

December 6, 2023

Yellowknife NT X1A 2N3

The Honourable Daniel Vandal, P.C., M.P.
Minister of Crown and Indigenous Relations and Northern Affairs
Terrasses de la Chaudière
10 Wellington Street, North Tower
Gatineau QC K1A 0H4
dan.vandal@rcaanc-cirnac.gc.ca

The Honourable Shane Thompson
Minister of Environment and Climate Change
Government of the Northwest Territories
Box 1320
Yellowknife NT X1A 2L9
Shane Thompson@gov.nt.ca

Re: Public Participation in a Regional Study under Part 5.2 of MVRMA

Dear Ministers Vandal and Thompson:

Alternatives North is concerned about the lack of public participation to date in the development and design of the Regional Study pursuant to part 5.2 of the *Mackenzie Valley Resource Management Act*. As public governments, the federal and territorial governments must set out a process for public involvement.

We support the concept of a Regional Study for the area between Yellowknife and the Arctic Coast including portions of Nunavut to cover the full range of the Bathurst caribou herd. We support a comprehensive, evidence-based approach that includes NWT and Nunavut interests, consideration of cumulative effects and climate change, sustainability, explicit trade-offs among competing interests, measures to ensure implementation, and public participant funding.

We are not aware of any current opportunities for public involvement. Some correspondence on the proposed Regional Study is found on an obscure "practitioners' workshops" webpage for the Mackenzie Valley Environmental Impact Review Board (https://reviewboard.ca/reference_material/practitioners_workshop). The status of the Regional Study was presented at the 2023 Geoscience Forum, with results showing next steps to include "discussions between Indigenous, Territorial and Federal Governments on governance structure and terms of reference", without any reference to public input.

Alternatives North was founded in 1992 and has successfully advocated for a number of significant public policy changes and improvements over the years, including an NWT Heritage Fund, the NWT Anti-Poverty Strategy, oversight and ongoing research at the Giant Mine resulting in the Giant Mine Environmental Agreement where we are a signatory and party, and many submissions about GNWT resource management legislation that resulted in amendments to ensure public participation. We look forward to similar opportunities with regard to the Regional Study.

There was a workshop held in June 2022 with no representation from non-governmental organizations other than the mining industry. That workshop resulted in a set of principles for any Regional Study that should include:

Partnership

Equal participation of all parties, awareness, and consultation. Built on trust, transparency, and openness. Working together as partners towards a common goal.

Inclusive

Active engagement and capacity building. Meeting people where they're at and ensuring no one gets left behind.

As Ministers of public governments responsible for this Regional Study, please implement this direction by ensuring meaningful public participation in the design and implementation of this work.

In addition to other opportunities for public participation, it is absolutely essential that there be a reasonable public comment period on a draft Terms of Reference for the Regional Study, where comments made are all public and there are public responses through written Reasons for Decision.

We look forward to your responses and to meaningful opportunities to participate in the development and implementation of the Regional Study.

Sincerely

Karen Hamre

Kara Hanne

On Behalf of Alternatives North

cc. Jackson Lafferty, Grand Chief, Tlicho Government, jackson.lafferty@tlicho.ca
Fred Sangris and Ernest Betsina, Chiefs of the Yellowknives Dene First Nation
fsangris@ykdene.com; ebetsina@ykdene.com; adrianb@ykdene.com
James Marlowe, Chief, Lutsel K'e Dene First Nation, sao.LKDFN@gmail.com
Robert Greenley, President, Kitikmeot Inuit Association, aemingak@kitia.ca
Hon. Daniel Qavvik, Government of Nunavut, Minister of the Environment,
dgavvik6@gov.nu.ca

JoAnne Deneron, Chairperson, Mackenzie Valley Environmental Impact Review Board, mcliffephillips@reviewboard.ca

Marjorie Kaviq Kaluraq, Chairperson, Nunavut Impact Review Board, mings@nirb.ca

Donna Ashamock and Elysia Petrone Reitberger, Co-Chairs, MiningWatch Canada, info@miningwatch.ca jamie@miningwatch.ca

Dawn Tremblay, Executive Director, Ecology North

Kris Brekke, Executive Director, Canadian Parks and Wilderness Society NWT Chapter