

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

28 July 2006

Stephen A. Lines
Technical Advisor
Nunavut Impact Review Board
P.O.Box 1360
Cambridge Bay, Nunavut, Canada
X0B 0C0

Dear Mr. Lines:

Land Use Permit Application NIRB File No. 06EN054

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the land use permit application by Pacific Ridge Exploration Ltd. regarding their proposal to conduct mineral exploration activity near the Kazan River, Nunavut.

The role of the BQCMB is to work cooperatively to promote the wise use of caribou to prevent population decline and safeguard the needs of traditional hunters and others. Some background information on the BQCMB is provided in Attachment 1, and additional information is available on the BQCMB website (www.arctic-caribou.com).

The BQCMB is concerned with the amount of mineral exploration underway and proposed across the range of the Beverly and Qamanirjuaq caribou herds, including the level of exploration activities in the southern Kivalliq region. We are particularly concerned about this proposed exploration activity in the Kazan River area because it is on calving and post-calving range of Qamanirjuaq caribou, and is also near water crossings used by the herd. The BQCMB has recommended establishing long-term legislated protection for calving and post-calving areas and protecting key water crossings through improved Caribou Protection Measures. These are two of the many actions the Board recommended that governments take to safeguard Beverly and Qamanirjuaq caribou and their habitats (see Attachment 1).

Approval of the permit application by Pacific Ridge Exploration Ltd. to conduct mineral exploration in the Kazan River area - and any proposals for similar work in this area - would increase the amount of exploration activity on the Qamanirjuaq caribou range. An assessment of the cumulative affects of these activities on Qamanirjuaq caribou and their habitat is needed to determine if these activities will have a long-term negative impact. Approval of this permit application would also raise the expectation by Pacific Ridge and other mineral exploration companies that exploration and development will

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proceed on the caribou ranges in Nunavut with no restrictions beyond those currently in place. This would be contrary to the recommendations made by the BQCMB for protecting this caribou herd and its habitat, and would not be consistent with the sustainable development principles that both DIAND and the Government of Nunavut profess to follow.

At a minimum, NIRB and DIAND should ensure that the existing Caribou Protection Measures are enforced. Pacific Ridge Exploration Ltd.'s proposed 5-year exploration project includes a primary diamond drilling camp located "approximately 5 km" from a designated water crossing, and at least 9 fly camps located along the shores of the Kazan River and nearby water bodies. The Baker Lake Project Location Map indicates that several fly camps are likely within 10 km of designated water crossings, which means their operation should be prohibited between May 15th and September 1st. However, the applicant proposes to operate these camps beginning as early as June 1st, which is clearly not allowed by the regulations. In addition, if their proposed diamond drilling camp is located within 5 km of a designated water crossing, it should not be operated until after September 1st – however, the applicant proposes to start drilling at this location on August 1st, which would not be allowed by the regulations. It is also critical that the applicant be made aware that it must cease operations if cows and/or calves occupy the project area between May 15th and July 15th.

If this and other mineral exploration projects are allowed to proceed on the calving and post-calving range of Qamanirjuaq caribou, the efforts of the federal and territorial governments must increase substantially to allow for effective management of the herd. This would include monitoring the herd's distribution and movements, identifying and protecting important habitats such as calving and post-calving areas, assessing herd health, assessing harvest levels, and evaluating the cumulative effects of all land use activities – including mineral exploration – across the caribou range.

Please let me know if you require further information or have any questions about these comments from the BQCMB.

Sincerely,

Leslie Wakelyn
BQCMB Biologist

cc: Richard Aksawnee, Baker Lake HTO
Jerome Denechezhe, BQCMB Chairperson
Monte Hummel, World Wildlife Fund Canada

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Attachment 1:

Background - The Beverly and Qamanirjuaq Caribou Management Board

What is the Beverly and Qamanirjuaq Caribou Management Board (BQCMB)?

