Appendix B-2
Comment Submissions Received (January 15, 2010)

On or before January 15, 2010 the NIRB received comments from the following parties:

- Qikiqtani Inuit Association (QIA)
- Government of Nunavut - Department of the Environment (GN-DOE)
- Alliance of Natural History Museum of Canada
- British Antarctic Survey – Natural Environment Research Council
- Canadian Museum of Nature
- Institute of Arctic and Alpine Research (INSTAAR)
- Ottawa Palaeontological Society
- Society of Vertebrate Palaeontology (SVP)

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Qikiqtani Inuit Association

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Serving the communities of

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Clyde River

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Grise Fiord

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Hall Beach

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Iqaluit

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Kimmirut

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Resolute Bay

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Sanikiluaq

January 13, 2010

Kelli Gillard, Technical Advisor
Nunavut Impact Review Board
P.O. Box 1370
Cambridge Bay, NU
X0B 0C0

Dear Kelli Gillard,

RE: Opportunity to Review Weststar Resources Corporation's Response to Comments Submitted Regarding the "Ellesmere Island Coal Exploration" Project Proposal.

The Qikiqtani Inuit Association (QIA) appreciates the opportunity offered by the Nunavut Impact Review Board (NIRB) to review and provide further comments on the response submitted by Weststar Resources Corporation (Weststar).

QIA's previous comments on this screening touched on three main themes, importance of wildlife, community consultation and socio-economic benefits. Weststar's proposed project presents numerous potential impacts to wildlife. Discussions around the value of wildlife to Inuit within the project area ought to consider a broad realm of knowledge.

Prior to land claim negotiations Inuit Tapiriit Kanatami (ITK) planned and carried out the *Inuit Land Use and Occupancy Project (ILUOP)*. The ILUOP is the most comprehensive and detailed description of traditional land use and knowledge that presently exists for any indigenous group anywhere in the world. Map pages 144 and 150 of ILUOP *Volume Three, Land Use Atlas* depicts areas of known Inuit land use and harvesting. These maps include Eureka Sound and the surrounding area. The extent of Inuit land use was one of the key parameters used to define where Inuit were able to select Inuit Owned Lands (IOL) during land claim negotiations.

Documentation of IOL selection in the high arctic suggests four main attributes were used to describe IOL selection; cultural, harvesting, economic/commercial and conservation. When observing the current project proposal a portion of the project area includes IOL parcel GF-05. The attributes for selection of this parcel are: cultural, harvesting and conservation. It should also be noted the economic/commercial attribute is not listed as a reason for selection.

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Another set of documents, the *Lancaster Sound Regional Land Use Plan (LSRLUP)* and the *North Baffin Regional Land Use Plan (NBRLUP)* provide further evidence to the importance of this area. In observing the map titled *Areas of Importance in the Lancaster Sound Planning Region*, the proposed project area falls directly within the location identified as E2, where E is categorized as an Essential Area. Appendix G, *Land Use Values and Concerns*, of the NBRLUP describes Essential Areas as:

Criteria

a) The area is essential to the community for hunting, fishing and/or trapping. The community cannot survive without the area;

b) The area is essential to the biological productivity of wildlife because:
- *Wildlife needs the habitat to survive, and alternate habitat (e.g. calving areas, nestng areas, polynyas or migration routes) is not available;*
- *The habitat supports rare, threatened or endangered species, or concentrations of wildlife; and/or*
- *The habitat is scarce*

c) The area is either protected by legislation or has been proposed by government, other agencies, or communities for formal protection.

In most cases, these areas have a high diversity of values and meet more than one criterion.

Appendix B: *Land Values and Concerns in the Lancaster Sound Planning Region* of the LSRLUP describe area E2 in the following manner:

Location	Value	Use	Timing
Fosheim Peninsula	IBP Site	Arctic hare, muskox, Peary caribou, Arctic wolf, Arctic fox, birds, a few polar bears, high diversity of plants and animals over a large area	Year-round
	Considered an Arctic refuge for muskox		Year-round

Government Concerns:

- *Fosheim Peninsula – GNWT wildlife are of special interest: loss, degradation of muskox habitat with consequent loss of muskox – favorable lowland and valley habitats are few, small in area, and widely separated by unsuitable terrain; alternative sites are generally lacking*
    - *Restriction, alteration of muskox movements preventing access to favourable habitat; access to winter forage is particularly critical to muskox survival and productivity*
    - *Disruption of muskox by high noise levels causing them to move away from favourable habitat*

The *Nunavut Atlas* also provides information in relation to the proposed project area. Specifically, *Land Use Map 38*, *Wildlife Map 39* and *Map Description 154* speak to the existence, distribution and significance of wildlife within the Bache Peninsula. QIA notes the Government of Nunavut submission in relation to NIRB's Part 4 Screening (dated November 25, 2009) provides further evidence related to this document.

In addition to the above mentioned sources, Inuit of Grise Fiord have knowledge of other areas related to wildlife within the vicinity of the proposed project area. This knowledge is currently not available in publications, yet can be obtained through consultation.

In observing Weststar's response it is unclear how wildlife concerns will be taken into consideration. For instance, Weststar's response states;

> *"Weststar understands where Peary caribou and muskox areas overlap, GN-DoE recommends no activity from the on-set of muskox calving (April 15th) until the end of Peary caribou calving (July 15th). Post calving July 15th to August 15th is also a critical time for caribou and muskoxen and Weststar will make every effort to avoid disturbing these animals"*

This paragraph does not explicitly state whether Weststar has agreed that no activities will take place from April 15th-July 15th. Furthermore, Weststar goes on to state *"INAC established Caribou Protection Measures are to be strictly followed to avoid disturbance of migrating and calving herds."* It is QIA's impression that when speaking about caribou protection measures Weststar is referencing Appendix I, *DIAND Caribou Protection Measures* of the NBRLUP. It should be noted that DIAND's *Caribou Protection Measures* are amenable to additional terms and conditions based on project specific information. In establishing project specific *Caribou Protection Measures* for Weststar's proposed project QIA is aware the body of available science, including the "Caribou Protection Map" (as

referenced in Appendix I of the NBRLUP) may be limited or non-existent. QIA strongly recommends that NIRB and all other parties give traditional knowledge, as identified under section 43 of NIRB's Rules of Procedure (September 2009), due weight when determining appropriate *Caribou Protection Measures.*

In reviewing the original application for IOL, QIA's Community Land and Resources Committee Community (CLARC) was very forthright in requesting that community consultation take place as part of project planning.[1] QIA does not consider Weststar's proposed community visit in May 2010 as an appropriate or effective means of local engagement. From QIA's perspective, community consultation should be planned in order to provide an opportunity for all parties to discuss the full extent of project plans, including appropriate terms and conditions. The goal of initial community consultation should be to explain the proposed project, including what is known about the project area and present how comments can be accommodated for in project planning. Consultation also offers the opportunity for the proponent to learn more firsthand from Inuit who use and value the project area. The information available at local level can be collected and used as an effective tool in project planning. Achieving a collective understanding of how a proposed project would operate and what terms and conditions would apply is an essential step in gaining project approval. Specific to Weststar's project proposal consultation on appropriate wildlife protection measures would go a long way to address the concerns of Inuit. Furthermore, it is difficult to foresee how mitigation measures could be deemed appropriate without input from Inuit who rely upon the wildlife in question.

QIA would like to reiterate that socio-economic aspects of a project offer a tangible relationship beyond consultation and updates. For a community with limited employment and economic opportunities avenues for local involvement should factor significantly into project planning. Weststar's response, *"Weststar is committed to obtaining support services where practical from local communities"*, does not appear to address these factors in a meaningful way.

QIA is aware NIRB is seeking recommendations consistent with 12.4.4 of the Nunavut Land Claims Agreement (NLCA). Based on the lack of community consultation, unresolved wildlife mitigation measures and undefined socio-economic benefits QIA strongly

[1] QIA notes that the CLARC, although a QIA body, includes representation from the local HTO and hamlet council. In addition to a CLARC meeting on Weststar's application for IOL, the Department of Lands and Resources also conducted a meeting via teleconference with CLARC and HTO of Grise Fiord. The purpose of this meeting was to revise and verify comments received in relation to the NIRB's Part 4 Screening.

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Qikiqtani Inuit Association

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recommends the proposal be returned to the proponent for clarification, consistent with 12.4.4.(c) of the NLCA.

If Weststar intends to continue to pursue project approval, QIA recommends a community consultation take place no later than early March 2010. The purpose of the consultation would be to clearly layout before the community of Grise Fiord what the project proposal entails and how wildlife and socio-economic concerns can best be addressed. Additionally, the community consultation would also allow parties to discuss appropriate amendments to DIAND's *Caribou Protection Measures*. This said, caribou are not the only species for which mitigation measures ought to be developed.

QIA feels this approach is respectful of the Part 4 Screening process and Weststar's desire to gain project approval in advance of the 2010 field season.

Should you have any questions or wish to follow-up on anything we have raised please feel free to contact our office.

Sincerely,

Stephen Bathory
Director, Lands and Resources

CC: George Eckalook, Vice President-QIA
Larry Audlaluk, Chairman-Grise Fiord CLARC
Aiviq Hunter's and Trapper's Organization-Grise Fiord
Ryan Grywal and Dean Besserer, Weststar Resources Corporation

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Qikiqtani Inuit Association

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ᑭᐊᕆ ᒥᑖᑦᒧᑦ,

ᐱᔾᔪᑖ: ᕿᒥᕐᕈᓇᑦᑕᐅᒋᐊᒃᑲᓐᓂᕈᓐᓇᕐᕕᖃᖅᑎᑦᓯᓂᖅ ᕗᐃᔅᑖ ᑯᐊᐳᕆᓴᒃᑯᑦ ᑭᒡᒍᑎᖏᓐᓂᒃ ᐅᖃᐅᓯᐅᓚᐅᖅᑐᓂᒃ ᑎᑎᖅᑲᒃᑯᑦ ᑐᓂᔭᐅᓪᓗᑎᒃ ᐱᔾᔪᑎᓕᓐᓂᒃ "ᐊᐅᓱᐃᑦᑑᑉ ᕿᑭᖅᑖᓗᐊᓂ ᐊᐅᓖᓗᑦᓯᐅᓂᕐᒧᑦ" ᑐᒃᓯᕋᐅᑦ.

ᕿᑭᖅᑕᓂ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᑦ (ᕿᑭᖅᑕᓂᒃᑯᑦ) ᖁᔭᓕᕗᑦ ᐱᕝᕕᐊᑦᓴᖅᑎᑕᐅᓚᐅᕐᓂᖓᓂᒃ ᒪᓂᒪᑎᑕᐅᓚᐅᖅᑐᒥᒃ ᓄᓇᕗᒻᒥ ᐊᕙᑎᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᖏᓐᓄᑦ ᕿᒥᕐᕈᓇᒋᐊᒃᑲᓂᕐᓂᕐᒥᒃ ᐊᒻᒪ ᐅᖃᐅᓯᑦᓴᑲᓐᓂᕐᕕᖃᖅᑎᑦᓯᓂᕐᒥᒃ ᑭᒡᒍᑎᖓᓐᓄᑦ ᕗᐃᔅᑖ ᑯᐊᐳᕆᓴᒃᑯᑦ (Weststar).

ᕿᑭᖅᑕᓂᒃᑯᑦ ᐅᖃᐅᓯᕆᒋᐊᓐᖓᓚᐅᖅᑕᖏᑦ ᖃᐅᔨᓴᖅᑕᐅᔾᔪᑎᒋᓚᐅᖅᑕᖕᒪᓄᑦ ᑖᑦᓱᒪ ᐱᖓᓲᓕᖅᑲᖓᓪᓗᐊᑕᖅᑐᑦ, ᐱᖕᒪᕆᐅᓂᖏᓐᓄᑦ ᓂᕐᔪᑏᑦ, ᓄᓇᓕᓐᓂ ᑐᓴᕋᓱᐊᕐᓂᖅ ᐊᒻᒪ ᐃᓅᓯᕐᒧᑦ-ᒪᑭᒪᔾᔪᑎᒃᓴᓄᑦ ᐃᑲᔫᑏᑦ. ᕗᐃᔅᑖᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᓕᐊᕆᓚᐅᖅᑕᖓ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐅᖃᐅᓯᖃᖅᓯᒪᔪᖅ ᐅᓄᖅᑐᓂᒃ ᐊᒃᑐᐃᓂᖃᕈᓐᓇᕐᓂᖓᓂᒃ ᓂᕐᔪᑎᓂᒃ. ᐋᔩᕋᕈᑕᐅᓚᐅᖅᑐᑦ ᐱᖕᒪᕆᐅᓂᖏᓐᓂᒃ ᓂᕐᔪᑏᑦ ᐃᓄᖕᓄᑦ ᐱᓕᕆᕕᐅᔪᒪᔪᒥ ᐃᓱᒪᒋᔭᐅᒋᐊᕆᐊᓖᑦ ᖃᐅᔨᒪᓂᕆᔭᐅᔪᑦ ᐊᑐᖅᑕᐅᒻᒪᕆᒋᐊᖃᕐᓂᖏᓐᓂᒃ.

