent states that project activities will occur from April to October from 2018 to 2025. As we have described in many previous submissions to the NIRB, proposals for industrial activities such as this one, which have potential to negatively affect pre-calving migration of caribou cows, and therefore to impact calving success and immediate post-calving care of newborn calves, are of great concern to the BQCMB.

The BQCMB's concern about this project is enhanced during this period when the Qamanirjuaq caribou herd is declining and demand for subsistence use is increasing. Sustainability of the herd is critically important to the food security and cultures of thousands of Indigenous peoples from Nunavut, Manitoba, Saskatchewan and the Northwest Territories. The herd has in recent years become an increasingly important food source for people from farther west and east of the Qamanirjuaq range due to decreased access to other herds, such as the Bathurst and Baffin Island herds.

The BQCMB believes it is crucial to minimize the level of cumulative effects resulting from industrial development activities to which declining herds are subjected. This project provides an example in

which one originally localized project is being expanded into a network of exploration areas, only a few months after the original project was screened by NIRB. This raises questions about how many more exploration areas will be initiated under the umbrella of this one project. It is clear that this project alone has the potential to create cumulative effects, and that other similar projects underway and to be developed over the next few years will likely increase these effects.

BQCMB Comments

Please refer also to the BQCMB's previous submission of screening comments on the Huckleberry project submitted on January 12th. The BQCMB's concerns about Huckleberry apply equally to the expanded Whale Cove Area Projects.

We acknowledge that the Proponent has made commitments in its permit amendment application to follow the Caribou Protection Measures (CPM) in the Keewatin Regional Land Use Plan. Given the outdated nature of the Caribou Protection Area, the lack of the monitoring system on which the CPM were based, and availability of recent mapping of the seasonal ranges of the Qamanirjauq herd by the government of Nunavut, the BQCMB believes the NIRB should not accept a plan that relies on outdated measures and maps. We note also that the Proponent refers to monitoring in its "Wildlife Protection and Response Plan", but the plan does not include a comprehensive monitoring plan for caribou. Therefore the Board believes the proposed measures are inadequate for use on a declining herd that is vital to the food security of so many people from Nunavut and beyond.


In addition we have the following comments:

- The project proposal is **likely to arouse significant public concern** as a result of activities proposed and their potential effects and cumulative effects on the Qamanirjauq herd, due both to the nature of the exploration activities and because the objective of these activities is to locate mineral resources that would justify further exploration and ultimately development of a mine and associated infrastructure.
- The project proposal is **likely to cause significant adverse eco-systemic and socio-economic effects** because:
 - a) proposed activities could produce disturbance to pregnant caribou cows, reducing their chance of calving successfully, or cause them to change their migration patterns to avoid the infrastructure and human activities associated with mineral exploration. This could have the effect of reducing herd productivity, which would be a major problem for a declining herd.
 - b) permitting increasing amounts of exploration on the pre-calving migration route and calving areas would set a precedent for allowing other exploration and development projects to occur elsewhere in these areas, so that negative cumulative effects on the herd from disturbance will accelerate over time; and
 - c) increasing the level of cumulative effects experienced by the herd by increasing human-caused disturbance will contribute to continuing the decline of the herd, which could have severe ramifications for the food security of people who have traditionally harvested barren-ground caribou, should the herd decline to levels below which harvest is no longer sustainable.

- The project proposal is **likely to lead to significant adverse impacts on crucial caribou habitat** if results lead to development of a mine and roads.

Thank-you for the opportunity to comment on this project proposal. If you have any questions about these comments, please contact BQCMB Executive Director Ross Thompson (rossthompson@mymts.net) or contract biologist Leslie Wakelyn (wakelyn@theedge.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read "Earl Evans".

Earl Evans
BQCMB Chairperson