

## 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> <u>Whale Cove Area Exploration</u>	
<b>Proponent:</b> <u>Agnico Eagle Mines Ltd.</u>	
<b>Location:</b> <u>Kivalliq Region</u>	
<b>Comments Due By:</b> <u>June 12, 2019</u>	<b>NIRB #:</b> <u>19EN027</u>

**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 checked="" 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:**

This proposed expansion of this exploration project will be in the heart of critical habitat for the Qamanirjuaq barren-ground caribou herd. It will impact the key migratory route and also the sensitive calving ground.

This project will have a direct impact on the caribou herd, which in turn will potentially impact our communities. There is significant concern from the Athabasca Denesųliné. Any further impact to the caribou population will have direct impact on the Denesųliné way of life. The Athabasca Denesųliné depend almost exclusively recently on the Qamanirjuaq caribou herd for spiritual, cultural and sustenance reasons. There is a serious concern, and the AD have always maintained that calving grounds are not areas where any development should occur. We are alarmed at the rate in which these exploration projects are expanding and creating more and more disturbance.

The AD Elders tell us through traditional knowledge and first-hand experience that any activity that causes stress, or results in a change of usual behaviour and/or diversion of the migratory path of the caribou, can impact on the health and condition of these animals. The area that this project would be located is heavily used by the caribou during the critical time of calving and post-calving. This subsequently impacts on the AD communities that rely on these caribou for sustenance. Industrial activity and development is the first and foremost activity that causes this type of impact. The timing of the exploration activities (July 2018-September 2025) is of significant concern, as there is no respect for the caribou when they are in the area. We are seeing the impacts of industry, roads and exploration on the Bathurst herd, and also now the Qamanirjuaq herd.

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

The Athabasca Denesųłiné request:

- 1) That NIRB does not issue a permit for Agnico Eagles' proposal, and for any other exploration or development within traditional barren-ground caribou calving grounds, and critical migration routes. The risks are too high at this time. We must err on the side of caution for the caribou at this time.
- 2) Cumulative impacts need to be considered on a larger scale, and consider impacts from climate change.


**Do you support the project proposal? Yes ☐ No ☒ Any additional comments?**

The rate in which this project is expanding, without a full comprehensive review of the impacts it will have on the barren-ground caribou, a species currently being considered as "threatened" under the Species at Risk Act, is too fast. It is irresponsible to continue to issue permits on a project that is in key critical habitat of the caribou. The Athabasca Denesųłiné do not support this project.

Our communities rely heavily on the Qamanirjuaq caribou herd for spiritual, cultural and sustenance reasons. If this project continues to expand, we will require a full consultation in order to fully understand how NIRB proposes to mitigate the issues surrounding barren-ground caribou. In our opinion, Caribou Protection Measures are not sufficient.

**Name of person commenting:** Ron Robillard **of** Athabasca Denesųłiné

**Position:** President **Organization:** Denesųłiné Ne Ne Land Corp.

**Signature:**  **Date:** 10 June 2019