ᓯᕗᓂᐊᓂ ᓄᓇᑖᕐᓂᕐᒧᑦ ᐊᐃᕙᓂᐅᔪᖅ ᐃᓄᐃᑦ ᑕᐱᓈᑦ ᑲᓇᑕᒥ ᐸᕐᓇᓚᐅᖅᑐᑦ ᐊᒻᒪ ᐊᑐᖅᑐᑎᒃ *ᐃᓄᐃᑦ ᓄᓇᒥᒃ ᐊᑐᕐᓂᕐᒧᑦ ᐊᒻᒪ ᐃᓐᓅᓯᒪᓂᕐᒧᑦ ᐊᑐᖅᑕᐅᔪᖅ (ᐊᑐᖅᑕᐅᔪᖅ)*. ᑖᓐᓇ ᐊᑐᖅᑕᐅᔪᖅ ᐊᑕᖕᒌᓯᒪᓂᖅᐸᐅᔪᖅ ᐊᒻᒪ ᓇᓗᓇᐃᖅᑐᑦᓯᐊᖅᓯᒪᓂᖅᐸᐅᔪᖅ ᓇᓗᓇᐃᔭᐃᓯᒪᓂᖏᓐᓂᒃ ᐃᓄᐃᑦ ᓄᓇᒥᒃ ᐊᑐᖃᑦᑕᕈᓯᖏᓐᓂᒃ ᐊᒻᒪ ᖃᐅᔨᒪᓂᖏᓐᓂᒃ ᒫᓐᓇ ᓴᖅᑭᐅᒪᖃᑦᑕᓕᖅᑐᖅ ᓄᓇᖃᖅᑳᖅᓯᒪᔪᑦ ᑲᑐᔾᔨᖃᑎᒌᖏᓐᓂ ᐊᑐᖅᑕᐅᕙᑦᑐᓂ ᓇᓂᓕᒫᑦᓯᐊᖅ ᓄᓇᕐᔪᐊᕐᒥ. ᓄᓇᙳᐊᖅ ᒪᑉᐱᒐᖓ 144-ᒥᒃ 150-ᒧᑦ ᐊᑐᖅᑕᐅᔪᖅ ᐱᖓᔪᐊᑦ, *ᓄᓇᒥᒃ ᐊᑐᕐᓂᕐᒧᑦ ᓄᓇᕐᔪᐊᙳᐊᖅ* ᓴᖅᑭᔮᖅᑎᑦᓯᔪᖅ ᖃᐅᔨᒪᔭᐅᕙᓂ ᐃᓄᐃᑦ ᓄᓇᒥᒃ ᐊᑐᖅᑕᖕᒪᓂᒃ ᐊᒻᒪ ᐊᖑᓇᓱᕝᕕᖏᓐᓂᒃ. ᑖᒃᑯᐊ ᓄᓇᙳᐊᑦ ᐃᓚᒋᔭᐅᓪᓗᓂ ᔪᓈᑲᒥ ᑲᖏᖅᑐᐊᓗᐊᓂ ᐊᒻᒪ ᐊᕙᑎᓕᒫᖓᓂ. ᐊᕙᖑᑦ ᐃᓄᐃᑦ ᓄᓇᒥᒃ ᐊᑐᖃᑦᑕᕐᓂᖓ ᑖᓐᓇᓪᓗᐊᑕᖅ ᐊᕙᑎᓕᒫᖓᑕ ᐊᑐᖅᑕᐅᓪᓗᐊᑕᖅᓯᒪᔪᖅ ᓇᓗᓇᐃᖅᓯᒍᑕᐅᓪᓗᓂ ᓇᓂ ᐃᓄᐃᑦ ᓂᕈᐊᖅᓯᔪᓐᓇᓚᐅᕐᒪᖕᒫᑕ ᐃᓄᐃᑦ ᓄᓇᖁᑎᒋᔭᖏᓐᓂᒃ (IOL) ᓄᓇᑖᕐᓂᕐᒧᑦ ᐊᐃᕙᔾᔪᐊᑎᖃᑎᖅᑎᑦᓗᒋᑦ.

ᑎᑎᕋᖅᑕᐅᓯᒪᓂᖏᑦ ᐃᓄᐃᑦ ᓄᓇᖁᑎᖏᑕ ᓇᓗᓇᐃᖅᑕᐅᓯᒪᓂᖏᑦ ᖁᑦᑎᑦᑐᒥ ᐅᖃᐅᓯᐅᔪᖅ ᓯᑕᐅᓕᖅᑲᖓᔪᓂᒃ ᓄᑭᖃᕈᑎᖃᓚᐅᓐᖏᓐᓂᖏᓐᓂᒃ ᓇᓗᓇᐃᖅᑐᐃᔾᔪᑎᖃᖅᑐᑎᒃ ᐃᓄᐃᑦ

ᖃᑭᖅᑕᓂᒃ ᐃᓚᓕᑦ ᑲᑐᔾᔨᖅᑎᑎᒋᓯᑦ
Qikiqtani Inuit Association

ᓚᓐᖏᑎᖓᓯᓐᓂᒃ ᓂᑭᐊᖏᔪᓂᕆᒃ; ᐃᓕᖏᑯᔪᖏᒃ, ᒪᖏᐅᐃᓂᖏᒃ, ᒪᑭᒪᔾᔨᑎᑦ/ᑭᓇᐅᔾᔪᓕᐅᑎᑭᓴᖅᓯᑦ ᐊᓚᒪᓗ ᓄᖓᐊᑎᑎᑦᑕᐃᓕᓂᖏᒃ. ᑕᑯᐃᓇᖅᑐᓗᒍ ᐃᓐᐃ ᐱᓕᓚᕕᐅᔪᒪᔪᒍᑦ ᑐᑭᔪᕆᐅᑦ ᐃᓕᓐᖓ ᐱᓕᓚᕕᐅᒪᔪᖏᒃ ᐃᓚᓐᓂᒃ ᓄᖓᐊᑎᑎᑦᑕᐃᓕᓂᖏᓕᒫᑦ ᓄᓇᐅᑦ ᓇᑦᓯᔪᓐᓇᖅᑐᖓ GF-05. ᓄᑭᑎᔾᐅᔪᑦ ᓂᑭᐊᖏᑕᐅᓂᖓᓂᐃᓂᒃ ᓄᓇᒍᑦ ᑭᑦᓯᒍᖓ ᐅᑯᐊᖓᑦᑐᒃ: ᐃᓕᖏᑯᔪᖏᒃ, ᒪᖏᐅᐃᓂᖏᒃ ᐊᓚᒪᓗ ᓄᖓᐊᑎᑎᑦᑕᐃᓕᓂᖏᒃ. ᖏᐅᐱᒪᖅᑭᑎᐊᖏᖅᑎᒪᔪᖏᒃ ᒪᑭᒪᔾᔨᒪᓄᑦ/ᑭᓇᐅᔾᔪᓕᐅᑎᑭᓴᖅᓄᑦ ᓄᑭᖏᕈᑎᑦ ᓇᓗᓇᐃᖏᑕᐅᓯᒪᓂᖅᓯᒪᒪᓕᑦ ᐱᔾᔪᑎᑕᐅᓕᓐᓂᓗ ᑭᑦᓯᒍᖓᑦᑐᒃᓴᓕᑦ. ᖏᐅᑭᑎᑦᑕᐃᓕᓂᖏᒃ ᐊᓚᒪᓗ ᓄᖓᐊᑎᑎᑦᑕᐃᓕᓂᖏᒃ.
ᐊᓯᖏᑦᑕᐅᖏᒃ ᑎᑎᕋᖏᒃᑕᐅᓯᒪᔪᑦ, ᑕᑦᓗᕈᒪᔪᑦ ᓄᓇᒥᒃ ᐊᑐᖏᓂᔪᑦ <ᕋᓇᑦ ᐊᓚᒪᓗ ᕿᑎᕐᑐᑐᒋᒥ ᓄᓇᒥᒃ ᐊᑐᖏᓂᔪᑦ <ᕋᓇᑦ ᖏᑕᐅᔾᔪᓕᐅᑎᑦᑐᒃᑕᓂᖏᒥᑦ ᐱᖓᒪᓇᐅᓂᖓᓂᒃ ᑕᒪᓐᓇ. ᑕᑯᑎᐊᖏᓗᒍ ᓄᓇᖏᐅᐊᖏᒃ ᓇᓗᓇᐃᖏᑯᑦᑐᒃ ᐱᖓᒪᓇᐅᔪᑦ ᑕᑦᓗᕈᒪᔪᑦ, ᑐᒃᔪᕆᐅᑦᐅᑕᐅᔪᒪᔪᖏᒃ ᑕᒪᓐᖏᐊᕕᐅᒪᔾᔪᑎᓗᒃ ᐃᓚᓐᓂᒃ ᐊᑐᖏᓂᔪᑦ ᑕᑦᓗᕈᒪᔪᑦ, ᖏᐅᑭᑎᑦᑕᐃᓕᓂᖏᒃ E2, ᑕᖓᓇ E ᓇᓗᓇᐃᖏᑯᑦᑐᒃᑕᓂᖏᒥᑦ ᐊᑐᖏᑕᐅᒪᒪᓕᑦᑕᐃᓕᓂᖏᒃᓂᖓᓂᒃ. ᐅᐃᒍᖓᓂᒃ G, ᓄᓇᒥᒃ ᐊᑐᖏᓂᔪᑦ ᐱᖓᒪᓇᐅᔪᓯᑎᑎᑭᔾᔨᐅᔪᑦ ᐊᓚᒪᓗ ᐃᓕᓴᐅᑕᐅᔪᑦ, ᖏᑯᑎᑦᑕᐃᓗᒍ ᓄᓇᒥᒃ ᐊᑐᖏᓂᔪᑦ <ᕋᓇᐅᑎᓂ ᓇᓗᓇᐃᖏᑕᐅᓯᒪᔪᖏᒃ ᐊᑐᖏᑕᐅᒪᒪᓕᑦᑕᐃᓕᓂᖏᒃᓂᖓᓂᒃᐅᓂᒃ ᐃᓱᒃ:

ᒪᑕᑦᑕᐅᔾᔨᐊᖏᖅᖄᑎᑕᐅᔪᑦ

a) ᐊᑐᖏᑕᐅᒪᒪᓕᑦᑕᐃᓕᓂᖏᒃ ᓄᓇᑕᓐᓄᑦ ᒪᖏᐃᓐᓂᑦ, ᐃᖏᑦᑕᓪᓕᐊᓂᔪᑦ ᐊᓚᒪᓗ/ᐅᓐᓀᓴᓐᓂᑦ ᒥᑭᑭᐊᓂᐊᓂᔪᑦ. ᓄᓇᑕᒃ ᐊᓐᓇᓱᒪᓐᓇᔾᔨᖏᑦᑐᑐᒍ ᑕᒪᓐᓇᐅᑦᑭᑦᑕᒃ;

b) ᑕᒪᓐᓇ ᐱᖓᒪᓇᐅᔪᓯᑎᑎᑭᔾᔨᐅᔪᖏᒃ ᐊᑐᖏᑕᐅᖏᑦᑕᐃᓕᑦᑕ ᐅᒪᔨᓄᑦ ᐃᓕᓴᐅᑕᐅᖏᒪᒪᓕᑦ ᐱᔾᔪᑎᑕᐅᓕᓐᓂᓗ:

- ᓂᔪᔨᑎᑦ ᓇᔨᒪᖏᓕᖏᑦᑐᒪᑕ ᐅᒪᓐᓕᕆᔨᓇᓐᓇᖖᓐᓂᖓᓂᒃ, ᐊᓚᒪᓗ ᓄᑦᑕᖏᑦᑕᓕᓯᖓᓕᒫᑦᑐᒃ ᓇᔨᒪᓇᔾᔪᓚᐊᑕᒪᓕᖏᑦᑐᓄᑦᑐᒃ (ᓯᔪᓐᓗ, ᓄᓇᒪᓂᔪᓐᓇᑦ, ᐱᑭᐅᑦ, ᓴᖅᖖᐃᑦ ᐅᖖᓐᓂᒃᓴᖅᑎᑦ ᐊᑐᐃᖖᓐᓂᖓᓂᒃ) ᐊᑐᐃᖖᐅᒪᓂᑦᑐᑦ;
- ᓇᔨᒪᓇᔾᔨᑦ ᐃᑲᔪᖏᓯᒪᔪᑦ ᐱᑕᖏᑦᓴᔪᐃᑦᑐᒥᒃ, ᐅᓗᓇᐊᖖᓐᓂᒃᑐᑦᑐᒥᒃ ᐅᖖᓐᓂᒃᓴᖅᑎᑦ ᓄᓕᐊᑎᑐᐃᖖᓐᓇᐊᑕᖖᓐᓂᒃ ᐅᓚᔨᓂᒃ, ᐅᖖᓐᓂᒃᓴᖅᑎᑦ ᓂᔪᔨᑎᑦᑐᒪᑦᑎᓇᓐᓇᔾᔪᑎᓂᑦ; ᐊᓚᒪᓗ/ᐅᖖᓐᓂᒃᓴᖅᑎᑦ
- ᓇᔨᒪᖏᑦᓯᐊᑎᖖᓐᓇᒋᑕ

c) ᑕᒪᖖᓇᑕᓪᓚᖓ ᓴᓗᔾᔨᐅᔪᓯᒪᑎᑦᑐᒍ ᒪᓇᑕᒪᖏᓄᑦ ᑐᑭᔪᖏᐅᔪᐅᑕᐅᔪᓯᒪᑎᑦᑐᒍᒧᖓᓂᑦ ᑲᖖᒪᓄᑦ, ᑎᑎᐅᔨᓂᖖᓐᓇᓚᖓᑕᓄᑦ, ᐅᖖᓐᓂᒃᓴᖅᑎᑦ, ᓄᓇᑕᖖᓄᑦ ᓴᓗᔾᔨᐅᔪᓯᒪᔪᖏᑦᑐᑦᑐᒍ ᓇᓗᓇᐃᖏᑕᐅᓯᒪᔪᖏᒃ.

