

Canadian Arctic Resources Committee

MAILING ADDRESS: Box 371, Station A, Ottawa, Ontario, Canada, K1N 8V4

OTTAWA OFFICE: 488 Gladstone Avenue TEL: 613.789.4284 FAX: 613.237.3845

December 7, 2012

Ms. Elizabeth Copland
Chairperson– Nunavut Impact Review Board
Cambridge Bay, Nunavut,

Dear Ms. Copland,

RE: Request for Comments: NIRB 12MN043: Notice of Part 4 Screening for Minerals and Metals Group's "Izok Corridor Project" proposal

With reference to the above thank you for the opportunity to provide comment.

Please find included in our response and for your review maps prepared by CARC as part of the CARC Bathurst Caribou Herd Cumulative Effects/Impact Assessment.

In 2003 CARC submitted to the Mackenzie Valley Environmental Impact Review Board as part of CARC's opening statement at the De Beers Public Hearing April 28, 2003 the two maps listed below. These maps are submitted and attached separately with this letter for your review:

- Current Activity in the SGP, Canadian Arctic Resources Committee, April 28, 2003.
- GLOBIO CE Modeling: 2003 Scenario, CARC, April 28, 2003.

Also submitted and attached separately with this letter are two maps prepared for the original NIRB review of BIPAR:

- Bathurst Caribou Herd Crossings of Proposed Bathurst Inlet Road and Port Project, Canadian Arctic Resources Committee, December 31 2002.
- Barren-Ground Grizzly Bear Crossings of the Proposed Bathurst Inlet Road and Port Project, December 31 2002.

Also included in this letter is Figure 19 from the CARC submission to NIRB in December 2009 again for the NIRB review of the Bathurst Inlet Port and Road Project that illustrates the vulnerability of the calving grounds of the Bathurst herd to the proposed road in the Izok Corridor and BIPAR.

Please note these maps need to be updated but do present the development challenges facing the Bathurst caribou herd and for the Assiniboine, Dene, Métis and Inuit residing in the province of Saskatchewan, the Northwest Territories and Nunavut dependent upon this herd as a local, not imported, food source.



Three issues are raised by the MMG proposal for the Izok Corridor Project:

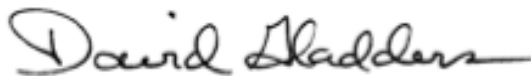
1. Caribou: The Bathurst caribou herd is in a recovery phase, mature female caribou and healthy calves are a priority for herd recovery. The disturbance caused by roads through the calving ground will not help the herd recover.
2. Trans-boundary: This proposal presents a national trans-boundary issue for people in the Northwest Territories, Nunavut and Saskatchewan dependent upon a healthy population for this herd for basic nutritional requirements. The impact of the Izok Corridor Project proposal goes beyond the boundaries of Nunavut.
3. Transportation – This is the third road proposed by a mining company in the Slave geological province. The first being the Bathurst Inlet Port and Road Project put forward by Sabina for Back River and a second proposed by the Areva Kiggavik Uranium Mine proposal. All three roads affect the traditional range of the Bathurst caribou herd.

Based on these factors CARC recommends:

- That both Izok and Sabina be combined into a Part 6 review to examine the impact on the Bathurst and associated caribou herds and the user groups across the respective borders in the province of Saskatchewan and in the Northwest Territories; and
- The completion of a transportation assessment for the Slave geological province to examine the road and winter road systems, and port requirement that would access BIPAR, the Kiggavik Uranium Mine and the Izok Corridor proposal and further the interests of the people of Nunavut without impact on the Bathurst herd.

Based on the maps provided CARC feels it is imperative that the NIRB complete a transportation study for the Slave geological province before any further resource development proposals are considered. Without a complete transportation study assessing the impacts on the Bathurst caribou herd proponents are at a serious disadvantage in bringing resource development projects to the production stage.

