



BAKER LAKE HUNTERS AND TRAPPERS ORGANIZATION

REVISED FINAL HEAR PRESENTATION FOR 'WHALE TAIL PIT' PROPOSAL

The Baker Lake Hunters and Trappers Organization (BLHTO) supports the Whale Tail project.

We believe the project will have net benefits for our community and region. In particular, we believe that the employment opportunities the project will provide to our community will be a substantial benefit. We also believe that, with the right environmental controls, negative impacts can be kept to acceptable levels.

That said, the BLHTO has several outstanding issues with the Whale Tail project. These include:

- 1) The need for an independent dust monitoring study, based on Inuit Qaujimajatuqangit
- 2) Need for independent wildlife monitoring
- 3) Need for community participation in monitoring/mitigation decisions
- 4) Need to remodel Meadowbank and Amaruq roads
- 5) Need for stronger caribou protection measures
- 6) The need for government to address barriers to employment



Dust monitoring study

The dust from the Meadowbank road has upset many hunters and elders in our community. Baker Lake residents have repeatedly complained about dust levels at meetings held by the Baker Lake HTO, the NIRB, Agnico-Eagle, and other parties.

In written comments, the BLHTO suggested AEM provide funding for an independent dust-fall monitoring study, which emphasises Baker Lake resident's perspectives on dust. Further, the BLHTO suggests that the results of this study be used to determine whether or not dust suppressant is required.

In its response, AEM agreed with our suggestion to hire an independent consultant to assess the impacts of road dust. However, AEM did not explicitly agree that the study should focus on Baker Lake residents' perspectives on dust.

The BLHTO reiterates that this study should be focused on Inuit Qaujimajatuqangit, with emphasis on Baker Lake residents' perspectives on dust.

The BLHTO proposes the following term/condition for the Whale Tail project certificate:

AEM shall contract a researcher to conduct an independent dust monitoring study. The focus of the study will be the Inuit Qaujimajatuqangit of dust, with an emphasis on people's perspectives of dust issues. The researcher and study design must be agreed upon by both the Baker Lake HTO and Agnico Eagle.



Independent wildlife monitoring

The BLHTO is concerned that most project monitoring is being carried out by Agnico-Eagle employees.

In written comments, the BLHTO suggested AEM provide funding to the HTO to hire independent wildlife monitors, that are not directly employed by AEM. In its response, AEM agreed to hire an HTO representative to assist with road monitoring during migration seasons.

The BLHTO proposes the following term/condition for the Whale Tail project certificate:

AEM shall provide the Baker lake HTO with funding for one additional staff person, to aid in the monitoring work for Whale Tail and other projects in the area. AEM and the Baker Lake HTO shall negotiate a funding agreement.

Community participation in mitigation decisions

The BLHTO also believes that the community of Baker Lake needs to have a greater say in whether or not mitigation measures (dust suppressant, road shut-downs, etc.) are required. These vital decisions cannot be left in the hands of mining company employees.

In written comments, the BLHTO suggested creating a monitoring committee that includes representatives from local councils and organizations (i.e. Hamlet Council and HTO) to oversee monitoring and make decisions about mitigation.

In its response, AEM suggested that its Terrestrial Advisory Group already fills this role.

The BLHTO is uncertain that AEM's Terrestrial Advisory Group meets our needs, because it is only an advisory body. The final decisions still remain with AEM. As such, the BLHTO recommends the TAG be given greater powers to direct AEM's monitoring and mitigation.

The BLHTO proposes the following term/condition for the Whale Tail project certificate:

AEM shall revise the Terrestrial Ecosystem Management Plan based on the advice of the Terrestrial Advisory Group. For greater clarity, AEM will comply with the recommendations provided by the majority of Terrestrial Advisory Group representatives.



Need to re-slope sections of the Meadowbank and Amaruq roads.

The BLHTO is concerned that the currently operating Meadowbank and Amaruq access roads are not properly sloped to allow caribou and snowmobiles to cross. As a result, caribou migrations may be disturbed, and hunters' snowmobiles may be damaged.