ᑕᐃᒪᖖᓐᓇᓪᓚᑦᑐᒃ, ᑕᒪᑯᐊ ᐊᔾᓴᖖᓐᓇᑭᑐᒪᓕᐊᑐᔨᓂᖓᓂᒃ ᐱᖓᒪᓇᐅᔪᓯᑎᑎᑭᔾᔨᐅᔪᖏᒃᓯᔪᓂᑦ ᐊᓚᒪᓗ ᐊᑕᐅᔪᐅᖖᓐᓇᑭᑐᒃ ᒪᓇᑕᒪᓴᖅᑭᑦᑐᒪᓕᐊᑐᔨᓂᖓᓂᒃ.

ᐅᐃᒍᖓᓂᒃ B: ᓄᓇᐅᑦ ᐱᖓᒪᓇᐅᔪᓯᑎᑦ ᐊᓚᒪᓗ ᐃᓕᓴᐅᑕᐅᔪᑦ ᑕᑦᓗᕈᒪᔪᑦ <ᕋᓇᐅᑎᓕᐊᔪᓯᒪᔪᑦ ᑕᑦᓗᕈᒪᔪᑦ <ᕋᓇᐅᑎᓕᐊᔪᓯᒪᔪᒥᑦ ᓇᓗᓇᐃᖏᑕᐅᓯᒪᔪᖏᒃ E2 ᐃᒪᐃᑕᖖᓐᓂᑦᑕᐃᓗᒍ:

ᐃᓄᖖᓂ	ᐱᖖᒪᓇᐅᔪᓂ	ᐊᑐᖏᑕᐅᔪᓂ	ᖏᑲᖖᓂᖅ
Fosheim Peninsula	IBP ᓄᓇᖖᓂᓄ	ᐅᑲᑕᖏᒃ, ᐅᒥᖖᓯᑦ, ᑐᑦᑐᕋᓭᖏᒃ, ᐊᒪᔭᖏᒃ, ᑎᓚᖓᓄᐊᕕᖏᒃ, ᑎᖖᒥᐊᑦ,	ᐊᖏᕐᔪᒍᑕᒥᒥᒃ

		ᓄᓇᐃᑦ ᐅᓄᓗᐊᓐᖏᑦᑐᑦ, ᐊᔾᔨᒋᓐᖏᑦᑐᑦ ᐱᕈᖅᑐᑦ ᐊᒻᒪᓗ ᐆᒪᔪᑦ ᐅᓄᖅᑐᑦ ᓄᓇᐸᐅᔫᓗᒻᒦᑦᑐᑦ	
	ᐅᑭᐅᖅᑕᖅᑐᒥ ᕿᒪᕝᕕᐅᓲᖑᓯᓇᔭᐅᔪᖅ ᐅᒥᖕᒪᓄᑦ		ᐊᕐᕌᒍᑕᒫᒥ

ᒐᕙᒪᒃᑯᑦ ᐃᓱᒫᓘᑎᖏᑦ:

- *Fosheim Peninsula* – ᓄᓇᕐᔪᐊᖅ ᒐᕙᒪᒃᑯᖏᓐᓂ ᓂᕐᔪᑏᑦ ᐃᓱᒪᒋᔭᐅᔪᑦ: ᓄᖑᐊᑎᖅᐸᓪᓕᐊᓯᒪᔪᑦ, ᐃᓕᖀᓪᓕᕙᓪᓕᐊᓯᒪᓂᖓ ᐅᒥᖕᒪᓄᑦ ᓇᔪᒐᐅᔪᖅ ᑕᐃᒫᒃ ᓄᖑᑎᖅᐸᓪᓕᐊᖃᑦᑕᖅᓯᒪᔪᑦ ᐅᒥᖕᒪᑦ - ᐅᐸᑦᑕᐅᓯᒪᒐᔪᓲᖑᔪᖅ ᐊᕐᔪᖅᑐᖅ ᓄᓇᖓ ᒻᒪᓗ ᓇᖅᓴᖏᑦ ᓇᔪᒐᕆᔭᐅᒐᔪᑉᐸᑦᑐᑦ ᑖᒃᑯᐊ ᐃᓚᐃᓐᓇᖏᑦ, ᒥᑭᔫᓪᓗᓂ ᓄᓇᖓ, ᐊᒻᒪᓗ ᐊᕕᕐᓯᒪᓪᓗᓂ ᓄᓇᖓᑕ ᒪᓃᑦᑑᓂᖓᓄᑦ; ᐊᓯᐊᓅᕐᕕᑦᓴᖃᓗᐊᖅᑕᖏᑦᑐᑦ
  - ᑭᓪᓕᖃᖅᑎᑕᐅᔪᖅ, ᐊᓯᐊᒎᖕᒫᖃᑦᑕᓕᖅᑐᑦ ᐅᒥᖕᒪᑦ ᑕᔾᔭᐊᖅᑐᑎᒃ ᐅᐸᒍᒪᔭᕋᓗᐊᖏᓐᓅᖃᑦᑕᕈᓐᓃᖅᑐᑦ ᓇᔪᒐᕆᒐᔪᑦᑕᒥᓄᑦ; ᐅᑭᐅᒃᑯᑦ ᓂᕆᓇᓱᕝᕕᒋᖃᑦᑕᓲᖏᑦ ᐱᖕᒪᕆᐅᓂᖅᐸᖑᔪᑦ ᐅᒥᖕᒪᐃᑦ ᐆᒪᕕᖏᓐᓄᑦ ᐊᒻᒪᓗ ᓄᕐᕆᐅᕕᖏᓐᓄᑦ
  - ᐅᒥᖕᒪᐃᑦ ᐃᓇᖏᖅᑕᐅᕙᓪᓕᐊᔪᑦ ᐸᕝᕕᓴᑦᑕᐅᓂᕐᒥᓄᑦ ᓂᐱᖅᑯᖅᑐᓗᐊᖅᑐᓄᑦ ᐊᐅᓪᓚᕈᑎᒋᕙᑦᑕᖓ ᐃᓂᒋᔭᒪᔭᕋᓗᐊᒥᓂᒃ

ᓄᓇᕗᒻᒥ ᓄᓇᓐᖑᐊᖓ ᑐᓴᕈᑎᑕᐅᖃᕐᒥᔪᑦ ᑐᒃᓯᕋᐅᓯᐊᖑᓯᒪᔪᒧᑦ ᐱᓕᕆᕝᕕᐅᔪᒪᔪᓂ. ᐱᓗᐊᖅᑐᒥ, ᓄᓇᒥᒃ ᐊᑐᕐᓂᖅ ᓄᓇᓐᖑᐊᖅ 38, ᓂᕐᔪᑎᖃᕐᕕᐅᔪᓄᑦ ᓄᓇᓐᖑᐊᖅ 39 ᐊᒻᒪᓗ ᓄᓇᓐᖑᐊᖅ ᓇᓗᓇᐃᔭᖅᑕᐅᓯᒪᓂᖓ 154 ᐅᖃᐅᓯᖃᖅᑐᖅ ᓂᕐᔪᑎᑕᖃᐅᕐᓂᖓᓂᒃ, ᐱᑕᖃᐅᕐᓂᖓᓂᒃ ᐊᒻᒪᓗ ᐅᔾᔨᕐᓇᖅᑐᒻᒪᕆᐅᓂᖓᓂᒃ ᓂᕐᔪᑎᑕᖃᒻᒪᕆᓐᓂᖓᓄᑦ ᑕᒫᓂ Bache Peninsula. ᕿᑭᖅᑕᓂᒃᑯᑦ ᖃᐅᔨᒃᑲᐃᔪᑦ ᓄᓇᕗᑦ ᒐᕙᒪᒃᑯᖏᑕ ᓴᖅᑭᓚᐅᖅᑕᖏᓐᓂᒃ ᑐᓂᔭᐅᓚᐅᖅᑐᓂᒃ ᑖᒃᑯᓄᓐᖓᖓᔪᓂᒃ ᓄᓇᕗᒻᒥ ᐊᕙᑎᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔩᖏᓐᓄᑦ ᐊᕕᑦᑐᖅᓯᒪᓂᖓ 4 ᖃᐅᔨᓴᖅᑕᐅᓂᖓ (ᐅᓪᓗᓕᐅᖅᑕᐅᓯᒪᔪᖅ ᓅᕙᐃᒻᕙ 25, 2009) ᖃᐅᔨᒃᑲᓐᓂᕈᑎᒃᓴᒻᒪᕆᐊᓘᔪᖅ ᑕᕝᕗᓐᖓᖓᔪᓄᑦ ᑎᑎᕋᖅᑕᐅᔪᓄᑦ.

ᓱᓕᒃᑲᓐᓂᖅ ᖄᖓᒍᑦ ᑖᒃᑯᐊ ᓇᓗᓇᐃᖅᑐᐃᓯᒪᔾᔪᑕᐅᔪᑦ ᓇᑭᓐᖒᖅᓯᒪᓂᖏᓐᓂᒃ, ᐊᐅᓯᐃᑦᑐᒥ ᐃᓄᐃᑦ ᖃᐅᔨᒪᓂᖅᑲᖅᐳᑦ ᑕᒪᑦᓱᒥᖓ ᓄᓇᐅᑉ ᐊᓯᖏᓐᓂᒃ ᓂᕐᔪᑎᓅᖓᔪᓂᒃ ᓄᓇᖓᑕ ᐊᕙᑖᓂ ᐱᓕᕆᕝᕕᒋᔭᐅᔪᒪᔪᒥ. ᑕᒪᓐᓇ ᖃᐅᔨᒪᓂᐅᔪᖅ ᒫᓐᓇᐅᑎᓪᓗᒍ ᐊᑐᐃᓐᓇᐅᖏᑦᑐᖅ ᑎᑎᕋᖅᑕᐅᓯᒪᓐᖏᒪᑦ ᓴᖅᑭᖅᑕᐅᓯᒪᔪᓂ, ᓱᓕ ᐅᖃᖃᑎᒌᒍᑕᐅᔭᕆᐊᖃᕐᒪᑦ ᑐᓴᕐᓯᐊᕈᑕᐅᓂᖓᒍᑦ.

