



June 4, 2018

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

NIRB File No. 17EN029 Auryn Resources Inc. Gibson MacQuoid Project

Please accept this submission as the formal response to the above referenced file from the Baker Lake Hunters and Trappers Organization (HTO).

For many years the HTO has consistently expressed its opposition to mining and exploration activities being established within the boundaries of caribou calving and post calving grounds of the Kivalliq Region. We have requested that calving and post calving grounds, as well as water crossings be protected through a ban on these industrial activities. Our HTO remains extremely concerned that mining and exploration activities are being proposed within these critical wildlife areas.

As inland Inuit country food, such as caribou, is critical to our ongoing physical and cultural well-being. Historically Inuit of our region have experienced times when wildlife was scarce. During those times there was little Industrial activity on the land and, after a time of fallow, the caribou returned. It is the knowledge of our ancestors combined with the changes we see today that informs our Boards' submission to the Nunavut Impact Review Board (NIRB).

Today industrial expansion and a changing climate within our region places food security as a leading issue for our community. Inuit, Denesuline and others have depended upon these areas to reproduce our primary source of protein, for millennia. Without caribou, Inuit in our community do not have access to an equally healthy and affordable protein source.

The HTO acknowledges that exploration proposals are considered to be low level and short term. However, in our experience mining exploration is not a temporary land use. Exploration activities can be ongoing for many years as proponents work to identify a marketable resource suitable for

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,



Richard Aksawnee, Chairperson

CC:

Beverly Qamanirjuaq Caribou Management Board

Kivalliq Wildlife Board

Baker Lake Hunter and Trappers Organization