



April 29, 2014

Jon Pierce Chair **Environmental Impact Review Board** PO Box 2120 Inuvik, NT XOE OTO

Dear Mr. Pierce:

RE: Beaufort Sea Exploration Joint Venture Drilling Program Environmental Impact Statement (EIS) Draft Terms of Reference.

Inuvialuit Regional Corporation (IRC) has reviewed the EIS Draft Terms of Reference and strongly recommends the scope be expanded to comprehensively reflect the social and economic benefits accorded to Inuvialuit and their communities. While the importance of defining the environmental impacts of the project cannot be overstated, the Inuvialuit can only determine their level of support for the project if they have a full understanding of all associated impacts. The Draft Terms of Reference do not direct an appropriate level of attention to the aforesaid benefits and opportunities. As with other hydrocarbon exploration projects within the ISR, IRC must closely examine both the associated risks and the benefits of the project as they will impact the Inuvialuit, their communities, their environment and their overall well-being.

The Inuvialuit have experienced over 40 years of boom/bust hydrocarbon exploration activities, both on-shore and in the shallower waters of the Canadian Beaufort Sea. Certain realities have been clearly demonstrated during this period:

- On-shore exploration activities provide significant economic opportunity and benefits to the inuvialuit, their communities and the region while maintaining environmental risks at a manageable level.
- Off-shore exploration activities reverse this equation in that the further off-shore the activities occur, the more the economic opportunities and benefits to the Inuvialuit and the ISR shrink and the more the environmental risks expand.

A sufficiently detailed description of the proposed social and economic benefits and opportunities must be provided by the Environmental Impact Statement. This will provide the Inuvialuit with the full range of information from which they can make a considered determination on their level of support for the project.

Nellie Cournoyea Chair and CEO

**Inuvialuit Regional Corporation**