



**Wildlife, Lands and Environment Department**

Lutsel K'e Dene First Nation  
P.O. Box 28  
Lutsel K'e, N.T.  
X0E 1A0

Telephone: (867) 370-3197  
Fax: (867) 370-3143

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Leslie Payette  
Manager of Environmental Administration  
NIRB  
Box 1360  
Cambridge Bay, NU X0B 0C0  
Ph: 867-983-4600  
Fx: 867-983-2594

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

On behalf of the Lutsel K'e / Kache Dene First Nation (LKDFN): Wildlife, Lands & Environment Department (WLED), I am responding to your request for comments on the proposal from AREVA Resources Canada Inc. (AREVA) for development for the Kiggavik project west of Baker Lake. This is in accordance with the mandate of the LKDFN WLED.

Further to many other various comments already submitted, recommending that no exploration or development activities should be permitted on the traditional calving and migratory routes of the Beverly caribou herd, LKDFN believes that the potential adverse impacts of the Kiggavik and Sissons projects are so unacceptable that it should be abandoned (NLCA Section 12.4.4(d)).

We are aware that Nunavut Tunngavik Inc. and the Kivalliq Inuit Association have already approved uranium mining in principle. Such a position is within their mandates but does not override the NIRB's duties and responsibilities. We are concerned that their respective decisions were made without access to important and balanced information about the risks of uranium exploration, extraction and processing. Both the *NTI Uranium Policy* and the *Background Paper on the NTI Uranium Policy* omit important information on uranium mining, the nuclear industry, and the entire nuclear fuel chain including health and ecosystem impacts.

The Keewatin Land Use Plan Term 3.5 places a moratorium on uranium development: "Uranium development shall not take place until the NPC, NIRB, the NWB and the NWMB have reviewed all of the issues relevant to uranium exploration and mining. Any review of uranium exploration and mining shall pay particular attention to questions concerning health and environmental protection."

These conditions were deemed by the Nunavut Planning Commission to have been fulfilled by it having convened a single workshop in Baker Lake on June 5-7, 2007; LKDFN was not invited. According to Section 12.2.5 of the NLCA, NIRB shall take into account the well being of residents of Canada outside the Nunavut Settlement Area in carrying out its functions. This requirement includes the well-being of members of the LKDFN who may be affected by the project. It is quite clear that caribou is a migratory species, and other users outside of Nunavut territory could be adversely affected by the Kiggavik and Sissons project.

It is worth noting that, Term 3.6 of the Keewatin Land Use Plan states: "Any future proposal to mine uranium must be approved by the people of the region." Unless there is to be a plebiscite on the project, such as was held on March 26, 1990 by the Baker Lake Hamlet Council, no mechanism exists to implement this Term apart from the environmental assessment process.

We are in agreement with the following statements submitted by INAC: After a preliminary assessment, INAC has identified several aspects of the proposal that merit an in-depth assessment, based on their potential for adverse effects. It is expected that these aspects also have the potential to cause significant public concern.

They include the following:

- The effect of construction, operation, closure and post-closure activities relating to road crossings, including the potential bridge over the Thelon River, on surface water quality;
- The potential impacts of the proposed all-weather or winter road on the surrounding environment including water quality, ground stability and permafrost, vegetation, soil and wildlife;
- The potential for acid rock drainage (ARD), and subsequently the effectiveness of ARD containment and mitigation. This would include the potential for ARD to occur on exposed open pit mine surfaces (East, Center and Main Zones, and Andrew Lake) and temporary waste rock piles, potential all season road construction materials, and ARD-related alteration of groundwater during underground mining (End Grid and potentially Andrew Lake) below permafrost;
- The anticipated impacts of potential dyke construction surrounding the Andrew Lake deposit, and the dewatering of a portion of Andrew Lake;
- The potential impacts of seepage from the subaqueous disposal of mill tailings at both the Center and Main Zone Tailings Management Facilities during operations and after closure on groundwater and surface water;
- The anticipated impacts of construction, operation, and closure activities on wildlife, vegetation, landforms and permafrost features in the project area;
- The potential impacts on surface water quality from water runoff of landfill sites at both the Kiggavik and Sissions sites;
- The impacts of potential accidents or malfunctions, on site as well as during transportation, especially of hazardous materials.
- The potential socio-economic impacts of all phases of the project on relevant communities, including those that may arise due to employment of large numbers of people and potential concerns with respect to health and safety, particularly relating to uranium.
- The potential for ongoing and incremental land use activities associated with this and other mining and transportation activity in the Kivalliq region to result in cumulative impacts.

