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January 12, 2018

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

**Via email: [info@nirb.ca](mailto:info@nirb.ca)**

Dear Ms. Copland,

**Re: Huckleberry Claim. NIRB File No. 17EA068.**

Thank you for the opportunity to submit comments on the Huckleberry claim regarding the application to permit the installation of an exploration camp on the Huckleberry-0001 property, as well as additional exploration activities including geophysical surveys (airborne and ground support), diamond drilling, rab drilling, trenching, and the use of a winter access from the Meliadine area and from Whale Cove up to the Huckleberry-0001 property.

The proposed work would take place in the calving grounds of the Qamanirjuaq barren-ground caribou herd. The Qamanirjuaq herd is currently declining, with survey results indicating a decline from 496,000 animals in 1994, to 349,000 animals in 2008, and 264,000 animals in 2004. Initial results from the most recent survey flown in June 2017 suggest that the decline is continuing. The Qamanirjuaq herd is subject to a variety of cumulative impacts impacting their survival, including population cycling, climate change, harvest pressure, and development activities on their range.

The Qamanirjuaq herd is an essential resource for Indigenous communities in Nunavut, northern Manitoba and northern Saskatchewan. The expansive range of the herd is seeing an increasing amount of development and associated increases in access and disturbance. Although mineral development activities contribute to necessary economic growth in northern communities, the calving ground habitat of barren-ground caribou should be off-limits to all exploration projects. Government biologists, regional wildlife organizations, caribou management boards, local hunters and trappers organizations, and community members alike have expressed the need to protect caribou calving grounds and other critical caribou habitat from disturbance in order to increase the reproductive output of the herds. Both scientific knowledge and Inuit Qaujimagatuqangit agree that disturbing caribou during calving can lead to calf abandonment and lower caribou populations.

This is a critical time for barren-ground caribou herds, and it is important that they be given the opportunity to rebound. Barren-ground caribou were recently assessed as Threatened by the Committee on the Status of Endangered Wildlife in Canada, emphasizing the need to enact conservation measures to safeguard the herds while they are declining.

While exploration activities are relatively low impact and can be conducted at times when caribou are not present and calving, the eventual goal of any exploration project is to progress to the development stage with permanent infrastructure and associated uses. To avoid investment by proponents in areas that will be incompatible for large-scale development projects in the future, and to avoid costly investments from communities and representative organizations during the lengthy review processes, no exploration projects should be permitted on the calving ground habitat of barren-ground caribou.

Because the proposed activities would take place on the calving grounds of the Qamanirjuaq herd, WWF-Canada recommends that the application of the Huckleberry claim not be approved. At a minimum, a public review of the project is necessary at this stage to hear from all potentially affected communities both within and outside of Nunavut. The approval of an exploration camp on the calving grounds of the Qamanirjuaq herd without the proper transboundary consultation could result in substantial investment from the proponent without knowledge of community opposition for the project to progress to future stages. We recognize that such an in-depth consultation will require significant investment from the NIRB and all affected parties, but given the widely expressed view that economic development should not occur on barren-ground caribou calving grounds, such a consultation is warranted in fairness to both the proponent and the communities of the Qamanirjuaq range.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brandon Laforest', with a stylized, cursive script.

Brandon Laforest  
Senior Specialist Arctic Species and Ecosystems  
WWF-Canada