In written comments, the BLHTO suggested that AEM re-slope the Meadowbank and Amaruq access roads, to allow caribou and snowmobiles to cross. The HTO recommended that the sections of the road where the slope needs to be adjusted should be identified by elders, appointed by the HTO.

In its response, AEM indicated that it has worked with the BLHTO to identify and maintain snowmobile crossings on the Meadowbank road for several years. It also committed to “discuss the slopes of sections of the Meadowbank AWAR and Whale Tail Pit Haul Road with the BLHTO, Elders, and TAG members to ensure the roads are sloped and if needed, recontoured in selected sections to allow caribou to safely cross the road.”

The BLHTO proposes the following terms/conditions for the Whale Tail project certificate:

AEM shall build and regularly maintain snowmobile and other traditional land use crossings along with Meadowbank and Whale Tail roads. The location of such crossings shall be determined through consultation with the BLHTO.

AEM shall consult with the BLHTO and Baker Lake elders to determine whether or not selected sections of the Meadowbank and Whale Tail access roads need to be recontoured.



Caribou protection measures

The BLHTO is concerned that the caribou protection measures currently proposed by AEM may not be strict enough.

The number of haul trucks that will travel between the Mill at Meadowbank and the Whale Tail pit is unprecedented for migratory tundra caribou. The BLHTO understands that the GN and KIA have outstanding issues with AEM's caribou monitoring and mitigation plans. The BLHTO supports the strongest feasible caribou protection measures for the Whale Tail project.

The BLHTO looks forward to discussing this issue further with government, Inuit organizations, AEM, and Inuit Elders during the NIRB hearings.

Government responsibility to address barriers to employment

The BLHTO is concerned that Agnico-Eagle's Environmental Impact Statement does not consider the role of government in addressing barriers to employment.

Inuit employment levels at the Meadowbank mine have ranged between 32% and 38% (Agnico-Eagle, 2017). Agnico-Eagle's EIS has predicted 42% Inuit employment at the Whale Tail project. This is better than most other projects that have operated in Nunavut. With the exception of the Rankin Inlet mine in the 1950s, no other project has achieved greater than 30% Inuit employment. Employment at other mines in Nunavut are well below those achieved by AEM (for example, Inuit employment levels at the Mary River mine recently dropped to 12.5%).

However, there is still considerable room for improvement. In its IIBA for the Meliadine project, Agnico-Eagle committed to a target of 50% Inuit employment at all of its projects. The Nunavut Economic Development Strategy set a target of 50% of all expenditures on wages should accrue to Nunavut residents (SEDSG, 2013). At a recent mining symposium, the president of Agnico-Eagle said his vision was 100% Inuit employment at its Nunavut projects (*Nunatsiaq News*, 2017). Clearly, a great deal more needs to be done to address barriers to employment if we are going to achieve something like that.

Agnico-Eagle analyzes barriers to employment in its EIS, and commits to continue studying barriers to employment during the lifetime of the Whale Tail project. However, these analyses



seem to imply that addressing barriers to employment is solely the responsibility of the mining industry and (through IIBAs) Inuit organizations.

This is an oversight. Both the Government of Nunavut and Government of Canada have an important role to play in addressing barriers to employment, by providing adequate social services to facilitate people's participation in the workforce.

A lack of necessary government services – especially mental health & healing services – might be a substantial barrier to employment for some Kivalliq Inuit at this time.

The Government of Nunavut, Nunavut Tunngavik Incorporated, the Inuit Tapirisat of Canada, and many other groups have recognized that social trauma is the root of many of the challenges that Nunavut faces today, including high suicide rates, poor educational attainment, addictions, and conflicts with the criminal justice system (Nunavut Tunngavik Incorporated, 2014; Government of Nunavut *et al*, 2010; Inuit Tapirisat of Canada, 2016). There has been a recognition, especially by the Nunavut Court of Justice, that there is currently a lack of necessary healing and mental health services to address this legacy of trauma (*R v O.P.*, NUCJ, 2012: para. 20-21; *R v Kinak*, NUCJ, 2011, Transcript at 61, lines 9-14).

The BLHTO recommends the NIRB report include recommendations to federal and territorial governments to increase funding for healing initiatives, mental health services, and other social services, to help address barriers to employment at the Whale Tail project.



References

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