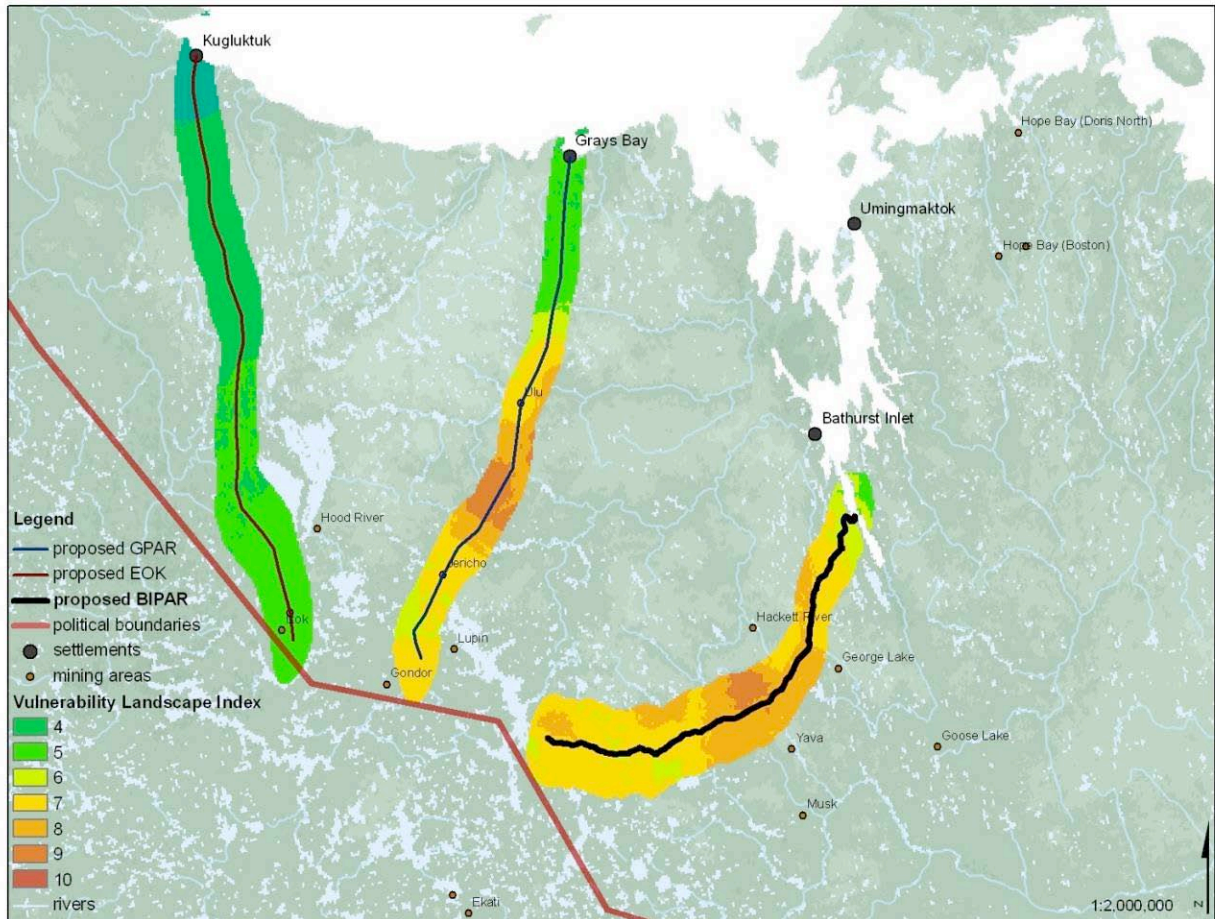
Yours truly,



David Gladders, Executive Director

CC: Canadian Arctic Resources Committee

Caribou Landscape Vulnerability Mapping Submitted by the Canadian Arctic Resources Committee to the Nunavut Impact Review Board as Part of the CARC Technical Presentation, December 2009: Page 27, Figure 19: Areas of the caribou landscape vulnerability map within 20 km of the BIPAR, Grays Bay Port and Road (GPAR), and East of Kugluktuk (EOK) proposed road alignments.

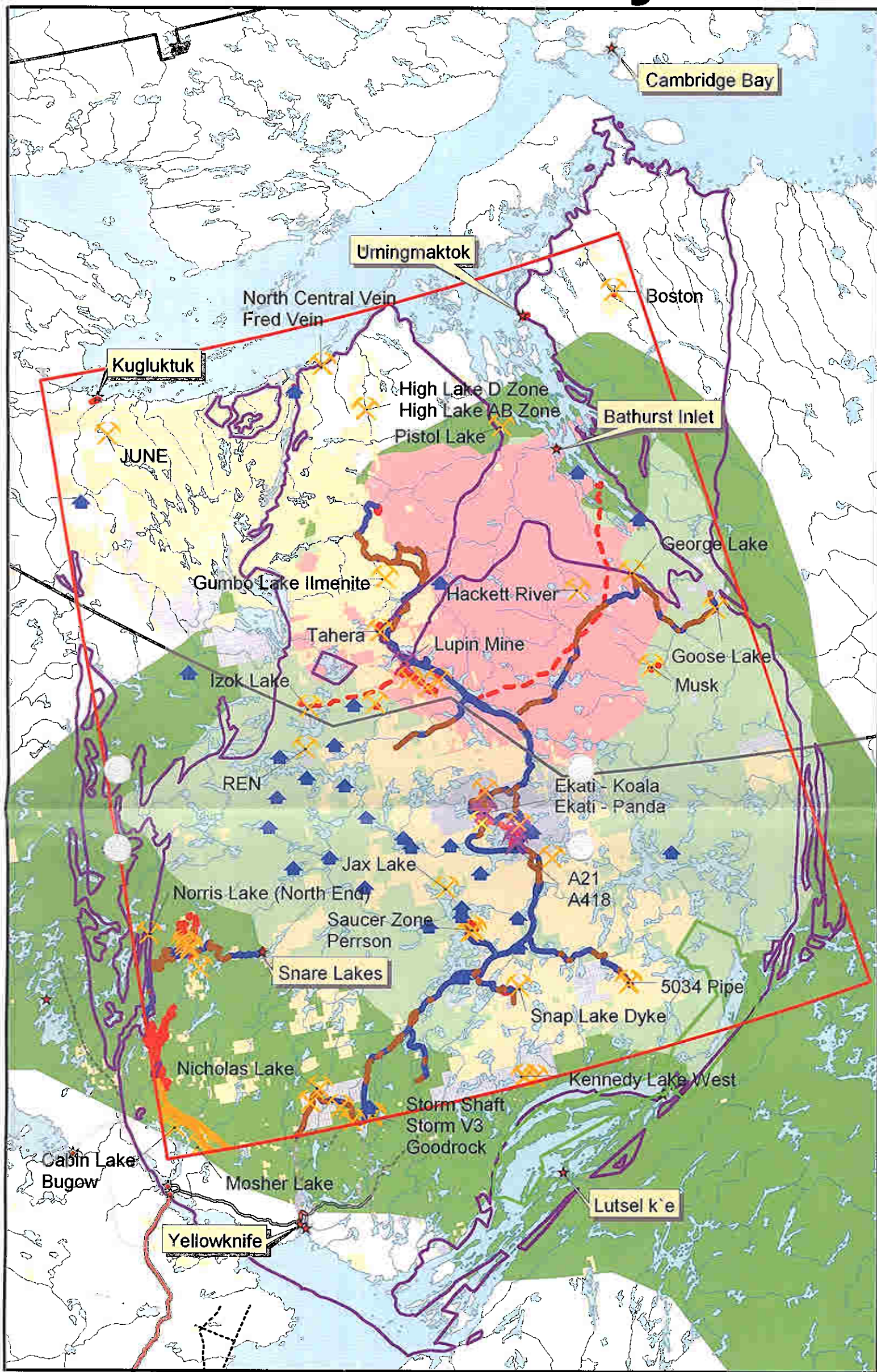


List of Maps Included with this Letter:

- Current Activity in the SGP, Canadian Arctic Resources Committee, April 28, 2003.
- GLOBIO CE Modeling: 2003 Scenario, CARC, April 28, 2003.
- Bathurst Caribou Herd Crossings of Proposed Bathurst Inlet Road and Port Project, Canadian Arctic Resources Committee, December 31 2002.
- Barren-Ground Grizzly Bear Crossings of the Proposed Bathurst Inlet Road and Port Project, December 31 2002.

