

July 15, 2022

The Honourable Daniel Vandal, P.C., M.P.
Minister of Northern Affairs
Terrasses de la Chaudière
10 Wellington Street, North Tower
HULL QUEBEC K1A 0H4

Re: Tłıchǵo Government Request for a “Regional Study” under Part 5.2 of MVRMA

Dear Minister Vandal:

I am adding my support for a Regional Study under the *Mackenzie Valley Resource Management Act* for planning and potential development in an area known as the Slave Geological Province. For the record, I believe we need to **find a better name for this initiative** to avoid the colonial and racist underpinnings of the name associated with this area.

It is my understanding that there was a recent workshop held by the Mackenzie Valley Environmental Impact Review Board (MVEIRB) on June 22-23, 2022. I have reviewed the presentations made at this workshop and I offer the following comments based on my more than 30 years of experience in environmental management of the NWT.

In terms of the **geographic scope** of this regional study, it should include the **full range of the Bathurst caribou herd**. At a minimum, the historical range of this herd within the NWT and Nunavut, needs to form the basis for any Regional Study geographic scope. With a geographic scope that is transboundary in nature, it is imperative that a Regional Study should have an **independent body conduct this work**, such as a **panel with representation from both the NWT and Nunavut. Members of the MVEIRB and the Nunavut Impact Review Board** with experience and expertise in large scale, cumulative effects assessment should ideally serve on such a panel.

I have confidence in the ability of both the MVEIRB and NIRB to conduct a Regional Study as part of the resource co-management regime that is in place for the

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NWT and Nunavut. That being said, **engagement with all interested parties will be crucial to ensure public confidence**, and appropriate and rigorous development of **goals, principles, alternatives or scenarios, evaluation criteria, consideration of opportunity costs and trade-offs, and modeling which should all form part of the Regional Study process.**

State of the art **cumulative effects assessment** should be part of any Regional Study. Clearly it is well past the point where **thresholds of change need to be established that include sustainability at their core. Equity for current sectors of society and future generations** must be central to any Regional Study.

It will also be very important to consider and ensure that the **results of any Regional Study will actually be implemented through land use planning and subsequent project assessments** by relevant and appropriate authorities as part of the existing co-management regime and by public and Indigenous governments as well.

Lastly and perhaps most importantly, for a Regional Study to be effective, efficient and participatory **the issue of funding needs to be addressed at the outset.** It has become **standard and best practice to ensure that there is sufficient participant funding for Indigenous governments and civil society** to bring value-added to environmental assessment, including regional and strategic exercises. I cannot emphasize enough based on my personal experience, how early and accessible participant funding can make a huge difference in the outcome of environmental assessment. The environmental assessment of the Giant Mine is a prime example of the difference that participant funding can make to improved decision-making.

I look forward to your decision with reasons on a Regional Study and I would be happy to discuss any of my thoughts and concerns with any of the interested stakeholders.

Sincerely



Kevin O'Reilly
Member of the Legislative Assembly, Frame Lake

cc. Jackson Lafferty, Grand Chief, Tlicho Government
Fred Sangris and Edward Sangris, Chiefs of the Yellowknives Dene First Nation

Daryl Marlowe, Chief, Lutsel K'e Dene First Nation
Stanley Anablak, President, Kitikmeot Inuit Association
Hon. Shane Thompson, GNWT, Minister Environment and Natural Resources
Hon. David Akeeagok, Government of Nunavut, Minister of the Environment
JoAnne Deneron, Chairperson, Mackenzie Valley Environmental Impact Review
Board
Marjorie Kaviq Kalura, Chairperson, Nunavut Impact Review Board