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December 7, 2012

Kugluktuk
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Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Bathurst Inlet
Kingaok
ᑭᓄᓄᓄᓄᓄᓄ

Dear Ms. Granchinho:

Bay Chimo
Umingmaktok
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Re: NIRB 12MN043: Notice of Part 4 Screening for Minerals and Metals Group's "Izok Corridor Project" proposal

Cambridge Bay
Ikaluktutiak
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On Nov. 9, 2012, the Kitikmeot Inuit Association (KIA) received a Part 4 Screening request from the Nunavut Impact Review Board (NIRB) for Minerals and Metals Group's (MMG) Izok Corridor Project (ICP) proposal, with a comment deadline of Nov.30 2012. On Nov.23, the KIA submitted an Extension Request to the NIRB. Later that same date, the NIRB sent notice that an extension to Dec.7 was granted in response to a request submitted by the Athabaska Denesuline. This extension was beneficial to KIA.

Gjoa Haven
Okhoktok
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The NIRB's screening notice requested that parties provide comment on four specific questions. The KIA provides this letter in response to those questions.

Taloyoak
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1. Whether the project proposal is likely to arouse significant public concern; and if so, why?

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In the past few years, MMG has steadily quantified and assessed the economic significance of the resources at their Izok and High Lake properties, as well as various options to access and deliver the concentrate. The KIA is pleased to see the project's progress, however, MMG's project proposal does have significant impact potential, and the KIA is of the opinion that a Part 5 Review will be required.

The KIA has not consulted Inuit beneficiaries to assess any level of public concern at this stage of the project. However, items within the ICP project proposal that arouse concern for the KIA itself include (but are not limited to): hydrogeology, air and water quality as it relates to the project's mine and mineral waste management; water consumption; impacts on fisheries, wildlife and their habitats; closure and reclamation management; and traditional knowledge.

2. Whether the project proposal is likely to cause significant adverse eco-systemic and socio-economic effects; and if so, why?

The KIA expects that the development of the ICP will result in some eco-systemic impacts on wildlife, fisheries and their habitats. The Project may also cause some adverse socio-economic effects such as: possible reductions and/or disruptions in harvesting opportunities for hunters and trappers; and the potential for some societal problems (i.e., due to rotation schedules, and/or increased disposable income available in the Kitikmeot communities). However, the ICP will also result in increased employment and training opportunities for



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A handwritten signature in black ink, appearing to read "Luigi Torretti".

Luigi Torretti, MSc, BComm
Senior Environment Officer
Kitikmeot Inuit Association

We thank the NIRB for providing the GN with the opportunity to review and provide comments on this project proposal and we look forward to receiving further information on this project from NIRB. Please contact me, Avatilirinirq (Environmental) Coordinator at (867) 975-7830 or asimonfalvy@gov.nu.ca if you have any questions or comments.

Qujannamiik,

Agnes Simonfalvy
Avatilirinirq Coordinator
Government of Nunavut

December 7, 2012

VIA EMAIL

Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
X0B 0C0

Dear Ms. Granchinho,

RE: Screening Comments and Request for Review Pursuant to Part 6, Article 12 of the Nunavut Land Claim Agreement for The Minerals and Metals Group Limited Izok Corridor Project

The Nunavut Impact Review Board (NIRB) has requested comments from a broad list of possibly affected parties for its screening of the Minerals and Metals Group Limited Izok Corridor Project proposal (the "Project").

The Government of the Northwest Territories (GNWT) has identified four subject areas of potential impact and concern:

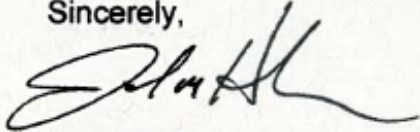
1. Impacts on Aboriginal harvesting rights;
2. Impacts on Bathurst barren-ground caribou and calving grounds;
3. Impacts on other wildlife, such as grizzly bears and wolverines; and
4. Concerns regarding cumulative effects on valued ecosystem components due to overall Project development and required road.

Our more detailed screening comments are attached for your reference.

As a result of these possible impacts to people and wildlife in the NWT, the GNWT requests this Project undergo a review pursuant to Part 6, Article 12 of the Nunavut Land Claim Agreement. This section of the agreement allows for a public review process that must also consider regional and national interests.

Please contact me at joel_holder@gov.nt.ca or (867) 873-7905 if you may require any further details.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joel Holder', written over a light-colored background.

Joel Holder
Manager, Environmental Assessment and Monitoring
Department of Environment and Natural Resources
Government of the Northwest Territories

Attachment

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:	Minerals and Metals Group (MMG)		
Location:	Kitikmeot Region		
Comments Due By:	December 7, 2012	NIRB #:	12MN043

Indicate your concerns about the project proposal below:

- | | |
|---|---|
| <input type="checkbox"/> no concerns
<input type="checkbox"/> water quality
<input type="checkbox"/> terrain
<input type="checkbox"/> air quality
<input checked="" type="checkbox"/> wildlife and their habitat
<input type="checkbox"/> marine mammals and their habitat
<input type="checkbox"/> birds and their habitat
<input type="checkbox"/> fish and their habitat
<input type="checkbox"/> heritage resources in area | <input type="checkbox"/> traditional uses of land
<input checked="" type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> community involvement and consultation
<input type="checkbox"/> local development in the area
<input type="checkbox"/> tourism in the area
<input type="checkbox"/> human health issues
<input checked="" type="checkbox"/> other: Dene harvesting activities
<hr style="border: 0; border-top: 1px solid black; margin-top: 10px;"/> |
|---|---|

Please describe the concerns indicated above:

GNWT's primary concern with this application is its potential impacts to the Bathurst barren-ground caribou herd and its calving ground. The proposed Izok corridor all-weather road would cut through the western portion of the calving ground, which has been used consistently by caribou since 1996. Cows with young calves are sensitive to disturbance, and calving grounds are widely considered the most sensitive habitats for barren-ground caribou. At a 2007 Caribou Summit, communities, aboriginal governments, and other interest groups indicated that the protection of caribou calving grounds in the NWT and Nunavut was important and actions to minimize effects of human activities on caribou herds must be put in place. Studies conducted on the Porcupine caribou herd show that calf survival is poorer when cows do not calve on their preferred calving grounds. The GNWT is concerned that displacement from preferred areas of calving due to development may have a similar negative effect on Bathurst caribou calf survival.

Another GNWT concern is how this project contributes to the overall amount of disturbance already on the landscape and particularly within the Bathurst range. The MMG project (at least during the initial two years of construction) will make use of the Tibbit to Contwoyto Winter Road. More developments are proposed for the Slave Geological Province (SGP), including a number of projects on the calving grounds in Nunavut. Another road and development near Bathurst Inlet (Bathurst Inlet Port and Road) is under discussion, which would be on the other side of the Bathurst calving ground. There are existing mines and roads on the Bathurst summer, fall, and winter ranges. The accumulated effects of factors both natural (e.g., fire) and anthropogenic (e.g., mine and road developments) may be enough to drive changes in population size and distribution. This is a cumulative effects issue.

If recovery of the herd is delayed because of these accumulated factors, then restricted harvest for aboriginal hunters in the NWT may continue, imposing continued hardship on affected communities. The Bathurst herd has declined significantly since its peak estimated size of 470,000 animals in 1986. Based on the most recent census survey released in November 2012, the Bathurst barren-ground caribou herd is stable at 35,000 animals but

remains low in numbers. In addition, there has been no change in the number of breeding females since 2009 and calf recruitment has been low for the past two years so continued conservation actions are needed to assist herd recovery. As a result, only a small amount of aboriginal harvest of the Bathurst herd is currently permitted. The GNWT will need to continue to work with its co-management partners, Aboriginal governments, and developers located within the Bathurst herd's range to understand how multiple factors affect herd size and trend. The GNWT continues to work with co-management partners, Aboriginal governments and traditional users to develop harvest management actions for the Bathurst herd and develop an overall process for the long term management of the Bathurst herd.

The GNWT also has concerns about how the mine will impact other wildlife (including grizzly bears and wolverines, both of which are COSWEIC listed species of species of concern) both from an individual mine and a cumulative effects perspective. For example, the construction of a 350 km all weather road and subsequent vehicle traffic may lead to increased carnivore mortality along the road. It may also lead to reduced use of habitats adjacent to the road, if wildlife avoid the road because of road-related disturbances. There is also some concern that the Project will impact local polar bear subpopulations (for example, ships travelling through the Beaufort Sea may impact the Southern Beaufort Sea polar bear subpopulation).

Do you have any suggestions or recommendations for this application?

GNWT met with MMG representatives twice (August 20, 2012 and November 15, 2012) to review the proposed project. These meetings provided an opportunity for GNWT to ask questions and make comments regarding the project. As first expressed during these initial meetings, GNWT has concerns about the effect of the proposed project on barren-ground caribou, both in terms of the proposed route of the Izok corridor all-weather road and how the entire Project contributes to cumulative effects within the Bathurst range. ENR looks forward to discussing the project further with MMG.


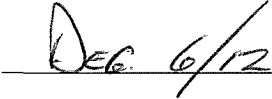
The location of the proposed development is a source of concern. Both the Izok Mine site and the High Lake Mine site, as well as the route of the Izok corridor all-weather road, occur either near to or on the Bathurst calving ground. MMG should re-route the proposed Izok corridor all-weather road so that the road and all other sites associated with the corridor (e.g., borrow sources, turn-off areas, stock piles) remain outside of the Bathurst herd's calving area as defined by surveys and collars since 1996.

The GNWT and its co-management partners are responsible for planning and management of the Bathurst herd. The GNWT issued a NWT Barren-ground Caribou Management Strategy (2011-2015) that recognizes the need for collaboration with industry and to provide information to decision makers. The GNWT is willing to work with MMG and other interested parties to define an area of avoidance around the calving ground. The GNWT is also willing to work with MMG and other interested parties on any other mitigation or monitoring strategies related to wildlife and wildlife habitat.

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

The Government of the Northwest Territories (GNWT) promotes and supports the sustainable use and development of natural resources to protect, conserve and enhance the environment of the Northwest Territories (NWT) for the social and economic benefit of all residents. This responsibility is shared with Aboriginal, federal, territorial, and municipal governments, boards and agencies, and every resident of the NWT.

The GNWT suggests the MMG find an alternate route that avoids the calving grounds, used in conjunction with a flexible approach to seasonal protection measures for caribou (i.e., during calving and post-calving migrations). All collar data and surveys since 1996 have shown that caribou from the Bathurst herd are calving consistently within the same area, including the 2012 calving season. Re-routing the Izok corridor all-weather road to avoid current calving grounds is a sound precaution given the herd's low numbers and two recent years of poor calf recruitment; hardships faced by NWT communities resulting from restricted harvest; and in the context of existing and proposed development in the Bathurst barren-ground caribou herd's annual range. Protection of caribou calving grounds is a high priority for Aboriginal governments, co-management boards, and communities in the NWT and Nunavut.

Name of person commenting: <u>Joel Holder</u> of _____	
Position: <u>Manager, Environmental Assessment and Monitoring</u>	Organization: <u>Government of Northwest Territories, Department of Environment and Natural Resources</u>
	Date: <u>December 7, 2012</u>
Signature: 	



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
12MN043
Our file - Notre référence
5510-5-12

December 4th, 2012

Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Part 4 Screening for Minerals and Metals Group's (MMG) "Izok Corridor" Project Proposal.

Ms. Granchinho,

On November 9, 2012 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Part 4 Screening for MMG's "Izok Corridor" project proposal. Aboriginal Affairs and Northern Development Canada (AANDC) appreciates the opportunity to provide comments, and offers the following for the NIRB's consideration.

AANDC has reviewed the project proposal and is of the opinion that due to the nature and scale of the proposed project's activities and components having potential to cause significant adverse environmental impacts and socio-economic effects on northerners, a review is required under 12.4.2 of the Nunavut Land Claims Agreement.

AANDC has conducted a preliminary assessment of the proposal and identified areas that merit more in-depth assessment:

- The anticipated impacts of construction, operation and closure activities on wildlife, water quality and quantity, vegetation, landforms and permafrost features in the area;
- The anticipated socio-economic impacts throughout the project
- The impacts of potential accidents or malfunctions on site as well as during transportation;
- The potential adverse impacts on the surrounding environment of the proposed development activities, including but not limited to open pit and underground mining, waste rock and ore storage areas, tailings



management, Izok Lake dewatering and associated site water management, Grays Bay Port facilities, proposed shipping routes, and the Izok all-weather road;

- Consideration for potential impacts to the groundwater regime and provisions for management and potential contamination of groundwater;
- The potential for ongoing and incremental land use activities associated with this and other mining and transportation activity in the Kitikmeot region to result in cumulative ecosystemic and socio-economic impacts;
- Consideration for potential transboundary impacts, given the proximity to the Northwest Territories border;
- The adequacy of proposed mitigation, monitoring, and adaptive management measures.

Accordingly, AANDC has jurisdictional responsibility in relation to the proposed project, particularly: Ministerial responsibilities for approval of the water licence and administration of Crown land. Furthermore, AANDC appreciates being of assistance to the NIRB throughout the impact assessment process, and expects to offer expertise in the following:

- Geotechnical engineering and permafrost considerations
- Site water management
- Surface water quality and quantity and groundwater quality
- Wastewater treatment
- Waste management plan (hazardous and non-hazardous)
- Mine and quarry design and construction
- Emergency response and spill contingency plan
- Closure and reclamation planning
- Environmental monitoring and management plans
- Cumulative effects and alternatives assessment
- Proposed mitigation measures
- Socio-economic impact and benefits analysis

AANDC looks forward to working with the NIRB and the Proponent throughout the environmental assessment of this project. Should you have any questions, please contact Rosanne D’Orazio at (867) 975-4554 or by e-mail at rosanne.dorazio@aandc-aadnc.gc.ca.

