

# BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

29 October 2008

Leslie Payette  
Manager Environmental Administration  
Nunavut Impact Review Board  
P.O.Box 1360  
Cambridge Bay NU X0B 0C0

Dear Ms. Payette:

## **RE: Scope of NIRB's Part 5 Review of UraVan Minerals Inc.'s Garry Lake Project Proposal**

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the Draft Scope of the NIRB's review of the UraVan Garry Lake project proposal, in response to NIRB's request of 8 October 2008. These comments are provided in accordance with the mandate of the BQCMB, which is to advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges.

As we described in our 23 April and 9 June 2008 letters to NIRB, the BQCMB is very concerned about UraVan's proposal to conduct exploration activities on the core traditional calving ground of Beverly caribou, which is also an area that has been proposed by parties to the Thelon Game Sanctuary Management Plan for designation as a special management area, specifically to help protect the Beverly caribou herd and its habitat.

### ***General Recommendations***

The BQCMB is encouraged that this project proposal is subject to a Part 5 review by NIRB, and will participate in the review process to the extent possible. However, I once again reiterate that:

1. The BQCMB's position is that long-term legislated protected areas that exclude industrial development must be established for calving and post-calving areas. In absence of this protection, proposals for exploration and development on these areas must be rejected.
2. No exploration or development activities should be permitted on the traditional calving ground of the Beverly caribou herd. The BQCMB recommends that UraVan's application not be approved.
3. The assessment of cumulative effects of human land use activities, including mineral exploration, on barren-ground caribou should occur at a regional scale (i.e., larger than individual project areas). This assessment should include all activities occurring on calving and post-calving areas, and should also consider the accumulating effects on caribou that may result from human land use activities across the caribou ranges.

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## *Comments on Draft Scope of NIRB's Review*

**Proposed focus** – In your letter you state that the Minister of INAC has “stated his support for focusing the scope of the review on the Project’s impacts and cumulative impacts on wildlife habitat and Inuit wildlife harvesting”. This focus would be too narrow in two main respects:

- A focus on habitat is not sufficient. The potential direct and indirect impacts of the proposed project on caribou at both the individual and herd level could be significant (see our summary of “Effects of disturbance on caribou” in our 23 April letter). It is likely that the Beverly and Ahiak herds are decreasing, as are 5 herds to the west in the NWT and Yukon. Additional exploration and development across the caribou ranges may worsen the decline and/or increase the time it takes for the herd to recover.

We therefore support your proposed inclusion of impacts on caribou, including calving activities, as indicated under “issues that warrant further review” (p. 1).

- A focus on wildlife harvesting by Inuit is not sufficient. Caribou herds that may be impacted by the proposed project (both Beverly and Ahiak) are harvested by other peoples in addition to Inuit, including the Akaitcho Dene, Athabasca Denesuline, Metis and non-aboriginal people. (More details on this issue are provided below in our comments on the scoping list.)

We agree that “issues that warrant further review” should include all four items indicated in your letter (p. 1-2), and that the assessment of cumulative impacts on caribou in relation to other similar projects in the region should be conducted across the caribou ranges. Disturbance from aircraft should be specifically included in assessment of impacts and cumulative impacts on caribou, as well as more generally included under impacts to wildlife.

**Scoping List** – The preamble to the list refers to “the effects of the construction, operation, modification, decommissioning, abandonment, and reclamation of each of the Project components”. The specified effects would be more relevant for a review of a project such as a proposed mine than this exploration project. For instance, airborne geophysical surveys do not have construction, decommissioning, abandonment, or reclamation components. Nevertheless they can result in significant disturbance impacts to caribou and other wildlife. We suggest that you frame the analysis in a way more appropriate to the project under review.

We agree that the environmental factors included in the scoping and analysis should include all those listed in your letter (p. 6). We suggest the some additions to certain factors below.

**b)** Emphasis should be placed on caribou calving activities, and also on caribou use of the area during spring migration, post-calving, and summer. As we indicated in our 23 April letter, the area is very important to Beverly and Ahiak caribou during these periods.

**c)** In addition to a focus on the traditional Beverly calving ground, particular attention should be paid to habitat around caribou water crossings. Undisturbed movement of caribou across water bodies, particularly during major migrations, is very important to safeguard the herds.

**f)** Assessment should be conducted of the potential cumulative effects of the project in relation to other similar projects in the region to caribou across the caribou ranges. In addition:

- Assessment of potential cumulative impacts should not be restricted entirely to caribou. This work should also be conducted for other wildlife species, particularly other

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migratory and wide-ranging species that may accumulate impacts from exploration and development activities from across their seasonal ranges (e.g., raptors, migratory waterfowl, bears, wolves, wolverines).

- “The region” to be used in these assessments needs to be defined in advance. For caribou the region should be the year-round ranges for the Beverly and Ahiak herds.

**g)** Inuit harvesting - The potential loss of caribou harvesting opportunities should be a factor addressed during this project review. However, project effects on harvesting by Inuit hunters is too narrow a focus. With respect to caribou harvesting, this should be expanded to an assessment of:

- The potential effects of the project on harvesting by all communities who rely on harvest of Beverly and Ahiak caribou, including those in Saskatchewan and the Northwest Territories.
- The cumulative effects on harvesting of the project in relation to other similar projects in the region.

