

February 10, 2009

Leslie Payette  
Manager of Environmental Administration  
Nunavut Impact Review Board  
PO Box 1350  
Cambridge Bay, NU X0B 0C0  
[lpayette@nirb.ca](mailto:lpayette@nirb.ca)

**Re: NIRB file no. 09MN002, AREVA Resources Canada Inc.'s proposed Kiggavik Project**

Dear Ms. Payette,

I am writing to inform you of the Baker Lake Concerned Citizens Committee's continued opposition to uranium mining in the Kivalliq region, and to comment on the manner in which we feel environmental assessment of the proposed Kiggavik project should take place.

The reasons why we opposed the first attempt to open the Kiggavik uranium deposit are as valid and important today as they were twenty years ago:

- Our belief that once one uranium mine is opened in the Kivalliq it will be politically impossible to stop the development of future uranium mines in the region.
- Our belief that all these future uranium mines, plus gold mines and possibly others as well, will have a very serious negative impact on the Beverly and Qaminirjuaq caribou herds upon which we depend as an essential food source – and upon which our culture as Caribou Inuit is based. They will impact on human health, on traditional activities, on our environmentally-friendly economic alternatives for the future, on community infrastructure, and on social issues in the communities. They will also have significant transboundary impacts on other aboriginal peoples living in the Northwest Territories, Saskatchewan and Manitoba.
- Our belief that there are very serious moral issues associated with uranium mining, nuclear power, nuclear weapons, and the storage of radioactive waste for countless generations to come.

We are well aware that Nunavut Tunngavik Inc. and the Kivalliq Inuit Association have already given their approval in principle to uranium mining in our region. They paid no attention to our concerns, and we feel that their decisions were made on the basis of one-sided information. We want you to know that we do not feel that we have been adequately consulting during the development of these positions, and that these organizations do not speak for us in this regard. The fact that several political organizations have already made their minds up does not mean that the people of the region have.

NIRB, the Government of Nunavut and the Government of Canada still have important responsibilities to the people and the environment of the Kivalliq region, and we owe it to our future generations – and to the caribou – to ensure that these duties are fulfilled out in an appropriate manner.

**It is critical that the review process examine the cumulative impacts of the *entire* uranium development scenario likely to result from approval of the Kiggavik uranium mine, in the context of *all* of the mines that are likely to be developed in the region in the foreseeable future.** We all know that if the Kiggavik mine is approved then other uranium mines will inevitably follow. They will be impossible to stop. It is therefore essential that this review consider far more than the impact of this one mine; that it consider the cumulative impact of *all* likely future uranium and other mining development in the region.

It is also critical important that the review process examine the capacity of all levels of government to effectively manage uranium development in the region. We simply do not believe that the Canadian Nuclear Safety Commission, the federal government or the territorial government have the capacity to do so. INAC has acknowledged that it cannot enforce some of the existing mining licences in Nunavut. The Government of Nunavut has not completed its caribou management strategy. The NIRB itself has not released its own rules of procedure.

The proponent likes to the point to uranium development in northern Saskatchewan as a 'success story.' To whatever degree it can be considered a 'success', this is due to the very high level of scrutiny that the industry has received from the regulatory authorities. The regulatory authorities in Nunavut simply do not have the capacity to subject uranium development here to the same level of constant and rigorous scrutiny. **If uranium mining is to take place in Nunavut, who will regulate the regulators?**

And finally, we want to comment on the ability of an organization of ordinary community residents to effectively participate in an environmental review process which will have such tremendous importance for the future of our region. As you know, the Canadian Environmental Assessment Agency (which does not operate in Nunavut) has a Participant Funding Program – but the NIRB does not. NTI and the KIA have made it quite clear that they do not intend to give us a penny to facilitate our participation in the Kiggavik review process. The politicians who run these organizations have already made up their minds about uranium mining, and they have no time for the concerns of hunters and community residents like us. Between NIRB's lack of a participant funding program and our representative Inuit organizations being in bed with the nuclear industry, the Baker Lake Concerned Citizens Committee will not have the resources to support even minimal participation in the review process. **Won't it be ironic if it turns out that the BLCCC was able to participate more effectively during the first Kiggavik review, conducted twenty years ago under the federal legislation then in place, than under the regulatory regime in place now that Nunavut has come into existence?!**

For all the above reasons, we will be urging the Minister of Indian and Northern Affairs to refer this project proposal to the Minister of the Environment for public review by a federal environmental assessment panel as per Section 12.6.1 of the Nunavut Land Claims Agreement.

We will also be asking the Minister of Indian and Northern Affairs to investigate the process by which the Nunavut Planning Commission claims to have met its responsibility under Term 3.6 of the Keewatin Land Use Plan – which states that “Any future proposal to mine uranium must be approved by the people of the region” – before granting land use plan conformity for the project. As you may be aware, on March 26, 1990 the people of Baker Lake voted in a plebiscite to oppose the proposed Kiggavik mine by a margin of 90.2% to 9.8%. **Since when does a motion passed by a Hamlet Council trump the overwhelming results of a democratic public vote?** Is there no ethical requirement to determine the wishes of the people of this community and of this region – and indeed of this territory – in a manner which cannot be manipulated by the politicians of the day? At this point it appears that opening the Kivalliq region to uranium mining will become a textbook example of how a small group of business-oriented aboriginal politicians imposed their will on the collective through sleazy and undemocratic means. You can bet that we will be raising these questions in the environmental assessment process – and again later if the assessment process concerning the Kiggavik proposal ends up going to judicial review.

Yours sincerely,

Joan Scottie  
Baker Lake Concerned Citizens Committee