Sincerely,

[original signed by]

Margaux Brisco
Manager, Impact Assessment



Environmental Protection Operations
Qimugjuk Building 969
PO Box 1870
Iqaluit, NU X0A 0H0
Tel: (867) 975-4631
Fax: (867) 975-4645

November 30, 2012

EC file: 4703 004 012
NIRB file: 12MN043

Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board
PO Box 1360, 29 Mitik
Cambridge Bay, NU X0A 0C0

Via email: info@nirb.ca

RE: NIRB 125MN043 Notice of Part 4 Screening for Minerals and Metals Group's "Izok Corridor Project" proposal

Thank you for the opportunity to provide comments with regardsto the Nunavut Impact Review Board's (NIRB) Part 4 Screening Decision for Minerals and Metals Group's (MMG) proposed Izok Corridor Project. The following specialist advice is provided pursuant to the *Canadian Environmental Protection Act 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

After reviewing the project proposal and supporting documents, Environment Canada (EC) is of the opinion that the proposed project may cause significant adverse effects on the ecosystem and wildlife habitat. This advice is based on both the scale of the proposed project and the anticipated environmental impacts that may occur if the project proceeds. Potentially impacted ecosystem components falling under EC's mandate include, but may not be limited to:

- Surface freshwater as a result of lake dewatering, nutrient input from blasting and sewage treatment, suspended sediments as a result of construction activities, surface runoff from ore and waste rock, and accidents and malfunction;
- Air quality as a result of the operation of the incinerator, mine site activities, equipment and supplies along winter and all-weather roads and marine shipping;
- Migratory birds as a result of habitat loss and disturbances at the proposed site facilities and roads; and,
- Species at risk as a result of habitat loss and disturbance at proposed site facilities and roads.

Due to the potentially significant adverse impacts to these ecosystem components resulting from the proposed project, it is EC's opinion that the project should be referred to a review under Article 12, Section 12.4.4(b) of the Nunavut Land Claim Agreement.

If there are any changes in the proposed project, EC should be notified, as further review may be necessary. Please do not hesitate to contact Paula C. Smith with any questions or comments with regards to the foregoing at (867) 975-4631 or by email at Paula.C.Smith@ec.gc.ca.

Regards,

Susanne Forbrich
Manager, Environmental Assessment and Marine Programs

cc Carey Ogilvie, Head, Environmental Assessment North, EA and Marine Programs Division, EC
Paula C. Smith, A/Senior Environmental Assessment Coordinator, EC

[View email as HTML](#)

RE: NINA 1558666 Notice of Part 4 Screening for Minerals and Metals Group's "Rock
Catcher Project" proposal

Thank you for the opportunity to provide comments with respect to the Review Panel Review Board's (RPB) Part 4 Screening Decision for Minerals and Metals Group's (MMG) proposed Rock Catcher Project. The following specialist advice is provided pursuant to the Canadian Environmental Protection Act (CEPA), the Pollution Prevention provisions of the Fisheries Act, the Migratory Bird Conservation Act, and the Species at Risk Act.

After reviewing the project proposal and supporting documents, Environment Canada (EC) is of the opinion that the proposed project may cause significant adverse effects on the ecosystem and wildlife habitat. The review is based on both the scope of the proposed project and the anticipated environmental impacts that may occur if the project proceeds. Potentially impacted ecosystem components falling under EC's mandate include, but they are not limited to:

- Surface disturbance as a result of land clearing, erosion control, and other activities; surface erosion; sediment accumulation as a result of construction activities; surface runoff from the site and water table and groundwater contamination;
- Impacts as a result of the operation of the rock catcher, mine site, and other equipment that supply water and oil-water rock and water slippage;
- Impacts as a result of habitat loss and disturbance at the proposed site and other areas;
- Impacts as a result of habitat loss and disturbance of proposed site and other areas.

Due to the inherently significant adverse impacts to listed ecosystem components resulting from the proposed project, EC's opinion that the project should be referred to a review under Article 13.1 of the Inland Water and Claim Agreement.

If there are any changes to the proposed project, EC should be notified, as full details may be necessary. Please do not hesitate to contact Paula C. Smith with any questions or comments with respect to the foregoing at (202) 973-4831 or by email at Paula.C.Smith@ec.gc.ca.



Eastern Arctic Area
Iqaluit Office

Région Arctique de l'est
Bureau de Calgary

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Your file / Votre référence
12MN043

Our file / Notre référence
NU-12-0010

November 26th, 2012

Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU X0B 0C0

Dear Ms. Granchinho:

Subject: DFO Comments, Review of Project Description for Izok Corridor Project

On August 20, 2012 Fisheries and Oceans Canada received applications for a *Fisheries Act* review and Authorization for Minerals and Metals Group's (MMG) Izok Corridor project (the Izok Project). On November 9, 2012, the Nunavut Impact Review Board notified parties of the commencement of the Part 4 Screening Review for the Izok Project and requested comment on the proposal.

Based on information that was presented at a preliminary meeting held with environmental representatives from the Izok Project on May 25, 2012 and taking into consideration the written project description dated August 2012, it was determined by DFO that the development of the Izok Project may cause a harmful alteration, disruption or destruction to fish and fish habitat and may require an authorization under subsection 35 (2) of the *Fisheries Act*. Aspects of the mine that may result in impacts to fish and fish habitat include:

- Whole lake loss due to the dewatering of Izok Lake to access the underlying deposit;
- Construction, operation and closure of a diversion dam and diversion channel to re-route water around Izok Lake from Iznogoudh Lake into Itchen Lake;
- Construction, operation and closure of a marine port facility at Gray's Bay, as well as a large infilling of the bay in the conceptual plan;
- Potential impacts to marine mammals from blasting, dredging and shipping at Gray's Bay marine port facility;
- Potential for impacts to Itchen Lake as a receiving waterbody during the drainage of Izok Lake; and,
- Construction, operation and closure of an all weather access road with several watercourse crossings.

After reviewing the scope of information that has been presented by the proponent to date, including mitigation measures and best management practices, DFO is of the opinion that there is potential for the Izok Project to cause significant adverse environmental impacts to fish and fish habitat. DFO suggests that the NIRB consider recommending the Izok Project to be reviewed under an Article 12 Review, as provided for in Section 12.4.4 (b) of the *Nunavut Land Claim Agreement*.

DFO is committed to working with NIRB, MMG and other Federal and Territorial Agencies during the regulatory review of this development proposal. If you have any questions concerning the above or would like to discuss in greater detail please contact Nicola Johnson directly by telephone at (867) 669-4933 or by email at nicola.johnson@dfo-mpo.gc.ca.

Sincerely,



Beverley Ross
Regional Manager, Environmental Assessment for Major Projects
Fisheries and Oceans Canada

cc. Derrick Moggy, Fisheries and Oceans Canada
Eric Kan, Fisheries and Oceans Canada
Elizabeth Patreau, Fisheries and Oceans Canada



December 7, 2012

Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

NIRB File#: 12MN043
NRCan File#: NT-075

Via email: info@nirb.ca, sgranchinho@nirb.ca

Re: NIRB 12MN043 Notice of Part 4 Screening for MMG Resources Inc. “Izok Corridor Project” proposal

Thank you for the notification of commencement of the Nunavut Impact Review Board’s (NIRB) Part 4 Screening and the opportunity to provide comments on the Mineral and Metals Group’s (MMG) proposed Izok Corridor Project.

After reviewing the project proposal (August 2012) and supporting documents, Natural Resources Canada (NRCan) has determined that the department is likely to have regulatory responsibilities for the project, as we may issue licences pursuant paragraph 7(1)(a) of the *Explosives Act*, for the following project components:

- Explosive storage and manufacturing facilities at the High Lake mine site;
- Explosive storage facility for the storage of explosives accessories at the Izok mine site; and,
- Storage facility to store explosive and blasting materials at the Grays Bay facility.

Based on NRCan’s review of the project information and our expertise in geoscience, mining and mineral science, a mine development of this scale -- two mines, a port and an all-weather road -- has the potential to result in significant adverse environmental effects. We further note that the geological modeling and geochemical characterization program for the mine areas is ongoing. From NRCan’s perspective, the results of these analyses will be an important consideration when completing the design of the mine areas, qualifying and quantifying potential adverse environmental effects related to environmental components such as water quantity and quality. On this basis, NRCan recommends that the Izok Corridor Project be referred to review under Article 12, section 12.4.4 (b) of the *Nunavut Land Claim Agreement*.

Should the project proposal be referred for further review, NRCan may be in a position to provide more detailed scientific and technical advice to the NIRB in the following areas of expertise: geology, hydrogeology, geohazards, permafrost and geotechnical science, engineering geology and acid rock drainage and metal leaching as it relates to mine waste management. Project components of particular interest to us are the emulsion plant, multiple explosives storage facilities, and dry-stack tailings facility using a frozen deposition method.



If you have any questions regarding the foregoing please contact Kathleen Cavallaro at (613) 996 0055 or via email at Kathleen.Cavallaro@nrcan.gc.ca.

Sincerely,

John Clarke
Director, Environmental Assessment SPI
Natural Resources Canada

cc: Rob Johnstone, Natural Resources Canada



Transport Canada Transports Canada

Prairie and Northern Region
P.O. Box 8550
3rd Floor, 344 Edmonton Street
Winnipeg, Manitoba
R3C 0P6

Your file Votre reference
12MN043

Our file Notre reference
7075-70-1-116

December 6th 2012

Sophia Granchinho
Technical Advisor
Nunavut Impact Review Board (NIRB)
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0

Re: Notice of Part 4 Screening for Minerals and Metals Group's "Izok Corridor Project" proposal

Dear Ms. Granchinho,

Transport Canada reviewed the November 9th, 2012 letter from the Nunavut Impact Review Board (NIRB) pertaining to the Part 4 screening of the Minerals and Metals Group Izok Corridor project proposal. After evaluating the summary list of main project activities and components associated with the project in your letter, as well as a review of the Izok Corridor project description and supporting information, Transport Canada (TC) offers the following comments with respect to our interests and mandate:

Transport Canada – Navigable Waters Protection Program (NWPP)

- Diversion dam and diversion channel to re-route water around Izok Lake from Iznogoudh Lake into Itchen Lake;
- Dewatering of Izok Lake to access the deposits;
- Storage of waste rock and overburden using sub-aerial deposition method within the former Izok Lake catchment area;
- Surface water diversion system, water holding pond, effluent treatment facility, potable water treatment facility and sewage treatment facility;
- Water withdrawal from Itchen Lake;
- Discharge of treated surface water, effluent, sewage and grey water into Itchen Lake;
- Transportation of crushed ore to the Izok Mine site for processing via the all-season access road;
- Port facility with dock to accommodate 50,000 deadweight tonnage (DWT) bulk-carrier ships;
- Construction of an approximately 350 km all-season access road linking the Izok and High Lake mines with the port at Grays Bay. Road to include approximately 60 single-span bridges, 10 multi-span bridge structures and 80 major culvert and rock fill locations;

Canada 

Approvals under Section 5 of the Navigable Waters Protection Act (NWPA) will be required for activities associated with the project, as well as a potential Section 23 Order in Council for deposition of waste rocks and tailings associated with the mining and dewatering of any specified lakes.

Transport Canada Marine Safety and Security

Vessel Operations

The commercial vessels that will be used for this proposed operation for transferring fuel, supplies, and product delivery will already be certified for domestic and/or international trade. As with all other projects that have a marine transportation component, the contracted shipping company must already be cognizant and compliant with applicable legislations such as (but not limited to) the Canada Shipping Act, 2001, Arctic Waters Pollution Prevention Act, Transportation of Dangerous Goods Act, Marine Liability Act, and respective enabling regulations. Foreign vessels may also be subject to the Coasting Trade Act and Port State Control inspections. These Acts and regulations are in place to ensure safe transportation of vessels and to protect the marine environment by preventing pollution.

Due to the fact that no large scale charts presently exist for Grays Bay and approaches, Marine Safety highly recommends that bathymetric surveys be conducted to establish a safe navigation corridor and to have this information shared with Canadian Hydrographic Services for production of new and updating existing chart editions. This is not a Marine Safety regulatory requirement.

Oil Handling Facilities (OHF)

The proposed bulk fuel storage at Grays Bay will be a prescribed Oil Handling Facility (OHF) and subject to Transport Canada OHF regulations.

Port Operations

The project proposes to ship bulk processed concentrates for international trade, therefore, the loading process at Grays Bay will be subject to Port Warden services prescribed Sections 119 and 120 of the Cargo, Fumigation and Tackle Regulations and the associated fees.

Summary

- Marine Safety does not consider the marine transportation components of this proposal to likely arouse significant public concern because the proposed increase in vessel traffic is negligible and projected to be mostly during the open water navigation season. Public concern in recent projects has been the transportation of bulk fuel and the threat of oil pollution however; fuel resupply already exists and is a reality for all the coastal Canadian Arctic communities.
- Marine Safety is not an authority to comment how the project's marine transportation components will affect eco-systemic and socio-economic effects.

Marine Safety does not believe that the marine transportation components will have any potential adverse effects that would require mitigation.

Transportation of Dangerous Goods

- The *Transportation of Dangerous Goods Regulations* adopted by all territories, focus on preventing hazardous incidents when dangerous goods are imported, handled, or transported.
- *Section 7* of the *Transportation of Dangerous Goods Act, 1992*, requires that before a person offers for transport or imports certain dangerous goods, the person must have an approved Emergency Response Assistance Plan (ERAP).

Civil Aviation

- Register the existing aerodromes at Ham Lake camp and Sand Lake. The advantages of this free service would be to mark their locations on maps and in GPS databases so pilots can find them easier, and allow instrument approach procedures to the sites to be developed when required.
- Any upgrades to these sites, as well as the proposed airstrip developments at High Lake, Grays Bay and a new airstrip at Ham Lake should be constructed as close as possible in accordance with TP 312 Aerodrome Standards and Recommended Practices; in particular the width of runway shoulders and the set back distances for apron parking areas from the runway so as not to interfere with runway operations.
- The guidance provided in TP 1247 Land Use in the Vicinity of Airports should be considered when locating the landfill sites.

