NUNAVUMI AVATILIKIYIN KATIMAYIN

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:

Project Proposal Title:	Precious Metal Property
Proponent:	5530 Nunavut Inc.
Location:	Kivalliq Region
Comments Due By:	March 31, 2021 **NIRB #:** 17EA020

Indicate your concerns about the project proposal below:

- □ no concerns
- √ water quality
- √ terrain
- √ air quality
- √ wildlife and their habitat
- □ marine mammals and their habitat
- √birds and their habitat
- √ fish and their habitat
- √ heritage resources in area
- √ traditional uses of land
- √ Inuit harvesting activities
- √community involvement and consultation
- □ local development in the area
- □ tourism in the area
- √ human health issues
- √ other: Cumulative effects of exploration by smaller projects that are not screened

Please describe the concerns indicated above:

- Many "exploration" projects have taken place without screening and this one last year was one of them. This project was visible and so made it very clear that helicopters disturb on the landscape especially with constant flying; this basically showed that it was the case and not just hearsay or only taking one side the proponents word. Disturbance of wildlife, people at camping sites or hunting grounds etc is a real issue. This was one project, how many happen in the area, region annually that are not screened?
- This project is will likely be part of a bigger parcel in the future; Agnico Eagle Mines (AEM) parcels currently holds in the mining stage. There are other AEM parcels that are not in the mining stage but are hard to locate on any of the federal, regional Inuit organization or IPGs sites…These parcels are under the exploration stage and have not been screened because of the scale of the project but like this one; last year or years prior it is/was active and the cumulative effects of this project plus many others besides 5530 Nunavut Inc (Western Atlas/ Apex Geoscience) and others who had title to this parcel in the past) and others are disturbing wildlife (large mammals birds etc), hunting grounds, enjoyment of the land with helicopters, drills and other equipment.
- The land parcel process is very colonial and for most people who live in the area or not in the exploration or environmental assessment processes are not familiar with all the layers and such. A cookie cutter process from the south is imposed and expected to work seamlessly. The only group that is at the advantage is the proponent and the regulators who do this type of work, day in day out. The whole concept of where these projects are taking place has lost its significance in a way, these land parcels are where Inuit live or once occupied in recent history and know the land, its meaning, or way of world view is not captured in the very colonial land use process. The land use process is very foreign and for community members who live in Nunavut all year round

to find out their favorite fishing, camping, hunting area or family homeland is disturbed because a company from the south or region has "title" to the land is very disheartening.

- Even those who are somewhat familiar with technology and computers, websites etc like myself; to try and find out what parcel of land is "owned/leased/rented temporarily" by company "X" or group "C" is very difficult. Trying to find information on the federal site takes time and when you find it, it takes time to load or crashes. Once you are on the site, the layers to click to find information is not very user friendly. You need to know what you are looking for, the basic search of who is in your backyard is not there…This goes for NTI, KIA, IPGS as well. Although some sites are better, NIRB for example but it still takes lots of clicks to find information. Finding current leases for companies is very difficult. A plain clear layout of who are the current, past and potential land users has yet to be seen. Or I have yet to find it, maybe it is out there?
- The land is not going anywhere and when our greatest resource, its people are not informed or aware of projects in the area; it's because the flood gates were opened for exploration, when a piece meal approach could be taken. This is where the Land Use Plan has failed us; a piece meal approached could have been taken with agreement from all parties; local communities, from all walks of life and organizations need to be informed and then take time to agree or disagree about what is to happen on the landscape not just to limited exploration, mining projects, types of minerals or rocks to be explored. Industry has a higher priority and deeper pockets than those who live at the community level. All users of the landscape need to be players and on the same level playing field. The communities are at a disadvantage from the start; their knowledge of the land is not fully utilized, or respected and set at a different standard. This is where the cookie cutter approach to Land Use and land leases, parcels are not comparable. Local Hunter Trapper Organizations (HTO) do not have the capacity to review very technical projects and give feedback. Whereas the companies have a biologist, chemist, statistician or other expertise available to prepare these documents. The local level is at a considerable disadvantage.
- NTI and KIA have yet to send information about Inuit Owned Lands (IOL) and why there were selected as per the Nunavut Agreement (NA) 17.1.2 (a,b,c,d); they were not all selected for 17.1.2.(b) development of non-renewable resources. Ex. BL 19, BL 18, BL 21, BL 25 etc.. all IOL and parcels.
- The federal government for Crown land; the major land holder in Nunavut has not come to the communities to ask if this type of activity is acceptable, they have left it to the proponent. A step has been missed and that is proper meaningful consultation for the people who live there or who have an interest there other than the proponents interested in non-renewable resource development should be consulted and/or rubber stamped. There are lots of players and legislation in play, but this has yet to be made understandable at the community level; the land and wildlife in most communities is a priority. What happens to this landscape when the project is complete, it is left to the community the proponent has left. The wildlife maybe diminished; water contaminated etc… there is legislation to protect the landscape but the local voice has yet to be heard. The land and wildlife are not the same. Money cannot buy back healthy ecosystems, wildlife populations etc.
- Nunavut is large but small because Inuit don't just live-in communities, they travel all over the land and waters to hunt, fish or get away from community life. This concept is daunting to southerners who come to claim/stake the land and feel they are on the landscape first and name sites. These sites have names to the local people and because they maybe hard to say or write is not the local problem, the proponents are guests who should be using local place names, so locals know where these people, companies, proponents are working.
- Some people in communities have yet to experience the land and traditional activities and for this the schools and other organizations / programs are starting to help youth and all people of all ages connect back to the land and learn skills that have nearly been lost or set aside. Some