The BQCMB was established in 1982 to co-ordinate the management of the Beverly and Qamanirjuaq caribou herds. The BQCMB operates under an agreement between the governments of the Northwest Territories (NWT), Nunavut, Saskatchewan, Manitoba, and Canada. Up to ten members represent communities across the Beverly and Qamanirjuaq caribou ranges, and five members represent governments. Membership includes representatives from the South Slave region of the NWT, the Kivalliq region of Nunavut, northern Saskatchewan, and northern Manitoba.

BQCMB Mission: To ensure the long-term conservation of the Beverly and Qamanirjuaq caribou herds for Aboriginal communities who wish to maintain a lifestyle that includes the use of caribou, as well as for all Canadians and people of other nations.

BQCMB Mandate: To advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges. This includes development of a Caribou Management Plan which outlines principles, goals and priorities for caribou conservation, as well as ways in which the BQCMB will work co-operatively with governments, communities and other organizations to incorporate the scientific work of biologists and the traditional knowledge of Aboriginal peoples during development of recommendations.

The BQCMB has more than 20 years of experience tracking developments on the Beverly and Qamanirjuaq caribou ranges, including participation in environmental assessments of proposed uranium mines, and reporting on the impacts of uranium mining. The BQCMB has produced various tools for assessing the potential impacts of developments on the caribou ranges, and has developed a clear position on action needed to protect the caribou herds in this era of increasing northern development.

BQCMB Position on Protecting Caribou Herds and Their Habitats: A BQCMB paper completed in September 2004 describes action needed to protect Beverly and Qamanirjuaq caribou and caribou range. This paper provides five key recommendations and describes various issues and principles used to develop these recommendations. The full technical paper and plain language summaries in Inuktitut, Dene and English are available on the Board's website (www.arctic-caribou.com), and the technical summary is provided below.

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Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuaq Caribou: A Position Paper by the Beverly and Qamanirjuaq Caribou Management Board (September 2004).

SUMMARY

The Beverly and Qamanirjuaq barren-ground caribou herds are an extremely valuable resource for the communities and governments of Nunavut, the Northwest Territories (NWT), Saskatchewan, and Manitoba. The minimum gross economic value of Beverly and Qamanirjuaq caribou harvested in a single year is about \$17 million, and the social and cultural value of the herds is immense. The preservation of these caribou herds and their habitats is essential both for the economic benefits they provide, and for maintaining traditional lifestyles.

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) believes that these caribou herds should be protected from any human-caused disturbance that has potential to cause significant adverse effects to the caribou or their key habitats across their ranges, and recommends that the following steps be taken to provide adequate protection for Beverly and Qamanirjuaq caribou over the long-term:

1. The traditional calving grounds and post-calving areas of these two caribou herds should be provided with long-term legislated protection that prohibits any type of activity that would cause serious or irreversible negative effects to caribou or habitat.
2. The herds should be protected during other key life cycle periods (i.e., fall migration/rut, winter, spring migration) and while at water crossings by means of improved Caribou Protection Measures (CPM). An assessment must first be conducted to determine if modifications to the original CPM can provide meaningful protection to these herds. Following an affirmative assessment and development of improved measures, they should be established as a conformity requirement of a revised land use plan for the Kivalliq region, and incorporated into other regional land use plans as they are developed.
3. Cumulative effects assessment/modeling through the environmental assessment process should be implemented to minimize destruction of all habitats used by Beverly and Qamanirjuaq caribou outside of traditional calving grounds and post-calving areas.
4. Regular delineation of calving grounds and post-calving areas should be undertaken.
5. A range-wide system of conservation planning should be established to safeguard the caribou herds over the long-term across all seasonal ranges.

Current policies and measures are not adequate to ensure maintenance of the Beverly and Qamanirjuaq caribou herds in the face of increasing levels of human activity on the caribou ranges. The need for action is urgent in light of (i) the growing and diversifying demand for caribou, (ii) increasing development occurring across the caribou ranges, particularly on or near the traditional calving and post-calving areas, (iii) the lack of action taken to date by the responsible governments to implement long-term caribou protection, and (iv) our lack of knowledge concerning recent seasonal range use by the caribou herds. A system is needed that

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addresses the cumulative effects of changes occurring across the entire Beverly and Qamanirjuaq caribou ranges.



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