



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

RE: Notice of Screening and Comment Request for Whale Cove Area Snow Mineral Project

On behalf of the Kangiqliniq Hunters and Trappers Organization (HTO), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Agnico Eagle Mines (the proponent) Snow Mineral Project.

The KHTO has some very serious concerns regarding the proposal and does not support the project as proposed. The KHTO has submitted multiple comments regarding exploration activities around critical caribou habitat and feel these are not taken seriously. The concerns regarding this project are:

1. The lack of regional consultation. The project lies partially with-in proposed protected areas under what should be Nunavut's first land use plan. The Kivalliq Wildlife Board which consists of the 7 Kivalliq regional Hunters and Trappers Organization has made several submissions which revolve around the protection of water crossings and the core calving grounds. Development in these areas would impact harvesting rights to all Kivalliq hunters and the proponent has yet to have consulted with all stake holders who are likely to be affected.
2. Mobile Protection measures. Based on opposition to development with-in critical caribou habitat, the Kivalliq Inuit Association has developed a model of Mobile protection that proponents are to use through-out the region. While the HTO supports a form mobile protection, these measures fail to protect caribou from habitat loss through habitat fragmentation which this project will likely due should the proponent find a sizable deposit in portions of the proposal. Also, due to the implementation of The Nunavut Planning and

Project and Assessment Act (NuPPAA), claims in these areas would receive pre-existing rights grandfathering the claims from becoming part of a protected area.

Reccomendations:

The Kangiqliniq HTO recommends that the Nunavut Impact Review Board and the Kivalliq Inuit Association with-hold issuing permits due to the lack of proper and meaningful consultation with potentially affected stake holders.

Should the project proposal be permitted, the HTO recommends that the proponent minimize investments into portions of the proposed area so as to minimize losses in further stages of exploration. These losses would be seen in the mitigation measures required at later stages of exploration and development.

Thank you,



Brian Sigurdson
Chair Kangiqliniq Hunters and Trappers Organization

