



**NIRB File No.: 15EN024**  
NWB File No.: 2BE-MDP----  
KIA File No.: KTL315C011  
AANDC File No.: N2015C0020

August 7, 2015

Robert L'Heureux  
Apex Geoscience Ltd.  
100 – 9797 Ave.  
Edmonton, AB T6E 5V8

*Sent via email: [rlheureux@apexgeoscience.com](mailto:rlheureux@apexgeoscience.com)*

**Re: Opportunity to address comments received regarding APEX Geoscience's "Muskox Diamond" project proposal**

Dear Rob L'Heureux:

On April 22, 2015 the Nunavut Impact Review Board (NIRB or Board) received APEX Geoscience's (APEX) "Muskox Diamond" project proposal from Aboriginal Affairs and Northern Development Canada (AANDC). The NIRB notes that a conformity determination from the Nunavut Planning Commission was not required for this file as the proposed project is within a region that does not have an approved land use plan in place (Kitikmeot region). The NIRB assigned this project proposal file number 15EN024.

Following a preliminary completeness check, the NIRB determined that the proposal as submitted did not contain sufficient information for the NIRB to permit proper screening. On April 27, 2015 the NIRB requested that APEX Geoscience provide additional information in support of this proposal by May 11, 2015. On May 27, 2015 the NIRB requested an extension to the screening deadline from the Minister of Aboriginal Affairs and Northern Development due to the extra time required to ensure sufficient information to permit proper screening. On June 24, 2015 the NIRB received the requested additional information to proceed with the screening of the project proposal.

On June 26, 2015 the NIRB invited interested parties and municipalities most affected by the Muskox Diamond project to provide comments directly to the NIRB by July 17, 2015.

On or before July 17, 2015 the NIRB received comments from the following interested parties:

- Kitikmeot Inuit Association
- Government of Nunavut
- Nunavut Tourism

- Aboriginal Affairs and Northern Development Canada
- Environment Canada
- Fisheries and Oceans Canada
- Transport Canada
- Government of the Northwest Territories – Department of Environment and Natural Resources
- North Slave Métis Alliance
- Wek'èezhì Renewable Resources Board

Please note that during the comment period, on July 15, 2015 the NIRB received amended versions of the Spill Prevention and Response Plan, Fuel Management Plan and Waste Management Plan from APEX. To ensure that parties were able to comment on the entire project application, including the amended management plans, the NIRB invited interested parties to provide comments directly to the NIRB by August 6, 2015. No amended or additional comments were received during this supplemental commenting period.

All comments and documents received pertaining to this project proposal can be obtained from NIRB's online public registry at

<http://ftp.nirb.ca/01-SCREENINGS/ACTIVE%20SCREENINGS/15EN024-APEX-Muskox%20Diamond/02-DISTRIBUTION/COMMENTS/>.

A summary of the main concerns raised relate to the following:

- The lack of community consultation in Nunavut and the Northwest Territories and further lack of incorporation of Inuit Qaujimajatuqangit (IQ) into the project proposal;
- Noting that the proposed project overlaps temporally and spatially with the Bathurst caribou migratory corridors, calving grounds, post-calving grounds and rutting regions and resulting concerns related to the status of the Bathurst caribou herd and impacts to traditional land use;
- The potential for cumulative effects on caribou habitats as well as other Valued Ecological Components (VECs) and Valued Socio-Economic Components (VSECs) resulting from increased mineral exploration and mining in the area;
- The lack of information provided regarding the proposed drill program, environmental management and monitoring plans, caribou management plans, medical emergency plans, fuel management plans, waste management plans and site reclamation plans;
- The potential impacts to water and soil quality;
- The potential impacts to Species at Risk, as well as denning animals, raptors, muskox and migratory bird habitats;
- The potential impacts to archaeological sites and esker landforms; and
- The potential for overlap with the Government of the Northwest Territories – Department of Environment and Natural Resources aerial photographic survey of the Bathurst caribou herd and resulting concerns of exploration activities changing the survey results.

Due to these concerns, the NIRB would like to provide APEX Geoscience Ltd. with an opportunity to address all the comments prior to the Board making its decision to the Minister. The NIRB requests that a response be provided directly to the NIRB by **August 14, 2015**.

Please send your comments to the NIRB at [info@nirb.ca](mailto:info@nirb.ca) or via fax at **(867) 983-2594**.

If you have any questions or require clarification, feel free to contact the undersigned at (867) 983-4615 or [dstpierre@nirb.ca](mailto:dstpierre@nirb.ca).

Sincerely,



Davin St. Pierre  
Technical Advisor  
Nunavut Impact Review Board

cc: Distribution List  
Tara Gunson, APEX Geoscience Ltd.  
Phyllis Beaulieu, Nunavut Water Board  
Geoffrey Clark, Kitikmeot Inuit Association  
Tracey McCaie, Aboriginal Affairs and Northern Development Canada  
Nicholas Kavanagh, Aboriginal Affairs and Northern Development Canada