



To: Nunavut Impact Review Board

Re: Baker Lake HTO comments on NIRB File No. 17EA020: Notice of Screening for 5530 Nunavut Inc.'s "Precious Metal Property" project proposal

March 29, 2021

To Whom It May Concern:

On behalf of the Baker Lake Hunters and Trappers Organization (BLHTO), I would like to thank the Nunavut Impact Review Board (NIRB) for providing the opportunity to provide comments on 5530 Nunavut Inc.'s Precious Metal Property project proposal.

Public Concern

The proposed project has already raised public concern in Baker Lake. Several community members have submitted comments to NIRB noting that the project will have significant adverse impacts on caribou migrations, caribou habitat and caribou, and fish habitat and fish. The public has also raised concern about impacts on Inuit hunting, camping, and harvesting activities on the land, rivers, and lakes project area. People in Baker Lake are also discussing this project with each other and are concerned about what impact it will have on important land use areas.

Adverse eco-systemic or socio-economic effects

The proposed project involves the construction of a temporary camp with tents, a shack, an incinerator, and waste systems. The location of this camp has not been determined, which makes it impossible to offer specific comments on it. The camp could have adverse impacts on the nearby ecosystem, wildlife, and people. It could disturb caribou and other wildlife migration routes. It could contaminate freshwater systems. It could be in areas used for hunting, fishing, and camping. These impacts would have adverse eco-systemic and socio-economic effects.

The proposed project also includes presence of workers on the land, ATV usage, helicopter transportation, diamond drilling, campsite construction, fuel storage, and machinery to run camp. All of this activity could disturb wildlife in the area, including Caribou, Musk-oxen, Grizzly bears, Wolves, Foxes, Waterfowl, and other animals. Fish and freshwater marine life could also be negatively impacted from pollution or contamination of waterways. Contamination of drinking water would have severe impacts on wildlife and on Inuit.

Adverse impacts on wildlife habitat or Inuit harvesting activities

The proposed project is planned to occur for eight weeks, starting May 1, 2021. This timing overlaps with caribou, geese, and waterfowl spring migrations through the area. It also overlaps with Inuit land activities in the spring including fishing, caribou hunting, geese hunting, and camping. The areas around and between White Hills Lake and the Thelon River are extremely important to Qamani'tuarmiut for these activities. The area around Quggiilik further north is also an important hunting and fishing area. There is already a lot of concern about the high usage of helicopters in and around the proposed area. More helicopter activity could further impact animals' migrations, movements, and health.

The BLHTO is concerned about the cumulative impacts of the already existing Meadowbank Mine, Whale Tail Pit Extension Project, All-Weather Access Road (AWAR), Whale Tail Extension Road, ongoing exploration activity, and the potential for increased exploration activity and mining developments in the future. The Government of Nunavut has released a report with findings that the Meadowbank AWAR and Whale Tail Extension Road are impacting caribou migrations, with a Zone of Influence that has expanded since the Whale Tail Extension Road was built. The proposed project will increase the cumulative impacts in the area around the existing mines and roads and could lead to even greater cumulative impacts in the future.

Recommendations on mitigation measures

The BLHTO does not support the current project proposal and does not offer any recommendations on mitigation measures.

Other matters of importance related to the proposed project

The prospecting claims are in an area that is a major travel route between Baker Lake and Gjoa Haven. The BLHTO is concerned that the project could impact these routes.

Most of the consultation that has occurred thus far has been with the Baker Lake Hamlet. The BLHTO expects companies to consult with the HTO, especially regarding issues that concern wildlife and Inuit harvesting activities.

Thank you for your time and consideration of the BLHTO's concerns.

Sincerely,



Richard Aksawnee

Chairperson

Baker Lake Hunters and Trappers Organization

¹ Boulanger, J., R. Kite, M. Campbell, J. Shaw, and D.S. Lee. 2020. Kivalliq Caribou Monitoring Program – Analysis of Caribou Movements Relative to Meadowbank Mine and Roads During Spring Migration.

<https://www.nwmb.com/en/funding/nunavut-wildlife-research-trust/reports/2019-1/2-19-03-kivalliq-caribou-monitoring/8464-2-19-03-campbell-final-report-kivalliq-caribou-monitoring-nwmb/file>