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August 11, 2003

Stephanie Briscoe
Box 2379
Nunavut Impact Review Board
Cambridge Bay, NU Canada
X0B 0C0

Re: Bathurst Inlet Port and Road Project Re-Screening

Dear Ms. Briscoe,

Thank you for the opportunity to assist the Nunavut Impact Review Board (NIRB) in re-screening the proposed Bathurst Inlet Port and Road (BIPAR) project. Since our letter to Wilf Attwood and Earl Baddaloo in September 2002 on this subject, we have had the opportunity to speak with the project proponents and community leaders in Nunavut. We have distilled our concerns to three main issues, which are consistent with the concerns raised by Minister Nault in his letter dated 10 April 2003.

1. There are potential adverse impacts to marine ecosystems as a result of the proposal to ship concentrate and the consequent need for a deep-sea port in Bathurst Inlet. It is critical that any environmental review include a thorough assessment of potential impacts to the near-shore and offshore marine environments as well as terrestrial ecosystems. This will have to be explicitly addressed in the Terms of Reference for the environmental review given that marine waters are the jurisdiction mainly of the federal Department of Fisheries and Oceans.
2. There are a number of trans-boundary issues that require careful consideration, including the management and monitoring of the Bathurst caribou herd, wildlife movements of top predators such as grizzly bear and wolf, and the potential development of a transportation corridor from Yellowknife, NWT to Bathurst Inlet, Nunavut. Communities in Nunavut, the Northwest Territories and other jurisdictions which depend on shared resources should be provided the opportunity to address specific issues during any environmental assessment.
3. The proposed project is a major industrial development with the stated intent of attracting further mineral resource development to the Kitikmeot region. As such, the same concerns regarding cumulative effects apply to this project as they do to the proposed natural gas pipeline in the Mackenzie Valley. This project should only occur within existing government and industry



commitments to “sustainable development”, and must include first establishing a network of conservation areas that adequately represents the natural regions affected by the proposed development and safeguards key wildlife habitats and culturally significant areas. WWF-Canada strongly believes that this issue – conservation planning to ensure the integrity of cultural sites as well as wildlife populations, regional landscapes, and habitats – is best addressed in advance of regulatory procedures. Whether conservation planning occurs within the regulatory framework or in a parallel process, it is critical that the outcome delineates and describes a set of conservation areas to maintain and/or enhance significant cultural and ecological values. Furthermore, the Nunavut Planning Commission may be in the best position to address this issue as part of comprehensive land use planning.

Although these issues remain critically important, the overall process to address the issues can be flexible and most likely requires federal-territorial cooperation. As such, we recommend screening option (b) which reads, “the proposal requires review under Part 5 or 6; NIRB shall identify particular issues or concerns which should be considered in such a review”.

We would be happy to discuss these issues in further detail with you or your staff at any stage.

Sincerely,

Tony Iacobelli
Senior Manager, Landscape Conservation and Planning
Arctic and North American Conservation Programs

cc. Cathy Towtongie, President, Nunavut Tungavik Inc.
Charlie Evalik, President, Kitikmeot Inuit Association
Tom Kudloo, Chair, Nunavut Water Board
Joe Tigullaraq, Director of Wildlife, Department of Sustainable Development
Luke Coady, Executive Director, Nunavut Planning Commission
Ben Kovic, Chair, Nunavut Wildlife Management Board
Burt Hunt, Regional Director, Department of Fisheries and Oceans - Iqaluit
Kevin O'Reilly, Director, Canadian Arctic Resources Committee
John Laird, Regional Conservation Director, Nunavut, WWF-Canada
Bill Carpenter, Regional Conservation Director, NWT, WWF-Canada