ᑕᑯᓐᓇᕐᓗᒋᑦ ᕗᐃᔅᑖ ᑭᐅᒍᑎᒋᓚᐅᖅᑕᖏᑦ ᑐᑭᓯᓇᓗᐊᕐᓵᓗᓐᖏᑦᑐᖅ ᖃᓄᖅ ᓂᕐᔪᑎᓅᖓᔪᓂᒃ ᐃᓱᒫᓘᑏᑦ ᐃᓱᒪᒋᔭᐅᒋᐊᕐᓂᐊᕐᒪᖔᑕ. ᓲᕐᓗ ᐊᔾᔨᐅᑎᓪᓗᒍ, ᕗᐃᔅᑖᒃᑯᑦ ᑭᒡᒍᓯᖏᓐᓂᒃ ᐃᒪᐃᓕᒻᒪᑦ;

> “ᕗᐃᒡᑖᒃᑯᑦ ᑐᑭᓯᔪᑦ ᓇᓂ ᑐᑦᑐᕋᓛᑦ ᐊᒻᒪ ᐅᒥᖕᒪᐃᑦ ᑕᕝᕙᓂᑦᓴᐃᓐᓇᖅ ᓇᔪᒐᖃᓰᖑᓪᒪᖕᒫᑕ, ᓄᓇᕗᑦ ᒐᕙᒪᒃᑯᖏᑕ, ᐊᕙᑎᓕᕆᔩᒃᑯᖏᑦ ᐱᓕᕆᕝᕕᐅᖁᔨᓐᖏᓂᕐᒥᓂᒃ ᐊᑐᓕᖁᔨᔾᔭᑎᓕᐅᖅᓯᒪᔪᑦ ᑕᕝᕙᓐᖓᑦ ᐱᕆᐊᖅᓯᒪᓗᓂ ᐅᒥᖅᒪᑦ ᓄᕐᕆᐅᕐᕕᖏᓐᓂᒃ (ᐋᐳᕈ 15) ᐃᓯᐊᓄᑦ ᑐᑦᑐᕋᓛᑦ ᓄᕐᕆᐅᕐᕕᖓᓄᑦ (ᔪᓚᐃ 15). ᑭᖑᓂᐊᓂ ᓄᕐᕆᐅᕐᓇᓚᐅᖅᑎᑦᑐᒍ ᔪᓚᐃ 15-ᒥᒃ ᐊᐅᒡᒍᓯ 15-ᒧᑦ ᑕᒪᓐᓇᑦᑕᐅᖅ ᐱᖕᒪᕆᐊᓘᔪᖅ ᑐᑦᑐᐃᑦ ᐊᒻᒪᓗ ᐅᒥᖕᒪᑦ ᐊᒻᒪᓗ ᕗᐃᔅᑖᒃᑯᑦ ᐸᕝᕕᓴᑦᑕᐅᑦᑕᐃᓕᒪᕝᕕᐅᑎᓐᓇᓯᐊᕐᓂᐊᖅᑕᖓ ᑖᒃᑯᓂᖓ ᐆᒪᔪᓂᒃ”

ᑖᓐᓇ ᑎᑎᕋᖅᑕᐅᓯᒪᔪᖅ ᓇᓗᓇᐃᖅᓯᓯᒪᓗᐊᕌᓗᓐᖏᑦᑐᖅ ᕗᐃᔅᑖᒃᑯᑦ ᐊᖏᖅᓯᒪᓪᒪᖕᒫᑕ ᐸᕝᕕᓴᑦᑕᐅᑦᑕᐃᓕᒪᕝᕕᐅᑎᑦᓯᓂᐊᕐᓂᕐᒥᒃ ᐋᐳᕈ 15-ᒥᒃ ᔪᓚᐃ 15-ᒧᑦ. ᐊᒻᒪᓗᑦᑕᐅᖅ ᓯᓚ, ᕗᐃᔅᑖᒃᑯᑦ ᐅᖃᕆᐊᒃᑲᓂᖅᓯᒪᒻᒥᔪᑦ “ᐃᓄᓕᕆᔾᑐᖃᒃᑯᑦ ᓴᐳᔾᔭᐅᓯᒪᔾᔪᑎᒃᓴᓕᐅᓚᐅᖅᑐᑦ ᑐᑦᑐᐃᑦ ᓴᐳᔾᔭᐅᓯᒪᔾᔪᑎᒃᓴᖏᓐᓂᒃ ᒪᓕᑦᑕᐅᑦᓚᕆᒋᐊᓖᑦ ᐸᕝᕕᓴᑦᑕᐅᓕᕐᑯᓇᒥᑦ ᑕᔾᔭᐊᕝᕕᖏᑦ ᐊᒻᒪᓗ ᓄᕐᕆᐅᕝᕕᖏᑦ.” ᕿᑭᖅᑕᓂᒃᑯᑦ ᑕᑯᓐᓇᖅᑕᖓᒍᑦ ᐅᖃᐅᓯᐅᓕᖁᐃᓪᒪᑕ ᑐᑦᑐᐃᑦ ᓴᐳᔾᔭᐅᓯᒪᓂᖏᓐᓄᑦ ᒪᓕᑦᑕᐅᔭᕆᐊᓖᑦ ᕗᐃᔅᑖᒃᑯᑦ ᑕᑯᓐᓇᕐᒪᑕ ᐅᐃᒍᖓᓂ ᓇᓗᓇᐃᖅᓯᒋᐊᕈᑎ I, ᐃᓄᓕᕆᔾᑐᖃᒃᑯᑦ ᑐᑦᑐᐃᑦ ᓴᐳᔾᔭᐅᓯᒪᔾᔪᑎᒃᓴᖏᓐᓄᑦ ᒪᓕᑦᑕᐅᔭᕆᐊᓖᑦ ᑖᒃᑯᓇᓂ ᖁᑦᑎᑦᑐᒥ ᓄᓇᒥᒃ ᐊᑐᕐᓂᕐᒧᑦ ᐸᕐᓇᐅᑦ. ᖃᐅᔨᒪᔭᐅᑎᑕᐅᒋᐊᓕᒃ ᐃᓄᓕᕆᔾᑐᖃᒃᑯᑦ ᑐᑦᑐᐃᑦ ᓴᐳᔾᔭᐅᓯᒪᔾᔪᑎᒃᓴᖏᓐᓄᑦ ᒪᓕᑦᑕᐅᔭᕆᐊᓖᑦ ᐊᖏᖅᑕᐅᔪᓐᓇᕐᓂᖏᓐᓂᒃ ᐱᑕᖃᒃᑲᓂᖅᐸᑦ ᓇᓗᓇᐃᖅᑕᐅᓯᒪᔪᓂᒃ ᒪᓕᑦᑕᐅᔭᕆᐊᓕᓐᓂᑦᓗ ᑖᒃᑯᓇᓐᖔᖅᓯᒪᔪᓂᒃ ᐱᓕᕆᐊᒃᓴᓂᒃ ᓇᓗᓇᐃᖅᑕᐅᓯᒪᔪᓂᒃ ᑐᓴᕈᑎᓂ. ᓴᖅᑭᖅᑕᐅᔪᓐᓇᖁᑦᓗᒋᑦ ᐱᓕᕆᐊᒃᓴᑦ ᓇᓗᓇᐃᖅᑕᐅᓯᒪᓗᑎᒃ ᑐᑦᑐᐃᑦ ᓴᐳᔾᔭᐅᓯᒪᓂᖏᓐᓄᑦ ᒪᓕᒐᕐᓴᓕᐊᖑᓯᒪᔪᑦ ᕗᐃᔅᑖᒃᑯᑦ ᑐᒃᓯᕋᐅᓯᐊᕆᓯᒪᔭᖓ ᐱᓕᕆᐊᕆᔪᒪᔭᖏᓐᓄᑦ ᕿᑭᖅᑕᓂᒃᑯᑦ ᐅᔾᔨᕈᓱᑦᑐᑦ ᑎᒥᐅᔪᒥᒃ ᐊᑐᐃᓐᓇᐅᔪᒥᒃ ᖃᐅᔨᓴᖅᑐᓕᕆᓂᕐᒧᑦ, ᐃᓚᒋᔭᐅᑦᑐᓂ “ᑐᑦᑐᓄᑦ ᓴᐳᔾᔭᐅᓯᒪᕝᕕᐅᔪᖅ ᓄᓇᖑᐊᖅ” (ᓇᓗᓇᐃᖅᓯᔾᔪᑕᐅᓯᒪᔪᖅ ᐅᐃᒍᖓᓂ ᓇᓗᓇᐃᖅᓯᒋᐊᕈᓯᒥ I ᖁᑦᑎᑦᑐᒥ ᓄᓇᒥᒃ ᐊᑐᕐᓂᕐᒧᑦ ᐸᕐᓇᐅᕗ) ᑭᒡᓕᖃᖅᑎᑕᐅᑐᐃᓐᓇᕆᐊᓕᒃ ᐱᑕᖃᓐᖏᓯᐊᓪᒪᑎᑦᑐᓂᔫᓐᓃᑦ. ᕿᑭᖅᑕᓂᒃᑯᑦ ᐊᑐᖅᑕᐅᖁᔨᓪᒪᑎᑉᐳᑦ ᓄᓇᕗᒻᒥ ᐊᕙᑎᓕᕆᔩᒃᑯᑦ ᑲᑎᒪᔩᖏᓐᓂᒃ ᐊᒻᒪᓗ ᑕᒪᐃᓐᓂᒃ ᑲᒪᖃᑕᐅᔪᓂᒃ ᐊᑐᖅᑕᐅᖁᔩᑦᑐᑎᒃ ᐃᓄᐃᑦ ᖃᐅᔨᒪᓂᖏᓐᓂᒃ, ᓇᓗᓇᐃᖅᑕᐅᓯᒪᔪᓂ ᐊᕕᑦᑐᖅᓯᒪᓂᖓᓂ 43 ᓄᓇᕗᒻᒥ ᐊᕙᑎᓕᕆᔩᒃᑯᑦ ᑲᑎᒪᔩᖏᑕ ᒪᓕᒋᐊᓖᑦ ᐊᐅᓚᕐᓯᔾᔭᑕᐅᓂᐊᖅᑐᓄᑦ (ᓯᐸᑎᒻᕙ 2009), ᐅᖁᒪᐃᑦᓴᐅᑎᑦᓴᐅᔪᓂᒃ ᓇᓗᓇᐃᖅᑕᐅᓇᓯᐊᖅᑎᑦᑐᒥᑦ ᓈᒻᒪᑦᓯᐊᖁᑦᓗᒋᑦ ᑐᑦᑐᐃᑦ ᓴᐳᔾᔭᐅᓯᒪᓂᖏᓐᓄᑦ ᒪᓕᒋᐊᓖᑦ.

ᕿᒥᕐᕈᓇᑦᑕᐅᑎᑦᓗᒍ ᑐᑦᓯᕋᐅᑎᓕᐊᖑᒋᐊᓐᖓᓚᐅᖅᑐᖅ ᐃᓄᐃᑦ ᓄᓇᖁᑎᖏᓐᓄᑦ, ᕿᑭᖅᑕᓂᒃᑯᑦ ᓄᓇᓕᕆᔩᕋᓛᒃᑯᑦ ᑲᑎᒪᔩᕋᓛᖁᑎᖏᑦ ᓄᓇᓕᓐᓂ ᐅᖃᑦᓯᐊᓪᒪᕆᓚᐅᖅᑐᑦ ᑐᒃᓯᕋᖅᑐᑎᒃ ᓄᓇᓕᓐᓂᒃ ᑐᓴᕋᓯᐊᕐᓂᖅᑲᖅᓯᐅᔾᔨᖁᔾᔨᑦᑐᑎᒃ ᐃᓚᒋᔭᐅᓗᓂ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐸᕐᓇᓂᕐᒧᑦ.[1] ᕿᑭᖅᑕᓂᒃᑯᑦ ᕗᐃᔅᑖᒃᑯᑦ ᓄᓇᓕᓐᓅᑏᕈᒪᓂᖏᓐᓂᒃ ᒪᐃ 2010 ᓈᒻᒪᒐᓯᒋᓯᖏᑦᑐᑦ ᐅᕙᑑᓐᓃᑦ ᐊᑑᑎᖃᕐᓴᖅᑐᕆᓯᖏᑦᑐᑦ ᓄᓇᓕᓐᓂᒃ ᐃᓚᐅᑎᑦᓯᓂᕐᒨᖓᑎᑕᐅᓇᓯᐊᖅᐸᑦ. ᕿᑭᖅᑕᓂᒃᑯᑦ

