



Beverly and Qamanirjuaq Caribou Management Board

12 June 2019

Nunavut Impact Review Board
Cambridge Bay NU
XOB 0C0

Via e-mail: info@nirb.ca

NIRB 125460/19EN027 – Agnico-Eagle Whale Cove Area Exploration Project Proposal

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting screening comments on the application from Agnico Eagle Ltd. (AEM) to expand the Huckleberry/Whale Cove Area Project into new exploration areas, described as the Whale Cove Area Exploration Project. The BQCMB is concerned about the continuing expansion of this project due to its location on important Qamanirjuaq caribou habitat and the timing of proposed activities, which the proponent states will occur from April to October from 2018 to 2025.

Based on the information provided by the proponent and the NIRB, we have identified seven main issues related to this project proposal and the ongoing screening and permitting process. Our specific concerns and recommendations are outlined below.

- 1) **Importance of exploration areas as caribou habitat** - This is the second proposal by AEM to expand mineral exploration activities further into an area documented by the Government of Nunavut's Department of Environment (GN-DOE) as key caribou habitat. The area of proposed exploration has been used regularly in recent years by the Qamanirjuaq caribou herd as key access to calving areas and as post-calving habitat (see attached map). As a result of its importance to caribou, this area has been proposed for designation as protected area in the draft Nunavut Land Use Plan.

Recommendation: Permits for exploration should not be issued in this area. Continuing to issue permits in this area would be inconsistent with scientific evidence, the precautionary principle, and recommendations from the Nunavut Planning Commission.

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- 2) **Vulnerability of caribou during proposed period of activities** – Exploration activities during April-May, particularly on key access areas, are of concern because they have the potential to negatively affect pre-calving migration of caribou cows, and therefore to impact calving success and immediate post-calving care of newborn calves. Activities during July-August, particularly on post-calving habitat, are of concern because they have the potential to prevent feeding activity when cows and calves need to gain strength and weight to prepare for rutting and winter.

Recommendation: Exploration activities should not be permitted on key access corridors during pre-calving or on post-calving areas during the post-calving and summer periods.

- 3) **Inadequacy of Caribou Protection Measures (CPM)** - If required through the CPM, the proponent says they will not conduct activities from May 15-July 15, but they could be released from this permit condition under certain circumstances. There are at least two other reasons that the CPM will not be sufficient to avoid impacts on caribou, however: first, the CPM will not prevent AEM from conducting activities in key areas used to access calving grounds during April-May when caribou may be moving through the area, during the sensitive pre-calving period; and second, the CPM will not protect habitat from damage or disturbance caused by exploration activities.

Recommendation: A standard permit with CPM as a condition should not be issued. Issuing exploration permits that rely on CPM to mitigate impacts on caribou does not provide sufficient protection for caribou.

- 4) **Lack of recognition of status of barren-ground caribou** - Barren-ground caribou have been designated a Species at Risk by the Committee on the Status of Wildlife Species in Canada, and are currently undergoing consideration for listing under federal legislation as a Threatened Species.

Recommendation: The precautionary principle dictates that actions that would cause harm to a species at risk such as barren-ground caribou should not be allowed. Continuing to review annual project expansion proposals on a case-by-case basis and to permit increasing exploration activity on key caribou habitats does not take this into consideration.

- 5) **Lack of recognition of status of the Qamanirjuaq caribou herd** – In May 2015 the BQCMB conducted a vulnerability assessment of the Qamanirjuaq herd based on both scientific and traditional knowledge about numerous factors affecting caribou, and rated the herd's vulnerability level as medium-high. This was based in part on GN-DOE survey information that showed that the herd was declining. Additional surveys conducted in 2017 showed that the herd had decreased significantly since 2008.

Recommendation: This vulnerable and declining herd should be protected from potential negative impacts that may result from activities such as mineral exploration, including impacts both to animals during the sensitive pre-calving and post-calving periods and to key sensitive habitats.

- 6) **Lack of recognition of the value of the Qamanirjuaq caribou herd** – As a result of population declines and contractions in range use experienced by most of Canada’s mainland barren-ground caribou herds, the importance of the Qamanirjuaq herd has increased for a growing number of people who rely on caribou for social, cultural, spiritual and economic sustenance outside the Kivalliq region of Nunavut. This includes Inuit people living on Baffin Island as well as Dene, Cree and Metis people from communities in northern Manitoba, northern Saskatchewan, and eastern NWT.

Recommendation: Potential negative effects on the herd from human activities that can be managed should be prevented because any impacts that reduce availability of Qamanirjuaq caribou for hunters and families that rely on the herd will cause hardship.

- 7) **Lack of cumulative effects assessment** - In light of the increasing and expanding exploration activity on these key caribou habitats, it is clear to the BQCMB that an assessment of the project’s cumulative negative effects on caribou and caribou habitat is required. In addition, impacts on the caribou herd that result from this expanding project will affect all those who rely on the caribou from across the caribou ranges, not just residents of the community of Whale Cove. Therefore an assessment of the potential cumulative effects of the project over the long-term on caribou people from across the Kivalliq region, northern Manitoba, northern Saskatchewan and south-eastern NWT is needed.

Recommendation: A regional cumulative effects assessment should be conducted to determine how this project and other exploration projects may affect the caribou herd and caribou people from across the Qamanirjuaq caribou range before further exploration in this area is permitted.

Additional Comments

From the BQCMB - Please refer also to the BQCMB’s previous submission of screening comments on the “Huckleberry Project” submitted on January 12th 2018 and on the “Whale Cove Area Projects” submitted on June 3rd 2018. The BQCMB’s concerns explained previously apply equally to the current proposed expansion of the Whale Cove Area Project.

We are not aware of the proponent’s long-term plan for mineral exploration in this area, but based on recent evidence it appears that the project may continue to expand opportunistically over the years. In our June 2018 comments we observed that this project “provides an example in which one originally localized project is being expanded into a network of exploration areas, only a few months after the original project was screened by NIRB”. A year later we are reviewing a further expansion proposal. This continues to raise questions about how many more exploration areas and increased

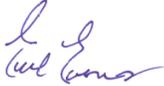
activities will be proposed and screened on a case-by-case basis with no comprehensive review of additive or cumulative regional effects. The BQCMB believes it is crucial to minimize the level of cumulative effects resulting from industrial development activities to which declining herds such as the Qamanirjuaq herd are subjected.

We believe that the project proposal is **likely to arouse significant public concern, to cause significant adverse eco-systemic and socio-economic effects, and to lead to significant adverse impacts on crucial caribou habitat** as a result of the exploration activities proposed and their potential effects and cumulative effects on the Qamanirjuaq herd. This is due both to the currently proposed exploration activities and because the objective of these activities is to locate mineral resources that would justify further exploration and ultimately development of a mine and associated infrastructure.

From the Sayisi Dene First Nation (SDFN) – The SDFN has asked the BQCMB to include a letter from Chief Tony Powderhorn to the BQCMB in our submission on this project. We believe their message is very clear and will let it speak for itself.

Thank-you for the opportunity to comment on this project proposal. If you have any questions about these comments, please contact BQCMB Contract Biologist Leslie Wakelyn (wakelyn@theedge.ca) or Executive Director Ross Thompson (rossthompson@mymts.net).

Sincerely,



Earl Evans
BQCMB Chairperson

Map: Whale Cove Area Exploration Project in Relation to Important Caribou Habitat