Current Activity in the SGP

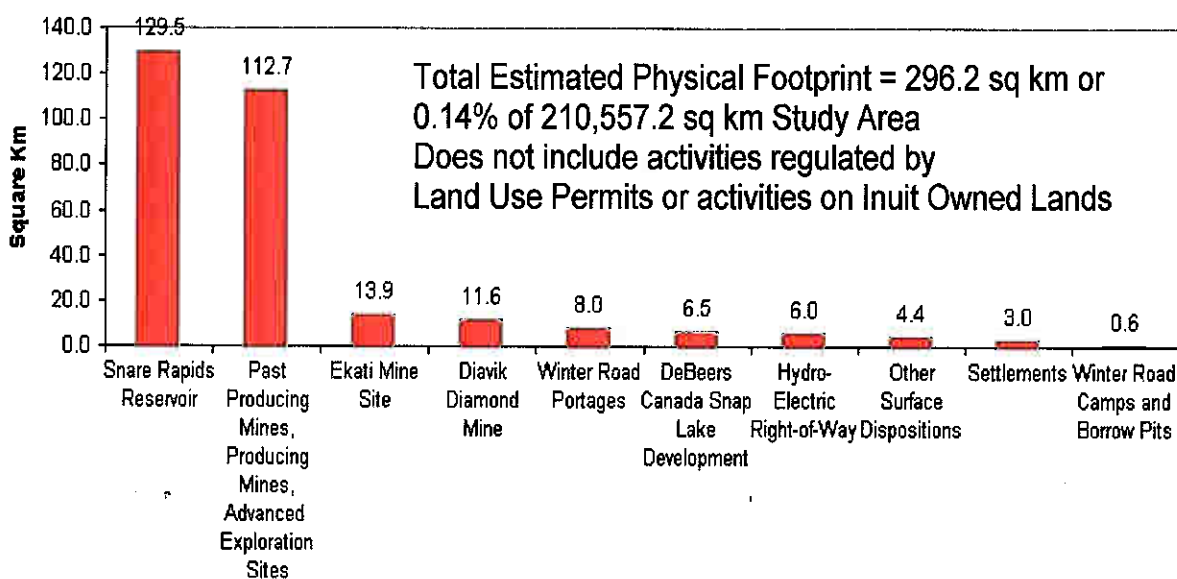
886



- Study Area
- National Park Proposals**
- East Arm, Great Slave Lake
- ▲ Outfitter Lodges and Camps
- SGP Mineral Activity**
- ⚡ Advanced Exploration
- ⚡ Producer
- Slave Geological Province
- Winter Road Portages
- ~ Winter Roads on Ice
- - - Proposed BIPAR Road
- ~ Hydroelectric Corridors
- Physical Footprints
- Mineral Claims**
- Active
- Leased
- Pending
- Bathurst Caribou Herd**
- Calving grounds
- Summer range
- Annual range

1:3000000

NOTE: This map is a simplified version of a poster entitled, "Estimated Physical Footprint of Human Activities in the Bathurst Inlet Port and Road Study Area of the Slave Geological Province", submitted to the MVEIRB as part of CARC's opening statement at the De Beers Public Hearing (April 28 2003). Electronic copies of the original poster may be obtained from the MVEIRB Public Registry or by contacting CARC's Yellowknife office.



prepared by
Petr Cizek, Cizek Environmental Services
Yellowknife, NWT
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AND



Canadian Arctic Resources Committee

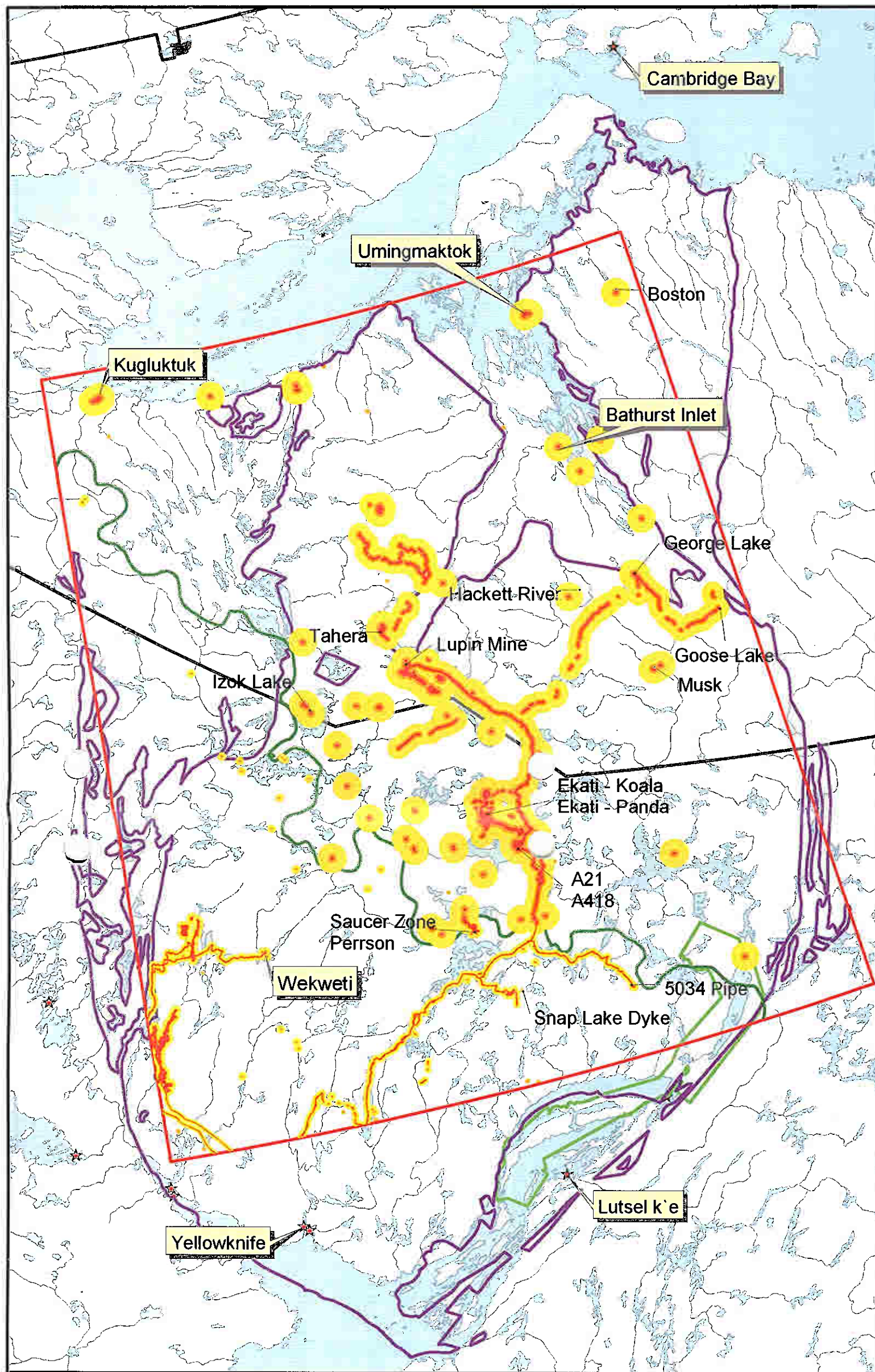
A voice for citizens on the Canadian North for more than 25 years

