



Prince Albert Grand Council

Athabasca Land Use

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FACSIMILE TRANSMITTAL SHEET

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Athabasca Denesuline Negotiation Team

February 10, 2009

Leslie Payette
Manager of Environmental Administration
NIRB
Box 1360
Cambridge Bay, NU X0B 0C0
Ph: (867) 983-4600

Fax: (867) 983-2594

Re: Notice of Part 4 Screening for AREVA Resources Canada's "Kiggavik" project proposal

Dear Ms. Payette,

We have reviewed the project summary sent to us by NIRB and looked at the proposal drafted by AREVA. A project of this scale may have significant impact on the environment and the caribou as the proposed mining activities intersect with caribou and other wildlife habitats that are very important to the Athabasca Denesuline.

Athabasca Denesuline territory parallels the range of the caribou herds that our people have relied upon for more than 8,000 years; including northern Saskatchewan, the Northwest Territories, and Nunavut. Hunting, trapping, fishing and other land-based and cultural activities are based around the caribou.

Since the yearly migration of the Beverly-Qamanirjuaq caribou herd is integral to Athabasca Denesuline economic, social and cultural identity, any potential disturbance to the caribou is potential risk to the Athabasca Denesuline identity. For this reason, we are submitting comments in the attached comment form, along with a map depicting caribou activity around the proposed project site.

Sincerely,

 Ron Robillard
ADNT Chief Negotiator, Prince Albert Grand Council

c/o Prince Albert Grand Council

~~Suite 208, 1804 - 1st Avenue West, Prince Albert, Sask. S6V 4Y4~~

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COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Kiggavik Project

Proponent: AREVA Resources Canada Inc.

Location: Kivalliq Region

Comments Due By: February 10, 2009

NIRB #: 09MN003

Indicate your concerns about the project proposal below:

- | | |
|--|---|
| <input type="checkbox"/> no concerns | <input checked="" type="checkbox"/> traditional uses of land |
| <input type="checkbox"/> water quality | <input type="checkbox"/> Inuit harvesting activities |
| <input type="checkbox"/> terrain | <input type="checkbox"/> community involvement and consultation |
| <input type="checkbox"/> air quality | <input type="checkbox"/> local development in the area |
| <input checked="" type="checkbox"/> wildlife and their habitat | <input type="checkbox"/> tourism in the area |
| <input type="checkbox"/> marine mammals and their habitat | <input type="checkbox"/> human health issues |
| <input type="checkbox"/> birds and their habitat | <input type="checkbox"/> other: _____ |
| <input type="checkbox"/> fish and their habitat | _____ |
| <input checked="" type="checkbox"/> heritage resources in area | _____ |

Please describe the concerns indicated above:

Since the yearly migration of the Beverly-Qamanirjuaq caribou herd is integral to Athabasca Denesuline economic, social and cultural identity, any potential disturbance to the caribou is potential risk to the Athabasca Denesuline identity. This specific area is integral habitat for the calving and migration of caribou that we depend on. Caribou are especially sensitive to disturbance at water crossings, many of which are in the vicinity of the proposed mine. As shown on our map and stated in AREVA's proposal, Beverley calving grounds are NW and SE of the proposed site, and post-calving grounds are in and around the project area. The winter and spring ranges are also in that area. Due to the size and nature of this project, we are concerned that mitigation measures may not be sufficient enough to minimize negative effects on caribou. There are also archaeological sites in the area and all activities should be conducted so that there is little or no impact on these.

Do you have any suggestions or recommendations for this application?

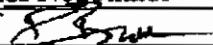
More up-to-date studies of the Beverley and Qamanirjuaq herds are necessary before this project can begin. Without these, it will be difficult to make an accurate cumulative effect assessment. As well, we do not feel that the initial mitigation measures presented by AREVA are not strong enough.

Do you support the project proposal? Yes ☐ No ☒ Any additional comments?

At this time, the project proposal provides insufficient information about how our concerns about caribou, heritage resources and Athabasca Denesuline livelihoods would be addressed.

