



August 6, 2003

Elizabeth Copland
Executive Director
Nunavut Impact Review Board
Cambridge Bay NU X0B 0C0

Dear Ms. Copland

Re: Bathurst Inlet Port and Road Project

We have now had the opportunity to visit Bathurst Inlet, to meet with the Bathurst Inlet Road and Port Committee and the proponents of the project described above, and submit the following comments in addition to those set out in our letter of June 23, 2003.

Public Consultation

We are advised by Connie Kapolak, Chair of the Bathurst Inlet Road and Port Committee, that neither the people of Bathurst Inlet nor those living on Contwoyto Lake have been consulted in the development of this project. Ms. Kapolak has submitted a list of questions to the proponent, but advises that these have not been answered. People living in Bathurst Inlet are understandably concerned about the potential loss of their livelihood and at the potential loss of access to caribou, which provides 80% of the meat for the community.

We believe the Committee may be making its own submissions to you with respect to the questions they have posed about the proposal.

Port Site Impacts

Our visit to the proposed port site disclosed evidence of very recent and historic use of the site by caribou and muskoxen. Caribou use was within the sensitive period following calving—within at most a week earlier than our visit of July 19. The site is marked with deep trails, indicating historic use as well. Impacts on these animals from port site construction and operation have not been evaluated in the project description and indeed,

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the proponent has repeatedly asserted in public that the port is not located in the calving grounds of the Bathurst caribou herd.

Historic changes in the location of the calving grounds are well known to local hunters and to biologists studying the herd; but the fact remains that for the past 5-6 years and in this year, the herd has used the proposed port site at a time when cows and calves are most sensitive to disturbances of any kind. References to impacts on caribou contained in the project description are insufficiently detailed to permit any kind of assessment and we would respectfully suggest that the proponent be directed to employ the data currently being generated by the Government of the Northwest Territories Department of Resources, Wildlife and Economic Development, based on current monitoring of the herd.

The port site is also clearly an historic hunting site. We found at least two chipping stations and numerous bones and skulls. The impact on cultural heritage resources of Bathurst Inlet is not properly reflected in the project description.

Purpose of the Project

It is abundantly apparent, having travelled the length of Bathurst Inlet by boat, that it would be costly and illogical to operate a community fuel resupply business for the Kitikmeot region from the south end of the Inlet. Navigation will be exceedingly difficult and dangerous, especially in bad weather; and the distance alone will mean extra days of delay and extra costs in getting fuel transshipped to communities. Community resupply could be achieved far more economically and safely by enhancing existing facilities at either Cambridge Bay or Kugluktuk, or by going back to the route formerly proposed and building a new deep sea port to the east of Kugluktuk.

We would accordingly respectfully suggest that the proponent be directed to provide a comparative full cost and risk analysis for community fuel resupply, looking at all of the sites that offer reasonable potential for this business.

With respect to mine resupply, we observe that presently operating and proposed mines are currently meeting or anticipating meeting their fuel needs by winter road. If these mines can operate profitably under these conditions, we submit that there is no current need for the project.

Thus, the only remaining rationale for the project would appear to be opening up new mines in the West Kitikmeot region. While this is certainly an important step in the development of a sustainable economy in this region, it is not at all clear that the proposed route is the only means, or a viable means, to achieve this end. Nor is it clear

that financing for the project could be arranged on the private market, given the current prices of base metals and the apparent reluctance of Inmet Mining Corporation to pursue its claim at Izok Lake in this market.

The proponent's defence of the project's rationale, as presented to us at Bathurst Inlet, is little more than "build it and they will come"—and that proposition is not borne out by current market conditions or the present behaviour of private capital.

We would accordingly most strongly reiterate our earlier submission, that the proponent be required to file its economic feasibility study with NIRB immediately and that that document should be made available to the public. Public funds will have to be expended to assess this project and that expenditure should not be undertaken if the financial feasibility of the project cannot be established at the screening stage.

Alternate Routing

The previously proposed route from Izok Lake to a point east of Kugluktuk was very well studied through the early 1990's and a great deal of that information is available and relevant to the consideration of this project. While we have not had an opportunity to review all of the data that were collected regarding this route, it does have two distinct advantages: it avoids the calving and post-calving grounds of both the Bathurst and East Bluenose herds and provides a safer, more easily accessed port site for both community resupply and mine resupply.

The proponent has dismissed this route as "too expensive" without providing any analysis to support this proposition. We suggest, with respect, that the cost of both routes should be assessed from a "full cost" perspective, including potential impacts on caribou and cultural resources, on communities dependant on caribou. Relative risks of each route should be assessed, including a consideration of the risks attendant on operating the shipping business envisaged by the proponents.

Assessment Process

It is our respectful submission that this proposal is insufficiently developed and detailed for assessment to proceed, and it should be referred back to the proponent for all of the reasons set out here and in our earlier letter, June 23, 2003.

It would be unfortunate indeed if the time, expertise and money required on the part of the proponent, NIRB and the federal government were to be wasted on assessment of what may well prove to be a fundamentally unsound proposal, without first considering

whether or not other options might achieve the desired ends of economic development and employment.

Sincerely,



Karen G. Wristen
Executive Director

- cc. Hon. Robert Nault, Minister of Indian Affairs and Northern Development
Hon. Robert Thibeault, Minister of Fisheries and Oceans
Hon. Paul Okalik, Premier of Nunavut
Hon. Stephen Kakfwi, Premier of the NWT
Hon. Ethel Blondin-Andrew, MP Western Arctic
Nancy Karetak-Lindell, MP Nunatsiag
Cathy Towtongie, President, Nunavut Tunngavik Inc.
Charlie Evalik, President, Kitikmeot Inuit Association
Tom Kudloo, Chair, Nunavut Water Board
Todd Burlingame, Chair, Mackenzie Valley Environmental Impact Review Board
Grand Chief Joe Rabesca, Dogrib Treaty 11 Tribal Council
Chiefs Darrell Beaulieu and Peter Liske, Yellowknives Dene First Nation
Chief Archie Catholique, Lutsel K'e First Nation
North Douglas, President, North Slave Metis Alliance