



extraction. During this time changes to critical caribou habitats as a result of; vegetation disturbance, noise, fragmentation from access roads and trenches, and in some instances long term storage of waste and by-products, have lasting effects on the behaviour and health of caribou. This in turn impacts the health of Inuit; these effects become more pronounced through the accumulation of impacts within these areas critical to caribou. It is for these reasons the HTO continues to call for a total ban on mine exploration and development within the calving and post calving grounds, and near water crossings.

The HTO recognizes that after several decades of DIAND and KIA Caribou Protection Measures there has been some movement in the modernization of these measures to "Mobile Caribou Conservation Measures". These mobile measures are intended to be more robust and travel with the caribou as opposed to being implemented for specific static geographic areas only. These measures are only as good as the level of rigour and frequency applied to monitoring and surveillance activities. The HTO is skeptical that there will be sufficient funding available to support implementation of an effective and responsive monitoring and surveillance program as envisioned under the Mobile Caribou Conservation Measures. The HTO is also concerned that the Mobile Caribou Conservation Measures do not protect habitat from disturbance when caribou are not present. The HTO is of the view that habitat protection, in addition to Mobile Caribou Protection Measures are critical components that must work together to ensure the long-term health of caribou in the region.

In closing, the HTO believes that this application, where it includes caribou water crossings or caribou calving grounds should be abandoned. In the absence of a total ban on industrial development we would like to see a moratorium on mining exploration and development within these critical areas. A moratorium should be in place until there is evidence that the caribou herd populations are no longer in decline. If you would like additional clarity please do not hesitate to contact Hugh Nateela, Manager.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Richard Aksawnee', followed by a horizontal line.

Richard Aksawnee, Chairperson

CC:

Beverly Qamanirjuaq Caribou Management Board

Kivalliq Wildlife Board

Baker Lake Hunter and Trappers Organization