



September 12, 2017

Ms. Elizabeth Copland, Chairperson
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
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Sent by e-mail to info@nirb.ca

Re: NIRB Screening of Grays Bay Road and Port Project – NIRB File # 17XN011

The Northwest Territories Chapter of the Canadian Parks and Wilderness Society (CPAWS-NWT) is a non-profit organization dedicated to the conservation of land, water, and wildlife in the NWT. We are supported by an NWT membership and our work is grounded in collaborating with communities across the territory.

CPAWS-NWT is deeply concerned that the proposed Grays Bay Road and Port Project will impact Bathurst caribou and its habitat in ways which will have serious consequences for the herd and for NWT communities that rely on caribou for food security. As proposed, the road would be built through known calving and post-calving areas and at time when Bathurst caribou have yet to show recovery from the herd's recent drastic decline. The road could contribute to the total loss of the herd. We encourage NIRB to consider the long term viability of the Bathurst caribou herd as a key factor in screening this project.

There is no question that many communities and organizations have continually supported a precautionary approach to development within the caribou range. Submissions that oppose development on caribou calving grounds are prevalent on the public record and can be found within the Nunavut Land Use Planning process, and in the reviews of other similar projects such as the proposed Bathurst Inlet Port and Road [BIPAR], the Izok Road corridor, and Sabina Back River Mine.

Prior to a final screening decision we request that the proponents provide the following:

- A map that shows the proposed route of the main road and location of other infrastructure (including proposed winter roads to access quarry sites) in relation to Bathurst caribou calving and post calving areas
- Information about possible alternative routes for the road or locations for the port. This would include routes that completely avoid caribou calving and post-calving areas. Other significant areas such as caribou migration corridors and key caribou water crossings should also be considered as

important for determining the potential impacts of the project.

We recommend that NIRB indicate to the Minister that the proposal requires a full environmental and socio-economic review and that the following recommendations be addressed by the review:

- The full review will include assessment of trans-boundary cumulative effects and trans-boundary participation by all parties who would be subjected to those effects if the project is approved.
- Participant funding will be provided thus allowing all parties, including NWT communities, regional organizations and ENGOs, to participate fully in all stages of the review.

On behalf of CPAWS-NWT I thank you for considering our submission,



Kris Brekke
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