



Beverly and Qamanirjuaq Caribou Management Board

29 May 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. 17EN029 – North Country Gold Corp.’s Gibson-MacQuoid Project Proposal

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting screening comments on the application from North Country Gold Corp. to amend the scope of previously approved activities for their Gibson-MacQuoid Project. Particularly alarming to the BQCMB is the proposal to expand mineral exploration activities into the core calving and post-calving habitats of the Qamanirjuaq caribou herd.

Although proposals for industrial activities on calving and post-calving areas are always of concern to the BQCMB, this is of even greater concern at this time when the Qamanirjuaq caribou herd is declining. 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.

We acknowledge that caribou herds decline as a result of both the cumulative negative effects from various factors as well as the natural cycle of abundance. However the BQCMB believes it is crucial to minimize the level of cumulative effects resulting from industrial development activities to which declining herds are subjected.

As you know, the BQCMB has been actively involved for many years in discussions and policy and planning exercises about mineral exploration and development on caribou calving and post-calving areas, including recent long-term involvement in development of the Nunavut Land Use Plan. Through these processes and during regular board meeting discussions, board members from across the Beverly and Qamanirjuaq caribou ranges have restated their perspective that mineral exploration and development should be excluded from caribou calving and post-calving areas.

BQCMB Comments

Our response to the questions asked by the NIRB in the request for comments on this project is as follows:

- The project proposal is **likely to arouse significant public concern** as a result of activities proposed in the core calving and post-calving areas of the Qamanirjuaq herd, due both to the nature of the 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 caribou cows and calves during late summer and early fall, which is a vulnerable period when they need to be undisturbed to maximize their energy intake in preparation for the demands of winter;
 - b) permitting exploration on the core calving and post-calving areas would set a precedent for allowing other exploration and development projects to occur elsewhere in these areas, initiating a situation in which 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 also as a result of the precedent it would set for allowing other projects to occur on core calving grounds of this and other caribou herds, leading over time to development of one or more mines and/or other infrastructure on caribou calving grounds in Nunavut.

We acknowledge that the Proponent has made commitments in its permit amendment application to follow the Kivalliq Inuit Association's Mobile Caribou Conservation Measures and other measures intended to reduce disturbance to caribou. However, it is the Board's view that while these measures may *reduce* disturbance, the only certain method for *avoiding* negative effects on calving and post-calving caribou is to exclude those activities from these crucial areas. Furthermore, because the effectiveness of these measures for significantly reducing disturbance to caribou has not been tested, their use remains experimental. Therefore the Board believes these measures should not be used on a declining herd that is vital to the food security of so many people from Nunavut and beyond when there is another option that provides greater certainty for protecting caribou and habitat – namely to exclude development from the most crucial areas.

In the absence of any legislated protection for Qamanirjuaq caribou calving and post-calving areas, and with the territorial land use planning process stalled, the environmental review process continues to be the primary means by which the potential impacts of exploration and development on calving

grounds and post-calving areas for this herd can be avoided. It is therefore critical that the NIRB apply a precautionary approach and not allow this project to conduct mineral exploration activities on the core calving and post-calving areas of the Qamanirjuaq caribou herd.

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