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Kevin O'Reilly (koreilly@theedge.ca) OR
Shelagh Montgomery (smontgomery@theedge.ca)

GLOBIO CE Modeling: 2003 Scenario

588



NOTE: This map is a smaller version of a poster entitled, "GLOBIO Cumulative Effects Estimate: Existing Activities 2003", submitted to the MVEIRB as part of CARC's opening statement at the De Beers Public Hearing (April 28 2003). Electronic copies of the original poster may be obtained from the MVEIRB Public Registry or by contacting CARC's Yellowknife office.

- 2003 Scenario**
- 2,329.1 sq. km (1.1% of study area) ■ High risk of reduced abundance of most biodiversity
 - 7,176.0 sq. km (3.4% of study area) ■ High risk of reduced abundance of many bird/mammal species
 - 29,523.3 sq. km (14.0% of study area) ■ High risk of impacts on species and food chains
 - Study Area
 - Slave Geological Province
 - Treeline
 - National Park Proposals**
 - East Arm, Great Slave Lake



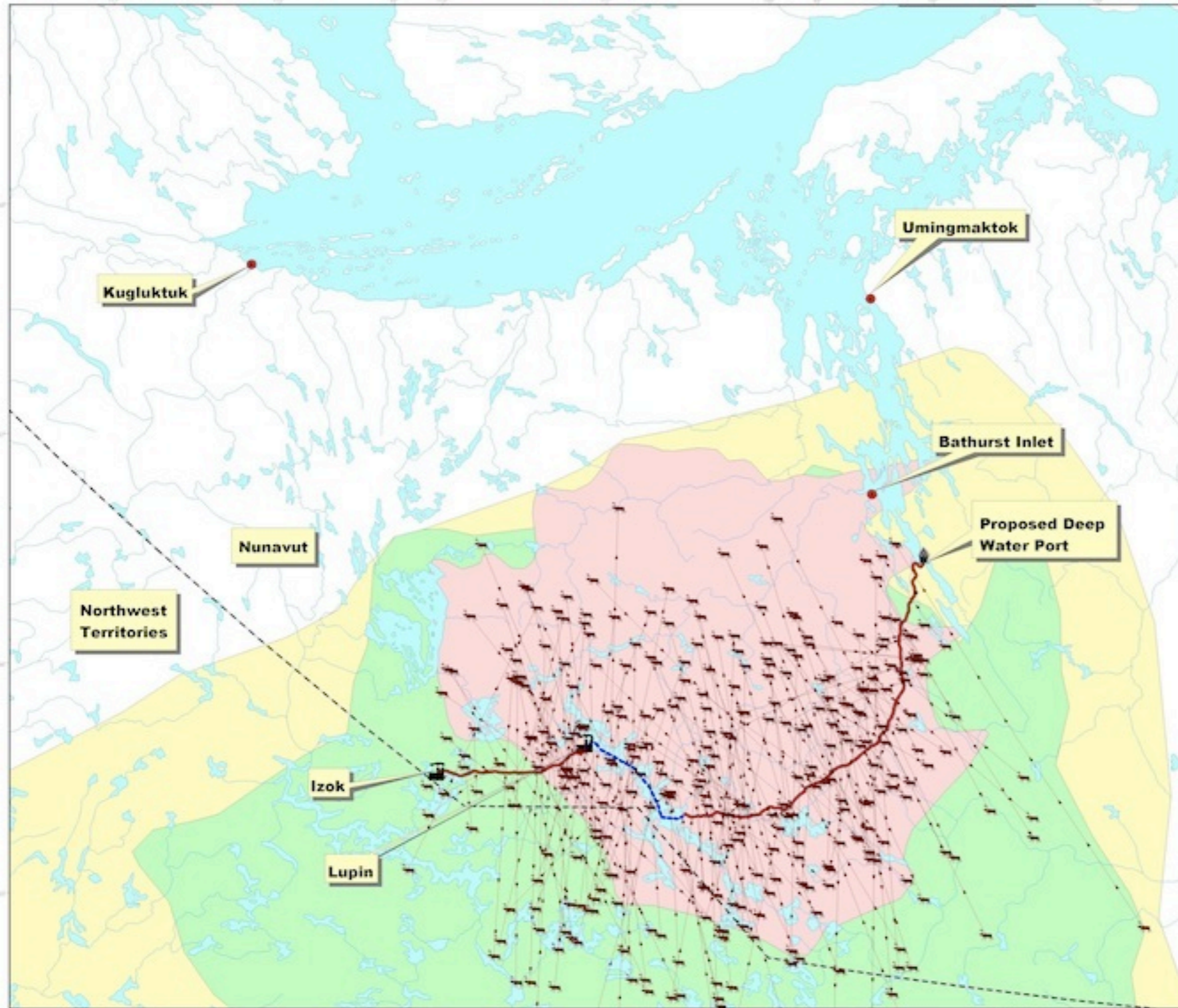
prepared by
 Petr Cizek, Cizek Environmental Services
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AND

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Bathurst Caribou Herd Crossings of Proposed Bathurst Inlet Road and Port Project



In March 2002, the Kitikmeot Corporation and Nuna Logistics Ltd. completed the "Bathurst Inlet Road and Port Project description." The proponents intend to construct a deep water port and all-weather road supplying the Lupin and Izok Lake mine sites.

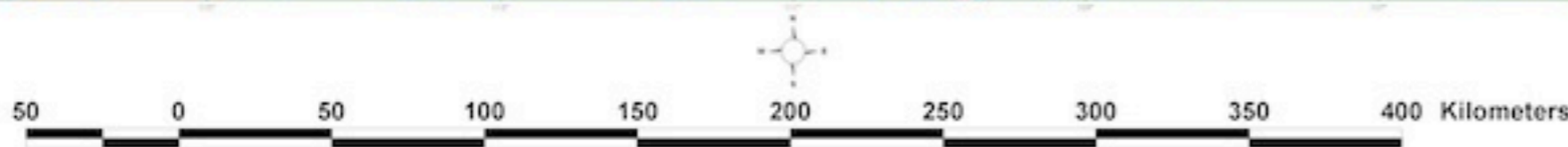
Between 1996 and 2002, 39 out of 43 satellite collared caribou crossed the proposed road corridor 170 times.

