Environmental Affairs – Programs P.O. Box 8550 3rd Floor, 344 Edmonton Street Winnipeg, Manitoba R3C 0P6

Your File Votre référence NIRB: 09MN003 Our file Notre référence

February 10, 2009

Leslie Payette
Manager of Environmental Administration
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Leslie Payette:

Re: Transport Canada's Review and Comments on the Part 4 Screening for the AREVA Resources Canada Inc. Kiggavik mine Project Proposal

Transport Canada (TC) appreciates the opportunity to participate in the Part 4 Screening process for the above mentioned project proposal as requested by you in your January 20, 2009 letter. TC is responsible for transportation policies and programs that promote a safe transportation system, ensuring that they work effectively and in an integrated manner.

Our review consisted of the following documents:

The Kiggavik Project Proposal, Areva Resources Canada Inc., dated November 2008

With respect to this project TC offers the following comments for your consideration:

Transport Canada has conducted a cursory review of the project proposal in accordance with our departmental mandate. Based upon this initial review, several works identified in the project proposal may pose interference to safe navigation and possibly require a Formal Approval under the *Navigable Waters Protection Act.* TC is also of the opinion that the proposed project has the potential to cause significant adverse effects on the ecosystem, significant adverse effects on Northerners and be a cause of significant public concern.

Project activities and components that maybe of TC concern are:

- Dewatering of a portion of Andrew Lake.
- Construction of a 2,000 metre (m) airstrip, and airport facilities for the transportation of employees and material including drums of uranium (yellowcake).
- Construction of fuel storage facilities at Kiggavik and Baker Lake. Tank farm at Kiggavik includes 2 to 6 tanks, each of 10 megalitre (ML) capacity; tank farm at Baker Lake includes 4 to 7 tanks, each of 10 ML capacity. Number of tanks at each location dependent on road option selected.
- Explosives transportation, storage and on-site manufacture.
- Chemical and hazardous material transportation and storage.
- Water withdrawal from lakes to the north and east of Kiggavik site.
- Discharge of treated effluent into receiving environment.



- Construction of an access road from Baker Lake to Kiggavik. The road option is dependent on location of the Storage Facility in Baker Lake. The options include two all-weather roads (north route or south route) or a winter road.
- Potential construction of bridge crossing or cable-ferry/ice bridge crossing over the Thelon River in association with the all-weather road, north route.
- Construction of an approximate 20 km all season Kiggavik-Sissons site haul road.
- Construction of facilities at Baker Lake including wharf, fuel storage tank farm, storage facility, laydown area, and satellite administration and community liaison office.
- Marine shipment of reagents, fuel and supplies to storage facility near Baker Lake and continued shipment via truck to the Kiggavik site.
- Shipment of yellowcake (~ 3,000 tonnes as U annually or 3,600 tonnes yellowcake) from the Kiggavik site via truck to Baker Lake port and/or via air from Kiggavik to southern Canada.
- Decommissioning and Reclamation activities.

Transport Canada appreciates the opportunity to participate in this review and provide comments to the NIRB for your consideration. Should you have any questions pertaining to these comments, please contact Chris Aguirre via email at christopher.aguirre@tc.gc.ca or by telephone at (204) 984-2615.

Regards,

Doug Soloway
Superintendent

Environmental Assessment Management Program (North)

cc: Christopher Aguirre – TC - Environmental Officer Sophia Garrick – TC – Environmental Officer Greg Black – TC – NWPP