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[1] ᕿᑭᖅᑕᓂᒃᑯᑦ ᓇᓗᓇᐃᖅᓯᕗᑦ ᓄᓇᓕᓐᓂ ᓄᓇᓕᕆᔩᕋᓛᒃᑯᑦ ᑲᑎᒪᔩᕋᓛᖏᑦ, ᑎᒥᖁᑎᒋᔭᐅᒐᓗᐊᖅᑎᑦᓗᒋᑦ ᕿᑭᖅᑕᓂᒃᑯᓐᓄᑦ, ᑲᑎᒪᔩᐅᖃᑕᐅᔪᖃᖅᑐᖅ ᑖᒃᑯᓄᖓ ᑭᒐᖅᑐᐃᔪᓂᒃ ᓄᓇᓕᓐᓂ ᐊᖑᓇᓱᑦᑐᓕᕆᔩᖏᓐᓂᒃ ᐊᒻᒪᓗ Hᐊᒻᓚᑦᖏᓐᓂᒃ. ᐊᒻᒪᓗᑦᑕᐅᖅ ᓯᓚ ᓄᓇᓕᕆᔩᕋᓛᒃᑯᑦ ᑲᑎᒪᔩᕋᓚᖏᑕ ᑲᑎᒪᓂᖓᓄᑦ ᕗᐃᔅᑖᒃᑯᑦ ᑐᒃᓯᕋᐅᑎᖓᓄᑦ ᐃᓄᐃᑦ ᓄᓇᖁᑎᖏᓐᓂᒃ, ᓄᓇᓕᕆᔩᒃᑯᑦ ᑲᑎᒪᑎᑦᓯᓚᐅᕐᒥᔪᑦ ᐅᖄᓚᐅᑎᒃᑯᑦ ᓄᓇᓕᓐᓂ ᓄᓇᓕᕆᔩᕋᓛᒃᑯᑦ ᑲᑎᒪᔩᕋᓛᖏᓐᓂᒃ ᐊᒻᒪᓗ ᓄᓇᓕᓐᓂ ᐊᖑᓇᓱᑦᑐᓕᕆᔩᒃᑯᑦ ᑲᑐᔾᔨᖃᑎᒌᖏᓐᓂᒃ ᐊᐅᓯᐃᑦᑐᒥ. ᑲᑎᒪᓂᖃᓚᐅᖅᑐᖅ ᐱᔾᔪᑕᐅᓪᓗᓂ ᐋᖅᑭᒋᐊᕆᐊᓕᓐᓄᑦ ᐊᒻᒪᓗ ᓇᓗᓇᐃᖅᑕᐅᓪᒪᕆᖁᑦᓗᒋᑦ ᐅᖃᐅᓯᕆᓴᐅᖃᑦᑕᓚᐅᖅᑐᑦ ᐱᓚᐅᖅᑕᓂ ᑖᒃᑯᓄᓐᖓᖓᔪᑦ ᓄᓇᕗᒻᒥ ᐊᕙᑎᓕᕆᔩᒃᑯᑦ ᑲᑎᒪᔩᖏᑕ ᐊᕕᑦᑐᖅᓯᒪᓂᐅᔪᒧᑦ 4 ᖃᐅᔨᓴᕐᓂᖓᓄᑦ.

ᕿᑭᖅᑕᓂ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᖏᑦ
Qikiqtani Inuit Association

ᑕᑯᓐᓇᖅᑕᖓᒍᑦ, ᓄᓇᓕᓐᓂ ᑐᓴᓇᐊᕐᕕᖃᕐᓂᖅ ᐸᕐᓇᑕᐅᓯᒪᔭᓇᐊᓕᒃ ᐱᕝᕕᖃᑦᓯᐊᖅᑎᑕᐅᓗᑎᒃ ᑕᒪᕐᒥᒃ ᐱᓕᕆᖅᑕᐅᔪᑦ ᐅᖃᐅᓯᖃᕐᕕᖃᑦᓯᐊᖁᓪᓗᒋᑦ ᐃᓘᓐᓈᒍᑦ ᐊᑕᖏᑦᓯᐊᖅᑐᒥᒃ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐸᕐᓇᐅᑎᓄᑦ, ᐃᓚᒋᔭᐅᓗᑎᒃ ᓈᖕᒪᑦᓯᐊᕆᐊᖃᕐᓂᖏᑦ ᓇᓗᓇᐃᖅᑕᐅᔾᔪᑏᑦ ᒪᓕᑦᑕᐅᔭᕆᐊᓖᓪᓗ. ᑐᕌᒐᓕᐊᖑᒋᐊᓐᖓᕆᐊᖃᕐᓂᐊᖅᑐᖅ ᓄᓇᓕᓐᓂ ᑐᓴᕋᓱᐊᕐᓂᕐᒧᑦ ᓇᓗᓇᐃᔭᖅᑕᐅᑦᓯᐊᕆᐊᖃᕐᓂᖓ ᐱᓕᕆᐊᖑᔪᒪᔪᒧᑦ ᑐᑦᓯᕋᐅᑦ, ᐃᓚᒋᔭᐅᓗᑎᒃ ᖃᐅᔨᒪᔭᐅᔪᑦ ᐱᓕᕆᕕᐅᔪᒪᔪᒨᖓᔪᑦ ᐊᒻᒪᓗ ᐅᓂᒃᑳᕆᓗᒋᑦ ᖃᓄᖅ ᐅᖃᐅᓯᕆᔭᐅᓚᐅᖅᑐᖅ ᐃᓚᓕᐅᔾᔭᐅᔪᓐᓇᕋᔭᕐᒪᖔᑕ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐸᕐᓇᐅᑎᓄᑦ. ᑐᓴᕋᓱᐊᕈᑕᐅᔭᕆᐊᖃᕐᒥᔪᖅ ᒪᓂᒪᑎᑦᓯᓂᕐᒥᒃ ᐱᕝᕕᒃᓴᕆᔭᐅᔪᓐᓇᖅᑐᓂᒃ ᐱᓇᓱᐊᖅᑐᖅ ᐃᓕᒃᑲᓐᓂᖁᓪᓗᒍ ᓇᖕᒥᓂᖅ ᐊᑐᕐᓗᓂ ᐃᓄᐃᑦ ᐊᑐᖅᐸᑦᑕᖏᓐᓂᒃ ᐊᑐᖃᑦᑕᖅᑐᓂᒃ ᐊᒻᒪᓗ ᐱᖕᒪᕆᐅᔪᖁᑎᖃᖅᑐᓂᒃ ᐱᓕᕆᕝᕕᐅᔪᒪᔪᒥ. ᑐᓴᕈᑏᑦ ᐊᑐᐃᓐᓇᐅᔪᑦ ᓄᓇᓕᓐᓂᒃ ᑲᑎᖅᓱᖅᑕᐅᔪᓐᓇᖅᑐᑦ ᐊᒻᒪᓗ ᐊᑐᖅᑕᐅᓗᑎᒃ ᐊᑑᑎᖃᑦᓯᐊᕋᔭᕐᒪᑕ ᐃᖅᑲᓇᐃᔭᐅᑕᐅᓗᑎᒃ ᐱᓕᕆᐊᖑᔪᒪᔪᒧᑦ ᐸᕐᓇᓂᕐᒧᑦ. ᑲᔪᓯᑎᑦᓯᓂᖅ ᑲᑎᑕᐅᓯᒪᔪᓂᒃ ᑐᑭᓯᐅᒪᖃᑦᑕᐅᑎᓂᕐᒧᑦ ᖃᓄᖅ ᐱᓕᕆᐊᖑᔪᒪᔪᖅ ᐊᐅᓚᓂᖃᖅᓯᒪᖔᖅ ᐊᒻᒪᓗ ᖃᓄᖅ ᓇᓗᓇᐃᖅᑕᐅᓯᒪᓂᖏᑦ ᒪᓕᑦᑕᐅᒋᐊᓖᓪᓗ ᐊᑐᖅᑕᐅᔪᓐᓇᕋᔭᕐᒪᖔᑕ ᑕᒪᓐᓇ ᑲᒪᒋᔭᐅᓪᓗᐊᑕᖅᑳᕆᐊᖃᕐᓂᐊᖅᑐᖅ ᑎᒍᓯᕙᓪᓕᐊᔪᒪᑉᐸᑕ ᐱᓕᕆᐊᑦᓴᒧᑦ ᐊᖏᖅᑕᐅᓂᕐᒥᒃ. ᓇᓗᓇᐃᖅᓯᒪᔭᖓᓄᑦ ᕗᐃᔅᑖᒃᑯᑦ ᐱᓕᕆᐊᓇᔪᒪᔭᖏᓐᓄᑦ ᑐᑦᓯᕋᐅᑎᖑᓄᑦ ᑐᓴᕋᓱᐊᕐᓂᖅ ᓈᖕᒪᑦᓯᐊᖁᓪᓗᒋᑦ ᓂᕐᔪᑏᑦ ᓴᐳᔾᔭᐅᓯᒪᔭᕆᐊᖃᕐᓂᖏᓐᓄᑦ ᒪᓕᑦᑕᐅᔭᕆᐊᓖᑦ ᐊᑯᓂᐊᓗᒃ ᐊᑐᖅᑕᐅᖃᑦᑕᓲᔭᕈᓐᓇᕋᔭᕐᒪᑕ ᐅᖃᐅᓯᕆᔭᐅᖃᑦᑕᕐᓂᖏᓐᓂ ᐃᓱᒫᓘᑕᐅᔪᑦ ᐃᓄᖕᓄᑦ. ᓱᓕᒃᑲᓐᓂᖅ, ᐱᔭᕆᐊᑐᓇᔭᕐᒪᑦ ᑕᑯᓐᓇᓐᖑᐊᕋᓱᐊᕆᐊᑦᓴᖅ ᐊᕗᖔᓗᒃ ᖃᓄᖅ ᐃᑯᓪᓚᐅᒥᑎᑦᓯᓯᒪᔪᓐᓇᕐᒪᖔᑕ ᐊᑐᖅᑕᐅᖃᑦᑕᕆᐊᓖᑦ ᓈᖕᒪᒋᐊᖃᕐᓂᖓᓄᑦ ᐃᓕᖓᑎᑕᐅᓂᐊᖅᑎᓪᓗᒋᑦ ᐅᖃᐅᓯᖃᕐᕕᐅᖏᓪᓗᑎᒃ ᐃᓄᖕᓂᒃ ᓱᖏᖅᓲᑎᖅᖃᑦᑕᖅᑐᓂᒃ ᑖᒃᑯᓂᖓ ᓂᕐᔪᑎᓂᒃ ᐊᐱᖅᑯᑕᐅᔪᓂᒃ.

ᕿᑭᖅᑕᓂᒃᑯᑦ ᐅᖃᕆᐊᒃᑲᓐᓂᕈᒪᔪᑦ ᐃᓅᓯᕐᒥᑦ-ᒪᑭᒪᔾᔪᑎᓅᖓᔪᓂᒃ ᐱᓕᕆᐊᒃᓴᒧᑦ ᒪᓂᒪᑦᓯᒍᑕᐅᔪᒧᑦ ᖃᐅᔨᒪᔾᔪᑕᐅᓂᐊᖅᑐᒧᑦ ᑲᑐᔾᔨᖃᑎᒌᓐᓂᒃᑯᑦ ᑭᖑᓂᐊᓂ ᑐᓴᕋᓱᐊᕐᓂᐅᑉ ᐊᒻᒪᓗ ᐊᓐᖑᑎᑎᑦᓯᕆᐊᖃᑦᑕᕐᓂᐅᑉ. ᓄᓇᓕᓐᓂ ᐃᖅᑲᓇᐃᔮᑦᓴᖃᓗᐊᕌᓗᑦᑎᓐᓇᒍ ᐊᒻᒪᓗ ᒪᑭᒪᔾᔪᑎᒃᓴᐅᓇᔭᖅᑐᓂᒃ ᐱᕕᑦᓴᖃᓗᐊᕌᓗᑦᑎᓐᓇᒋᑦ ᓄᓇᓖᑦ ᐃᓚᐅᑎᑕᐅᖃᑦᑕᕐᓂᖏᓐᓄᑦ ᐊᖏᔫᑎᑕᐅᔭᕆᐊᖃᒻᒪᕆᓐᓂᐊᖅᑐᖅ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐸᕐᓇᓂᕐᒥ. ᕗᐃᔅᑖᒃᑯᑦ ᑭᒡᒍᑎᒋᓚᐅᖅᑕᖏᑦ, “ᕗᐃᔅᑖ ᐊᖏᕈᑎᖃᖅᓯᒪᕗᖅ ᑐᓂᓯᒪᓪᓗᓂ ᑎᒍᓯᓯᒪᓂᕐᒥᒃ ᐃᑲᔫᑎᒃᓴᓂᒃ ᐱᔨᑦᓯᕋᐅᑎᑎᒍᑦ ᑕᕝᕙᓐᖔᕈᓐᓇᕋᐃᑉᐸᑕ ᓄᓇᓕᓐᓃᖔᖅᑐᓂᒃ”, ᓴᖅᑭᐅᒪᓐᖏᓚᖅ ᐋᖅᑭᑦᓯᒪᒍᑎᒃᓴᐅᓇᔭᖅᑐᓂᒃ ᑖᒃᑯᓂᖓ ᐱᖕᒪᕆᐅᔪᓂᒃ ᑐᑭᖃᑦᓯᐊᖅᑐᒃᑯᑦ.