Satellite collar data were provided by Anne Gunn and Adrian d'Hont of Resources, Wildlife, and Economic Development, Government of the NWT.

- Caribou Satellite Location Points
- Caribou Movement Paths
- Settlements
- Mine Sites
- Proposed All-Weather Road
- Proposed Winter Road/Barge Route
- Political Borders
- Rivers 1:2M
- Waterbody 1:2M
- Calving Grounds
- Summer Range
- Annual Range

"Location of calving grounds depends not only on the movements of the caribou but also on how calving grounds are defined. Previous maps of calving grounds for the Bathurst and Ahlak herds were based on aerial surveys close to or within days of the peak of calving (Sutherland and Gunn 1996, Gunn et al. 2000). Russell et al (2002) recommended mapping the extent of calving as the area used up until 3 weeks past the peak of calving. The median peak of calving for the Bathurst herd is 5 - 9 June but has been recorded as late as 11 - 15 June (1969 and 1986). For the Bathurst herd, the extent of calving will be the area used occupied until 5 July (Figure 12)." (paragraph from Gunn and D'Hont, in prep. 2002)

Russell, D. E., G. Kofinas and B. Griffith. 2002. Barren-Ground Caribou Calving Ground Workshop. Report of Proceedings. Technical Report Series No. 390. Canadian Wildlife Service, Ottawa, Ontario, 39pp.



Scale 1:800,000 Projection UTM Zone 12 NAD83

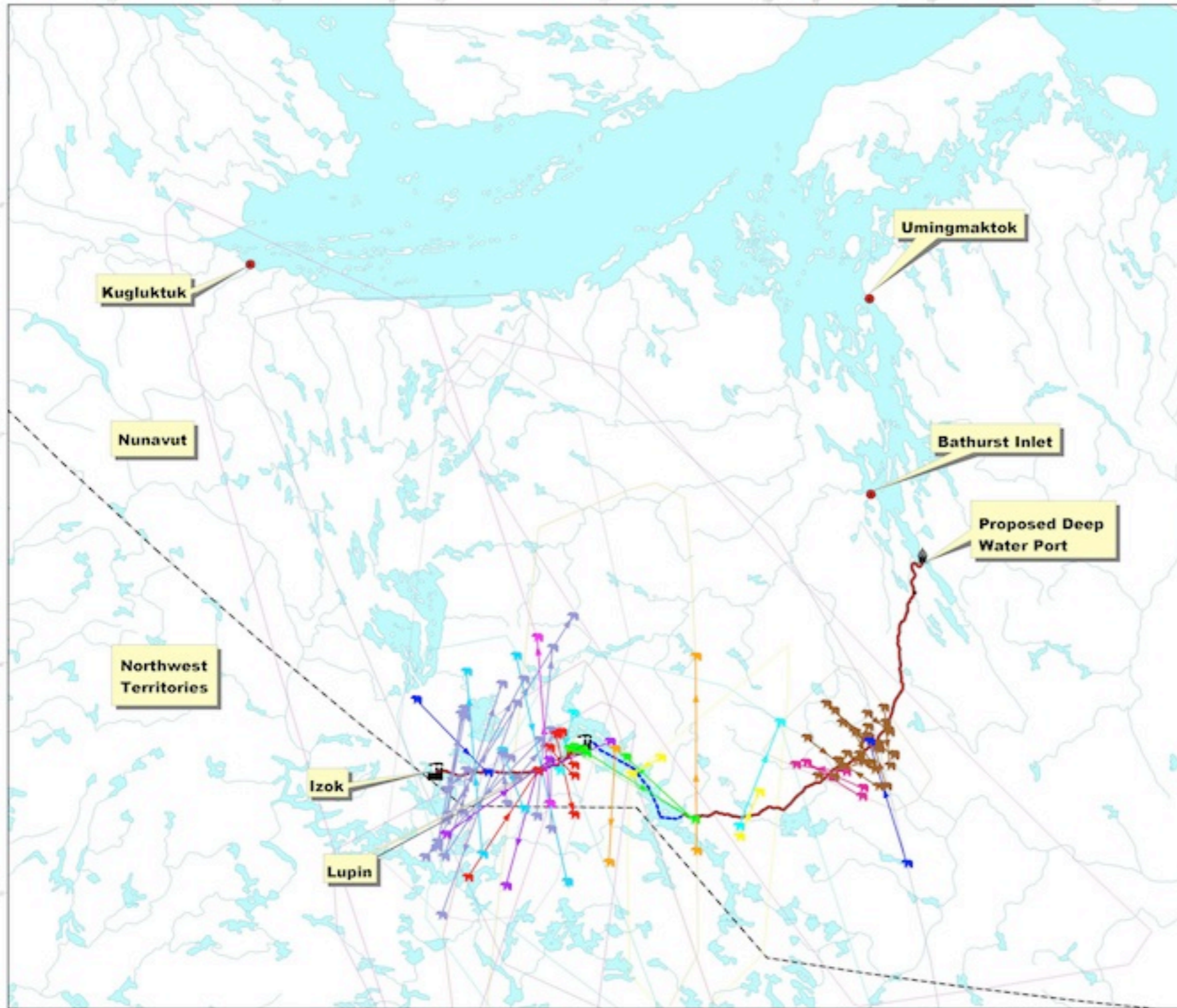
prepared by:

Gizak Environmental Services, Yellowknife, NWT
Tel 867-820-7529 Fax 867-873-3580 gizak@interweb.com
Dec. 31, 2002

for:



Barren-Ground Grizzly Bear Crossings of the Proposed Bathurst Inlet Road and Port Project



In March 2002, the Kitikmeot Corporation and Nuna Logistics Ltd. completed the "Bathurst Inlet Road and Port Project Description." The proponents intend to construct a deep water port and all-weather road supplying the Lupin and Izok Lake mine sites.

Between 1995 and 1998, 12 satellite collared barren-ground grizzly bears (8 males and 4 females) crossed the proposed road corridor 59 times.

