



May 22, 2015

Kelli Gillard
Technical Advisor
Nunavut Impact Review Board
Cambridge Bay NU X0B 0C0

Sent VIA Email: info@nirb.ca

Re: NIRB 12EN012: Comment Request for Potential 12.4.3 Exemption to Stornoway Diamond Corporation's "Qilalugaq" Project

Dear Ms. Gillard,

On May 4, 2015, the Government of Nunavut requested an extension to allow for the submission of additional comments for the Stornoway Diamond Corporation's "Qilalugaq" project proposal.

Core habitat delineation is the product of multi-year Geographic Information System spatial analysis of collared caribou cows, monitoring data, and Inuit Qaujimajatuqangit. Scientific research (including telemetry) and Inuit Qaujimajatuqangit have clearly shown that barren ground caribou annually and predictably use core calving and post-calving habitats, which offer spatial and temporal segregation from factors that may decrease survival, such as predation and industrial activities. Inuit Qaujimajatuqangit and the scientific monitoring of patterns of habitat use by caribou have supported the importance of critical calving and post-calving areas to the long-term survival of caribou and the maintenance of traditional lifestyles, including subsistence harvesting, that rely on these populations.

Caribou cows must feed intensively in early June until the end of the plant growing season in order to nurse calves and gain weight for pregnancy as well as to survive the upcoming winter. Low flyovers, take-offs and landings, ground movement and drilling noise disturbances in these areas are especially harmful as they can stress the caribou inducing various negative responses including: fleeing, cow/calf separation, habitat shifts, decreased foraging and resting rates, and decreased reproductive success.

Stornoway Diamond Corporation's proposed project is located in core caribou calving habitat for the Wager Bay caribou population (see attached map). The NIRB is urged to give serious consideration to the effects this proposed project will have on core caribou calving habitat.

Should you have any questions regarding this submission, please contact me at (867) 975-7830 or by email at asimonfalvy@gov.nu.ca.

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[Original Signed by]

Agnes Simonfalvy
Avatiliriniq Coordinator