Based upon the proposed project scale, Transport Canada is of the opinion that the proposed project may cause significant adverse effects to the ecosystem encompassing water bodies or watercourse crossings and could arouse public concern.

Transport Canada appreciates the opportunity to review and comment on the Izok Corridor project and will work with the NIRB and other Federal and Territorial Agencies during the regulatory review of this project. Should you have any questions concerning this submission, please contact me directly at (204)-983-1139 or by email at john.cowan@tc.gc.ca

Sincerely,



John Cowan

cc: Dale Kirkland, Regional Manager, Programs
Meighan Andrews, Superintendent (North) Program
Kim Pawley, Manager, Environmental Programs



Athabasca Denesuline Negotiation Team

December 4, 2012

Nunavut Impact Review Board
Attn: Ryan Barry
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Re: Minerals and Metals Group's "Izok Corridor Project" proposal (12MN043)

Mr. Barry,

Thank you for extending the public comment period for the Screening of this project proposal. The Athabasca Denesuline (AD) have reviewed the proposal and have some significant issues as it has the potential to have major impacts to barrenground caribou, our traditional activities and culture.

Firstly, the Bathurst caribou herd range has historically extended into northern Saskatchewan for winter feeding. Since the health and well-being and yearly migration of caribou herds is integral to the AD economic, social and cultural identity, any potential disturbance to the caribou is potential risk to the AD identity. The Bathurst herd will be impacted by this project but the AD and northern Saskatchewan have not been included in any assessment of trans-boundary and cumulative effects of this potential development. This is a major concern, because if the initial assessments took into consideration and understood the migration routes and ranges of barren-ground caribou, then MMG would have addressed the caribou-related environmental and socio-economic concerns that may arise due to this project. The AD understand that any activity that causes stress or results in a change of usual behaviour and/or diversion of migratory path of the caribou can impact on the health and condition of these animals. This subsequently impacts on the AD communities that rely on the caribou for sustenance. The AD request a full review of trans-boundary and cumulative impacts within our traditional territory and jurisdiction, possibly through a Part 6 Review conducted by a federal panel.

Email: rrobillard@pagc.sk.ca or tgiroux@pagc.sk.ca

Chief Joseph Custer Reserve # 201

Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7

Phone: (306) 765-2560 Fax: (306) 763-2973

Secondly, the AD have serious concerns regarding the proposed 350 km all-season road. The proposed Izok Corridor intersects the heart of the Bathurst barrenground caribou calving ground, its habitat and migration route. At no time should any disturbance or development be constructed within or in the vicinity of a calving ground. This is particularly important in light of the recent documented declines in the Bathurst, Ahiak and Beverly herds. Although the Bathurst herd is considered 'stable' at the moment, there was a great effort by the governments and aboriginal peoples to reduce impacts to the herd, thereby slowly stabilizing numbers.

However, current surveys have shown that the number of breeding females have not increased, neither has calf production and survival.

Furthermore, communities that hunt caribou are being asked to hunt with quotas, to aid in the recovery of the caribou herd. This is a significant sacrifice to the communities that depend on caribou for sustenance. However, it is predicted that more access to roads may potentially increase harvesting rates on this herd. The Athabasca Denesuline cannot support a development that will counter any efforts on barren ground caribou recovery. The herd is not secure, and this project would place unnecessary stress on the herd in the most critical time of the year.

These issues have not been properly mitigated for or dealt with in the proposal. These are key issues, and monitoring impacts will not be sufficient to protect the herd. The AD **do not support** the construction of an all-season road through the calving ground. A no-route option is preferred and should be examined by MMG and developed in their proposal.

Sincerely,



Ron Robillard
ADNT Chief Negotiator, Prince Albert Grand Council

Cc:

Chief Earl Lidguerre – Fond du Lac Denesuline First Nation
Chief Bart Tsannie – Hatchet Lake Denesuline First Nation
Chief Ricky Robillard – Black Lake Denesuline First Nation
Earl Evans – Beverly-Qaminirjuaq Caribou Management Board



Beverly and Qamanirjuaq Caribou Management Board

7 December 2012

Nunavut Impact Review Board
P.O.Box 1360
Cambridge Bay NU
X0B 0C0
info@nirb.ca

NIRB File No. 12MN043 – Minerals and Metals Group’s “Izok Corridor Project” Proposal

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the “Izok Corridor Project” proposal from Minerals and Metals Group (MMG). This is in accordance with the mandate of the BQCMB, which is to advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges. These comments are based on MMG’s Izok Corridor Project Proposal (Volume 1 and 2) for activities that include base metal mining, milling and construction of a 350 km all-weather road on the range of the Bathurst barren-ground caribou herd.

Summary of BQCMB Concerns about this Project

The Bathurst caribou herd is of great importance to Aboriginal and other people across the caribou range, including people from communities in the Northwest Territories (NWT) and northern Saskatchewan (SK) who traditionally harvest both Bathurst and Beverly caribou. The assessment of this proposed project must recognize that caribou conservation is critical to both the ecological and socio-economic future of a region that extends beyond Nunavut. There are potentially serious implications of this proposed project and its cumulative and trans-boundary effects for both caribou and people.

According to information provided to the BQCMB by the NWT Department of Environment and Natural Resources, the proposed all-season road from the Izok mine just north of the NWT/NU border to the coast crosses critical calving and post-calving habitat of the Bathurst herd. This includes areas used frequently since 1996 by collared Bathurst caribou cows during the calving period (including peak calving) and the post-calving period. It would cut through the area the BQCMB would consider to be the “core” calving ground of the Bathurst herd.

The BQCMB is very concerned about this proposed project because activities will occur on important habitats used by Bathurst caribou during sensitive periods (calving and post-calving) at a time when the Bathurst herd is just beginning a possible recovery from a drastic decline. Furthermore, project infrastructure that includes construction of all-weather and winter roads and expansion and upgrading of airstrips would support activities that may cause increasing disturbance to the herd and long-term damage to key habitats. There is clear potential for MMG’s proposed development activities to result in significant impacts to Bathurst caribou through disturbance and cumulative effects.

Implications for Beverly and Qamanirjuaq caribou and harvesters

This proposed project and its potential impacts on Bathurst caribou could have serious ramifications for Beverly and Qamanirjuaq caribou herds and people who harvest them, as outlined briefly below. More background on these issues is provided in the attachment to this letter.

- **Trans-boundary effects** - Project effects will not be restricted to NU, and may result in significant trans-boundary effects for reasons that include:
 - a) use by MMG of the existing winter road south to Yellowknife, which means that the direct effects of the proposed project will occur in the NWT as well as NU;
 - b) use by Bathurst caribou of seasonal ranges in NU, the NWT and northern SK, which means that reductions in caribou availability will have impacts for communities in these three jurisdictions, including many communities which traditionally harvest Beverly and/or Qamanirjuaq caribou as well as Bathurst caribou; and
 - c) cumulative effects of this project and other ongoing and proposed projects across the caribou range will occur in NU, NWT and SK.

- **Development on calving grounds** - If development on the Bathurst calving ground is approved, it will set a precedent for allowing development on barren-ground caribou calving grounds. This could have negative consequences for ongoing efforts to protect other calving grounds in Nunavut and elsewhere in Canada, and also internationally. The BQCMB is very concerned about the potential impacts of such a decision on its current opposition to mineral exploration on the Qamanirjuaq calving ground and its recent opposition to exploration on the Beverly calving ground.

Also, as the BQCMB noted in a position paper circulated widely on this subject in 2004¹, the Government of Canada's long-standing opposition to development on the Porcupine caribou calving ground in Alaska could be compromised by any approvals for industrial development on caribou calving grounds in Canada.

- **Increased harvest** - Potential negative effects of this proposed project on availability of Bathurst caribou for harvest could also lead to increased harvest of Beverly and Qamanirjuaq caribou through shifting of harvest (intentionally or not) to other herds when the Bathurst herd is not available. Because both the Beverly and Qamanirjuaq herds are declining, this additional harvest pressure would not be sustainable and would likely worsen the long-term prospects for those herds as well as for availability of caribou for harvest by communities in NWT and SK.

A cautious approach is particularly important at this time, given the recently reduced availability of caribou from both the Bathurst and Beverly herds to many communities in the NWT and SK, and the sacrifices that many hunters in the NWT have made to reduce or eliminate their caribou harvest to give the Bathurst herd the opportunity to recover.

BQCMB Position

It has always been a firm and consistent position of the BQCMB that long-term legislated protected areas that exclude industrial development must be established for calving and post-calving areas. In the absence of this protection, proposals for exploration and development on these areas must be rejected.

The BQCMB is deeply concerned about the potential absence of responses from Nunavut government organizations and institutions, which was noted during Anconia's permit application for mineral exploration in the heart of the Qamanirjuaq calving ground. Thus the BQCMB cannot sit idly by in this case for which potentially serious impacts will result, not only on Bathurst caribou, but to Beverly caribou and traditional communities as well. Therefore the BQCMB insists that this project proposal not be approved.

¹ Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuaq Caribou: A Position Paper (BQCMB 2004).

Level of Review

MMG has stated that it expects their project to be subject to a Part 5 Review conducted by the NIRB because the project corridor is located entirely within Nunavut (NU). However, a Part 6 Review would be required to ensure that adequate assessment is provided for trans-boundary impacts, including cumulative impacts.

Cumulative Effects

As we have stated repeatedly, the BQCMB is concerned about the lack of cumulative effects assessment and finalized land use plans in Nunavut. Reviewing single project proposals in isolation is clearly not adequate to ensure protection of caribou and caribou habitat, or conservation of the irreplaceable renewable resource upon which subsistence harvesters, resident hunters and commercial users of the herd depend. A regional approach for cumulative effects assessment is clearly needed.

Recommendations

1. MMG's application should not be approved and no further exploration or development activities should be permitted on the calving ground and post-calving range of the Bathurst caribou herd.
2. MMG should be asked to develop a new project proposal that does not include a road across the Bathurst calving and post-calving areas.
3. A Part 6 Review of the new project proposal should be conducted by a federal panel that includes elements described below.
 - Environmental impact statement (EIS) guidelines for the new project proposal should require an assessment of transportation alternatives that includes justification for rejecting certain alternatives and selecting a preferred option. This assessment should be based on analysis that includes assessment of potential impacts (direct and indirect, short-term and long-term) on Bathurst caribou and key habitats.
 - The EIS for the new project proposal should include assessment of cumulative effects for this project in combination with other ongoing and planned projects on the range of the Bathurst caribou herd in NU and the NWT. The cumulative effects assessed should include potential effects on hunters in NU, NWT and SK of continued or worsening reductions in caribou availability.
 - The Review should include a full and transparent public discussion in which all interested parties have equal opportunity to present their concerns and to describe the potential impacts of a continued lack of availability of Bathurst caribou. The parties should include NWT and Saskatchewan First Nation and Metis communities that traditionally harvest both Bathurst and Beverly caribou, as well as organizations such as the Dene Nation, the NWT Metis Nation, the Athabasca Denesuline and the BQCMB.
4. The NIRB should work with other institutions of public government (i.e., KIA, NTI, NPC, NWMB) and territorial and federal government agencies (i.e., governments of NU, NWT, SK; AANDC) to develop a plan and process for identifying and mitigating the potential cumulative effects of human land use activities on barren-ground caribou, including the Bathurst, Beverly and Qamanirjuaq herds. This assessment of cumulative effects for caribou should consider ongoing and planned activities, and include impacts associated with mineral exploration as well as development and roads.

The tenuous state of the Bathurst herd requires that the Precautionary Principle be applied when making decisions about human activities that could cause significant disturbance to these caribou and their habitat at sensitive times and locations. The BQCMB asks the NIRB to recognize the critical importance of the Bathurst caribou herd to Dene and Metis people in the NWT and northern Saskatchewan, to consider the potential implications of this proposed project on Beverly and Qamanirjuaq caribou and people who harvest them, and to make appropriate recommendations to the Minister required by application of the Precautionary Principle.

If you require further information or have any questions about these comments from the BQCMB, please contact Leslie Wakelyn (wakelyn@theedge.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read "Earl Evans".