These bears are not necessarily a representative sample of all the bears in the vicinity of the proposed road corridor.

Satellite collar data were provided by Robert Mulders of Resources, Wildlife, and Economic Development, Government of the NWT.



prepared by:
 Ozek Environmental Services, Yellowknife, NWT
 Tel 867-920-7529 Fax 867-873-3580 gjozek@interorb.com
 Dec. 31, 2002



50 0 50 100 150 200 250 300 350 400 Kilometers

Scale 1:800,000 Projection UTM Zone 12 NAD83



December 6, 2012

Sophia Granchino – Technical Advisor
Nunavut Impact Review Board (NIRB)
Re: MMG Izok Corridor Project Screening

Dear Ms, Granchino

The Canadian Parks and Wilderness Society – Northwest Territories Chapter (CPAWS-NWT) submits that the proposed Izok corridor project is an issue of significant public concern. The potential impacts of the project on Bathurst caribou are likely to cause significant adverse eco-systemic and socio-economic effects that extend far beyond its proposed physical footprint in Nunavut into the NWT and other adjacent regions.

Impacts to Bathurst Caribou:

Industrial development is simply not acceptable on the calving grounds of the Bathurst or any other barren ground caribou herd. Bathurst Caribou have yet to show a recovery from the herd's recent drastic decline and allowing development on their calving grounds would add further uncertainty to the future of the herd. This proposal threatens the livelihood of communities in Nunavut and the NWT, and increases the likelihood that the Bathurst herd will continue to have harvest limits for Aboriginal hunters and may never again be harvested by resident NWT hunters or be a reliable resource for tourism operators.

Cumulative Impacts:

Regional cumulative impacts should be considered in this project review. The proposed mine sites and all-weather road for the Izok corridor project add to a growing list of existing and proposed developments in the Slave Geological Province of Nunavut and the NWT that impact our water, caribou and other species such as grizzly bear, wolves and wolverine. The proposed 350km all season road would link with the existing Tibbet - Contwoyto ice road in the NWT, providing a direct route from Yellowknife to the proposed shipping port at Gray's Bay. It is unreasonable to assume that the Izok road and port would be closed to other developments or individuals. We question if the Izok road and port is in fact feasible without investment from other developers who would also benefit from a road to a shipping port on the Arctic coast. We ask that NIRB consider this scenario and recognize that this proposal includes much more than just a mining operation; it includes region-opening infrastructure that will induce further developments in Nunavut and the NWT that will impact terrestrial and marine environments across the north.

Summary:

For the following reasons we do not support the project:

- Developing a road through the Bathurst caribou calving grounds is simply unacceptable; an alternative should be presented in the proposal.
- We do not believe that the project's potential adverse effects are predictable because the geographical scope of ecological and socioeconomic impacts is without precedent. We can't expect that impacts will be mitigable without consideration of cumulative environmental impacts from existing infrastructure and proposed regional developments such as the Back River and Hackett River mining projects, the BIPAR project, as well as future developments that may link into the Izok project corridor.
- The ecological and socioeconomic repercussions of this project, particularly in regards to Bathurst caribou, must be considered a trans-boundary issue. We therefore recommend that the project be subject to Part 6 review under the NLCA.

Thank-you for the opportunity to comment,

Kris Brekke



Executive Director
Canadian Parks and Wilderness Society
NWT Chapter
5020 52nd st.
Box 1934, Yellowknife
X1A 2P5



MiningWatch Canada

Mines Alerte

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tel. (613) 569-3439 — fax: (613) 569-5138 — info@miningwatch.ca — www.miningwatch.ca

Comment on the Izok Corridor Project

To: Nunavut Impact Review Board
From: Ramsey Hart, MiningWatch Canada, ramsey@miningwatch.ca
Date: December 7, 2012

MiningWatch Canada would like to support various government and Indigenous organizations' calls for a review of this project by a Federal Environmental Assessment Panel under Part 6 of Article 12 of the Nunavut Land Claims Agreement (NLCA).

This recommendation is based on the following issues:

- This project is of a considerable scale and complexity;
- Both Environment Canada and Department of Fisheries and Oceans have indicated the potential for significant effects;
- One of the most dramatic potential effects is to the precarious population health of the Bathurst caribou herd, which is of national significance and ranges well beyond Nunavut into the NWT and Saskatchewan, representing a significant trans-boundary impact;
- The Yellowknives Dene, Athabasca Denesuline, and Tlicho First Nations have all expressed serious concern about the project; and
- Individuals and organizations from across Canada have also expressed their concern;

Given the above we urge NIRB to recommend a review of the project and further recommend to the Minister that the review be a 'Part 6' review by an independent panel. We also urge NIRB and the Minister to ensure the provision of adequate participant funding for Indigenous groups and interested stakeholders to meaningfully engage in the review. The review should include an assessment of alternative options for development that avoid the construction of a permanent road through the calving grounds of the Bathurst Caribou.

Thank you for the opportunity to submit our comments and concerns.

