



Tłıchǫ Government

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June 7, 2021

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

Dear Minister Vandal,

We are writing to request that you initiate a regional study of the Slave Geological Province area of the NWT, under Part 5.2 of the Mackenzie Valley Resource Management Act (MVRMA).

The Slave Geological Province is a large area of the Northwest Territories and Nunavut, most of the area is within Mǫwhì Gogha Dè Nı̀tlèè and a large part is in Wek'èezhìı – the co-management area established by the Tłıchǫ Agreement. Tłıchǫ language, culture, and way of life have always been intimately connected to the land in this area. The health of barren-ground caribou and the ecological integrity of this region are critical for Tłıchǫ wellbeing.

We recognize that the region has great value for cultural well-being, way of life, and caribou, **and** the region has great value and potential for economic development. **Tłıchǫ Government's view is that in order to reconcile these values we need an independent assessment of options, impacts, and benefits, before permanent infrastructure is built.**

Permanent infrastructure such as the Slave Geological Province Road (“Corridor”) proposed by GNWT would irreversibly change the region. Starting to build a road or major infrastructure without working together to develop a common vision, and without the information needed to inform wise decisions, risks long delays, lost time and money, severe impacts on wildlife and the environment, and missed economic opportunities. There is only one chance to get it right.

Fortunately, we have a co-management tool available in the MVRMA to help us.

To make good decisions about the future of this region, we need good information.

A regional study is a way to get the right information. The type of study we are requesting is a regional strategic environmental assessment (RSEA), as described in the Mackenzie Valley Environmental Impact Review Board (MVEIRB) 2020 *Perspectives Paper*¹ (p.19).

Without a regional approach, proposals for major infrastructure projects may be seriously hindered or overwhelmed by the complexity and scale of cumulative effects assessment. RSEA outcomes can provide a better foundation for project assessments.

The recent (2019) amendments to the MVRMA allow the federal Minister to initiate this type of study under Part 5.2. Part 5.2 also requires the minister to seek and consider the advice of the GNWT, Tłı̨chǫ Government, and other First Nations when establishing the terms of reference.

RSEA can inform and support land use planning, impact assessment processes, and policy development.

We look forward to a time in the future when land use plans are implemented in Wek'èezhì and throughout Mǫwhì Gogha Dè Nı̨tlèè. However, experience has shown that land use plan development is a long process, is very important, and should not be rushed.

RSEA is a shorter more focussed process that can inform impact assessment, land use planning, and regional development planning. A timeline of 2-3 years is reasonable for an RSEA to engage stakeholders and rightsholders, gather information, analyze scenarios, and make recommendations (similar to the timeline for the Nunavut Impact Review Board's strategic assessment in Baffin Bay and Davis Strait).

RSEA does not make binding decisions – it fully respects decision-making authority of Indigenous, territorial, and federal governments, resource management boards, and processes like project EA, land use planning, and policy development. The purpose of RSEA is to gather information, evaluate options, facilitate discussion, and **inform** decisions about the future of a region.

We recommend that the Mackenzie Valley Environmental Impact Review Board (MVEIRB) be tasked with carrying out the RSEA using a structure similar to an environmental impact review. MVEIRB:

- Could follow a scope and terms of reference established by a steering committee of Indigenous, territorial, and federal governments.
- Is independent from any one party or government.
- Has experience using a variety of public engagement and consultation approaches, evaluating impact predictions, and making clear recommendations.
- Has recently assessed projects in the Slave Geological Province, including considerations for caribou, water, cultural use of the area, minimizing impacts and maximizing benefits.

¹ https://reviewboard.ca/reference_material/conference_papers_and_articles

MVEIRB could engage all interested parties, do the work of gathering information and analyzing scenarios on behalf of everyone, and present recommendations for all parties to consider in our own decision-making processes.

The RSEA would not replace, but could inform direct collaboration between governments, as well as other processes in the region (such as Tł̨chq̨-Akaįtcho Overlap agreement discussions, Wek'èezhì Land Use Planning, caribou management plans, mine closure planning, infrastructure planning, economic development strategies etc.).

An independent strategic assessment of all the factors in the region will inform TG, GNWT, and all decision-makers and interested parties about future development of the region.

Otherwise, on the surface, the decision looks like choosing between caribou and cultural well-being *versus* roads and economic well-being. An evidence-based, non-political assessment would help show the full picture of potential impacts, benefits, and trade-offs.

We believe creative opportunities can be found to develop the region in a way that balances economic benefits with cultural and environmental values.

This work is urgent and needs to be approached in the spirit of co-management. We are ready to work with GNWT, Canada, and our Indigenous neighbours.

Hè dọ gha gọita,



Grand Chief George Mackenzie
Tł̨chq̨ Government

- cc. Honourable Caroline Cochrane, Premier, GNWT
Honourable Shane Thompson, Minister Lands and Minister of Environment and Natural Resources, GNWT
Honourable Diane Archie, Minister of Infrastructure, GNWT
Honourable Caroline Wawzonek, Minister of Industry, Tourism and Investment, GNWT
Chief Edward Sangris and Chief Ernest Betsina, Yellowknives Dene First Nation
President Stanley Anablak, Kitikmeot Inuit Association
Joanne Deneron, Chairperson, Mackenzie Valley Environmental Impact Review Board
President Ken Armstrong, NWT and Nunavut Chamber of Mines