



ᑦᓂᓐᑕ ᐱᓐᓇᑕᓐᓇᑦᓂᓐᓇᑦ
Minister of Environment
Ministat Avatiliqiyitkut
Ministre de l'Environnement

Elizabeth Copland
Chairperson
Nunavut Impact Review Board
P.O. Box 1360
Iqaluit, NU X0B 0C0

July 13, 2015

**RE: NIRB 15EN009 – Notice of Indication for Tundra Copper Corporation's
"Coppermine-Exploration" Project Proposal**

Dear Ms. Copland,

The Government of Nunavut has reviewed the Nunavut Impact Review Board's (NIRB) Screening Decision Report for Tundra Copper Corporation's "Coppermine-Exploration" Project Proposal distributed on July 7, 2015.

I am writing this letter to you to express my disappointment in the decision that the NIRB has made. Of specific concern is the lack of protection for critical caribou habitat.

The NIRB Screening Decision Report for the Project recommended that, with a number of terms and conditions, the project could proceed. I do not believe that our concerns were adequately incorporated in arriving at this recommendation, or that the recommended terms and conditions will sufficiently protect critical Bluenose-East caribou habitat.

On May 11, 2015, the Government of Nunavut (GN) provided comments on the Part 4 Screening of the Coppermine-Exploration Project Proposal (the Project). Our comments outlined the overlap between the Proposed Project site and highly sensitive calving and post-calving habitat of the Bluenose-East caribou herd.

We recommended that the Project not proceed due to its location in caribou calving habitat. This recommendation was consistent with our May 2014 submission to the Nunavut Planning Commission which stated that adverse development impacts within caribou calving grounds cannot be mitigated and that avoidance of these areas is necessary to prevent negative impacts to caribou herds.

The GN was not the only party concerned about impacts to the Bluenose-East caribou herd. Many interveners also submitted comments stating their concerns regarding impacts to the Bluenose-East caribou and their habitat. This included the Tłıchǫ Government, the North Slave Métis Alliance, the Deline Land Corporation, the Government of Northwest Territories (GNWT), the Nunavut Wildlife Management Board, the Sahtú Renewable Resources Board, the Tuktut Nogait National Park Management Board, the Wek'èezhii Renewable Resources Board, and individual community members.

Recently, surveys of the Bluenose-East caribou herd have been conducted by the GNWT and the GN. These surveys show there has been a significant decline in Bluenose-East caribou population. The Northwest Territories has put in place harvest management actions for this herd and management options are being considered in Nunavut. By allowing industrial development to occur in the critical habitat of the Bluenose-East herd while at the same time contemplating harvest restrictions for those caribou, regulators and other agencies are sending a conflicting message to Nunavummiut and those other groups who harvest Bluenose-East caribou.

The Screening Decision Report recommends the Proponent consult with GN's Regional Biologists to ensure adequate mitigation of potential wildlife impacts. We reiterate that adverse development impacts within caribou calving grounds cannot be properly mitigated and avoidance of these areas is necessary to prevent negative impacts.

While we recognize that the recommendation from the NIRB to work together and explore protection options through the Nunavut Land Use Plan is a valuable one, we also require mechanisms to address concerns in the immediate term.

In these cases, we often rely on providing our expertise through the impact assessment process to protect sensitive wildlife species or habitat. Considering the current decline of the Bluenose-East caribou herd population, I am very concerned that our expertise does not appear to be significantly reflected in the decision made regarding the Tundra Copper Corporation's Project.

Given the significant concern and potential for adverse eco-systemic effects raised by this project, I am hopeful that you will be able to provide me with more clarity respecting the lack of protection for critical caribou habitat presented in the NIRB's Screening Decision Report.

Sincerely,

A handwritten signature in black ink, appearing to read "John H. H. H." with a stylized flourish at the end.

Hon. Johnny Mike
Minister of Environment