ᕿᑭᖅᑕᓂᒃᑯᑦ ᐅᔾᔨᕈᓱᑦᓯᒪᔪᑦ ᓄᓇᕗᒻᒥ ᐊᕙᑎᓕᕆᔨᒃᑯᑦ ᑲᑎᒪᔨᖏᑦ ᕿᓂᕐᓂᖏᓐᓂᒃ ᐊᑐᓕᖁᔨᔾᔪᑎᑦᓴᐅᓇᔭᖅᑐᓂᒃ ᒪᓕᑦᓯᒪᔪᓂᒃ ᐃᓛᒃᑯᑦ 12.4.4 ᓄᓇᕗᒻᒥ ᓄᓇᑖᕐᓂᕐᒧᑦ ᐊᖏᕈᑎᓂ (ᐊᖏᕈᑏᑦ). ᓄᓇᓕᓐᓂ ᑐᓴᓇᐊᕐᕕᖃᓐᖏᓗᐊᖃᑦᑕᕐᓂᖏᓐᓄᑦ, ᐋᖅᑭᑦᑐᖃᓚᐅᖅᓯᒪᓐᖏᑦᑐᖅ ᓂᕐᔪᑎᓄᑦ ᐃᑯᓪᓚᐅᒥᒍᑎᒃᓴᓂᒃ ᐊᑐᖅᑕᐅᖃᑦᑕᖅᑐᓂᒃ ᐊᒻᒪᓗ ᓇᓗᓇᐃᖅᑕᐅᓯᒪᑦᓯᐊᖅᑐᓂᒃ ᐃᓄᓯᕐᒥ - ᒪᑭᒪᔾᔪᑎᓄᑦ ᐃᑲᔫᑕᐅᓇᔭᖅᑐᓂᒃ ᕿᑭᖅᑕᓂᒃᑯᑦ ᑐᑦᓯᕋᐅᒻᒥᒃ ᐅᑎᖅᑎᑕᐅᖁᔨᒻᒪᕆᒃᑲᓗᐊᖅᐳᑦ ᐱᓇᓱᐊᖅᑐᒧᑦ ᓇᓗᓇᐃᖅᑕᐅᑦᓯᐊᖁᓪᓗᒍ, ᒪᓕᑦᓯᒪᓗᑎᒃ ᐃᓛᒃᑯᑦ 12.4.4.(c) ᐊᖏᕈᑎᓂᒃ.

ᑕᐃᒪᓕᒃ ᕗᐃᔅᑖᒃᑯᑦ ᐱᓇᓱᐊᖏᓐᓇᓂᐊᖅᐸᑕ ᐱᓕᕆᐊᒃᓴᒧᑦ ᐊᖏᖅᑕᐅᔪᒪᔾᔪᑎᒥᒃ, ᕿᑭᖅᑕᓂᒃᑯᑦ ᓄᓇᓕᓐᓂ ᑐᓴᓇᐊᕐᕕᖃᖁᔨᓂᐊᖅᑐᑦ ᒫᑦᓯ 2010 ᑭᖑᓂᐊᓂᐊᓐᖏᑦᑐᖅ. ᑐᓴᕆᐊᕈᑎᖃᕐᓗᑎᒃ ᑐᑭᓯᓇᑦᓯᐊᖅᑐᓂᒃ ᓴᖅᑭᑎᑦᓯᕕᐅᖁᓪᓗᒋᑦ ᐊᐅᓯᐃᑦᑐᒥᐅᑦ ᑕᑯᔭᐅᑎᑕᐅᑦᓯᐊᓗᑎᒃ ᐱᓕᕆᐊᒃᓴᒧᑦ ᑐᑦᓯᕋᐅᑎᕆᔭᐅᔪᒧᑦ ᐱᔾᔪᑎᕆᔭᐅᔪᒥᒃ ᐊᒻᒪᓗ ᖃᓄᖅ ᓂᕐᔪᑏᑦ ᐊᒻᒪᓗ ᐃᓅᓯᕐᒧᑦ-ᒪᑭᒪᔾᔪᑎᒃᓴᓄᑦ

ᕿᑭᖅᑕᓂ ᐃᓄᐃᑦ ᑲᑐᔾᔨᖃᑎᒌᖕᒋᑦ
Qikiqtani Inuit Association

ᐃᓱᒫᓘᑕᐅᔪᑦ ᐊᑲᐅᓂᖅᐹᒃᑯᑦ ᐅᖃᐅᓯᕆᔭᐅᔪᓐᓇᕋᔭᕐᒪᖔᑕ. ᓱᓕᒃᑲᓐᓂᖅ, ᓄᓇᓕᓐᓂ ᑐᓴᕋᓯᐊᕐᓂᖅ ᑲᔪᓯᑉᐸᑦ ᐱᓕᕆᖃᑎᒌᑦᑐᑦ ᐋᔩᕋᕈᑎᖃᕈᓐᓇᕋᔭᕐᒪᑕ ᐅᖃᐅᓯᕆᔭᐅᔭᕆᐊᓕᓐᓂᒃ ᐊᖅᑭᒋᐊᕈᑎᒃᓴᓄᑦ ᐃᓄᓕᕆᔨᑐᖃᒃᑯᑦ ᑐᑦᑐᐃᑦ ᓴᐳᔾᔭᐅᓯᒪᔾᔪᑎᒃᓴᖏᓐᓄᑦ ᒪᓕᑦᑕᐅᔭᕆᐊᓕᓐᓂ. ᑕᒪᓐᓇ ᐅᖃᐅᓯᕆᓪᓗᒍ, ᑐᑦᑐᐃᑦ ᑖᒃᑯᑑᓐᖏᒻᒪᑕ ᐃᑯᓪᓚᐅᒥᒍᑎᒃᓴᐅᓇᔭᖅᑐᓄᑦ ᑲᒪᒋᔭᐅᔭᕆᐊᓕᓐᓄᑦ ᒪᓕᒐᓕᐅᖅᑕᐅᒋᐊᓖᑦ.

ᕿᑭᖅᑕᓂᒃᑯᑦ ᓈᖕᒪᒐᓱᕆᔭᖓ ᑲᒪᒋᔭᐅᑦᓯᐊᕆᐊᖃᕐᓂᖓᓄᑦ ᐊᕙᑦᑐᖅᓯᒪᓂᖓ 4 ᖃᐅᔨᓴᖅᑕᐅᓂᖓᓄᑦ ᐊᒻᒪᓗ ᕗᐃᔅᑖᒃᑯᑦ ᐊᖏᖅᑕᐅᔾᔪᑎᖃᕈᒪᓂᖓ ᐱᓕᕆᔪᒪᓂᕐᒥᓄᑦ ᓯᕗᓂᐊᒍᑦ 2010 ᑲᒪᕕᔅᓴᕈᓚᐅᖅᑳᑎᓐᓇᒍ.

ᐊᐱᖅᑯᑎᒃᓴᖃᕐᓂᕈᕕᑦ ᐅᕝᕙᓘᓐᓃᑦ ᖃᐅᔨᒋᐊᕈᒪᓐᓂᕈᕕᑦ ᖃᓄᐃᓕᐅᖅᐸᓪᓕᐊᓯᒪᓂᐅᔪᓂᒃ ᑭᓱᑐᐃᓐᓇᕐᒧᑦ ᓴᖅᑭᖅᓯᒪᔭᑦᑎᓐᓄᑦ ᐊᑏ ᐊᓪᓚᕝᕕᑦᑎᓐᓄᑦ ᐅᖄᓚᖃᑦᑕᕆᑦ.

ᑎᑎᕋᖅᑐᖅ,

ᓯᑏᕙᓐ ᕙᑐᕆ
ᑐᑭᒧᐊᒃᑎᑦᑎᔨ, ᓄᓇᓕᕆᔨᒃᑯᑦ

ᐊᔾᔨᖏᓐᓂᒃ ᐱᔪᑦ: ᔪᐊᔾ ᐃᖅᑲᓪᓗᒃ, ᕿᑭᖅᑕᓂᒃᑯᑦ ᐊᖏᔪᖅᑳᑉ ᑐᒡᓚᐊ
ᓚᐅᕆ ᐊᐅᓪᓗᒃ, ᐃᔅᓯᕙᐅᑕᖅ, ᐊᐅᓯᐃᑦᑐᒥᒃ ᓄᓇᓕᕆᔨᓴᓖᑦ ᑲᑎᒪᔨᓴᓖᖏᑦ
ᐊᐃᕕᖅ ᒪᖃᐃᑎᒃᑯᑦ ᑲᑐᔾᔨᖃᑎᒌᖕᒋᑦ - ᐊᐅᓯᐃᑦᑐᖅ
ᕋᐃᔭᓐ ᒍᓃᐅᐊᑦ ᐊᒻᒪᓗ ᑏᓐ ᐱᓯᕆᐃ, ᕗᐃᔅᑕ ᑯᐊᐳᓃᔅᑯᑦ

ᐊᕙᑎᓕᕆᔨᒃᑯᑦ
Avatiligiyiit
Department of Environment
Ministère de l'Environnement

January 15, 2010

TO: Kelli Gillard
Technical Advisor
Nunavut Impact Review Board

via Email to: kgillard@nirb.ca

RE: NIRB 09EN067 -- Parties' Opportunity to Review Weststar Resources Corporation's Response to Comments Submitted Regarding the Ellesmere Island Coal Exploration project proposal

Dear Ms. Gillard:

The Government of Nunavut, Department of Environment (DOE) has reviewed Weststar's letter of response dated 09-12-09 to comments submitted regarding the Ellesmere Island Coal Exploration project proposal.

DOE has serious concerns about activity in this significant wildlife area, hence the conclusion in our original letter of 25-11-09. Nevertheless, after reviewing the proponent's response to our original comments, we believe that, with very stringent wildlife mitigation measures, such as those proposed by the proponent in its response and further recommendations we provide below, it may be possible for the project to proceed.

DOE acknowledges the efforts made by the proponent to implement industry best practices to mitigate disturbance to wildlife. Many of these best practices are reflected in the proponent's Wildlife Management & Mitigation Plan (WMMP). In most cases the measures proposed in the WMMP, along with the caribou protection measures and specific commitments made by the proponent in their letter of response dated 04-12-09 would likely be able to adequately mitigate disturbances to wildlife. However, DOE has provided further information on Muskox and Peary caribou in the proposed area that the proponent should be aware of if they intend to proceed, as well as additional recommendations for mitigative measures.

In particular, the proponent has proposed the following measures:

> *If caribou and/or muskox are seen in the area, the geophysical survey will not be flown until they have moved a safe distance (at least 1 km) from the area to be surveyed.*

and,

Low-level aircraft and helicopter flights will make efforts to avoid areas which are crucial migration, nesting and denning habitats.

and

No aircraft landings when wildlife are present

DOE notes that these measures are often effective in areas where migratory species are abundant (eg. Kivalliq). However, DOE notes that in the case of Peary Caribou and muskox in this area, DOE's surveys and observations have shown that neither species move very far, if at all, from this area. For this reason, the proponent should be aware that the density of Muskox on Fosheim Peninsula is such that in DOE's opinion they may never get a chance to fly very many transects, if at all.

Additionally, the following measure was proposed by the proponent:

> *Prior to conducting any low-level airborne geophysical surveys the QIA will be contacted and the following information will be provided; dates of surveys, location of surveys, how long the surveys will take to complete. As well, the locally hired wildlife monitors will be required to conduct a survey of the area to ensure that there are no wildlife present and will monitor for wildlife during the survey.*

DOE concurs with the usefulness of this measure for garnering community support, and further recommends that the proponent be required to retain the services of a professional biologist(s) to monitor their activity and the impact they are having on wildlife. If the impacts are generating significant wildlife responses then the biologist would advise the proponent to temporarily shut down operations until operating procedures are either changed or the wildlife are no longer impacted by the activities. Additionally, DOE recommends that prior to conducting surveys the proponent should undertake high altitude (>300 m) aerial reconnaissance with the presence of the professional biologist on board. During these months DOE Conservation Officers would also be inspecting this site.

Should NIRB allow the project to proceed, DOE recommends that the following mitigative measures be included in the terms and conditions:

- Prior to significant operational movements (e.g. before moving drill rigs), the proponent should undertake high altitude (>300 m) aerial reconnaissance with the assistance of the professional biologist.

- At the end of each month, the proponent should submit a daily logbook of caribou reconnaissance to DOE, also detailing when and how, these measures have been implemented.

Finally, DOE has also included additional information to this letter that we believe the proponent should take into consideration regarding the Department's research efforts on

Muskox and Peary Caribou as well as additional information on the ecological significance of the Fosheim Peninsula.