Regards,

Ramsey Hart

COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Izok Corridor Project proposal			
Proponent: MMG Resources Inc.			
Location: Kitikmeot Region			
Comments Due By: November 30, 2012	NIRB #: 12MN043		
<p>Indicate your concerns about the project proposal below:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> no concerns <input checked="" type="checkbox"/> water quality <input type="checkbox"/> terrain <input checked="" type="checkbox"/> air quality <input checked="" type="checkbox"/> wildlife and their habitat <input checked="" type="checkbox"/> marine mammals and their habitat <input type="checkbox"/> birds and their habitat <input checked="" type="checkbox"/> fish and their habitat <input type="checkbox"/> heritage resources in area </td> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> traditional uses of land <input checked="" type="checkbox"/> Inuit harvesting activities <input checked="" type="checkbox"/> community involvement and consultation <input checked="" type="checkbox"/> local development in the area <input checked="" type="checkbox"/> tourism in the area <input type="checkbox"/> human health issues <input type="checkbox"/> other: _____ _____ _____ </td> </tr> </table>		<input type="checkbox"/> no concerns <input checked="" type="checkbox"/> water quality <input type="checkbox"/> terrain <input checked="" type="checkbox"/> air quality <input checked="" type="checkbox"/> wildlife and their habitat <input checked="" type="checkbox"/> marine mammals and their habitat <input type="checkbox"/> birds and their habitat <input checked="" type="checkbox"/> fish and their habitat <input type="checkbox"/> heritage resources in area	<input checked="" type="checkbox"/> traditional uses of land <input checked="" type="checkbox"/> Inuit harvesting activities <input checked="" type="checkbox"/> community involvement and consultation <input checked="" type="checkbox"/> local development in the area <input checked="" type="checkbox"/> tourism in the area <input type="checkbox"/> human health issues <input type="checkbox"/> other: _____ _____ _____
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<p>Please describe the concerns indicated above:</p> <p>1. As a species of great ecological and socio-cultural significance with a demonstrated vulnerability to land use changes, caribou deserve particular attention when it comes to potential negative impacts from this major proposed development. The Bathurst herd's range extends through much of the Izok Corridor Project's footprint (and beyond) and is currently at low numbers, having suffered a 90% decline since the 1990s. Continued poor recruitment indicates that recovery has not yet commenced. The proposed 350-km all-season road would extend right through this herd's core calving area, known from many years of radio-telemetry and observations. Females and their calves have demonstrated sustained fidelity to this area, which contains unique habitat features not readily found elsewhere in the range. Female and calf survival during this key time of the year are critical determinants of this population's persistence into the future, and disturbance events have been well-documented to have significant effects on both parameters. Types of disturbance range include direct habitat loss, barriers to movement across parts of the calving area, dust and noise pollution from traffic increasing stress to animals and displacement from important feeding areas, and other effects. This herd is already exposed to escalating development elsewhere in its range.</p> <p>2. Numerous Inuit and Dene communities within the range of the Bathurst caribou herd in Nunavut and NWT have already experienced severe harvest restrictions due to the poor status of this herd. Additional mortality and stress imposed by the various components of this project during construction, operation, and reclamation phases would almost certainly bring about added hardship to human residents who share the range and rely upon this resource.</p> <p>3. There is significant potential for this major project to result in negative impacts to aquatic habitats. This would occur from dewatering, withdrawal or draining of numerous waterbodies, contamination from tailings runoff, and/or discharge of effluent, fuel spills, and/or mining waste spills near storage sites or during transport.</p> <p>4. The Izok Corridor Project is proposed for a roadless area that has so far been subject to minimal development. The installation of an all-season road of this enormous length through fragile tundra habitats in a changing climate is virtually certain to precipitate permanent changes to the character, ecology and social environment of the larger region. This road -- a permanent fixture to accommodate a project envisioned to be in operation for a mere 12 years -- will allow an unknown number of mineral development projects to suddenly become feasible. This will add to the existing and known proposed development in the region and lead to cumulative negative impacts to a number of valued ecosystem components over time.</p>			

Do you have any suggestions or recommendations for this application?

1. Subject the proposed Izok Corridor to a Part 6 Review conducted by a Federal Panel to transparently and comprehensively assess the potential for significant project-level and cumulative impacts:

- The length and position of the road, at least one mine site, and other project components so close to the NWT border combined with the range of the Bathurst caribou herd, make it clear that the impacts from the proposed Izok Corridor Project will extend beyond Nunavut into NWT and even Saskatchewan. This real potential for transboundary impacts increases the imperative for engagement at the federal level.
- Because this project is the first to introduce industrial development into the region and highly likely to stimulate additional development, the nature of the assessment process will set an important precedent for review processes for other similar projects in Nunavut and other areas of Canada's North. This again increases the imperative for federal engagement.

2. Immediately reject MMG's anticipated application to the Nunavut Impact Review Board for an exception to potential future review processes. Allowing for initial development activities to proceed prior to a considered assessment of the potential impacts of the larger project would severely undermine the intent and outcomes of any legitimate impact review process.

3. Develop and implement a process without delay that brings together communities, governments, and development proponents to create a shared transboundary vision for the region following considered evaluations of cumulative impacts on selected valued ecosystem components using various scenarios of change to the region. Such a process would include the development of a strategic access management strategy for the region that would consider the feasibility of alternative access and transport technology, minimize road length, avoid critical wildlife and other sensitive areas, while servicing development projects and access to communities.

4. Provide dedicated funding to communities (e.g., through Intervener funding) to ensure they have the necessary capacity to participate fully in impact review processes for this project.


5. Provide a formal and explicit opportunity within the impact review process for selected independent scientists to evaluate associated documentation.

Do you support the project proposal? Yes No Any additional comments?

In the absence of details about the project, including 1) analyses of various scenarios of cumulative changes to the land that are likely to be stimulated by it in conjunction with other ongoing activities in the range and 2) a thorough and transparent discussion of alternatives and trade-offs, it is impossible for me to select yes or no at this time.

Name of person commenting: Justina C. Ray, Ph.D. **Of** Ontario

Position: Exec. Director/Sr. Scientist **Organization:** Wildlife Conservation Society Canada

Signature:  **Date:** 7 December 2012

COMMENT FORM FOR NIRB SCREENINGS

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Project Proposal Title: Izok Corridor Project proposal	
Proponent: MMG Resources Inc.	
Location: Kitikmeot Region	
Comments Due By: November 30, 2012	NIRB #: 12MN043

Indicate your concerns about the project proposal below:

<input type="checkbox"/> no concerns	<input type="checkbox"/> traditional uses of land
<input type="checkbox"/> water quality	<input type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain	<input type="checkbox"/> community involvement and consultation
<input type="checkbox"/> air quality	<input checked="" type="checkbox"/> local development in the area
<input checked="" type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input type="checkbox"/> birds and their habitat	<input checked="" type="checkbox"/> other: Dene harvesting activities; cumulative effects
<input type="checkbox"/> fish and their habitat	
<input type="checkbox"/> heritage resources in area	

Please describe the concerns indicated above:

Bathurst caribou calving: The proposed road development cuts through the core calving ground of the Bathurst caribou herd as defined by many years of observation of this herd's calving. Development of a permanent, all-weather road through a barren-ground caribou calving ground has a high likelihood of being detrimental to the herd, by: (i) removing a significant portion of the calving ground habitat in direct road footprint; (ii) inducing avoidance behavior by caribou to the visual and auditory disruption of the vehicle traffic; (iii) direct mortality through additive road kill of cows and calves; (iv) inducing caribou to move away to lower quality habitats to calve. These effects will have negative population consequences first because of the direct mortality, but also because the disruption to normal activities will likely result in lowered rates of food intake by lactating cows, reduced quantity of milk production, reduced suckling rates by calves, and reduced vigour of calves facing predation risk later in the year. It is generally recognized by caribou biologists that calving grounds of barren-ground herds should be protected from direct development activity because these are such vital habitats to a herd, and because caribou productivity and calf health are highly dependent on unimpeded behaviours during this crucial period in the life history.