Earl Evans, Chairperson
BQCMB

cc: Ross Thompson, BQCMB Executive Director
Mike Tollis, Lutsel K'e Wildlife, Lands and Environment
Ron Robillard, Athabasca Denesuline
Lee Mandeville, Dene Nation

Attachment to BQCMB Comments on MMG's "Izok corridor Project" Proposal

Concerns about this proposed project for Beverly and Qamanirjuaq caribou and caribou range communities include:

- 1) ***Development on calving grounds*** - The BQCMB has serious concerns about allowing industrial development and roads on caribou calving grounds for any herds.
- 2) ***Potential development impacts on Bathurst caribou*** - The Bathurst herd is currently considered "stable" at a size of approximately 35,000 (2012), however, the number of breeding females has not increased since 2009, and surveys indicate two poor years for calf production and survival. Therefore the herd's recovery from its recent major decline is tenuous, and the caribou are vulnerable to any additional disturbance from human activities. The herd could be pushed back into a decline by the impacts of this project, the cumulative effects of ongoing and planned exploration and development elsewhere on the herd's range and other factors (e.g., climate change effects).
- 3) ***Effects on availability of Bathurst caribou for harvest*** - Potential detrimental effects of this proposed project on the Bathurst herd could worsen the situation concerning low availability of caribou for many people in NWT and Saskatchewan communities. This includes Aboriginal hunters who have traditionally harvested Bathurst caribou from Beverly and Qamanirjuaq range communities in NWT (Lutsel K'e, Ft. Smith, and Ft. Resolution) and have recently made sacrifices by reducing their harvest of caribou in order to allow the Bathurst herd to recover from its decline. Resident hunters in the NWT and caribou outfitters dependent on availability of Bathurst caribou have also been impacted by lack of availability of caribou. Harvest reductions in place in the NWT were intended to be temporary, but could be required over the long-term if other factors are allowed to prevent the recovery of the Bathurst herd.
- 4) ***Pressure for increased harvest of Beverly and Qamanirjuaq herds*** - If the Bathurst herd does not increase and continues to be unavailable for harvest, there may be pressure to shift greater harvest to adjacent herds, including the Beverly herd and Qamanirjuaq herds. In recent years availability of both Bathurst and Beverly caribou has been reduced for communities in northern Saskatchewan (Camsell Portage, Uranium City, Fond du Lac, Stony Rapids and Black Lake), which has meant that some hunters from these communities have accessed the Qamanirjuaq herd instead. An ongoing lack of availability of Bathurst caribou followed by a shift of additional harvest to the Beverly and Qamanirjuaq herds could produce a "domino effect" if additional increases in harvest are not sustainable, and could result in serious consequences for people who traditionally harvest these herds through northern Saskatchewan, northern Manitoba, and the southern Kivalliq region of Nunavut.
- 5) ***Implications for development on other calving grounds*** - How decisions are made for this proposed project and how the value of caribou is considered (or not) may affect other current and future project proposals for other calving grounds in NU (e.g., Qamanirjuaq herd) and elsewhere (e.g., George River and Porcupine caribou herds). As a result, decisions made about this proposed project, especially for development directly on the Bathurst calving and post-calving areas, could have ramifications nationally (e.g., in Quebec) and internationally (e.g., in Alaska).
- 6) ***Review of cumulative and trans-boundary effects*** - How cumulative and trans-boundary effects of industrial development in this region of NU are reviewed and how caribou-related environmental and socio-economic impacts outside NU are addressed will have implications and may set precedents for other current and future development proposals on caribou ranges in NU and elsewhere.



Dene National Office
Assembly of First Nations (NWT)

5125- 50th Street
P.O. Box 2338
Yellowknife, NT X1A 2P7

Toll Free: 1 866-511-4081
Phone: (867) 873-4081
Fax: (867) 920-2254
Website: www.denenation.com



December 7, 2012

Sophia Granchinho
Technical Advisor
Nunavut Environmental Impact Review Board
PO Box 1360
Cambridge Bay, NU X0 0C0

Dear Ms. Granchinho;

RE: Dene Nation Comments on Izok Corridor Project-NIRB #: 12MN043

Dene Nation is an Aboriginal Governmental Organization serving the 29 Dene Chiefs and communities in Denendeh. Our mandate is *“to retain sovereignty by strengthening the Dene spiritual beliefs and cultural values in Denendeh”* especially on environment and land issues. Dene Nation is concerned with the proposed Izok Corridor project because it is threatening a sacred caribou calving ground area. Caribou is the main source of sustenance for Dene. Our oral and written history has been tied to this animal for centuries. Dene Elders speak about a special relationship with the caribou and being one with the caribou. Denes share the caribou’s habitat and have historically protected sensitive eco-system for the benefit of future generations.

The proposed Izok Corridor Project will include two metal mines, a 350 km road and a port facility located north of Contwoyto Lake to Grays Bay in Nunavut. The project will have (to name some but not all): a 12 year mine life, two mines on Izok Lake and High Lake, 350 km all season weather road, 800 capacity accommodation complex, open pits and underground mining infrastructure, fuel storage of 35,000,000 litres of diesel and 100,000 litres of aviation fuel, tailing ponds, explosive storage, and a possible airstrip at Ham Lake.

Dene Nation opposes the project because of its location and its direct impacts on calving ground areas. The Tundra consists of a delicate habitat and wildlife. The destruction of such habitat and wildlife will cause irreversible, life changing damage that our generations may not get to enjoy and or benefit from them. Some sensitive wildlife species may be at risk such as the Bathurst Caribou herd, Grizzly Bear, Wolverine, Peregrine Falcons and Short-Eared Owl.

“Implementing Treaty & Aboriginal Rights Since 1970”

The Bathurst caribou herd migrates back and forth between the Northwest Territories and Nunavut border. They do not adhere to any jurisdictional line from the barrenlands to the treeline. Inuit and Dene have lived with the caribou for time immemorial. That is why it is important that the caribou and especially their calving grounds are protected and undisturbed.

Caribou is one of the most important renewable resources in Denendeh. They have shared their meat, bone, and hide with us since creation. Now caribou herds across the Arctic are suffering and are in decline. It is not the caribou that need to be managed but rather the rate of development in their habitat.

Dene Nation recommends that the project be rejected. The proposed project will impact treaty 8 and 11 territories which have a distinct connection to the Bathurst caribou calving grounds. Caribou is very important to Dene it is the vital connections to our health and cultural way of life. The decline of the caribou population must be taken seriously to continue our way of life.

If it is not rejected then Dene Nation recommends NIRB to conduct a thorough environmental assessment. Dene are occupants and stewards of the land and need to know, well in advance, about proposed mining projects and be involved in the Environmental assessments that affect our territory.

If you have any questions please contact Ms. Camilia Zoe-Chocolate at the Dene National Office by email, czoechoocolate@denenation.com or phone 867-873-4081ext 34.

Sincerely,



Camilia Zoe-Chocolate
A/Director, Lands & Environment
Dene Nation


c.c. Chiefs of Denendeh

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: December 7 th , 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 type="checkbox"/> water quality <input type="checkbox"/> terrain <input type="checkbox"/> air quality <input checked="" type="checkbox"/> wildlife and their habitat <input type="checkbox"/> marine mammals and their habitat <input type="checkbox"/> birds and their habitat <input 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 type="checkbox"/> Inuit harvesting activities <input type="checkbox"/> community involvement and consultation <input type="checkbox"/> local development in the area <input type="checkbox"/> tourism in the area <input type="checkbox"/> human health issues <input checked="" type="checkbox"/> other: - Similar to Inuit harvesting activities is the Dene people's ability to harvest the Bathurst caribou - also the increased access to a sensitive area </td> </tr> </table> <p>Please describe the concerns indicated above:</p> <p>The Lutsel K'e Dene First Nation is concerned about the potential for this development, specifically the road through the calving grounds of the Bathurst caribou, to impact the populations of caribou available for harvest by the Lutsel K'e Dene. Lutsel K'e hunts the Bathurst as well as the Ahiak and Beverly herds. We are concerned that the harvest will increase for these other herds with the decline of Bathurst caribou. The Bathurst herd has suffered massive population decline in the past years, in our opinion, due to the variety of developments in their range. Any impact to the calving grounds is a significant public and environmental concern for the Lutsel K'e Dene.</p> <p>We are also concerned about the ease of access that will result from a road in this sensitive area. It has the potential to incite further developments which will create further cumulative effects to this and other herds that use that area.</p> <p>We are concerned that our hunting and harvesting rights will be in jeopardy if the project is allowed to proceed as is.</p>		<input type="checkbox"/> no concerns <input type="checkbox"/> water quality <input type="checkbox"/> terrain <input type="checkbox"/> air quality <input checked="" type="checkbox"/> wildlife and their habitat <input type="checkbox"/> marine mammals and their habitat <input type="checkbox"/> birds and their habitat <input type="checkbox"/> fish and their habitat <input type="checkbox"/> heritage resources in area	<input checked="" type="checkbox"/> traditional uses of land <input type="checkbox"/> Inuit harvesting activities <input type="checkbox"/> community involvement and consultation <input type="checkbox"/> local development in the area <input type="checkbox"/> tourism in the area <input type="checkbox"/> human health issues <input checked="" type="checkbox"/> other: - Similar to Inuit harvesting activities is the Dene people's ability to harvest the Bathurst caribou - also the increased access to a sensitive area
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<p>Do you have any suggestions or recommendations for this application?</p> <p>The caribou is the life of Dene people and we cannot possibly allow for any development on their calving grounds, therefore the proposal should be rejected. If not possible, alternatives to the all season road must be recommended. Any development on the calving ground is simply unacceptable. The trans-boundary concern with the caribou that migrate from Nunavut, through the NWT, and as far as Saskatchewan, require a part 6 review under the NLCA.</p>			

8. Comment Form Distribution

Do you support the project proposal? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Any additional comments?	
Name of person commenting: <u>Michael Tollis</u> of <u>Lutsel K'e</u>	
Position: <u>Wildlife, Lands and Environment Manager</u>	Organization: <u>Lutsel K'e Dene First Nation</u>
Signature: 	Date: <u>December 7, 2012</u>

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;"> <ul style="list-style-type: none"> * closure standards *water quality *terrain * air quality * wildlife and their habitat marine mammals and their habitat * birds and their habitat *fish and their habitat *heritage resources in area </td> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> * traditional uses of land * Métis harvesting activities * community involvement and consultation local development in the area tourism in the area * human health issues * other <u>Aboriginal Human Rights to benefit from and be involved in decisions regarding development of resources within traditional territory; socially and economically</u> </td> </tr> </table>		<ul style="list-style-type: none"> * closure standards *water quality *terrain * air quality * wildlife and their habitat marine mammals and their habitat * birds and their habitat *fish and their habitat *heritage resources in area 	<ul style="list-style-type: none"> * traditional uses of land * Métis harvesting activities * community involvement and consultation local development in the area tourism in the area * human health issues * other <u>Aboriginal Human Rights to benefit from and be involved in decisions regarding development of resources within traditional territory; socially and economically</u>
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<p>Please describe the concerns indicated above:</p> <p>The proposed Izok mine is within the traditional territory of the Indigenous North Slave Métis community, as are the southern portions of the proposed Izok road. It is the mandate of the North Slave Métis Alliance to assert, protect, and exercise the aboriginal rights of its members with respect to its traditional lands and resources, as well as heritage and cultural rights.</p> <p>The entire Izok road is proposed to pass through the Bathurst Caribou herd range. The calving grounds are currently west of Bathurst Inlet. The rearing, breeding, and wintering grounds are in the area between the calving grounds and Contwoyto Lake, and Point Lake, including Ithen Lake. There have been winters, lately, where the herd, or portions of it, has stayed on the barrens in the vicinity of Point Lake and Contwoyto Lake for the winter instead of migrating into the treeline. Some people think they are trying to avoid excessive development in the Lac de Gras area. The herd is currently under stress and the numbers are so low that even aboriginal subsistence harvesting in the NWT has been outlawed for the past three years. It is unknown to what extent the population decline might be related to mining and road developments in the NWT portion of their range, although the wildlife monitoring programs of the diamond mines indicate a larger than expected zone of influence which is so far unexplained. Traditional knowledge indicates it has at least something to do with air quality, including fumes from combustion, and dust.</p> <p>An all-weather road, as proposed, would significantly increase the likelihood of additional cumulative effects in the entire region. There are already several known mines along the route, waiting for such a road.</p> <p>The North Slave Métis Alliance is the only Aboriginal government in the Northwest Territories which has not yet been respected by Canada with the initiation of a reconciliation process to address our comprehensive claims. We are also the only aboriginal group in the Northwest Territories with an aboriginal right to harvest the Bathurst Caribou herd which did not receive any allocation of the limited aboriginal harvest. We suffer discrimination and oppression, culturally and economically. We are a severely disadvantaged community with chronic and extreme capacity issues. For that reason we deserve special consideration during socioeconomic and cultural impact assessment. Impacts to our social and economic determinants of health also generate human health concerns.</p>			

8. Comment Form Distribution

Do you have any suggestions or recommendations for this application?

This is a very significant project that will have transboundary effects on numerous species of wildlife, and on people who harvest and otherwise value the wildlife. The entire wilderness character of the “barrenlands” will be permanently and irrevocably changed. This project deserves the highest possible level of environmental assessment, which includes thorough and comprehensive baseline data and impact assessment on:

- Trans-boundary Effects
- Aboriginal Human Rights.
- Cumulative Effects.

Please use a Limits of Acceptable Change approach, paying attention to pace of development, resilience of natural systems.

Please require compliance with standards and guidelines for Ethical conduct of Research involving Aboriginal Peoples, their lands, resources, culture. (ie: chapter 9, Tri-Council Policy)

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

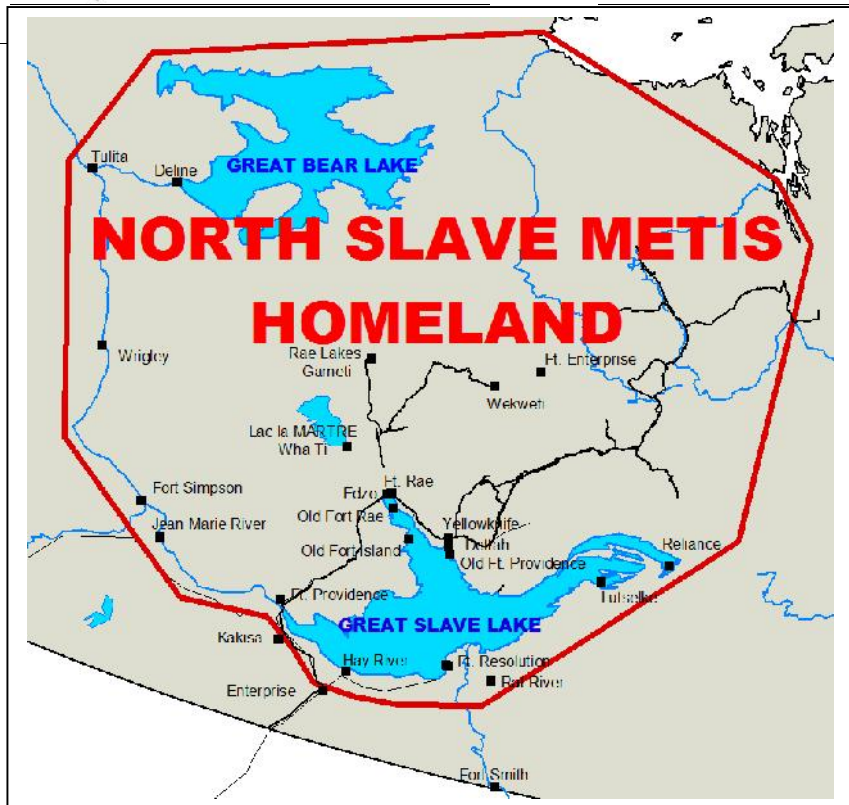
The North Slave Métis are in favor of sustainable development.

