



Yellowknives Dene First Nation
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August 11, 2003.

Stephanie Briscoe
Executive Director
Nunavut Impact Review Board
PO Box 2379
Cambridge Bay, NT



Re: Re-screening of the Bathurst Inlet Port & Road Project (BIPAR).

Dear Ms. Briscoe,

On behalf of the Yellowknives Dene First Nation, the Land & Environment Committee has reviewed the BIPAR project description and has determined that the project requires a full environmental review under Part 6 of the NLCA. In this instance, we agree with Minister Nault that there are significant trans-boundary issues and potential effects that could be caused to peoples outside of the Nunavut settlement area that cannot effectively be handled by any review limited to the NIRB. A Part 6 review would be considerably more comprehensive and would deal with the trans-boundary issues more effectively.

Of particular concern to the Yellowknives Dene are some of the following issues that we believe, have not been fully addressed in the project description:

1. Regarding the cumulative effects to which this project would contribute, there is not enough detailed information, contained in the Project Description Report to provide the full scope of the cumulative impacts. By way of example, Page 13 of the Report states "road route selection criteria included the route should be accessible by current and potential mines." No mention is made of the likelihood of any future spur road servicing future mine sites, even though these advanced exploration sites are presented in the route map.
2. As well the first page of the Report's Executive Summary states that the proponent recognizes the fact that metal concentrates from Izok will one day become an important source of revenue for the project. It is believed that the Izok project will be reactivated in the future". We note that at no point is the future road to Izok discussed in the cumulative effects summary. As well, a suggestion that the new road system connecting to an Arctic Port will stimulate further exploration and increase the value of existing deposits leading to a greater probability of mine development, is not

discussed as a potential cumulative impact nor is the potential for future development resulting from improved road access considered in determining future effects, both in and out of the Nunavut settlement area.

3. We believe that given the importance of the caribou to the whole of the peoples of the North, that that issue must be addressed specifically both as it would affect residents of Nunavut and residents of the Western Territories. In that regard, an analysis is needed to determine what impacts would result from the changes in truck traffic servicing various projects using the proposed road along with other users that might access other areas for hunting or recreational purposes via the proposed roadway.
4. As there is likely to be some negative impacts on the existing Bathurst herd migration routes, the overall impact of the alteration of those migration routes must be examined and the implications to all peoples of the North, who rely on those migration routes and the Bathurst herd in sustaining themselves. We believe that thorough examination is required to determine what steps the proponent should be taking to minimize the impact of the project on the Yellowknives Dene, who would most likely be affected by it.

Lastly, we have a growing concern over changes that are occurring in the Western Territories and the developments that are taking place. As a people, the Yellowknives Dene First Nation, have relied heavily on the caribou as a means of sustenance and indeed, as a means of survival. It is no longer reasonable to assume that a project that is developed in the Nunavut settlement area might not have some considerable impact on people as far away as Yellowknife and its surrounding areas. Clearly, the necessity of the full and comprehensive Part 6 review is the only way in which this matter can be dealt with effectively.

As intervenors, we strongly urge that as this matter is of such importance to all of the peoples of Nunavut and other Northern areas, this type of full comprehensive federal review should take place.

I trust this is satisfactory.

Sincerely,


Chief Peter Liske – Dettah


Chief Darrell Beaulieu – Ndilo

c.c. Rachel Ann Crapeau, Land and Environment, Dettah, NT
YKDFN Legal Counsel, Edmonton, Alberta
Tim Byers, Winnipeg, Manitoba