have taken these skills for granted and now we are in a situation where we are all trying to keep what we have before it is lost or relearn from elders who still remember. We want to try and save and keep what we can before it is lost. Traditional camps and such are now maybe a way for these activities away from town to connect back to traditional skills.

- The parcel that crosses the Thelon…do we want exploration, mining on that side of the Thelon River? Infrastructure such as the AEM road from Baker Lake to Meadowbank and Amaruq already has disturbed caribou migration. Will this be part of a bigger plan? The AEM project keeps adding pieces of a puzzle and looking at it as one piece and not the whole puzzle…one project piece at a time to NIRB to be screened etc; the road, the mine, the road to Amaruq, the Amaruq site, expansions etc…and what of this project 5530 Nunavut Ltd/WAR, who is to say AEM will not buy this company; 5530 Nunavut Ltd/Western Atlas, once all the paperwork is completed. Where are all the pieces of the puzzle? Are there more on the other side of the Thelon River? Or outside of Baker Lake? What is the big picture for all exploration, mining claims etc? Does the community besides those who are employed or have contracts with AEM or other big companies know what is being decided? Bigger picture landscape discussion and meaningful consolation by all parties in legislation, exploration etc needs to be properly addressed. Little pieces here and there start to add up very quickly and before we know it is gone…no amount of money will buy back healthy caribou herds, fish, water, air etc…
- Proper caribou management of populations, habitats and ranges need to be addressed for all herds in the region; Beverly, Qamanirjuaq, Wager Bay, Lorillard, Eastern Kitikmeot, their calving grounds, post calving grounds, spring and fall migration ranges and migratory ranges. Caribou is the most important mammal for Baker Lake, as we are known as the Caribou Inuit and only inland community in Nunavut. Caribou and fish are our main traditional food sources. A revitalization and pride of learning our traditional sewing clothing or making tools is slowly taking place before it is lost.
- Clean water from the lakes, rivers and streams that flow to Baker Lake are important as Baker Lake proper is the source for the municipal water source. Other lakes and rivers close to town, ex Prince River, Thelon River are also sources of water where individuals get their own potable water.
- Clean water for fish habitat is also important.
- Archaeological sites are important for current and future generations. The loss of sites is a detriment to the community. It is a piece meal loss of culture to a degree. Not knowing what is lost until it is gone would be a terrible disaster. These site(s) if disturbed cannot be returned to their former state. Not saying any will, just stating mater of fact.
- Current COVID -19 protocols must be strictly adhered too as there is still a pandemic ongoing. Cases are rising in Canada with COVID-19 virus and variants and expected third wave. Nunavut finally is COVID-19 free but recently an outbreak had taken place at AEM Meadowbank and one individual was COVID positive and put 15 individuals at risk. All have been flown south for treatment.

Do you have any suggestions or recommendations for this application?

- Proper consolation for the land for all people / parties especially from the local level.

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

Proper consolation about this project needs to be addressed by the proponent, crown land administrators for land parcels, KIA, NTI, AEM and players who administer wildlife populations, habitat, water resources, air quality and IPGS. The consultation process should start before exploration or any feet on the ground or flight over the area has even started.

A proper land use plan needs to be addressed. Ask at the local level if the type of activity is acceptable or want or not. The whole region needs to be addressed not piece meal approach. There are activities and land parcel distribution that have not been properly consulted since the beginning of Nunavut and before. A check box approach and layers of government or processes were used to approve of activities or land use.

A non-biased approach and one not one heavily influenced by one activity or with lots of money to make decisions about local or regional land use needs to be taken.

Name of person commenting: Paula Kigjugalik Hughson **of** Baker Lake
Position: **Community member** **Organization:** **Nunavut Land Claims Beneficiary**
Signature: Paula Kigjugalik Hughson **Date:** March 31, 2021