Local development in the area: An all-weather road and permanent camps will provide the impetus for numerous other activities in the region, ranging from increased harvest pressure on various wildlife species (e.g., caribou, wolverine) to expanding the economic potential of other mineral development projects. These have additional potential detrimental consequences for the Bathurst caribou herd in other all portions of its spring, summer and fall ranges, which need to be addressed. This project proposal cannot be viewed in isolation, because it will have significant cumulative impacts on the tundra ecosystem. There are already significant developments within the range of the Bathurst caribou herd, and some of these may have contributed to the recent decline in the herd and its continued low numbers. We lack a full understanding of how much development a herd can sustain, and this project is particularly risky by traversing much of the range and the calving ground.

Dene harvesting activities: Although the project footprint is within Nunavut, the impacts of this proposal will be felt well beyond the boundaries of Nunavut. The Bathurst herd is primarily a source of food for numerous Dene communities outside Nunavut (e.g., Lut'sel'ke, Wekweeti, Gameti), and even into northern Saskatchewan. This herd has experienced a major decline, and should not be faced with the additional mortality and negative population

8. Comment Form Distribution

consequences of a road through its calving grounds and much of its range. The harvest restrictions already placed on Dene communities have brought hardship, and all efforts at present should be on reducing risk of negative population consequences, and improving chances of population recovery. The environmental impacts of this proposal go beyond the jurisdiction of Nunavut and so require a more detailed hearing.

Do you have any suggestions or recommendations for this application?

1. This project should be subject to a federal environmental review (Part 6 Review) because it has significant inter-jurisdictional implications, including effects to the subsistence food economy of Northwest Territory communities. It is also a massive project, opening up a vast and previously undeveloped region to novel human activities, and as such deserves federal attention.

2. This project's proposal to build a road through the core of the Bathurst herd's calving grounds should be turned down. Such calving grounds should be considered no-go areas for development. Any proposal from MMG should, at the very least, propose a road routing that completely avoids the calving grounds.

3. This development project hinges on access by road. There is emerging air-ship technology that deserves attention in this context, and would provide a far less invasive and detrimental form of access and transport. The proponent should have to develop an assessment of the feasibility of alternative access and transport technology, compared to a road. The project should be postponed, on the basis of precaution, until a more solid understanding of the feasibility of air-ship transport is available.

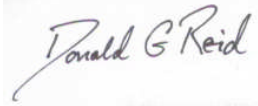
4. The proponent has proposed undertaking some activities in advance of a completed environmental assessment review and formal decision. That would be premature, and there should not be a prior assertion of approval before the review process is complete.

Do you support the project proposal? Yes No Any additional comments?

This proposal has large, and very straightforward, negative environmental implications, for which there is no clear mitigation, and no clear effort by the proponent to avoid.

Name of person commenting: Donald G. Reid PhD **of** Whitehorse, Yukon

Position: Associate Conservation Zoologist **Organization:** Wildlife Conservation Society Canada

Signature:  **Date:** 5 December 2012



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Nunavut Impact Review Board,
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Cambridge Bay, NU
December 7, 2012

Re: NIRB File No 12MN043—Minerals and Metals Group's Izok Corridor Project Proposal

I am writing to signal WWF-Canada's concerns regarding this project proposal. Referring to the headings in your Comment Form for NIRB Screenings, our concerns best fit the categories of wildlife and their habitat, traditional uses of the land, Inuit harvesting activities, and community involvement and consultation.

Wildlife and their habitat

The proposed 350 km road would pass through the core calving area of the Bathurst caribou herd, which has experienced a 90% decline since the 1990s. Companies such as De Beers Canada have already recognized the sensitivity of this critical habitat for caribou by voluntarily agreeing not to conduct any operations, including exploration, in any barren-ground caribou calving areas in Nunavut and the NWT. WWF is currently completing a Circum-arctic assessment of the status of calving areas, along with options for their management, which will be ready for general circulation by March 31, 2013. We would be pleased to share the results of our findings from this Pan-arctic study with NIRB, and to make suggestions as to how the lessons learned might be applied to this specific project.

Traditional uses of land and Inuit harvesting activities

The Bathurst herd is of great importance not just to Inuit harvesters in Nunavut, but to Dene hunters in the NWT where these caribou migrate and winter. Protecting the calving area for this herd is therefore a responsibility that has implications beyond the borders of the host jurisdiction. In our 2008 book *Caribou and the North: A Shared Future*, we documented that barren-ground caribou are conservatively valued at over \$100 million per year in North America, for food only. And there is arguably no other herd harvested by as many and diverse communities as the Bathurst.

Community involvement and consultation

Over the last ten years, protecting the calving areas has repeatedly been identified as the number one conservation priority through written resolutions and recommendations by Aboriginal organizations, hunters, caribou biologists, caribou management boards, managers within government, and non-government organizations. This widespread expression of concern has included commitments from jurisdictions where caribou winter, to urge greater protection from jurisdictions harbouring calving grounds. Further, the fact that harvesters of the Bathurst herd have experienced hardship and sacrifice over the last few years by drastically reducing their harvest of animals from this herd (for example in

the NWT), means that there is now a heightened expectation that others will also come to the table to play their role in the conservation of this herd, including Nunavut and companies such as MMG.

Accordingly, WWF recommends that NIRB turn down any request for an exemption to future environmental review of this project; that instead it be subjected to a Part 6 Review, given its transboundary implications and precedent-setting significance in terms of considering industrial development in a caribou calving area; that harvesters in both Nunavut and the NWT be afforded intervener funding to participate fully in any review; and that WWF be recorded by NIRB as an interested party and kept informed of progress as this project is assessed.

WWF believes that the burden of proof should be on the proponent to convincingly show that this project could be undertaken in a way that would not negatively impact the Bathurst caribou herd. Until or unless we see evidence to that effect, we are opposed to it going ahead.

Sincerely,

A handwritten signature in black ink, appearing to read "Monte Hummel", with a large, stylized flourish at the end.

Monte Hummel, O.C.
President Emeritus
WWF-Canada
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