

Comments from COFEX-N on Three Survey Protocols Submitted by Genivar Port Infrastructure for the Nunavik Nickel Mine Project

1/ Protocol for human environment

The study elements proposed by Genivar in its work plan are all relevant and should be updated in accordance with the amendments made between 2007 and 2012. However, a number of additional elements should also be covered in the work plan, such as:

- socioeconomic impacts (positive and negative) of the project on the region and on local communities: job creation, procurement of supplies locally, procurement of technical or professional services;
 - impacts on landscape;
 - impacts (positive and negative) on recreation and tourism;
 - impacts on the noise environment for communities; and
 - impacts (positive and negative) of the presence of the new infrastructure (use of the wharf by the general public, use of the new roads, changes to access to the territory).
- Regarding the meetings (approximately a dozen) scheduled to be held with users of the area, how will people be selected and met with?
- Certain details regarding the interviews that will be conducted need to be provided, namely:
- the period during which interviews will be conducted;
 - the number of people to be interviewed;
 - the average length of interviews;
 - the format (individual, focus group, workshop); and
 - the interview protocol/method.
- The deliverables to be produced by Genivar will therefore have to include a well-documented update of the anticipated economic impact of the project on the communities of Salluit and Kangiqsujaq, as well as the local and regional residents' expectations regarding the project and its anticipated benefits for them.
- The proponent's deliverables will also have to include the recommended mitigation measures.
- For future reference, record and provide the full name of every person who will be met with or will participate in the process.
- Certain requested information may be considered sensitive (hunting grounds, etc.).
- It will be necessary to plan to restrict the dissemination of sensitive information and contact the residents of the communities before sharing such information with other parties.
 - It will be important to ensure that the company keeps regional and local authorities well informed about the work plan and the status of the work in that regard.

2/ Protocol for archaeological potential

- The field work and archaeological survey report will be carried out in August 2012 by Groupe Artefactuel, the same firm (headed by archaeologist Louis Gilbert) that performed the initial studies in 2007. In our opinion, the information in the proposed protocol and the permit application is appropriate for adequately meeting the requirements engendered by the potential presence of archaeological sites in the study area.
- According to the 2007 report (p. 492 et seq.), about 10 archaeological sites had been surveyed on the south shore of Deception Bay, indicating that this sector had relatively high archaeological potential. That same report stated that none of the sites were likely to be affected by the port infrastructure as planned at the time. However, sediment storage site 4 and its access road and drainage channel were not among the sites studied at the time.
- It is therefore essential that the impact statement that will be submitted by Genivar in 2012 include, as a mitigation measure, the immediate stoppage of excavation, construction or other work in the event that remains of historical or archaeological interest are discovered. The appropriate authorities (Quebec Department of Culture, Communications and the Status of Women) will be responsible for verifying the value of the remains before granting authorization to resume the work.
- According to the document “Prospection archéologique,” the results of the archaeological study are also included in a report scheduled to be released in the fall of 2012. Those results should also be incorporated into the overall impact statement that Genivar must submit for all of the port infrastructure to be built in Deception Bay, and the statement should be submitted by the proponent as soon as possible so that COFEX-N can analyze and review it within an optimal time frame.

3/ Protocol for birds

➤ Aerial surveys

- Regarding the late dates (the weeks of July 16 and 23) for the surveys, after consultation with the Canadian Wildlife Service (CWS), the survey will take place in the last half. The survey should not take place later than that. Apart from that, the methodology complies with industry guidelines and is adapted for the end of the nesting season. (Environment Canada)
- According to the work plan, all aquatic environments will be flown over twice, and this should provide an optimal survey of the birds present and/or nesting in the study area. During the surveys, other species present, such as birds of prey, will also be

surveyed. However, the results obtained in 2012 will have to be compared to those obtained in the 2006 survey and those obtained for other studies carried out since that date, including the study by Poulin and Plourde (2010) cited in CRI's 2011 report.

➤ **Land surveys**

- The sampling plan proposed for land birds and shorebirds includes shoreline transects and 10-ha patches of land. The survey methods are appropriate and documented, but the protocol does not state how many patches will be visited in the impact and control environments or how many shoreline transects will be visited. The sampling date is also not mentioned, but it can be assumed that it will occur on the same dates as the waterfowl sampling starting in mid-July. For the land survey, it will also be important to compare the 2012 results with those from previous studies.
- How many patches will be visited? The areas “likely to be affected” should cover the locations of the three sediment disposal sites, the access road to site 4, the wharf (floating and permanent), and the conveyor.
- It is assumed that the survey will be carried out on the same dates as the waterfowl surveys, i.e. during the weeks of July 16 and 23.
- The summary data for the habitat to be described will include the substrate and vegetation.
- How many shoreline transects will be visited?

- Exactly who will be conducting the survey (expertise and experience in this type of survey) is not clearly explained. It is important that the individuals involved be experts.