



Kangiqliniq H.T.O.
ᑭᑎᑭᑭᑭᑭᑭ ᑭᑎᑭᑭᑭᑭᑭ ᑭᑎᑭᑭᑭᑭᑭ
P.O. Box 194
ᑎᑎᑭᑭᑭᑭᑭᑭ 194
Rankin Inlet, Nunavut X0C 0G0
ᑭᑎᑭᑭᑭᑭᑭ, ᑭᑎᑭᑭᑭᑭᑭ X0C 0G0

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

RE: Notice of Screening and Comment Request for Kahuna Property Field Camp Proposal

To Whom It May Concern:

On behalf of the Kangiqliniq Hunters and Trappers Organization (HTO), I would like to once again thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Dunnedin's (the proponent) Kahuna Property Field Camp proposal.

The HTO has several outstanding issues with the proposed project which revolve around cumulative effects of mineral exploration and mineral extraction in a small geographic area. These include:

1. Helicopter traffic and wildlife harassment

The HTO has made requests for clarification from the local conservation officer as to whether or not the proponent is involved in an ongoing investigation in which many members of the HTO saw a helicopter harassing a caribou herd 14 kilometers north of Rankin Inlet. The HTO recommends that the screening decision is delayed until this investigation is complete. See Image 1 for a picture of the incident.



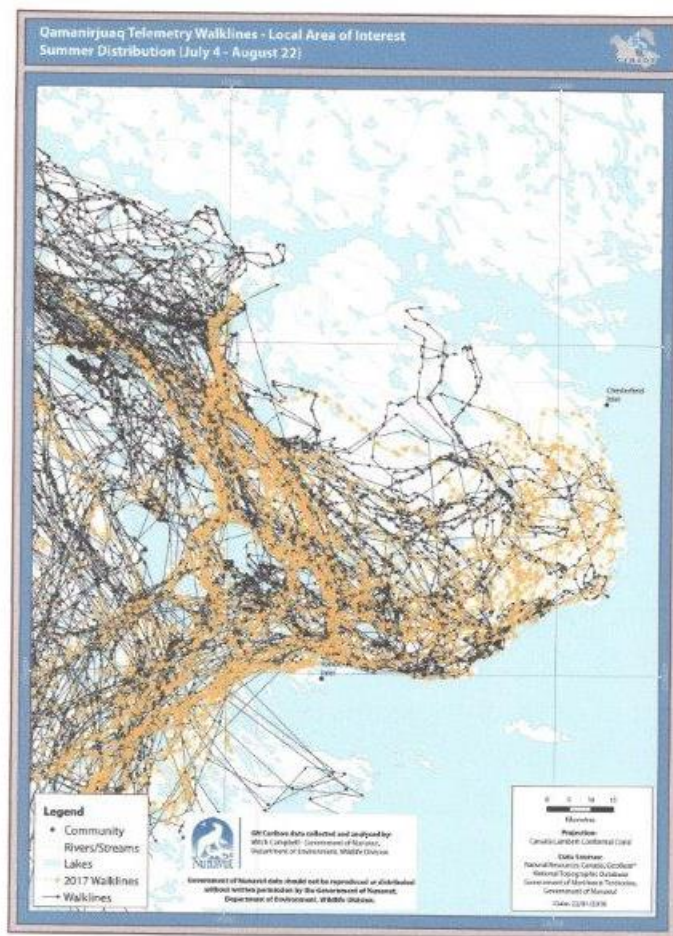
Image 1: Helicopter flying close to caribou herd 14 kilometers northwest of Rankin Inlet

2. Numerous reports of helicopter activity on an important caribou migration route

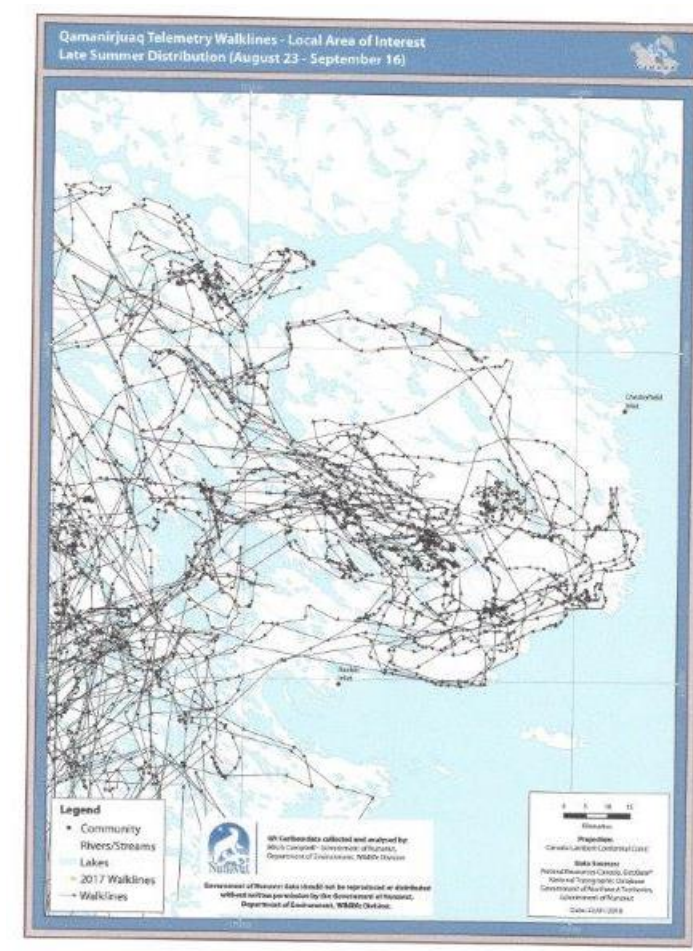
Apart from the incident under investigation, there was plenty of talk all summer that the caribou weren't able to properly get to their summering grounds by the Hudson Bay shoreline due to a dramatic increase in helicopter activity in what is a very important caribou migration route according to the hunters of Rankin Inlet. This includes the area where the proponent has proposed to build a camp and continue exploration work, including more invasive drilling. Hunters have said that the increase in activity did not allow for a proper migration which resulted in the caribou leaving sooner than they were supposed to. This forced a lot of hunters to hunt later in the year, during November, when small herds of caribou return from the south to overwinter in the Kivalliq. Hunters are forced to hunt cows in November because bulls are in rut; this leads to population decline on an already declining herd of caribou. The HTO recommends that the proponent finds an alternative location for their camp, further north of the proposed location closer to Josephine Lake. The proponent verbally committed to do this during the Community consultation in Rankin Inlet on January 12, 2018.

