

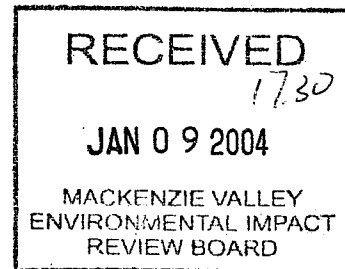


# INUVIALUIT GAME COUNCIL

January 9, 2004

Mackenzie Valley Environmental Impact Review Board  
 200 Scotia Centre  
 P. O. Box 938  
 Yellowknife, Northwest Territories  
 X1A 2N7

Attention: Martin Haefele  
 Environmental Assessment Officer



## ReDraft Work Plan for the Environmental Assessment of the Mackenzie Valley Gas Pipeline Project

We have reviewed the Draft Work Plan for the Environmental Assessment of the Mackenzie Valley Gas Pipeline Project (the "Work Plan") prepared by Mackenzie Valley Environmental Impact Review Board ("MVEIRB").

We are concerned at the scope of the development as defined by the Work Plan as well as the scope of the assessment. Specifically at page 2 the statements are made that

*"The Review Board deems the scope of development to include all components and activities associated with extracting natural gas and natural gas liquids from the Parson's Lake, Taglu and Niglintgak gas fields, process the gas and gas liquids for shipment and ship the gas and liquids to the currently existing pipeline system in Alberta."* [emphasis added]

The Work Plan continues by stating that

*"The Scope of Development also includes activities and developments related to preconstruction, construction, operation, decommissioning and post closure within the Mackenzie Valley as well as outside the Mackenzie Valley. This includes the manufacturing of materials ..."* [emphasis added]

The MVEIRB acknowledges that only 2 of the 4 principal components of the development are located in the Mackenzie Valley but views all 4 components to be part of one development. We agree that it is appropriate for the MVEIRB to examine any aspect of the development that it considers necessary to answer the questions which it asked to address by its legislation respecting the impact of the development within the geographical area of its jurisdiction but strongly disagree with the proposition that the MVEIRB should examine and pronounce upon "direct and indirect impacts on wildlife harvesting and cultural, social and heritage resources" in the Inuvialuit Settlement Region or that environmental assessment "may consider impacts in the rest of Canada and beyond".

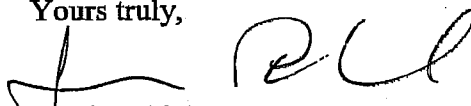
The Inuvialuit Settlement Region is subject to a different environmental assessment regime established under the Inuvialuit Final Agreement. This regime ensures that there will be Inuvialuit representation on the screening and review agencies. We ask that the MVEIRB respect this jurisdiction and refrain from entertaining questions and making pronouncements in relation to matters and geographic areas outside its jurisdiction.

In recognition of the inter-jurisdictional issues raised by the Mackenzie Gas Project, Inuvialuit institutions have supported the Cooperation Plan as an effective way of integrating the several processes and multiple interests raised by the Project. The Environmental Impact Screening Committee has indicated that it will refer the Mackenzie Gas Project to public review either before the Joint Panel to be established under the Cooperation Plan or to the Environmental Impact Review Board. Matters relating to impacts of the Project on Inuvialuit and in this region will be addressed in that review and the MVEIRB ought not to presume to speak in respect of matters in the Inuvialuit Settlement Region.

Appendix B of the Work Plan suggests that the final steps in this first phase of the environmental assessment of the Mackenzie Gas Project may not be complete until approximately May 28, 2004. Whatever the outcome of that process (whether phase 2 assessment or referral to joint panel review), the establishment of a joint review panel and the work of the other environmental assessment processes cannot begin until the MVEIRB first phase is completed. For this reason the proposed schedule for the MVEIRB phase 1 assessment has relevance for all interested parties. We believe that the earliest possible determination of the MVEIRB phase 1 process will serve the interests of northerners in all regions and of all institutions with a role to play in the impact assessment of the Mackenzie Gas Project. Accordingly we ask that you review the processes and time lines within your Work Plan to see whether you may be able to shorten the time required to come to a phase 1 determination.

We thank you in advance for the consideration of our comments.

Yours truly,



Frank Pokiak

Chairman, Inuvialuit Game Council

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