If and when it is shown to a **VERY HIGH LEVEL OF CONFIDENCE** that this project can be accomplished in a sustainable manner, we will support it.

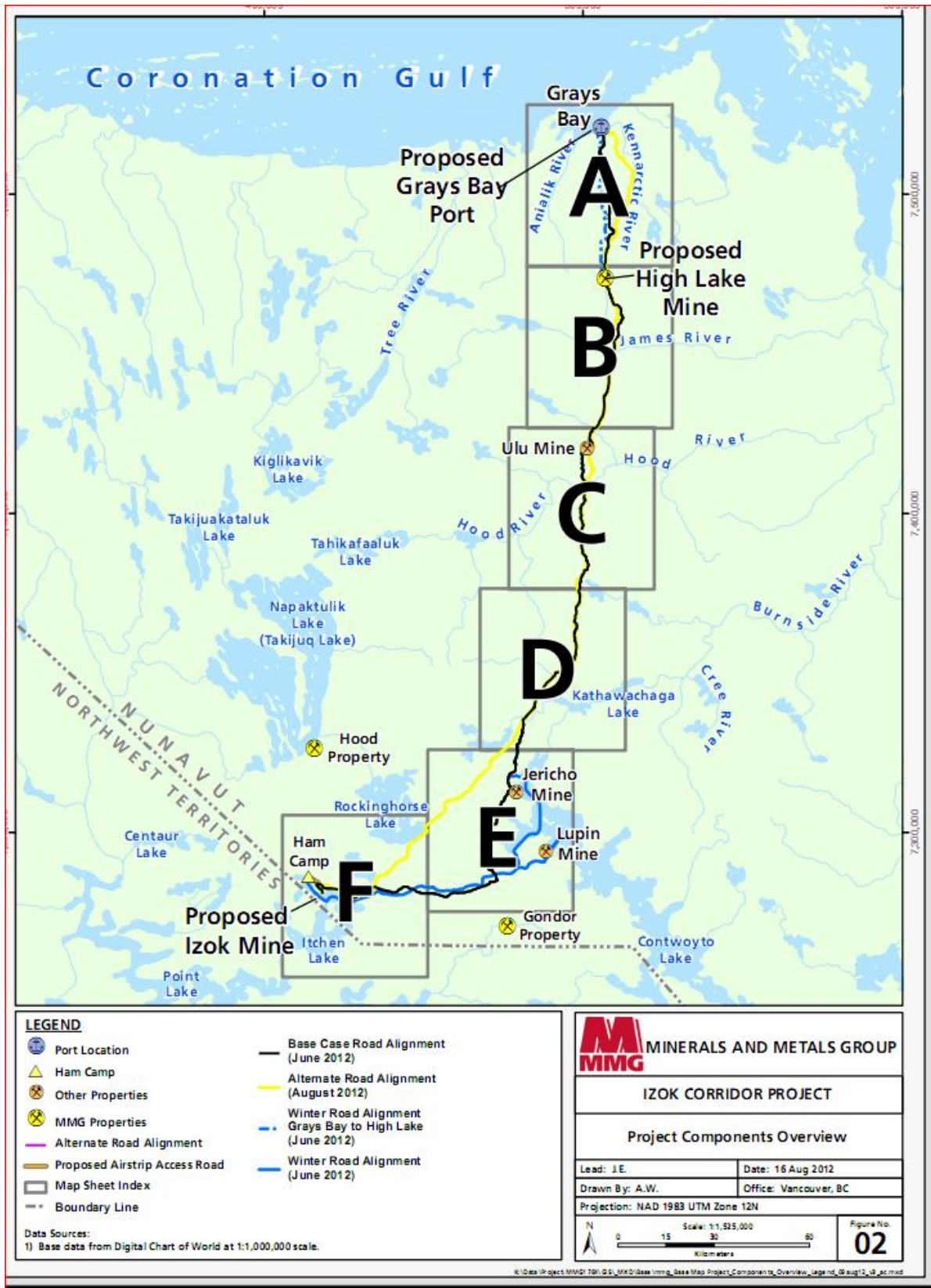
Name of person commenting: Sheryl Grieve of Yellowknife

Position: Environment Branch Manager **Organization:** North Slave Métis Alliance

Signature: *Sheryl Grieve* **Date:** December 6th, 2012



8. Comment Form Distribution



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:	Minerals and Metals Group (MMG)		
Location:	Kitikmeot Region		
Comments Due By:	Dec 7, 2012	NIRB #:	12MN043

Indicate your concerns about the project proposal below:

- | | |
|--|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> no concerns <input checked="" type="checkbox"/> water quality <input checked="" type="checkbox"/> terrain <input checked="" type="checkbox"/> air quality <input checked="" type="checkbox"/> wildlife and their habitat <ul style="list-style-type: none"> marine mammals and their habitat <input checked="" type="checkbox"/> birds and their habitat <ul style="list-style-type: none"> fish and their habitat <input checked="" type="checkbox"/> heritage resources in area | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> traditional uses of land and treaty rights <ul style="list-style-type: none"> Inuit harvesting activities community involvement and consultation local development in the area tourism in the area <input checked="" type="checkbox"/> human health issues other: _____ _____ _____ |
|--|--|

Please describe the concerns indicated above:

The primary concerns of the Tłıchǵ, as defined in a full scoping session held Nov. 19, are as follows (but are not limited to):

- impacts on caribou
- impacts on water
- potential impact on heritage resources.

The first major concern that the Tłıchǵ Government has with this development is the potential impact on caribou. This development arrives at a time when the Bathurst herd is in a significant decline. Barren-ground caribou are a cultural keystone species; they are essential to Tłıchǵ language, culture and way of life and their continued existence and availability for harvesting is of critical importance to the Tłıchǵ Government and the Tłıchǵ people.

The Bathurst caribou herd declined from over 450,000 in 1986 to approximately 126,000 in 2006 and 32,000 in 2009, which resulted in a harvest closure to residents and non-residents, and a voluntary harvest restriction agreed to by the Tłıchǵ Government and the Yellowknives Dene First Nation (YKDFN). The harvest restrictions to 150 Bathurst caribou for the Tłıchǵ and 150 for the YKDFN have led to challenges and sacrifices for those aboriginal communities. Thus, the proposed development is occurring at a time in which there is a heightened concern over the rapid decline and current small population size of the Bathurst herd, and a serious focus of governments and aboriginal communities is on conservation and recovery of the herd. The population estimate of 2012 shows that the herd seems to have stabilized and has increased a small amount to 35,000 however the number of breeding females is similar to 2009, so there is still a need to exercise caution with the herd.

8. Comment Form Distribution

The uncertainty and predicted duration of effects of the proposed development is a key concern to the Tłı̨chǫ Government, because the project proposal comes at a time when abundance of Bathurst caribou herd is at an historic low. With a predicted duration of effects of 20+ years for this one proposed mine, any incremental and cumulative impact to Bathurst caribou may be socially unacceptable to Tłı̨chǫ people. What this means is that concern about the Bathurst herd may already be at a threshold of social and cultural significance even without the added uncertainty of how the proposed development may impact caribou. In reviewing the proposed development, Chief Clifford Daniels stated, “We have done everything we can to conserve that herd. I think that herd is more precious and it is our main food staple. There will be direct impacts on the herd. The Tłı̨chǫ Government will have to review this carefully. This does really affect us.”

Many Tłı̨chǫ elders believe that the current mining and exploration activities in the barrenlands may already be having an effect on the caribou. The Chief of Wekweètì has questioned the impact of mines on the caribou many times, noting that the caribou simply do not go to his community any more. The potential impact of two open pits and an all season road from this development raise extensive concerns for the Tłı̨chǫ from the direct impact on the caribou calving grounds, the impact of noise and activity that will potentially stress the caribou at a very sensitive time, loss of habitat, air quality impacts, and deposition of dust and debris on the food source for the caribou at a critical time in their life cycle to start. Combined with the cumulative impacts of all of the exploration and development on the caribou within the calving grounds, migration route and wintering grounds, this proposed development must be considered with extreme caution.

This proposed development is also located in the range of several species of concern such as the Peregrine Falcon, Wolverine, Grizzly Bear and Short Eared Owl, meaning mitigation must be in place (if possible) to ensure the minimal impact to these important species.

An additional concern is that the water from the Izok site flows into Mǫwhì Gogha Dè Nı̨tłèè, which is the traditional territory of the Tłı̨chǫ, as expressed by Chief Monfwi in 1921. We are concerned about the potential impacts to the water and the aquatic life that is downstream from this development.

Lastly, Chief Football has noted that “George Mackenzie’s grandfather died in that area, so there may be burial sites”.

Do you have any suggestions or recommendations for this application?

The Tłı̨chǫ Government has requested that the alternatives assessment completed by the proponent be provided, in order to determine if there are any other options available to the proponent that include not siting the proposed road for industrial transport through the calving grounds of the Bathurst caribou herd. This is the strongly preferred first option that the Tłı̨chǫ Government requests consideration of.

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

This proposed project comes at a critical time in the population cycle of the Bathurst Caribou Herd. It is currently in a fragile state and its resilience to additional development pressures are weakened. There is significant public concern regarding the Bathurst herd and any further disruption to this critical species is an unacceptable risk to the Tłı̨chǫ Government and Tłı̨chǫ people.

The Tłı̨chǫ Government recommends a Part 6 Review be undertaken of this proposed development in order to assess the site specific and cumulative effects it may contribute to. We further recommend that a caribou specific cumulative effects assessment be done, in order to understand the realistic implications that yet another project in such a critical location of the Bathurst calving ground which will have in addition to all other development already underway, on the Bathurst caribou herd.

The Tłı̨chǫ Government also would like the Board to consider having a Tłı̨chǫ member on the Board for this review as this project will impact our Traditional Territory of Mqwhì Gogha Dè Nı̨łłèè

Name of person commenting: <u>kerri Garner</u> of _____	
Position: <u>Lands Director</u>	Organization: <u>Tłı̨chǫ Government</u>
Signature: <u>Kerri Garner</u>	Date: <u>Dec 7 '12</u>

November 30, 2012

Via email: sgranchinho@nirb.ca

Sophia Granchinho
Technical Advisor
Nunavut Environmental Impact Review Board
PO Box 1360
Cambridge Bay, NU X0B 0C0

Izok Corridor Project – File no. 12MN043

Dear Ms. Granchinho;

The following comments are submitted on behalf of the Wek'èezhì Renewable Resources Board (WRRB), to be considered during the screening phase of the Izok Corridor Project, File number 12MN043. The WRRB is the main instrument for wildlife management in Wek'èezhì and must apply the principles and practice of conservation in making its recommendations.

The Board understands the proposed project to be a base metal mining and milling operation with an expected mine life of 12 years. It is proposed to take place in the Izok and High Lakes area with an associated 350km all-weather road linking to a deep sea port at Grays Bay on Coronation Gulf. The following components make up the project:
At Izok Lake:

- Open pit and underground mining infrastructure;
- Diversion dam and channel ;
- Dewatering of Izok Lake;
- Processing plant to process ore from both Izok and High Lake mines;
- Concentrate storage ;
- Tailing deposition;
- Explosive storage;
- Permanent accommodation complex with 700-800 person capacity;
- Power supply, warehouse, maintenance shops, administration complexes, landfill
- Sewage treatment facilities;
- Fuel tank farm for storage of 35 million litres of diesel and 100 000 litres of aviation fuel ; and
- Possible development of an airstrip at Ham Lake.

At High Lake:

- Open pit and underground mining infrastructure;
- Ore storage ;
- Primary crusher ;
- Waste rock and overburden deposition;
- Explosive storage ;
- Permanent accommodation with 200-250 person capacity;
- Power supply, warehouse, maintenance shop, administration complex, landfill
- Sewage treatment facilities;
- Fuel tank farm with 7 million litres of diesel and 50 000 litres of aviation fuel; and,
- Possible development of an airstrip and associated facilities.

At Grays Bay:

- Port facility with dock to accommodate 50 000 deadweight tonnage bulk-carrier ships;
- Concentrate storage of copper lead and zinc with capacity for 10 months;
- Fuel storage with capacity of 50 million litres diesel fuel;
- Explosive and blasting material storage facility;
- Sewage treatment facilities;
- Power supply, warehouse, administration facility;
- Permanent accommodation with 25-40 person capacity; and,
- Airstrip.

Transportation corridor:

- All season access road linking the Izok Mine and High Lake mine with a port at Grays Bay ;
- Transportation of concentrate from Izok to Grays Bay; and,
- Transportation of fuel from Grays Bay to Izok and High Lake mines.

Species of management concern

The WRRB notes the proposed Izok Corridor Project is located within the range of several species that are of particular management concern. These are:

- Peregrine falcon, subspecies anatum - Threatened (federal Species at Risk Act (SARA))
- Peregrine falcon, subspecies anatum/tundrius complex – Special Concern (SARA)
- Wolverine – Special concern (Committee on the Status of Endangered Wildlife in Canada (COSEWIC))
- Grizzly bear – Special concern (COSEWIC)
- Short-eared owl– Special concern (COSEWIC)
- Bathurst Barren Ground Caribou – Sensitive (GNWT General Status Ranks)

Under the SARA (s. 79), species at risk are protected from the effects of development in that potential impacts are to be identified, mitigated and monitored regardless of their level of significance. Best practices for considering wildlife at risk in environmental impact assessment (including preliminary screening) suggest that COSEWIC listed species be treated in a similar fashion to species listed under the SARA.