Mitigation measures that limit exploration and mining activity when a certain number of caribou are in an area are not able to take into account the fall migration in which smaller groups of caribou should migrate through the area of the proposed camp and majority of exploration activities. Attached are maps that show the migration of caribou. Most telling is the late summer map (Map 3) which shows no caribou in the area in 2017 when exploration was occurring..

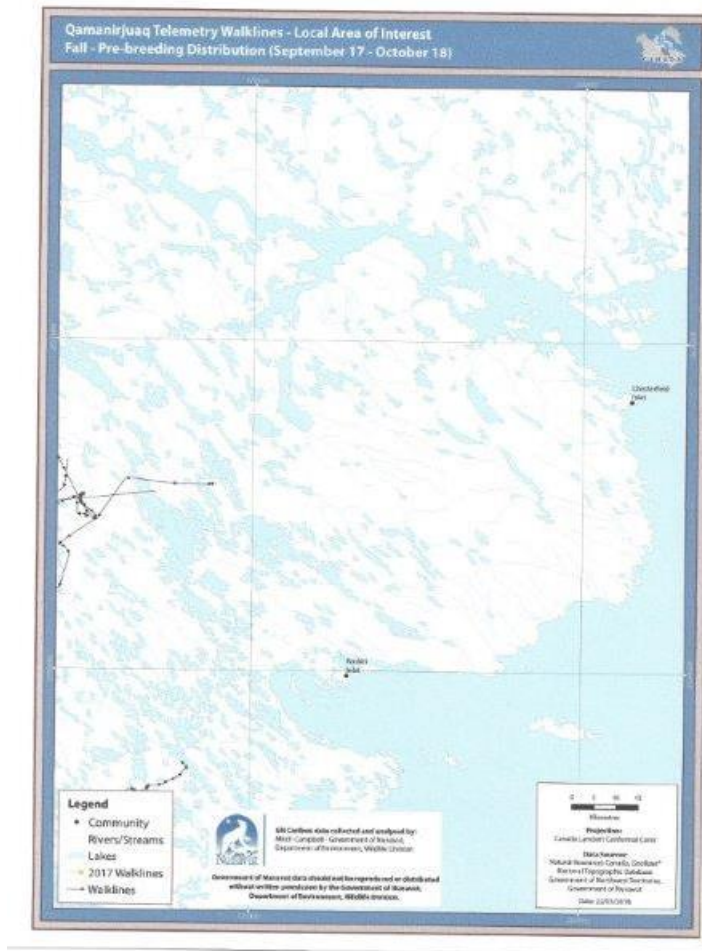




Map 2: Caribou Summer Walklines (Jul. 4 – Aug. 22). (2017 in orange)



Map 3: Caribou Summer Walklines (Aug. 23 – Sep. 16). (2017 in orange)



Map 4: Caribou Summer Walklines (Sep. 17 – Oct. 18). (2017 in orange)

3. The location of the proposed camp in relation to the caribou migration and other active projects in the area.

It was brought up at the community consultation that the proposed camp location is too close to the caribou migration area. The decision to build a camp in an area that is used by the hunters of Rankin Inlet should have included consultations with Rankin Inlet hunters and shouldn't have been primarily decided by a different community. There are cabins of Rankin Inlet community members very close to the proposed camp location, and they are concerned about what exploration activity will do to important areas for them.

The proponent verbally committed to allowing members of the HTO to go out with them and help them pick an alternate camp location; the HTO recommends a location that is further north of the current location. The HTO would also like to propose that no exploration activities (drilling/ helicopter activities) occur south of the camp location from June 23rd to October 1st as this is the prime time when caribou travel through the region.

The concerns listed above related to the cumulative impacts of helicopters and other exploration activities on caribou, impacts on the caribou migration and concerns about lack of community consultation in choosing a camp location are the main concerns of the Kangirliniq HTO. All of these issues came up in the proponent's community consultation in Rankin Inlet on January 12, 2018 and the proponent verbally agreed to address them. These issues should be dealt with before the project is permitted to proceed.

Sincerely,

Clayton Tartak
Secretary Manager
Kangiqliniq Hunters Organization