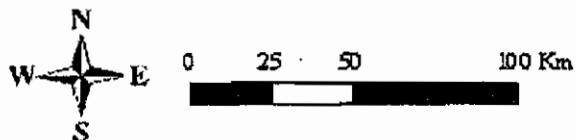
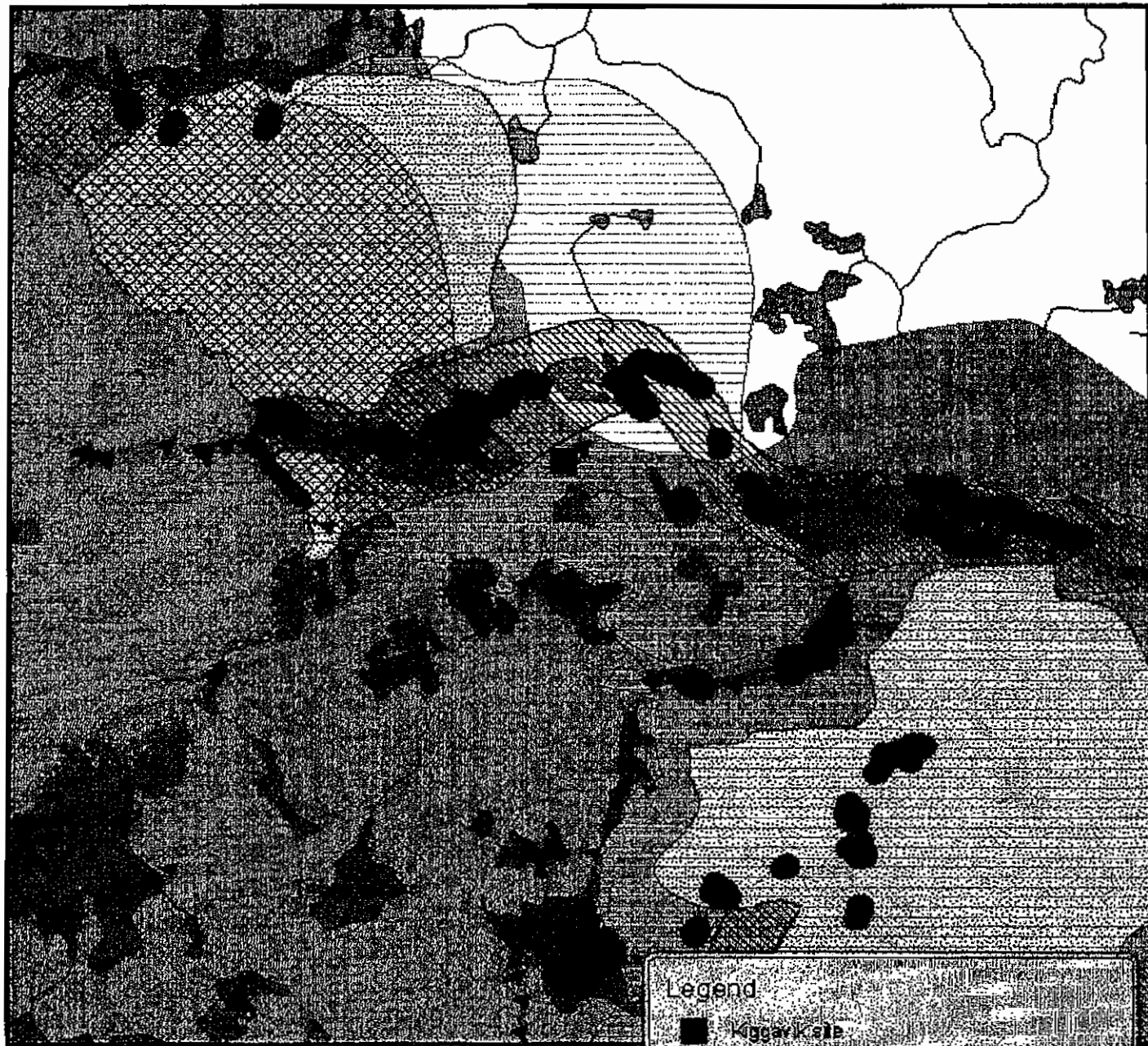
Name of person commenting: Ron Robillard of ADNT

Position: Chief Negotiator Organization: Prince Albert Grand Council

Signature:  Date: February 10, 2009

for Ron Robillard

AREVA Kiggavik Project Proposal and Caribou Habitat



Data descriptions and citations can be found in the Athabasca Denesuline Data Dictionary.

Prepared Feb. 6, 2009

Prepared by PACTEAM Canada Inc. for the Athabasca Denesuline Negotiation Team

Legend

- Kiggavik Site
- Caribou water crossings
- Post-calving grounds
- Caribou calving grounds
- Caribou winter range
- Caribou spring range
- Archaeological Sites in NU
- Thelon Wildlife Sanctuary
- Aberdeen Lake Special Management Area
- Tyrrell Lake Special Management Area