



Municipality Of Igloolik

P.O. Box 30, Igloolik, NU X0A 0L0 Ph: 867-934-8830 Fax: 867-934-8757

April 7, 2011

Ryan Barry
Director, Technical Services
Nunavut Impact Review Board
29 Mitik, P.O. Box 1360
Cambridge Bay, NU
X0B 0C0

Mr. Barry,

Re: Information Requests – Proposed Nuluyait Project

The Municipality of Igloolik would like to thank the Nunavut Impact Review Board (NIRB) for extending the time to comment for the Information Request (IR) phase of the review on the Draft Environmental Impact Statement (DEIS), submitted by Baffinland Iron Mines Corporation (BMIC).

From our perspective, an extension was critical as the DEIS is an extensive document to review in such a short time as we were originally only given less than two weeks to prepare a submission from the time the document arrived in Igloolik. In the future, and if meaningful community input is required, more time should be granted for the remaining phases of the review process as the original timeframe for this particular phase is not realistic to the participating communities.

Even with the extension, our review is quite limited due to the lack of capacity and resources available within the community, although we do offer the following information requests (IR):

General IR

In general the Municipality of Igloolik supports the IR prepared and submitted by QIA on the DEIS. QIA has submitted approximately 40 IR, and many of their IR are appropriate to concerns raised by Igloolik such as on harvesting and cultural well-being, potential impacts on the distribution and calving of caribou, and the extent of dust deposition on caribou

forage. Igloodik also agrees with QIA concerning the IR on the lack of baseline data on birds, which is very important for assessing any impacts arising from the proposed project, and for future monitoring purposes.

IR#1 Traditional Knowledge

It is evident that the proponent consulted with communities and incorporated traditional knowledge into various sections of the DEIS. It is not clear, however, how traditional knowledge has led to development of the project as a whole, or to specific components of the project, and how it will be used to manage and monitor the project if it proceeds. Given the importance of traditional knowledge to Igloodik and other communities, it would be useful to provide a section, to summarize and highlight the ways the project as proposed actually incorporates and reflects the use traditional knowledge and values. Similarly, it would be useful to highlight how the project may not agree with traditional knowledge and values, and to identify any gaps or areas of concern that need further attention for establishing mitigating measures. In many cases this type of IR could be provided by using tables or charts.

IR#2 Socio-economic Impacts

The DEIS does not provide a thorough discussion on the socio-economic effects from similar types of projects that have occurred elsewhere, even though an extensive body of literature exists on this subject. It would be useful, therefore, to summarize this literature, and highlight appropriate factors relevant to the proposed project, to help identify issues that may need to be addressed, and how they could be mitigated.

IR#3 Walrus and Marine Mammal Hunting

The Igloodik HTO has been concerned for the effects of tourism on the walrus population, and placed a moratorium on all tourist activities for the last several years. Although the moratorium has been lifted, we feel the DEIS does not adequately address the potential impacts of the shipping corridor on the walrus population and their calving areas. In short, the walrus is central to the identity of Igloodimiut, and any adverse impacts to the procurement, consumption, and distribution of walrus food will have an impact on Igloodik, and its ability to continue to pass on traditions from generation to generation. As such, the hunting of walrus is a significant activity that not only provides food, but also enables communities like Igloodik to provide stability in the face of a rapidly changing world. In fact, it can be thought of as the glue that binds social and economic relations in the community, and requires much more attention than provided in the DEIS.

IR#4 Cumulative Effects Assessment

Volume 9 of the DEIS discusses the potential effects of the project on the marine environment. It would be useful to expand this section by providing more information on how the project, particularly concerning the port and marine shipping in Foxe Basin, may impact hunting of marine mammals and fish. Moreover, more attention needs to be placed on how the marine mammals could react to open leads from the shipping corridor, and the subsequent impacts on hunting. Any negative impacts should be highlighted, particularly if

there are potential adverse effects to food security, as well as safety issues while hunting in a changing sea ice environment.

IR#4 Economic Benefits

Clearly, if the proposed project proceeds there will be economic benefits to communities. It would be useful if the DEIS could provide more information on the type and number of jobs that the project will require, as well as more information on potential contracting opportunities from the project, which will enable communities like Igloodik to conduct a better assessment of the impact and benefits of the project. At present, this area is treated in the DEIA in general terms, and does not provide enough information for a community to properly identify and plan for training programs so the community assess and evaluate how economic benefits can be realized.

IR#5 Monitoring

In our view, the DEIS does not provide enough information on how the potential effects of the project on the marine environment, its wildlife, and on the socio-economic and culture complex will be monitored. For example, it is not clear how community representatives will participate in the monitoring process, and how the monitoring program is linked to regional and territorial initiatives. Although the DEIS does indicate it supports regional and territorial monitoring initiatives like SEMC and the GNMP, it would be useful to provide more information on how they will be linked and work together.

Conclusions

If more time and resources were available it is likely many other information requests would have been identified. This is unfortunate, as one of the goals of a proper environmental assessment should be to identify as many issues as possible so they can be evaluated, and mitigation measures planned accordingly during the review process, to avoid adverse problems stemming from lack of information. As a result, we may forward additional IR in the future if considered important to the community.

In closing, we look forward to working closely with the NIRB throughout the remainder of the environmental review process. On behalf of the Municipal Council, thank you in advance for considering our comments, and we trust our community will be able to continue to actively participate in a meaningful way throughout the review process.

Yours truly,



Zacharias Kunuk
Acting Mayor