The DOE thanks the NIRB for the opportunity to provide comments on this submission from Weststar Resources Corporation's project proposal. A detailed discussion on the ecological significance of the Fosheim Peninsula is appended to this letter. Please contact us if you have any further questions or concerns.

Sincerely,

Original signed by

LΔdᑦ ᒥᖏᓪᓗᒍ
Michael Mifflin
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Manager of Land Use & Environmental Assessment
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Environmental Protection Service
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Additional Information for Westar Resources:

1. DOE Research

The Department of Environment has undertaken a long-term research project to survey and estimate Peary caribou and also muskoxen across their range. Since 2001 DOE and Hunters and Trappers Organizations (HTO)s from Resolute Bay and Grise Fiord have completed joint ground/aerial surveys on the Bathurst Island Group, Cornwallis Island, western Devon, Prince of Wales, Somerset, and in 2005-06 the entire non-glaciated area of Ellesmere and Graham Islands. In 2007, aerial survey techniques where used to record wildlife numbers and their locations for the first time since 1961 on Axel Heiberg Island, the Ringnes Islands and their smaller satellite islands.

The survey of Ellesmere Peary caribou and muskox was successfully completed June 1, 2006. Observations of Peary caribou yielded approximately 97 adult males, 229 adult females, 31 young males, 31 yearlings, and 23 unclassified adults for a total of 410 animals. Over the same period, 5080 adult muskox with approximately 168 young bulls and yearlings, and 921 calves were observed across Ellesmere. These observations represent only a minimum count as only a planned 10-20% of the land mass of Ellesmere Island was searched. The distribution of Peary caribou and muskox during the survey period (April / May) provides fundamental information on areas critical for calving and post calving. DOE notes however that these observations are only summary and currently undergoing in-depth analysis. As such, discussion as to the present and future status of Peary caribou on Ellesmere Island will be reserved until the final analysis is completed in the coming month. As soon as this report is completed we will make it publically available.

Reporting on the 2006 survey program was initiated immediately after the field program was completed. A summary report entitled "Estimating Peary Caribou (*Rangifer tarandus pearyi*) and Muskox (*Ovibos moschatus*) Numbers, Composition and Distributions on Ellesmere Island, Nunavut" (Campbell 2006) was distributed to the Resolute Bay and Grise Fiord HTOs and conservation officers, NWMB, NTI, and the Qikiktaaluk Wildlife Board (QWB), in June 2006. In November 2006, a research summary was presented to the QWB at their annual meeting in Iqaluit. As well, research results from the 2001-2006 field programs and the proposed 2007 aerial survey were detailed to both the Grise Fiord and Resolute Bay HTOs, the community Wildlife Officers, NTI representatives, and their invited elders at a workshop held in Resolute Bay on December 5 and 6, 2006.

2. Peary Caribou

The proponents Wildlife Mitigation & Management Plan states:

> *This project is not located near any caribou calving grounds or within the migration routes.*

Department of Environment's studies show that the Fosheim peninsula is Peary caribou habitat, and may even include calving areas. The proposed schedule of work (May-

October) includes calving and post calving seasons for this herd. Caribou are extremely sensitive to disturbance including over flights, ground activities, and noise which can affect their access to habitat, and their fitness levels and survival. Disturbances to Peary caribou and their habitat must be avoided. In their Assessment Summary of May 2004, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) assessed the entire *pearyi* subspecies of caribou as Endangered: that is, it is facing imminent extinction.

The decline of Peary caribou across its entire range is profound (numbers have declined by about 72% over the last three generations, mostly because of catastrophic die off related to severe icing episodes (COSEWIC 2004). Voluntary restrictions on hunting by local people have occurred and efforts to conserve Peary caribou by local Hunting and Trapping Organizations (HTO) are well documented. Nonetheless, the overall decline of Peary caribou across its entire range is profound and further management and conservation efforts are necessary to establishment of populations capable of sustaining the harvesting needs of communities. (Jenkins 2007 see attached maps).

3. Muskox

DOE's studies also show that the Fosheim Peninsula is the epicentre, *i.e.* the focal point of activity, for muskox distribution on Ellesmere Island (Jenkins 2007, see attached maps). The Fosheim Peninsula provides critical habitat to muskox and large numbers of muskox use the area for calving. Muskox are particularly sensitive to disturbance during calving and post calving. Every effort should be taken to minimize disturbances to the animals and the grazing habitat and to protect calving and post calving areas from any disturbance.

Furthermore, the Fosheim Peninsula is considered an Arctic Refugium (Thomas *et al.* 1981) or 'optimal habitat area' (Lent 1999) and supports high muskox densities (Thomas *et al.* 1981). This area is considered a refugia in the sense that it may support muskox population even during periods when most unfavourable conditions for muskox prevail across the Arctic Archipelago; thus, providing colonizers that will spread out and reoccupy other areas of less ideal habitat when conditions are more favourable. This area is not replaceable but unique providing optimal habitat for a variety of species at critical period in their life cycle (*i.e.* denning, nesting, and calving).

References

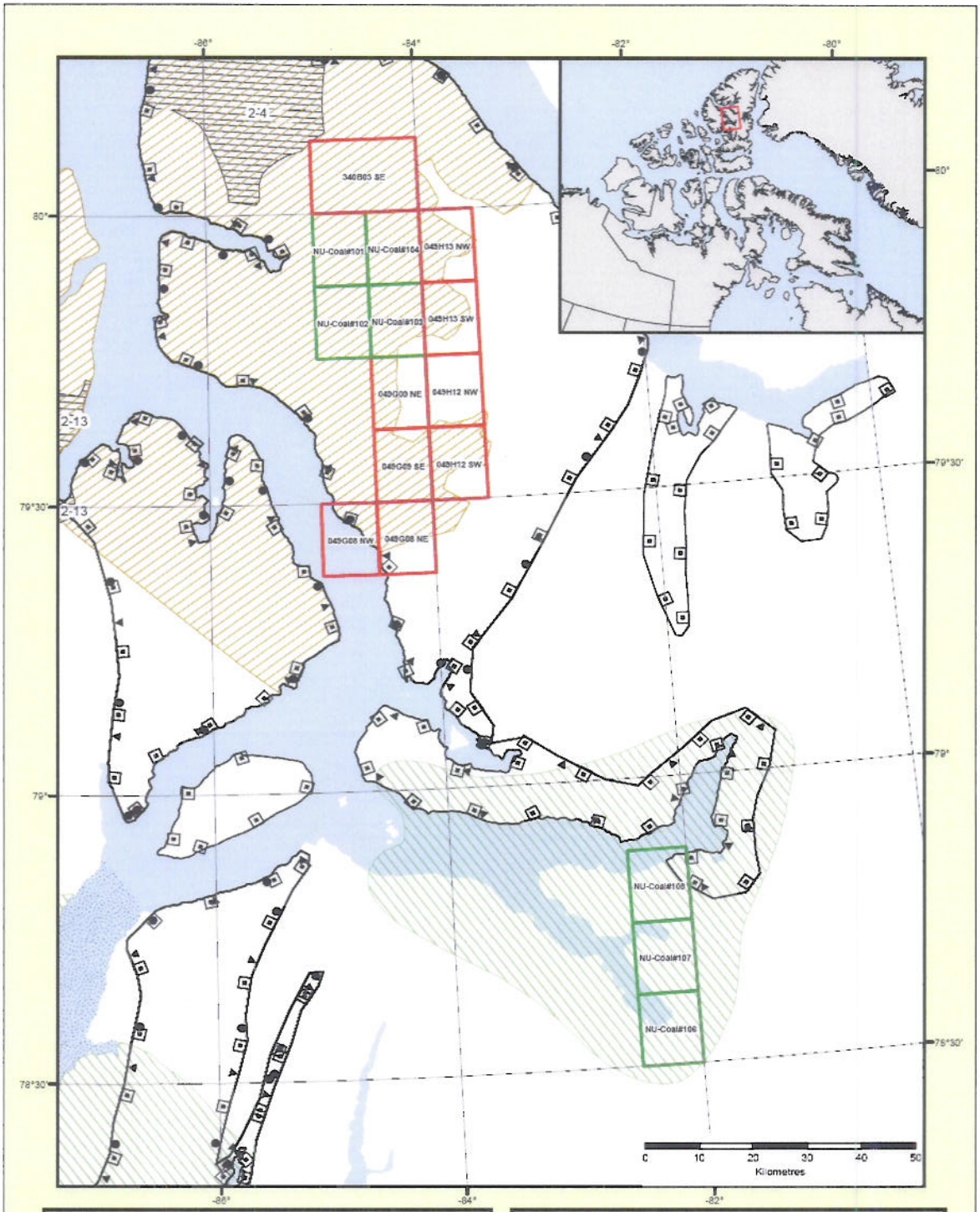
Campbell, M. 2006. Estimating Peary Caribou (*Rangifer tarandus pearyi*) and Muskox (*Ovibos moschatus*) Numbers, Composition and Distributions on Ellesmere Island, Nunavut. Department of Environment, Government of Nunavut, Arviat, NU. June, 2006.

COSEWIC. 2004. COSEWIC assessment and update status report on the Peary caribou *Rangifer tarandus pearyi* and the barren-ground caribou *Rangifer tarandus groenlandicus* (Dolphin and Union population) in Canada. Committee on the Status of Endangered Wildlife in Canada. Ottawa. x + 91 pp.

Jenkins, D. 2006. Estimating Peary Caribou (*Rangifer tarandus pearyi*) and Muskox (*Ovibos moschatus*) Numbers, Composition and Distributions on Ellesmere Island, Nunavut. Project Number 2-06-08. Government of Nunavut, Department of Environment, Pond Inlet, NU. 8 pp.

Lent, P.C. 1999. Muskoxen and their hunters: A History, Volume 5 in the Animal Natural History Series. University of Oklahoma Press. 325 pp.

Thomas, D.C., F.L. Miller, R.H. Russell and G.R. Parker. 1981. The Bailey Point region and other muskox refugia in the Canadain Arctic: A short review. Arctic, Vol. 34, No. 1: 34-36.



Prepared 12 November 2009

This map identifies some of the known ecological resources of the region. It is intended to be used for a broad overview of identified areas of potential interest for wildlife and ecosystem function. The area depicted in this map comprises Peary caribou habitat and may include calving areas of this subspecies.

KNOWN MISSING INFORMATION:
1) Wildlife Distribution and Local Land Use Information from the Northern Land Use Information Series Maps (Indian and Northern Affairs Canada and Environment Canada. 1975-1986. Canada Map Office. Dept. of Energy Mines and Resources, Ottawa Ontario. 1:250,000);
2) Arctic Ecology Map Series (Canadian Wildlife Service, 1972. 1:1,000,000)

Contact
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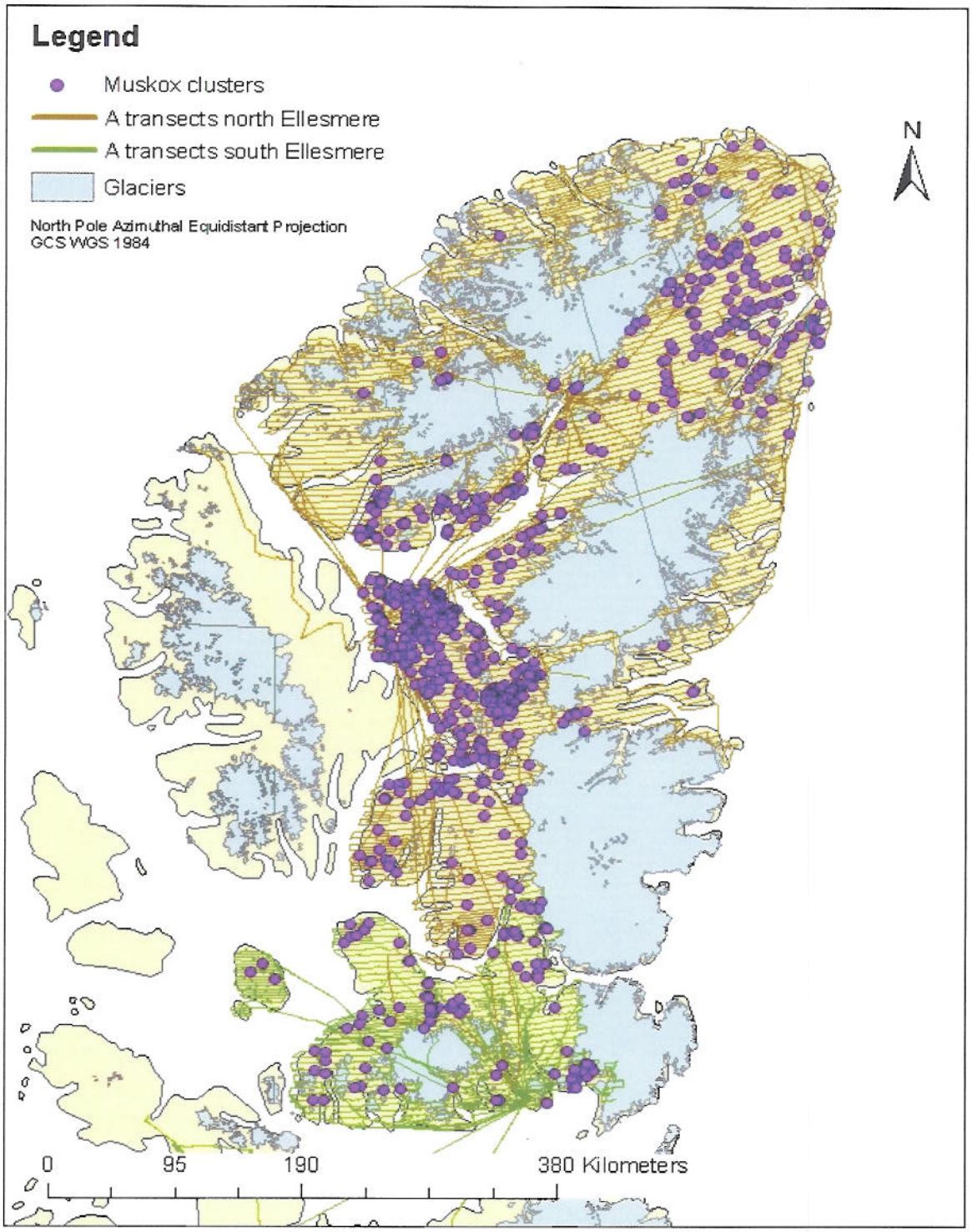
Weststar Permits - Pending
Weststar Permits - Acquired
International Biological Programme Sites
Important Bird Areas

