

March 30<sup>th</sup>, 2015

Simon Toogood  
Mackenzie Valley Environmental Impact Review Board  
Yellowknife, NT

**Re. Chedabucto Mineral Exploration Project EA 1415-02**

Dear Mr. Toogood,

The NWT Chapter of the Council of Canadians (CoCNWT) has reviewed the proposed scoping document for the Chedabucto Mineral Exploration Project and has the following comments, along with a recommendation and an information request.

As you are aware, CoCNWT was one of the non-government organizations that submitted comments to the Wek'eezhii Land and Water Board (WLWB) during the preliminary screening process regarding this project. Among its comments, CoCNWT noted that "The North Arm remains a popular and well-used public recreation area, for canoeists/kayakers, snowmobilers, hunters, fishers, and boaters. The recreational and tourism potential of the area is high as long as it remain a pristine land use area. Industrial scale development will severely undermine the long-term recreational and tourism value of the area – and tourism has longer term economic potential than non-renewable resource extraction".

CoCNWT further noted that "Without clear social licence, the development should not proceed without thorough scrutiny of its long term socio-environmental impacts. Public engagement and scrutiny need to be a first priority for such a potentially large and environmentally damaging project – even at this early stage in the development". Although the MVEIRB has determined in its proposed scoping document that the current Project has to essentially be considered as a 'stand-alone' project, without a direct link to related or further development, CoCNWT still maintains that the current Project does not have social licence to proceed.

In its Preliminary Screening Decision, the WLWB noted that there are concerns about the cultural, traditional, and *recreational* value of Whitebeach Point area and concluded that the project was "cause of *public concern*" [italics added]. The WLWB clearly took into consideration public use of the area for recreational purposes. Yet in its proposed scoping document, the MVEIRB states that "the geographic scope for assessing impacts to the human environment should include, at a minimum, consideration of the potential impacts to the Tłıchǫ, Yellowknives Dene First Nation, North Slave Métis Alliance, and NWT Métis Nation".

Without diminishing in any way the s.35 rights that Aboriginal governments and their members hold in relation to the North Arm generally and Whitebeach Point specifically, and while supporting those rights unequivocally, CoCNWT wants to emphasize to the MVEIRB the importance of soliciting broader public input regarding this Project. There are both Aboriginal and non-Aboriginal residents of communities in proximity to this Project that may not or do not hold rights in the area but that use the North Arm and

Whitebeach Point as a pristine recreational area. Their concerns, values, and interests need to be heard as well.

For that reason, CoCNWT recommends that the last sentence of section 2.3.4 (Geographic Scope) of the proposed scoping document be amended to read: “For instance, the geographic scope for assessing impacts to the human environment should include consideration of the potential impacts to the Tłı̨chǫ, Yellowknives Dene First Nation, North Slave Métis Alliance, and NWT Métis Nation, as well as potential impacts to public recreational users of the North Arm and Whitebeach Point areas”. This statement puts a clearer and greater obligation on Husky Oil Operations Limited to solicit public user input.

CoCNWT further notes that Husky’s Engagement Plan encompasses input from First Nation governments, territorial and federal governments, and member-driven agencies such the NWT Chamber of Commerce and NWT Chamber of Mines, but does not include a plan for gathering broader public input into its Project.

From this perspective, CoCNWT has the following information request for Husky:

In order to address the WLWB’s determination that “public concern [about the Project] is widespread”, what specific steps does Husky Oil Operations Limited intend to take to solicit public input on the Project and respond in a meaningful way to the concerns raised?

Thank you for your attention to these matters.

Respectfully,

A handwritten signature in black ink, appearing to read "Peter Redvers". The signature is fluid and cursive, with the first name "Peter" written above the last name "Redvers".

Peter Redvers  
CoC NWT Co-Chair