INAC would also like to indicate it's support to NIRB in conducting an assessment for this project that will include meaningful public engagement and participation. Uranium related projects have been the cause of particular public concern for public health and safety in the past. The regional land use plan in effect for the project area attests to this by requiring that "Any future proposal to mine uranium be approved by the people." (Section 3.6 of the Keewatin Regional Land Use Plan). In addition, INAC would like to bring NIRB's attention to the proponent's intention to transport yellowcake by air to locations outside the Nunavut Settlement Area. Although INAC does not believe this is a transboundary project component, INAC is not aware of any current or modern (last 15 years) Canadian usage of this method of transportation for large quantities of yellowcake.

We have also attached the MWC Policy Statement on Uranium Mining, calling for a total moratorium on uranium exploration and new uranium mines across Canada.

If you have any question regarding these comments, please contact our office directly by phone, fax or email.

*Sonya Almond*

Sonya Almond  
A/WLED Manager  
[sonyalmond@hotmail.com](mailto:sonyalmond@hotmail.com)

cc. Lutsel K'e Dene First Nation Chief & Council  
Akaitcho IMA Implementation Office



# MiningWatch Canada

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### *Policy Statement on Uranium Mining*

Uranium mining is a highly contentious issue across Canada and globally. Uranium mining, from exploration through to mining, processing, and eventual decommissioning, is risky and dangerous to the environment, wildlife, local peoples and communities, and workers.

Uranium is used for three purposes: weaponry, medical and scientific technology, and energy. MiningWatch Canada believes that there is no public support in Canada for the use of uranium for weaponry, and that medical and scientific technology uses could be well served by existing stockpiles of uranium.

The use of uranium for energy purposes is complex and contentious:

- The efficiencies, sustainability, costs, and benefits of nuclear energy must be considered and weighed against the efficiencies, sustainability, costs, and benefits of other energy sources (for example: gas, oil, coal, wind, and thermal), and against greatly enhanced conservation.
- The opportunity costs of the use of non renewable fuels (for example: coal, oil, and gas) for energy must be considered and weighed.
- The very serious short and long term waste management issues and risks of nuclear energy must be considered and weighed. At this point, there is no proven or publicly accepted technology for managing the long term risks.
- The risks of nuclear energy (for example: terrorist attacks and serious failures of nuclear plants) must be considered and weighed, particularly as these risks have far wider public impacts beyond the impacts on local environments, wildlife, people, and communities.
- Arguments have been made that nuclear energy is environmentally "clean and green". While this may be true at the point of burning processed uranium as a fuel, the nuclear industry, seen as a whole, is not clean, nor green. It does contribute to green house gas emissions.
- There is no public consensus across Canadian society about overall energy policy, nor about nuclear energy as a key or primary part of public energy policy.

MiningWatch Canada takes the position that *there should be a total moratorium on uranium exploration and new uranium mines across Canada until such time as:*

- *There is a full, well informed, and serious public debate and national consensus regarding energy policy, and the role of nuclear energy as part of this overall energy policy;*
- *The destructive environmental legacy of past and existing uranium mining has been cleaned up and permanently neutralized, and the people who have suffered injury to their health from involvement in or exposure to uranium mining and processing have been adequately compensated individually and collectively; and*
- *There is a sound, long term, economically feasible, scientifically demonstrated, and publicly acceptable means of isolating radioactive wastes (from the mining, processing, and use of uranium) from the environment and from human communities.*

Uranium exploration and mining creates serious negative short and long term impacts on the environment and on individuals and local communities. MiningWatch Canada takes the position, as it does with all exploration and mining, that these impacts must be minimized and mitigated against, no matter what the public benefits may be.