Peregrine falcons

Peregrine falcons have been known to interact with the diamond mines in the Northwest Territories through their use of pitwalls as nesting habitat. Other risks to Peregrine falcon are related to the effects of pesticide exposure in southern locations. While levels of pesticides in falcon tissues have decreased since the use of certain products have been banned, they remain at low levels and may still be affecting reproductive success. The potential for interaction of the proposed Izok Corridor Project with Peregrine falcons is unknown and its contribution to cumulative effects on this species will need to be fully considered in the project assessment.

Grizzly bear and wolverine

Vulnerability of grizzly bear and wolverine is related to their low intrinsic rate of increase and low density, which limits population growth. Carnivores are often attracted to mine sites with ineffective waste management systems, thus creating human safety issues and problem wildlife often ultimately resulting in destruction of the animal. An increase in the number of animals that end up being destroyed as a result of habituation to camp food and food wastes, can increase risks of population decline. A thorough assessment of impacts to carnivores, especially those with SARA and COSEWIC designations, as a result of food and waste management practices will need to be conducted for the Izok Corridor Project.

Short-eared owl

Loss and alteration of winter and summer nesting habitat in southern Canada has largely contributed to the threats facing short-eared owls in this country. While habitat in the NWT and Nunavut is likely fairly secure, a steady decline in numbers of short-eared owls of approximately 1.8% per year continues. The potential impact of the proposed Izok Corridor Project on short-eared owls should be assessed for its contribution to cumulative effects on this sensitive species.

Bathurst caribou herd

The proposed project occurs within the calving and summer range of the Bathurst Caribou herd. The Bathurst caribou herd has declined substantially over the last two decades from a high of 472 000 in the mid 1980s to a low of 32 000 in 2009 and continued stability at low numbers in 2012. Reduced use of habitat adjacent to mine sites of up to 20-25 km has been demonstrated at other mines in the Northwest Territories (e.g. Ekati and Diavik) for Bathurst caribou. Additional removal of effective habitat in their critical calving and summer range as a result of the proposed Izok Corridor project on a caribou herd already at low numbers is of concern and has not been addressed by the proponent.

Tłıchǵ harvesters have been limited in their harvest of the Bathurst caribou herd in order to allow the herd every opportunity to recover and increase in size. The proposed mines and transportation corridor may put the herd at further risk and ultimately affect harvesting opportunities for Tłıchǵ and other aboriginal harvesters. This consideration

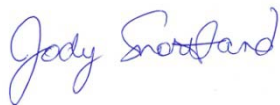
will need to be adequately addressed in the assessment of potential effects of the proposed project.

Concluding remarks

The proposed Izok Corridor Project involves substantial project components and activities involving three major locations and an all-weather road connecting them. It is situated in an area where at least five wildlife species are of conservation concern; one of which is especially valued by Tłıchǫ and other aboriginal peoples as a subsistence and culturally important species. The project will be the first of its kind in Nunavut and will have transboundary effects into the Northwest Territories through its impact on migratory species such as grizzly bear, wolverine and barren ground caribou and through its impact on harvesting opportunities that may be influenced by changes in wildlife abundance and distribution. The WRRB therefore recommends that a thorough Part 6 review be undertaken to adequately assess the potential for project specific effects and cumulative effects of this project on the wildlife of importance in this region and how it may influence wildlife that is transboundary.

If you have any questions regarding these comments, please feel free to contact our office.

Sincerely,



Jody Snortland Pellissey
Executive Director

c.c. Kerri Garner
Tłıchǫ Government

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

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 |
| X <input type="checkbox"/> air quality | <input type="checkbox"/> local development in the area |
| X <input type="checkbox"/> wildlife and their habitat | <input type="checkbox"/> tourism in the area |
| <input type="checkbox"/> marine mammals and their habitat | X <input type="checkbox"/> human health issues |
| X <input type="checkbox"/> birds and their habitat | <input type="checkbox"/> |
- other: _____
- X fish and their habitat _____

- heritage resources in area _____

Please describe the concerns indicated above:

MMG proposes construction of a new all-season road over about 350 km of tundra from just north of the NWT/NU border to the coast. The current road routing would cut through the "core" calving ground, defined as the area most frequently used for calving since 2000 (Map 2 - dark orange area) and as the peak calving grounds since 1996 (Map 3 - area outlined in brown) (SEE MAPS AT END OF FORM).

The Bathurst Herd of Caribou is at a record low level, and of grave concern. Despite a closed season with very minimal harvest allowed for Aboriginal use for the past 3 years, and zero non-aboriginal harvest, the number of cows has not changed, and reproductive potential has shown no recovery whatsoever.

There has been a demonstrated inability and lack of commitment to control harvest of caribou along roads such as the one proposed. There is insufficient protection measures provided in the proposal.

Transboundary effects: There is significant potential for transboundary effects resulting from the project (i.e., effects extending into the NWT), including effects from the proposed new winter and all-season roads across the calving ground and other Bathurst caribou range, impacts from other project facilities and activities on the Bathurst range, and possible use of the Tibbit-Contwoyto winter road. Effects could result for caribou and other wide-ranging wildlife species and hunters who harvest these species.

Cumulative effects - Other mining projects and roads are also proposed in the region (Map 4). Although the Izok Corridor Project is located in Nunavut, the cumulative effects on caribou from this and other projects are therefore also of concern, including *cumulative transboundary effects*.

Other Wildlife and Fish: With the recent and ongoing dismantlement of the environmental regulatory regime, particularly for Nunavut and the NWT, the potential to mitigate impacts on wildlife has been seriously decreased. Changes now in place, or well advanced through Bill C-45 still before Parliament, indicate even further dismantlement of protection for fish and their habitat, and a complete disregard for ecological relationships.

Air quality: Science clearly and indisputably indicates that every country must reduce Greenhouse Gas emissions by 90% in order to avoid dangerous levels of climate change, including a 25-40% reduction by 2020. This requires the participation of every jurisdiction, including Nunavut. The company has not described how GHG emissions will be fully mitigated in this project.

Do you have any suggestions or recommendations for this application?

The road must re-routed to avoid the Bathurst caribou calving grounds, and activity on the road needs to be restricted during migratory periods.

Mitigation of GHG emissions could be achieved by working with communities or agencies to offset others' emissions to the degree to which the project will be adding new ones.

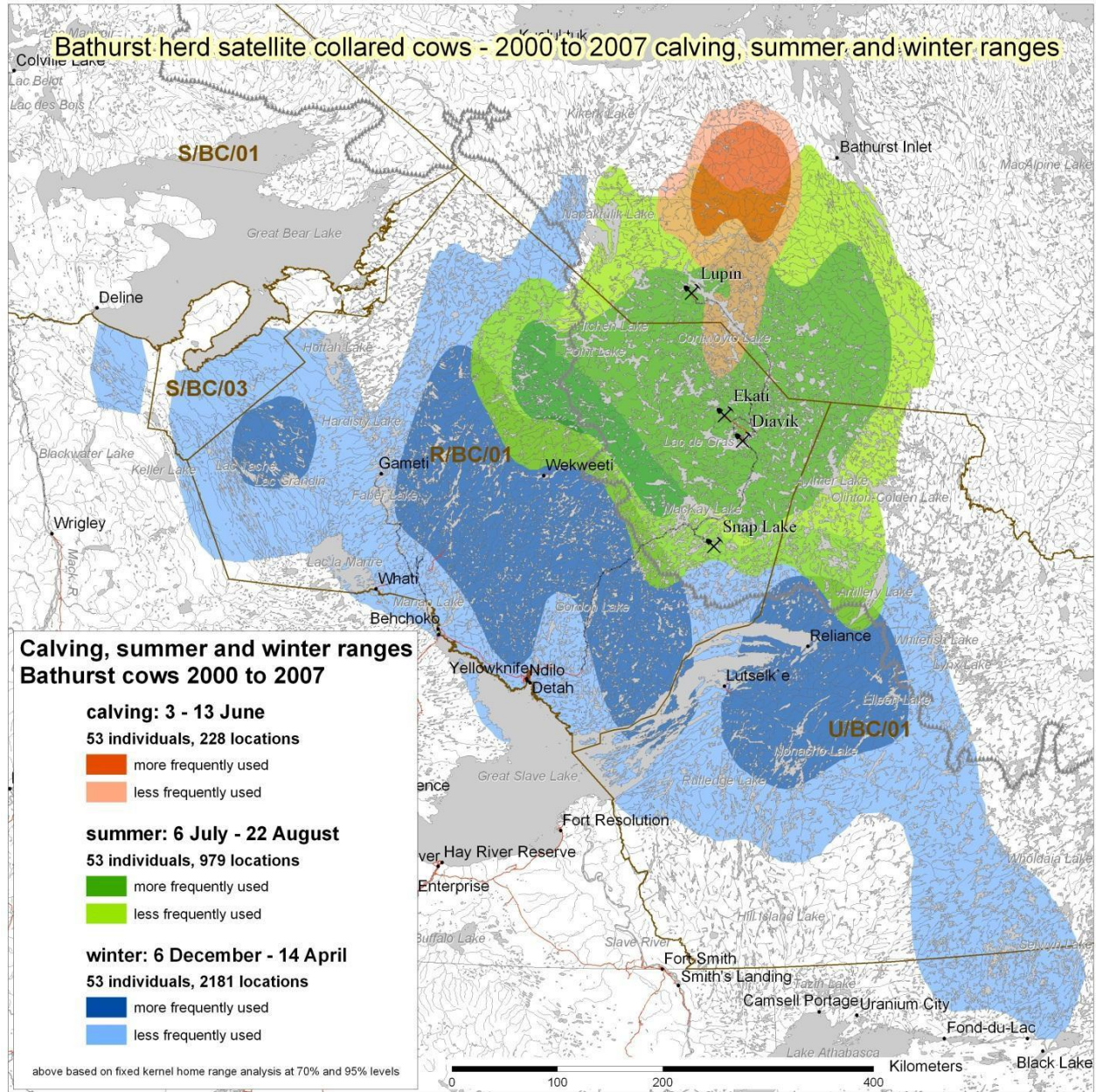
Do you support the project proposal? Yes No Any additional comments?

Pending the conditions put on the development

Name of person commenting: Robert G Bromley **of** Yellowknife, NT

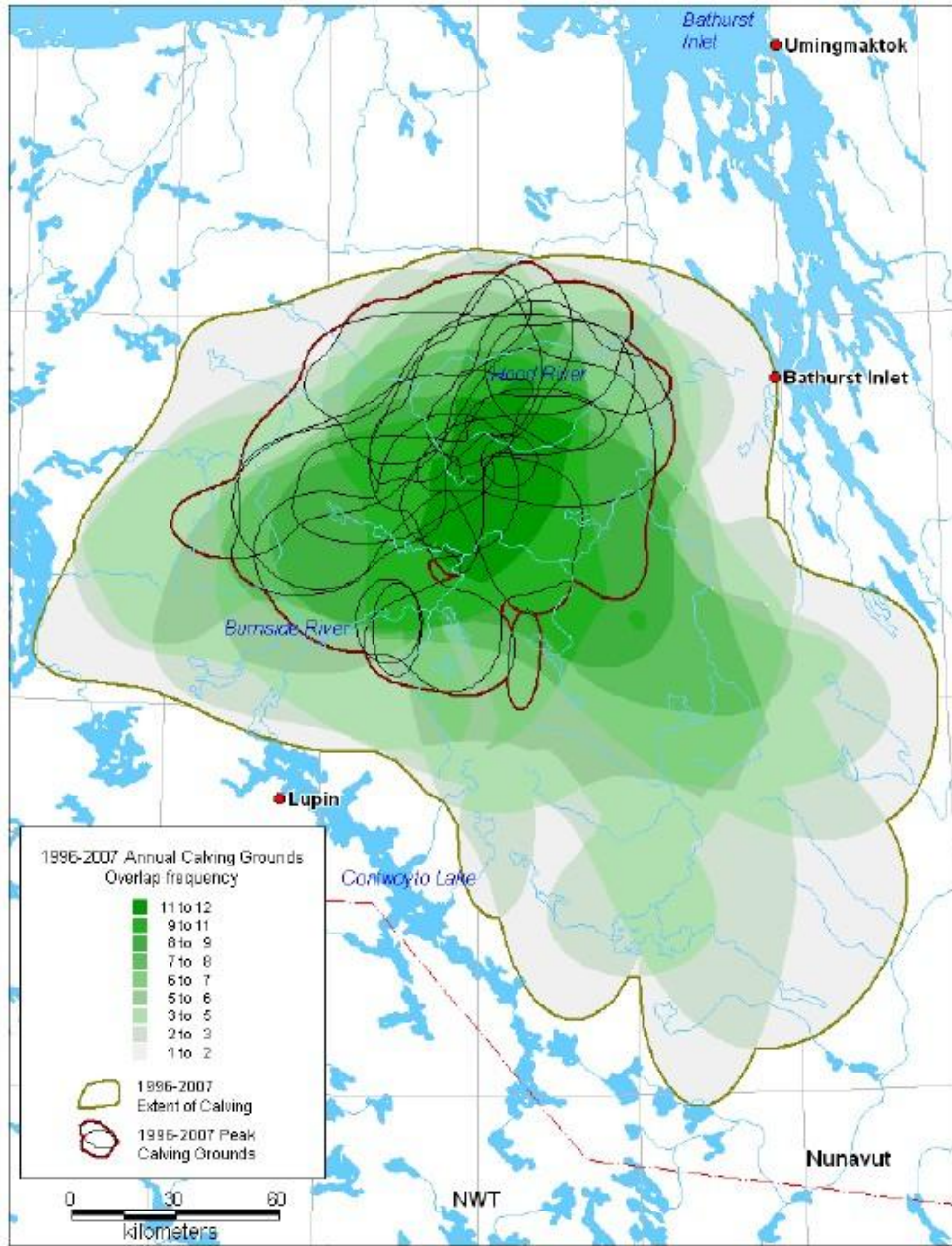
Position: Member of the Legislative Assembly **Organization:** Government of the Northwest Territories

Signature: RGHB **Date:** 7 December, 2012



Map 2. Bathurst caribou seasonal ranges based on locations of collared cows, 2000-2007.
(Provided by GNWT-ENR)

8. Comment Form Distribution



8. Comment Form Distribution

Map 3. Cumulative overlap of annual calving grounds for the Bathurst herd, 1996-2007, based on locations of collared cows. The darker shading indicates areas with greater frequency of use during peak of calving (the 7-day period when 50% of the cows had calved).