Loss of harvesting opportunities resulting from caribou population declines could result in genuine hardship for Inuit people who rely on caribou harvests both for food and as a vital part of their cultures, but also for the Akaitcho Dene, the Athabasca Denesuline and the Northwest Territory Metis Nation. According to the harvest estimates received by the BQCMB, the majority of Beverly caribou are harvested in Saskatchewan, with hunters in the NWT and Nunavut taking much fewer Beverly caribou.

A recent socio-economic study of the value of Beverly and Qamanirjuaq caribou, contracted by the BQCMB, concluded that the total annual net economic value of the harvest from the Beverly herd is almost \$5 million, including more than \$4 million for the domestic harvest and more than \$620,000 for the outfitted harvest.

**h)** It is not clear what will be included under “transboundary effects”. For Beverly and Ahiak caribou, consideration should be given to the effects of human land use activities on caribou that may have accumulating impacts while they are on parts of their range outside Nunavut (i.e., in Saskatchewan and the NWT) and while they are in transit during their annual movements northward into their calving, post-calving, and summering areas in Nunavut.

**Temporal and spatial boundaries** – The Draft Scope does not outline the temporal or spatial boundaries of the Review, except for references to “the caribou calving grounds of the Beverly herd” and “across caribou ranges”. For item “f” in the scoping list, there is reference to “similar projects in the region”; however the region is not defined. The temporal scope for the assessment of cumulative effects has not been defined. More specific instructions need to be provided to the Proponent.

### ***Specific Issues Related to Impacts on Beverly and Ahiak Caribou Herds***

We would also like to recommend that the following specific items be included in the list of factors to be considered during this project review.

- **Assessment of impacts and cumulative impacts on both the Beverly and Ahiak caribou herds.** It is important to note that assessing impacts on only the Beverly caribou herd alone will not be adequate, as Ahiak caribou also use the Beverly calving ground during the proposed period of operations (see “Importance of the area to Beverly and Ahiak caribou” in our 23 April letter).

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- **Increased uncertainty about the population status of the Beverly herd** – Beverly calving ground surveys in June 2007 and 2008 found low numbers and density of caribou and calves on the Beverly calving ground during the calving period. Until further information is obtained on the status of the Beverly herd, the precautionary principle should be applied if there will be any significant potential impacts, particularly to Beverly caribou cows and calves.
- **Effects of disturbance on caribou from different types of exploration activities**, including:
  - Flights by both fixed-wing aircraft and helicopters, particularly at elevations below 300m. This includes regular flights for transport of supplies and personnel during camp construction and operation, and movement of the mobile temporary camp; transport of personnel during geophysical work; transport of fuel; and drill moves.
  - Disturbance from low-level airborne geophysical surveys.
  - Disturbance during diamond drilling operations.
- **Timing of disturbance:**
  - Disturbance is particularly significant during spring migration as well as calving, as this is a time when pregnant female caribou are extremely vulnerable. This is a major issue for both the Beverly and Ahiak herds.
  - Frequent disturbance during July-September is also potentially harmful, as cows and calves are relatively stationary and they need to feed continuously to build up reserves for the breeding period (fall rut), survival during the winter and fetal development during winter months.
- **Cumulative effects of disturbance occurring on the calving grounds** as a result of multiple ongoing exploration projects, and the potential for additional cumulative effects from proposed projects. This is a major issue for both the Beverly and Ahiak herds because of potential for the following:
  - pregnant female Beverly caribou could be subject to frequent disturbance when they arrive on the calving ground, during birth of calves, and also during the 3-week period after calving while cows and calves are most vulnerable
  - pregnant female Ahiak caribou could be subject to disturbance as they migrate through the Beverly calving ground to their own calving ground farther north, and then again during the post-calving period when cows and calves are highly mobile due to insect harassment and travel through the Beverly calving ground and post-calving areas.
- **Cumulative effects of disturbance across the caribou ranges** from ongoing exploration and development on the Beverly calving and post-calving areas in combination with exploration on key migration range in the Upper Thelon region of the NWT and on winter range in the NWT and Saskatchewan. Mineral exploration on the caribou winter range in Saskatchewan has occurred for decades, and has increased over the past few years. Beverly and Ahiak caribou will be subject to increasing levels of disturbance from year to year, as long as regulators in Nunavut, NWT and Saskatchewan continue to issue permits and licenses for exploration and development on the caribou ranges.
- **Habitat loss** – If exploration projects continue to be approved on calving, post-calving, and key migration areas of Beverly and Ahiak caribou, loss of important habitat will likely occur as caribou avoid areas of activity. Key water crossings may be abandoned if industrial activity is encountered near them.

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- **Contamination** – If there is any contamination resulting from exploration projects anywhere on the year-round caribou range, there will be potential for caribou to accumulate this contamination through each year as they migrate through their seasonal ranges, and from year to year as the number of such sites increases. This would be a significant issue in terms of the health of individual caribou, herd health and productivity, potential transfer of contaminants up the food chain (e.g., to predators and scavengers that feed on caribou) and food availability for traditional caribou harvesters (i.e., whether the meat is safe for human consumption).

Thank you for the opportunity to comment on the draft scope of this project review. Please let me know if you require further information or have any questions about these comments from the BQCMB.

Sincerely,

*[original signed by]*

Leslie Wakelyn  
BQCMB Biologist

cc: Jerome Denechezhe, BQCMB Chairperson  
Chair, Baker Lake HTO Board  
Florence Catholique, Manager, LKDFN Wildlife, Lands and Environment Department  
Ron Robillard, Chief Negotiator, Athabasca Denesuline