

NORTH SLAVE MÉTIS ALLIANCE

PO Box 2301 Yellowknife, NT X1A 2P7



Simon Toogood
Mackenzie Valley Environmental Impact Review Board
200 Scotia Centre
Box 938, 5102-50th Ave
Yellowknife, NT X1A 2N7
Email: stoogood@reviewboard.ca

Dear Mr. Toogood:

RE: Chedabucto Mineral Exploration Project – EA1415-02 (2015) – NSMA Intervention

The proposed Chedabucto Mineral Exploration Project (“the Project”) is to occur within the traditional territory of the North Slave Métis Alliance (“NSMA”). The NSMA considered information, made available throughout the preliminary screening and Environmental Assessment, pertaining to the Project’s potential impacts on NSMA members’ S35 Aboriginal rights. The NSMA is also conducting, with funding provided by the Proponent, Preliminary Traditional Knowledge Research for the White Beach Point/Chedabucto Lake Area (“TK Research”). Based on this information, the NSMA hereby submits our intervention for consideration by the Review Board. In so doing, we hope that the Project’s impacts on the lands and the rights of our people, if approved, will be minimized and fully mitigated.

NSMA would also like to reiterate that the information we are using for our deliberation is limited by the Scope of Environmental Assessment, as well as the “preliminary” nature of the funding support provided by the Proponent. Therefore, the evidence, assessment, and conclusion provided here are correspondingly limited in scope, and do not indicate NSMA’s views of or inclinations towards the future development of the silica mine in the area.

Similarly, the depth and extent of the records of land use and traditional knowledge are partial, and adequate only for this specific EA. Further, as noted below, TK Research is currently still ongoing, and this submission includes only a partial analysis of what the NSMA is going to provide at the Public Hearing. All the relevant information will be provided to the Review Board prior to the Public Hearing.

1. North Slave Métis Traditional Land Use in White Beach Point/Chedabucto Lake Area

The NSMA can present reinforcing evidence of North Slave Métis land use in the project area, in the past and present. As of June 8, 2015, The TK Research is still ongoing, scheduled to be completed before the Public Hearing in Yellowknife (June 23-24, 2015), and will be submitted to the Review Board. However, without waiting for the completion of the current study, existing study from 2001 NSMA Land Use Study records hunting, fishing, gathering, and traveling in the area on and nearby White Beach Point by NSMA members. Further details including land use maps will be presented at the Hearing, and will be filed as soon as they are completed.

2. NSMA Traditional Knowledge in White Beach Point/Chedabucto Lake Area

TK Research is ongoing, and relevant TK will be shared with the Review Board for consideration. NSMA anticipates the TK will include key fish and wildlife habitats, spiritual and archaeological sites, and other considerations pertinent to mitigation of impacts to the land and Aboriginal rights of our people. For example, one member frequently uses the Project area during winter season for hunting, indicating habitat quality, animal movements, as well as potential conflict with the exploration schedule.

3. Engagement

NSMA is pleased to report that, in general, NSMA is satisfied with the engagement effort by the Proponent. We hope to maintain the respectful relationship that we currently enjoy.

4. Closure and Reclamation

NSMA has asked the Proponent to clarify what is meant by “industry best practices”. After the IR rounds, NSMA is still unclear what specific set of practices and guidelines the Proponent is going to follow. NSMA requests that the Proponent develop a defensible and demonstrated, by examples from actual industry practices and literatures, Closure and Reclamation Plan.

5. SARA, WWHPP and SOPs

NSMA notes that issues of Species at Risk, and development of WWHPP and SOPs for the Project operation have been raised. For this EA, NSMA will rely on the expert input from the GNWT ENR on these matters, rather than providing our own analysis. This is due primarily to the lack of capacity within the NSMA to adequately comment on these issues at this time.

6. Assessment of Potential Impacts to the NSMA Members and Their Aboriginal Rights

Due to the delay in the completion of TK Research, adequate assessment of the Project’s potential impact to North Slave Métis Aboriginal rights has yet to be done.

However, NSMA would like to note that we recognize the Project under consideration is an early exploration, involving relatively small disturbance to the land. We also acknowledge that the Project has agreed to avoid archaeological and other culturally significant sites that have so far been identified. This lends us certain confidence that the proposed Project is unlikely to significantly impact the land and Aboriginal rights of our members.

However, as further evidences are collected and analyzed through the ongoing TK Research, NSMA will likely request additional specific mitigation measures, including exclusion of certain areas or seasons, and specific closure and reclamation practices. This will be provided to the Review Board prior to the Public Hearing.

7. Conclusion

At this time, no conclusive assessment can be provided due to the delay in the TK Research. NSMA would like to thank the Review Board and other parties to the EA for understanding. Further information, including evidence, assessment, and conclusion will be provided to the Review Board as soon as it is possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shin Shiga', with a long, sweeping horizontal line extending to the right.

Shin Shiga

Regulatory Analyst

CC: Mark Cliff-Phillips, Review Board