

Ms. Kelli Gillard, Technical Advisor  
Nunavut Impact Review Board  
PO BOX 1360  
CAMBRIDGE BAY NU X0B 0C0

MAY 04 2015

Dear Ms. Gillard:

**Screening Comments and Request for Review Pursuant to  
*Part 5, Article 12 of Nunavut Land Claim Agreement for  
Tundra Copper Corporation's "Coppermine-Exploration"***

The Nunavut Impact Review Board has requested comments from a broad list of possible affected parties for its screening of the Tundra Copper Corporation's "Coppermine-Exploration" proposal (the "Project").

The Government of the Northwest Territories (GNWT) has identified potential impacts to wildlife as a serious concern:

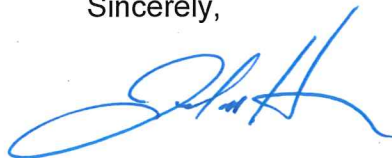
1. Impacts on Bluenose East Herd Caribou' calving grounds.

Our more detailed screening comment is attached for your reference.

As a result of these possible impacts to wildlife in the Northwest Territories, the GNWT requests this Project undergo a review pursuant to *Part 5, 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](mailto:joel_holder@gov.nt.ca) or (867) 873-7905 if you may require any further details.

Sincerely,



Joel Holder, Director  
Conservation, Assessment and  
Monitoring Division

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:

<b>Project Proposal Title:</b>	<b>Coppermine-Exploration</b>		
<b>Proponent:</b>	<b>Tundra Copper Corporation</b>		
<b>Location:</b>	<b>Kitikmeot</b>		
<b>Comments Due By:</b>	<b>May 4, 2015</b>	<b>NIRB #:</b>	<b>15EN009</b>

**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 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 type="checkbox"/> other: _____ _____ _____
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**Please describe the concerns indicated above:**

The proposed activities will occur within a highly sensitive barren-ground caribou calving, spring migration and post-calving habitat for the Bluenose East Herd, a trans-boundary herd that is in decline. This herd is of high importance to communities in Nunavut as well as NWT. Caribou are highly vulnerable in the days immediately prior to and during calving, and during the post-calving period.

Disturbance impacts associated with multiple helicopter flights daily, drilling activities in high use areas and at least weekly aircraft over flights during this critical time will disrupt caribou calving behavior and negatively impact calf production, cow-calf bonding as well increase potential for cow mortality. The herd's resilience and ability to tolerate stresses during calving is very low: GNWT-ENR calving ground photo survey results showed that the BNE herd declined from more than 100,000 in 2010 to around 68,000 animals in 2013.

A systematic calving ground reconnaissance survey conducted in June 2014 suggests that the BNE herd continues to decline. Recently, difficult harvest management actions have been put in place in the NWT to ease pressure on the herd, creating hardships in communities that rely on this herd as a subsistence and cultural resource.

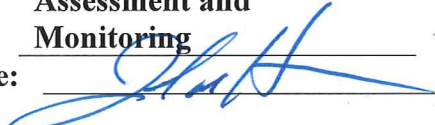
Maintaining the integrity of the calving grounds is absolutely crucial to the survival and recovery of any barren-ground caribou herd, and protection of calving grounds is widely supported by communities throughout Nunavut and the Northwest Territories. GNWT supports the Government of Nunavut's position, as stated in its submissions to the Nunavut Land Use Planning Commission that industrial activity of any type, including mineral exploration and production, construction of roads, pipelines and other infrastructure, should not be permitted in calving areas. GNWT submits that the activities proposed for this project would have negative consequences on the integrity of calving habitat, regardless of when they occur, and concurs with GN's further statement that "the effects of development cannot be mitigated in these areas." Furthermore, allowing exploration in this critical area opens the door for further industrial activity and sends the wrong message that effects can be mitigated.

**Do you have any suggestions or recommendations for this application?**

GNWT recommends that the adverse environmental impacts and potential for public concern related to the proposal are high enough that the project not proceed or at a minimum be subjected to a Part Five review.

8. Comment Form Distribution

<b>Do you support the project proposal? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Any additional comments?</b>	
<b>Name of person commenting:</b> <u>Joel Holder</u> <b>of</b> _____	
<b>Position:</b> <u>Director, Conservation Assessment and Monitoring</u>	<b>Organization:</b> <u>GNWT – Department of Environmental and Natural Resources</u>
<b>Signature:</b> 	<b>Date:</b> <u>May 4<sup>th</sup>, 2015.</u>