Polar Bear Distribution
Denning Area
Winter Concentration

Wildlife Areas of Special Interest
Muskox

Nunavut Atlas
Caribou
Muskox
Waterfowl

Regional Wildlife Overview -- Coal Exploration Licence Applications. November 2009



Muskox clusters observed on Ellesmere Island during April-May (2005-06). From Jenkins (2007)

Alliance des **musées d'histoire naturelle** du Canada

Alliance of **Natural History Museums** of Canada

January 14, 2010

Kelli Gillard
Technical Advisor
Nunavut Impact Review Board
Box 2379, Cambridge Bay
Nunavut X0E 0C0

Dear Ms. Gillard:

In am writing on behalf of the Alliance of Natural History Museum of Canada (ANHMC) concerning the review of Weststar Resources Corporation's proposal to mine coal on Ellesmere Island (NIRB 09EN067 Ellesmere Island Coal Project).

The Alliance of Natural History Museums of Canada is a consortium of 16 museums and related institutions. Members of the Alliance have national, provincial or territorial mandates for the documentation, preservation and interpretation of Canada's natural heritage. That mandate includes the stewardship and interpretation of Canada's significant palaeontological record.

As stewards of Canada's palaeontological heritage, the Alliance would like to comment on the proposal to mine coal on Ellesmere Island. Ellesmere Island, and the Strathcona Fiord area in particular, has a diverse fossil record of national and international scientific significance. This record includes documentation of the first invasion of land habitats by vertebrate animals 375 million years ago, and preservation of plants and animals associated with a 55 to 50 million-year-old temperate rain forest. These and other fossil sites document habitats and fossil species found nowhere else on the planet. In addition, many fossil sites on Ellesmere Island document warmer periods in earth history and provide tangible evidence that is contributing to the scientific study of the potential effects of climate change on modern ecosystems.

…/2

Given the importance of this palaeontological record, mining in this area should be approached with caution and with due consideration for the preservation of this fossil legacy. As such we support the recommendations and conditions in the review of this mining project by the Nunavut Department of Culture, Language, Elders and Youth. Fossils are a non-renewable resource and we would hope that mining in the Strathcona Fiord area will not jeopardize that legacy.

Sincerely,

Anne Chafe, Vice-President, Alliance of Natural History Museums (ANHMC)
On behalf of the President

Attach.

Alliance des musées d'histoire naturelle du Canada

Alliance of Natural History Museums of Canada

Member Institutions Membres

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CORRESPONDING MEMBERS

INVESTOR IN PEOPLE

British Antarctic Survey
NATURAL ENVIRONMENT RESEARCH COUNCIL

Director Prof. Nicholas J.P. Owens
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United Kingdom
Telephone (01223) 221400
Facsimile (01223) 362616
15 January 2010

To: Nunavut Impact Review Board

It has come as a surprise to many of us here in BAS that Canadian High Arctic areas that include the world renowned fossil sites of Strathcona Fjord, but also Beaver Lake, Fosheim Peninsula and Bache Peninsula, are now being considered for coal deposit exploration. These sites are, in several instances, utterly unique on this planet and all have inestimable value to researchers attempting to understand how the Earth and its biodiversity evolved against a background of numerous environmental upheavals – a critical issue in the face of the profound changes we are currently experiencing.

As yet, the research community has not had time to fully evaluate the scale and nature of the palaeo records present in these High Arctic sites, but what is known already is revolutionising our understanding of the ancient Arctic environment and various aspects of its biota. Canada has an opportunity to make major contributions to deciphering the history of our planet but importantly it also has stewardship of something very precious – an exquisitely detailed record of a world long gone but that nevertheless has great resonance for our present, and our not to distant likely future, environment.

One recognises that energy security is a pressing issue for most nations, that coal is a resource that is still relatively common and that it can probably be used more effectively than was the case in the past, with new technologies. Nevertheless Canada needs to look very critically at decisions that weigh economic benefits against the very real threat of damaging or destroying these quite remarkable deposits and their potential to inform our thinking which could even feasibly help us in addressing the coming problems of climate change.

Many of my geological colleagues are currently in Antarctica working on further fossil records but on behalf of them I would hope that NIRB would propose to the Minister at least a 12.4.4b recommendation to allow a full assessment of both the fossil record resources and the detailed implications for them of the proposed coal mining before any final decisions are taken.

Yours sincerely

Dr Cynan Ellis-Evans

UK Arctic Office

Canadian Museum of Nature / Musée canadien de la NATURE

January 14, 2010

Kelli Gillard
Technical Advisor
Nunavut Impact Review Board
Box 2379, Cambridge Bay
Nunavut, X0E 0C0

VIA EMAIL

Dear Ms. Gillard:

I am writing regarding the Review of Weststar Resources Corporation's interest to mine coal on Ellesmere Island (NIRB 09EN067 Ellesmere Island Coal Project).

The Canadian Museum of Nature is Canada's national museum for natural history. The Museum has a long and significant history of collection-based research, beginning with Canada's first Arctic Expedition, 1913-18. Our Arctic work encompasses the discovery and description of new specimens, their conservation and display for the general public and their availability for future study.

A significant component of our ongoing research work in paleontology is focused on Ellesmere Island and the activities under consideration by Weststar Resources Corporation for that location are of concern to us. The areas being considered for mining development are considered very significant for paleontological research and need to be dealt with carefully.

We are aware of the involvement of the Nunavut Department of Culture, Language, Elders and Youth in this issue and of the extensive, excellent list of conditions for exploiting mineral resources in these areas. We endorse those requirements and hope that they will be considered as part of a review of the mining proposal and that a constructive working relationship can be defined among all the concerned parties.

Yours sincerely,

Joanne DiCosimo
President and CEO

Canada

University of Colorado at Boulder
Institute of Arctic and Alpine Research

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E-mail: James.White@Colorado.edu

January 14, 2010

To the members of the Nunavut Impact Review Board,

I appreciate the opportunity to write to you concerning the proposed Westar coal project.

I am the Director of the Institute of Arctic and Alpine Research (INSTAAR) at the University of Colorado at Boulder. INSTAAR has conducted research throughout the Arctic for over 50 years. Its scientists are strong advocates for the Arctic and its peoples, as well as the remarkable archives of the past that are found in the cold Arctic.

The proposed Westar coal project could damage or destroy sites that contain fossils and other samples that form an important part of Nunavut's history. The fossils tell us about the history of Arctic plants and animals, and are recognized internationally for their scientific importance. They also provide important evidence from a time when Earth, especially the Arctic, was warmer. Ultimately, evidence from Nunavut's fossil record can help us better predict and prepare for future climate change.

If the fossil sites in the Westar coal project areas are destroyed the evidence is lost forever, therefore I recommend that the Nunavut Impact Review Board advise the Minister, pursuant to article 12.4.4(a) of the Nunavut Land Claim Agreement, that the project proposal requires review under Part 5 or 6.

I thank you for your consideration, and request that you keep me informed of the results of this screening process.

Sincerely,

James W. C. White
Director, Institute of Arctic and Alpine Research
Professor, Department of Geological Sciences and of Environmental Studies

100115-09EN067-Ottawa Palaeontological Society Comments-IA2E
From: Jonas Weselake-George [Paleo@ncf.ca]
Sent: January 15, 2010 2:28 PM
To: info@nirb.ca
Subject: Recommendation to the Nunavut Impact Review Board and the Minister of Indian and Northern Affairs

To: Members of the Nunavut Impact Review Board

We would like to make it known that there are those in the Canada's south (as well as in Nunavut), outside of the academic community, who understand the importance of arctic fossil exploration. These finds are important for understanding Canada's past and climate, as well as for our national pride and international image.

We urge protection of these sites and recommend that the Nunavut Impact Review Board advise the Minister, pursuant to article 12.4.4(a) of the Nunavut Land Claim Agreement, that the project proposal requires review under Part 5 or 6.

Development should be delayed until the potential damage to our national heritage and scientific knowledge is assessed and a solution is found which will ensure that the interests of the CSCC and the Canadian scientific community/public are no longer in conflict.

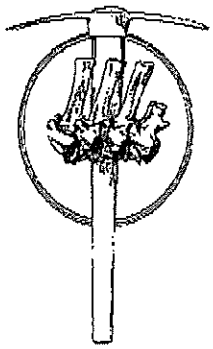
This is a critical moment for ensuring that a solution can be found,

Sincerely,

Jonas Weselake-George

President, Ottawa Palaeontological Society

(613) 521-4932 , Paleo@ncf.ca



Society of Vertebrate Paleontology

111 Deer Lake Road, Suite 100
Deerfield, IL 60015
Phone: (847) 480-9095 Fax: (847) 480-9282
E-mail: svp@vertpaleo.org Web site: www.vertpaleo.org

Sent by fax 14 January, 2010

13 January 2010

To the members of the Nunavut Impact Review Board,

I am writing on behalf of the Society of Vertebrate Paleontology (SVP), an international society with over 2000 members whose goal is to advance the science of vertebrate paleontology, including the conservation and preservation of fossil sites. I am grateful for the opportunity to write you concerning the proposed Westar coal exploration activities.

There is mounting evidence from science and traditional knowledge that the Earth's climate is changing. In particular, polar regions are experiencing rapid warming, and we need information on how climate change affects Earth's life in order to predict what the world will be like for future generations. Questions such as "How fast will the climate change?"and "How will the plants and animals adapt?"are as yet unanswered. Nunavut, and especially Ellesmere Island, is one of the few places in the world that may provide some answers from the fossil record.

Rocks within Westar's proposed development area near Strathcona Fiord preserve fossil plants and animals that lived during one of the warmest times in all of Earth history, when Ellesmere Island was blanketed in forests inhabited by alligators, turtles, primates and hippo-like *Coryphodon*. Their discovery in the 1970s and 80s was among the greatest contributions to paleontology of the last century. These unique fossil sites are world-renowned, and despite over three decades of searching the High Arctic, no sites of comparable age and fossil richness have been discovered elsewhere in the Canadian Arctic. Younger fossil sites near the head of Strathcona Fiord indicate that this area was home to larch forests, horses, and beaver just a few million years ago, and underscore how quickly and dramatically the Arctic can change. These fossils are irreplaceable. Destroying these fossil sites will impact our ability to understand (and predict) the effects of future climate change in polar regions.

For this reason, the Society of Vertebrate Paleontology urges protection of these sites and recommends that the Nunavut Impact Review Board advise the Minister, pursuant to article 12.4.4(a) of the Nunavut Land Claim Agreement, that the project proposal requires review under Part 5 or 6.

If we can be of assistance in providing information to you regarding the importance of these unique fossil sites near Strathcona Fiord, please contact us through the SVP (Society of Vertebrate Paleontology) business office at svp@vertpaleo.org.

Sincerely,

Blaire Van Valkenburgh, Ph.D.
President, Society of Vertebrate Paleontology
Professor, University of California, Los Angeles