(From: Gunn et al. 2008. A geostatistical analysis for the patterns of caribou occupancy on the Bathurst calving grounds 1966–2007. Submitted to Indian and Northern Affairs Canada, Yellowknife, NWT.)

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

Indicate your concerns about the project proposal below:

- | | |
|--|--|
| <input type="checkbox"/> no concerns
<input type="checkbox"/> water quality
<input checked="" type="checkbox"/> terrain
<input type="checkbox"/> air quality
<input checked="" type="checkbox"/> wildlife and their habitat
<input type="checkbox"/> marine mammals and their habitat
<input type="checkbox"/> birds and their habitat
<input type="checkbox"/> fish and their habitat
<input type="checkbox"/> heritage resources in area | <input checked="" type="checkbox"/> traditional uses of land
<input type="checkbox"/> Inuit harvesting activities
<input checked="" type="checkbox"/> community involvement and consultation
<input type="checkbox"/> local development in the area
<input type="checkbox"/> tourism in the area
<input type="checkbox"/> human health issues
<input checked="" type="checkbox"/> other: Closure Objectives, Long Term Impacts _____

_____ |
|--|--|

Please describe the concerns indicated above:

The Yellowknives Dene First Nation is dependant on the Bathurst Caribou herd. This project and the associated road are occurring adjacent and directly within the core calving grounds. The impacts associated with this project cannot be mitigated and are of such significance that the project should be rejected at this point.

The herd that YKDFN have coexisted with for generations is at a very low population. Constitutionally protected Treaty Rights have been suspended, with consequential hardship amongst the Yellowknives Dene. While YKDFN have made great sacrifices, development has continued unabated – with significant development pressure in the post calving and winter ranges. Additional development in the calving grounds would be the final step towards its permanent and irrevocable collapse.

To date, YKDFN are unaware of any mitigation from the company that begins to address the likely impacts – until the company is able to demonstrate that the impacts to this herd can be successfully mitigated, YKDFN will remain steadfastly opposed to this project. Sacrificing the Caribou that our people have relied on for time immemorial to allow mineral development to occur is simply not acceptable.

Do you have any suggestions or recommendations for this application?

This project will have significant impacts on the Bathurst Caribou, crippling the herd’s recovery. The application should be outright rejected. If this is not possible through NIRB legislation, this project must be referred to the highest level of public review – which we believe is a Part 6 review.

8. Comment Form Distribution

Do you support the project proposal? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Any additional comments?	
Name of person commenting: <u>Todd Slack</u>	of <u>Yellowknife</u>
Position: <u>Regulatory Specialist</u>	Organization: <u>Yellowknives Dene First Nation</u>
Signature: <u><i>Todd Slack</i></u>	Date: <u>November 23rd, 2012</u>

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:

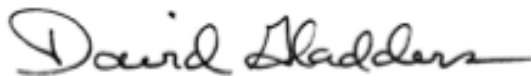
1. Caribou: The Bathurst caribou herd is in a recovery phase, mature female caribou and healthy calves are a priority for herd recovery. The disturbance caused by roads through the calving ground will not help the herd recover.
2. Trans-boundary: This proposal presents a national trans-boundary issue 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.

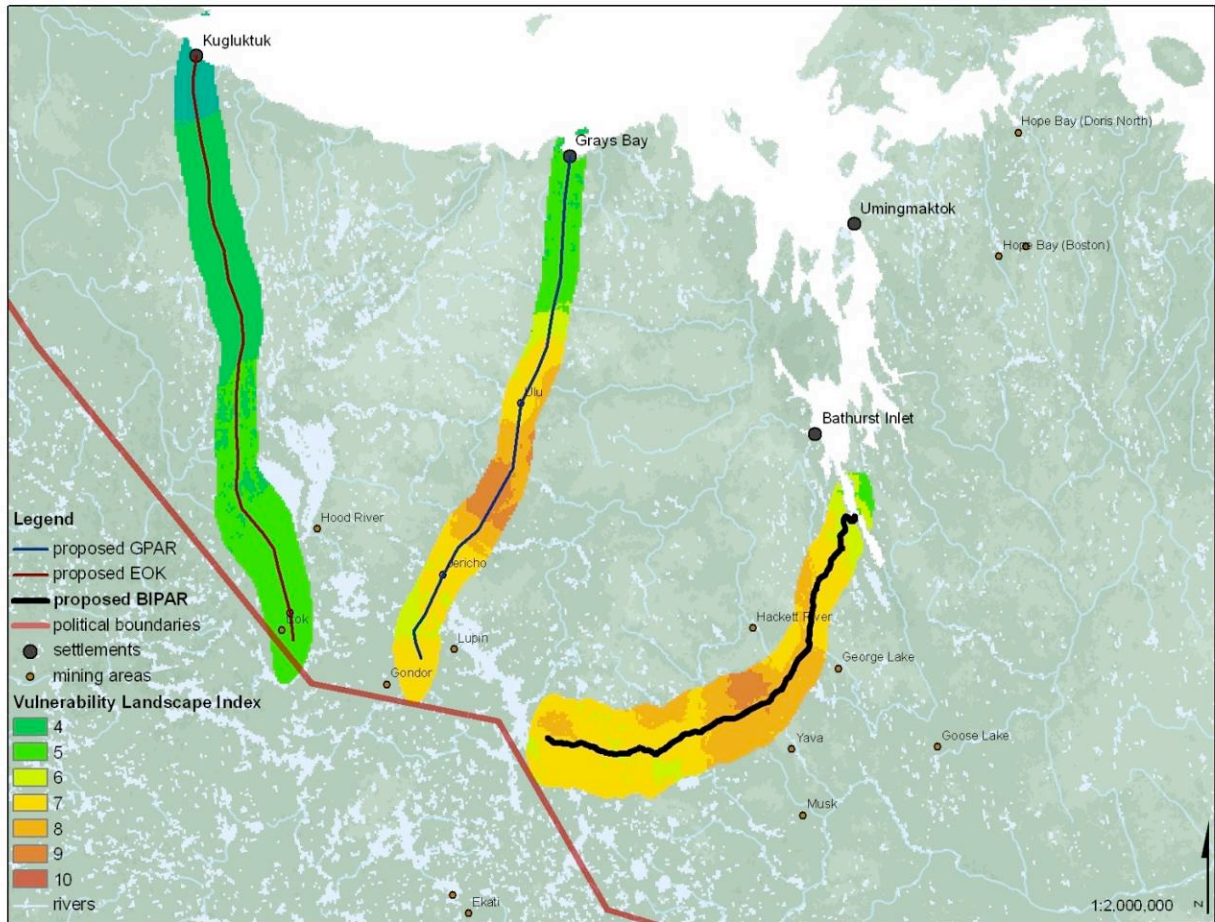
Yours truly,



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.

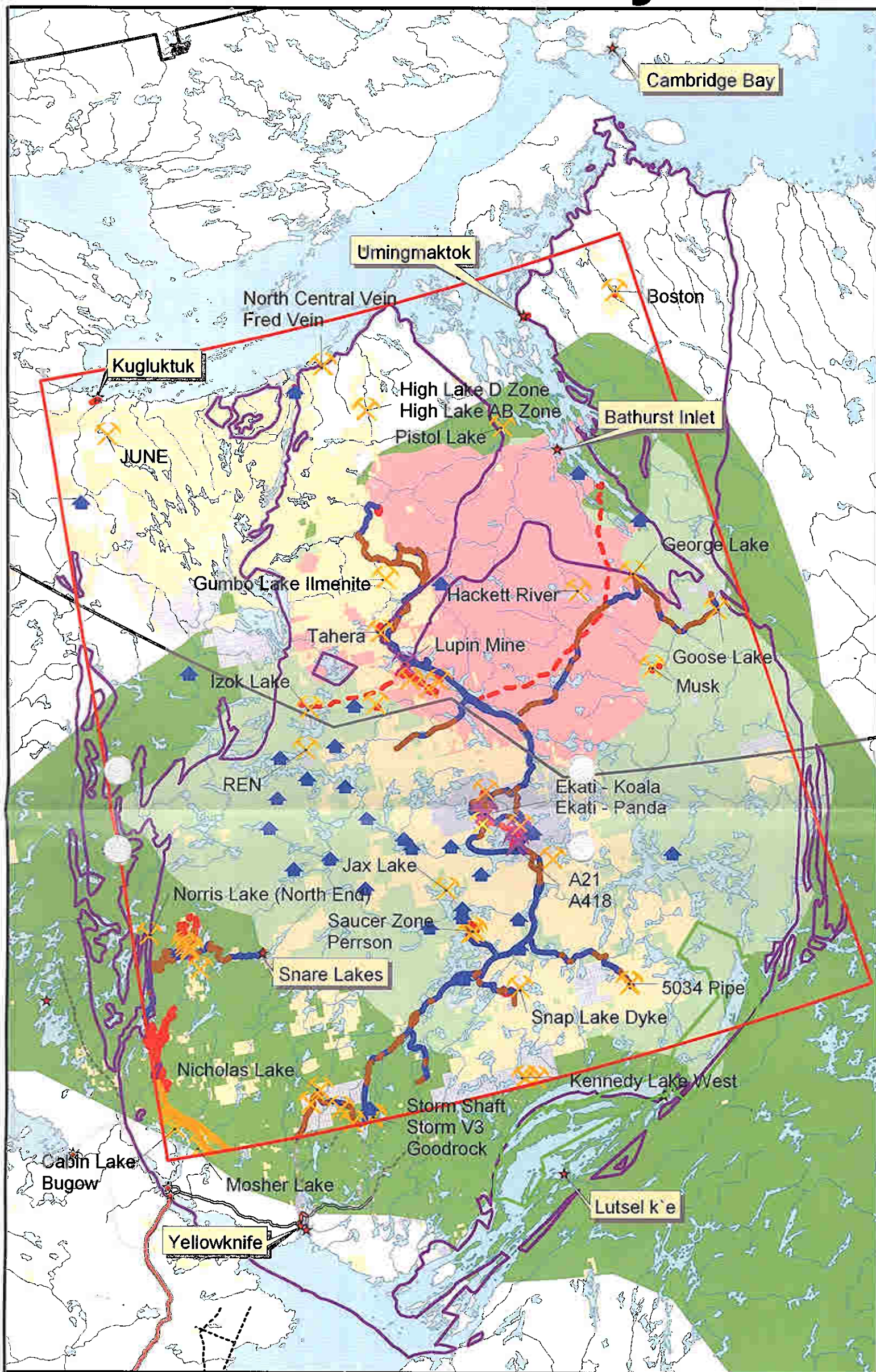


List of Maps Included with this Letter:

- **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.
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Current Activity in the SGP

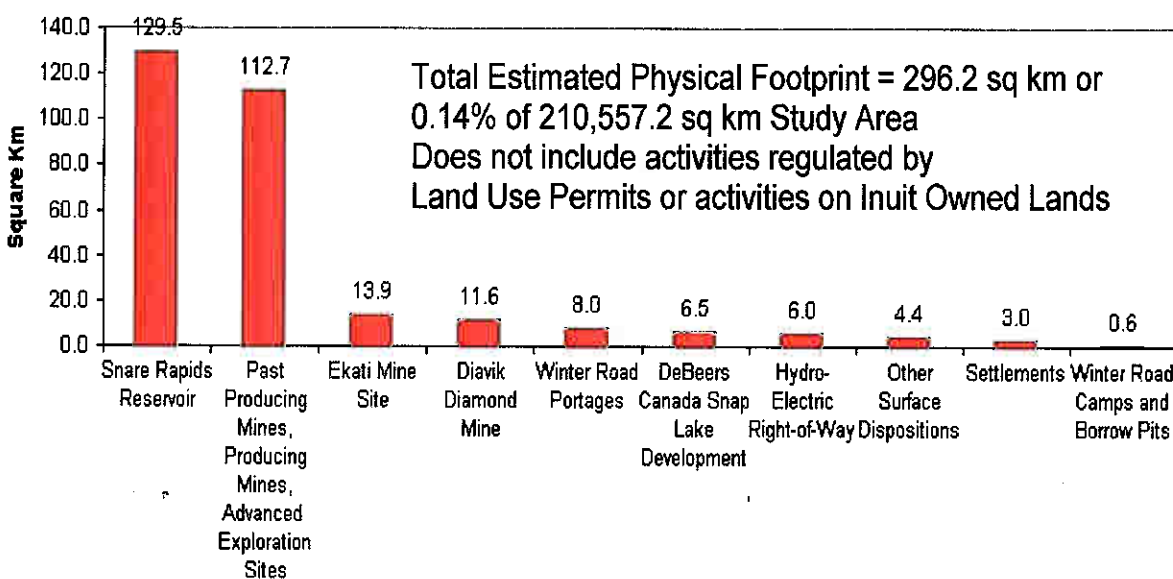
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- Study Area
- National Park Proposals**
 - East Arm, Great Slave Lake
 - Outfitter Lodges and Camps
- SGP Mineral Activity**
 - Advanced Exploration
 - Producer
- Slave Geological Province
- Winter Road Portages
- Winter Roads on Ice
- Proposed BIPAR 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
867 920-7629 pcizek@internorth.com

AND



Canadian Arctic Resources Committee

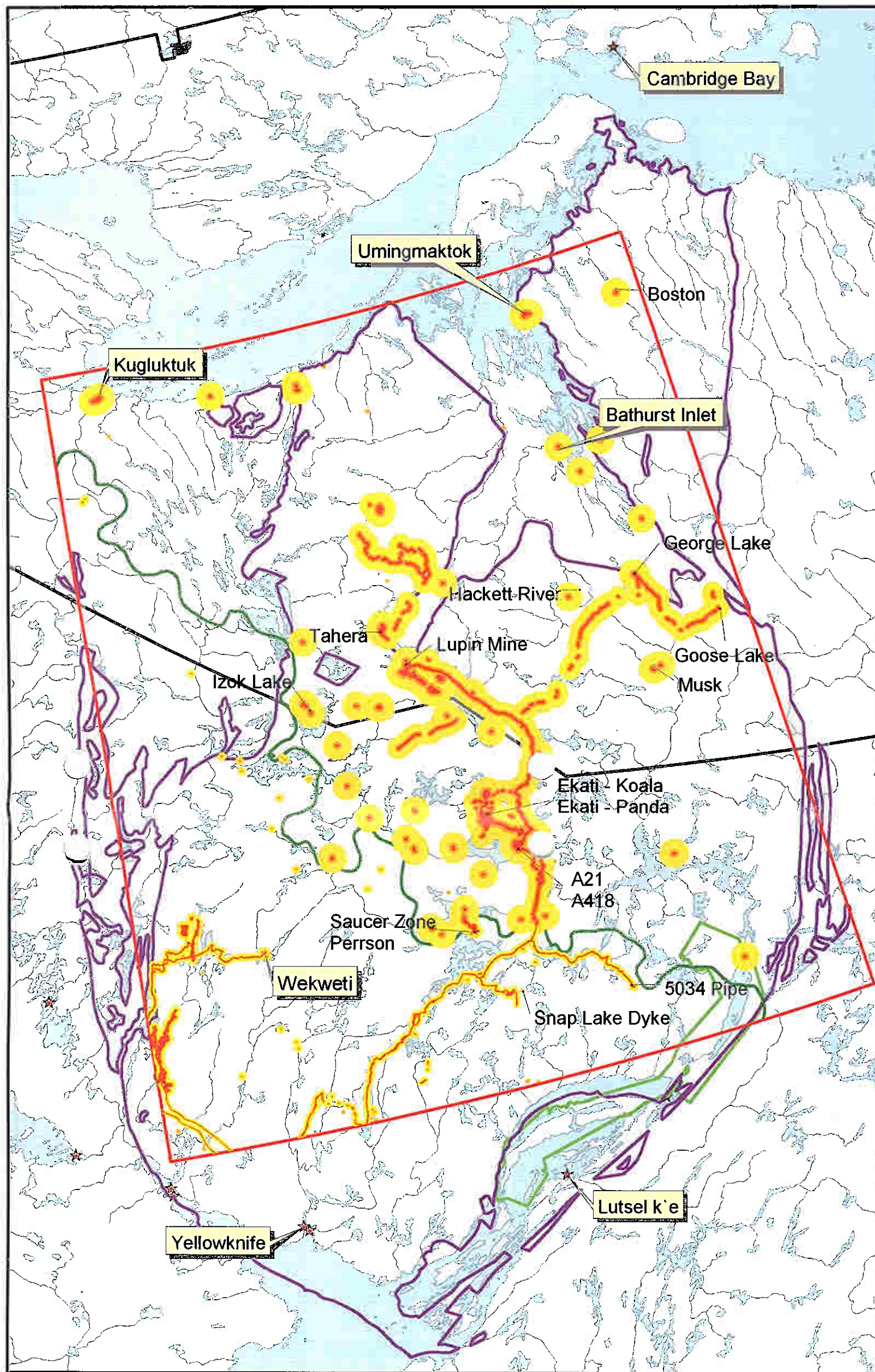
A voice for citizens on the Canadian North for more than 25 years

4910-50th St (MacKay Building, 3rd floor)
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Kevin O'Reilly (koreilly@theedge.ca) OR
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GLOBIO CE Modeling: 2003 Scenario

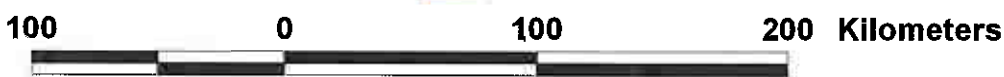
588



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



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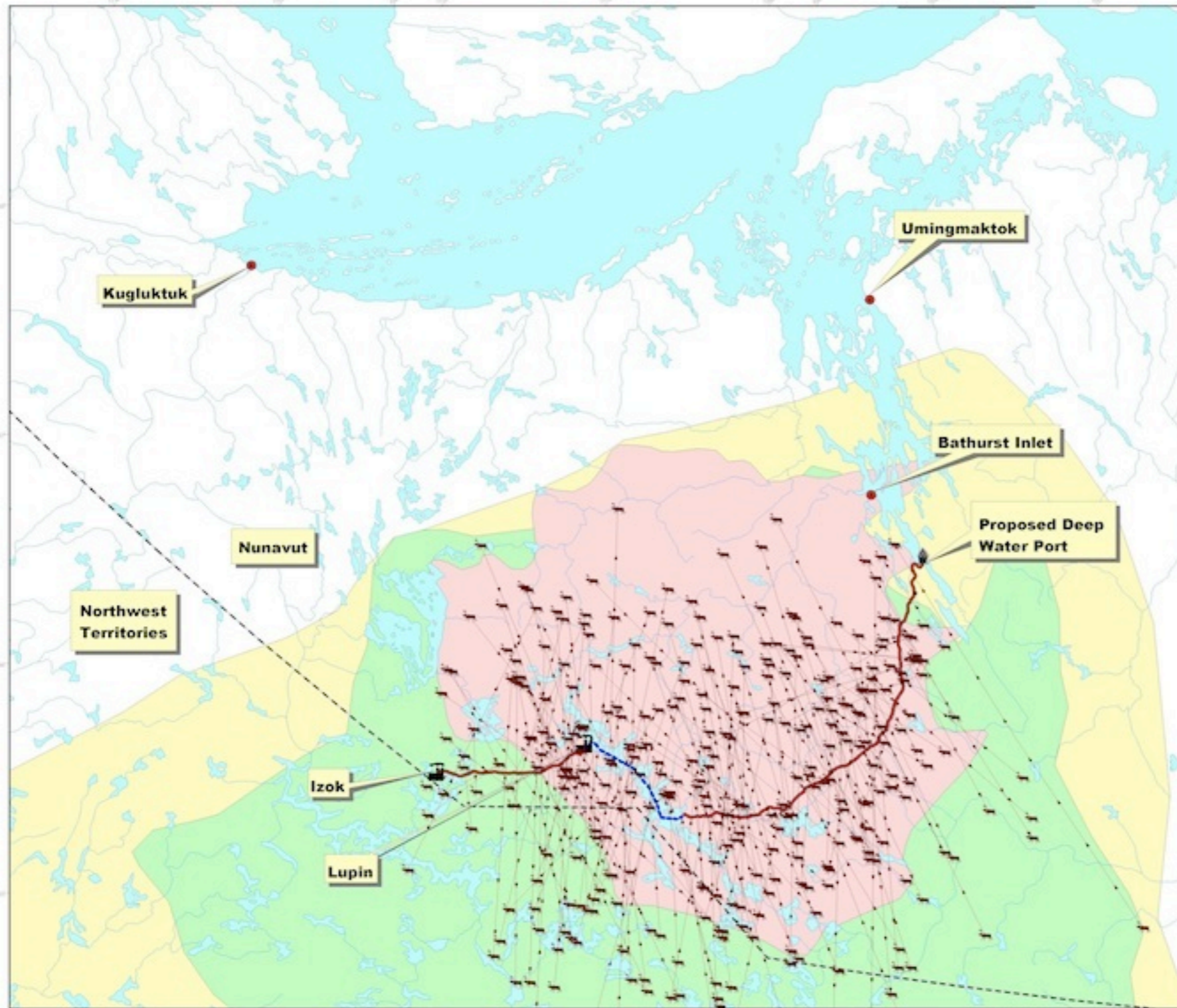


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Bathurst Caribou Herd Crossings of Proposed Bathurst Inlet Road and Port Project



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.

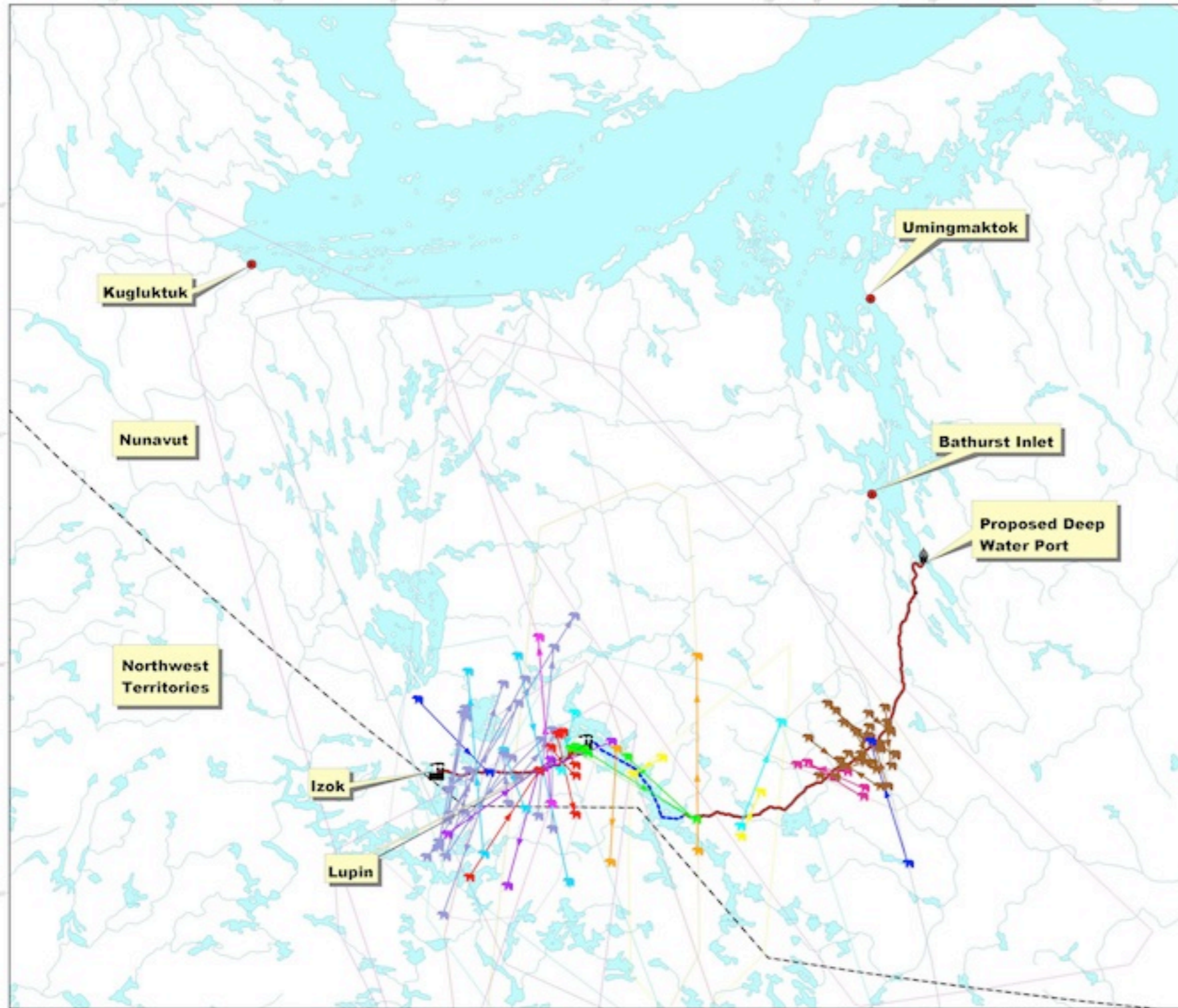


prepared by:
 Ozak Environmental Services, Yellowknife, NWT
 Tel 867-920-7529 Fax 867-873-3580 ozak@interiorlu.com
 Dec. 31, 2002



Scale 1:800,000 Projection UTM Zone 12 NAD83

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.

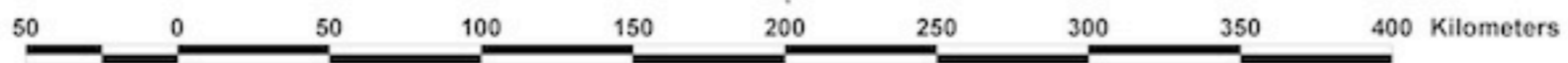
Between 1995 and 1998, 12 satellite collared barren-ground grizzly bears (8 males and 4 females) crossed the proposed road corridor 59 times.

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

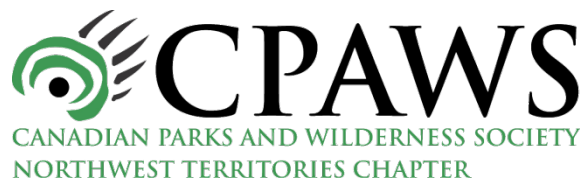
Satellite collar data were provided by Robert Mulders of Resources, Wildlife, and Economic Development, Government of the NWT.



prepared by:
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 Dec. 31, 2002



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

Suite 508, 250 City Centre Avenue, Ottawa, Ontario, Canada K1R 6K7
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: _____ _____ _____
<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: _____ _____ _____		
<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

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

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.

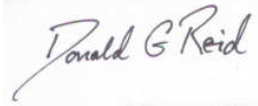
4. The proponent has proposed undertaking some activities in advance of a completed environmental assessment review and formal decision. That would be premature, and there should not be a prior assertion of approval before the review process is complete.

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,
P.O. Box 1360,
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". The signature is fluid and cursive, with a large loop at the end.

Monte Hummel, O.C.
President Emeritus
WWF-Canada
416-489-4567 Ext 7223