

SCREENING DECISION REPORT NIRB FILE NO.: 09MN003

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DFO File No.: 08-HCAA-CA7-00052

March 13, 2009

Honourable Minister Chuck Strahl Minister of Indian Affairs and Northern Development 10 Wellington, 21st Floor Gatineau, QC K1A 0H4

Via email: Strahl.C@parl.gc.ca

Re: Screening Decision for AREVA Resources Canada's "Kiggavik" Project Proposal

Dear Honourable Minister Strahl:

As can be seen from the more detailed comments below, the Nunavut Impact Review Board (NIRB or Board) is recommending that AREVA Resources Canada Inc.'s "Kiggavik" uranium mine project proposal be the <u>subject of a public review</u> pursuant to Section 12.4.4 (b) of the Nunavut Land Claims Agreement (NLCA).

Legal Framework

The primary objectives of the NIRB are set out in Section 12.2.5 of the NLCA. This section reads:

In carrying out its functions, the primary objectives of NIRB shall be at all times to protect and promote the existing and future well-being of the residents and communities of the Nunavut Settlement Area, and to protect the ecosystemic integrity of the Nunavut Settlement Area. NIRB shall take into account the well-being of the residents of Canada outside the Nunavut Settlement Area.

Subsection 12.4.2 (a) of the NLCA directs the NIRB, when screening a project, to recommend a public review when in its judgement:

- (i) the project may have significant adverse effects on the ecosystem, wildlife habitat or Inuit harvesting activities,
- (ii) the project may have significant adverse socio-economic effects on northerners,
- (iii) the project will cause significant concern, or

(iv) the project involves technological innovations for which the effects are unknown

Pursuant to Subsection 12.4.2 (b), a review is generally not required when, in NIRB's judgement, the project is unlikely to arouse significant public concern and;

- (i) the adverse ecosystemic and socio-economic effects are not likely to be significant, or
- (ii) the project is of a type where the potential adverse effects are highly predictable and mitigable with known technology

Subsection 12.4.2 (c) instructs the NIRB to give greater weight to the provisions of 12.4.2 (a) in determining whether a review is required or not.

Procedural History and Background

On November 25, 2008, the Board received the "Kiggavik" mine project proposal from AREVA Resources Canada Inc. (AREVA). The proposed "Kiggavik" project is located in the Kivalliq Region, approximately 80 kilometres (km) west of Baker Lake.

On November 26, 2008, the NIRB informed AREVA that the project proposal appeared to be located in an area which required conformity to the Keewatin Regional Land Use Plan (KRLUP) and would require a conformity determination from the Nunavut Planning Commission (NPC).

By January 16, 2009, the NIRB received a positive conformity determination from NPC for AREVA's "Kiggavik" project. The correspondence also indicated that, with respect to sections 3.5 and 3.6 of the KRLUP which require review of all issues relevant to uranium exploration and mining by the NPC, as well as approval of the people of the region, the NPC has concluded that these requirements have been met. The NIRB assigned this project proposal file number 09MN003. An Executive Summary of the project proposal as submitted may be reviewed in Appendix A to this decision.

This application was distributed to various interested Federal and Territorial Agencies, Inuit Organizations, and those communities and organizations of the Kivalliq region potentially affected by this development.

The Parties were asked to review the application and provide the NIRB with comments by February 10, 2009 regarding:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic and socioeconomic effects; and if so, why;
- Whether the project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures); and
- Any matter of importance to the Party related to the project proposal.

On February 13, 2009, a request for an extension to provide comments was received from the Government of Nunavut. Additional time was granted for all Parties to provide comments on the Kiggavik project to February 18, 2009.

On or before February 19, 2009, NIRB received comments from the following interested Parties:

- Kivalliq Inuit Association
- Nunavut Tunngavik Incorporated
- The Community Coalition Against Mining Uranium
- Canadian Nuclear Safety Commission
- Baker Lake (Kangiqliniq) Hunters and Trappers Organization (various members individual submissions under single cover)
- Athabasca Denesuliné Negotiation Team
- Indian and Northern Affairs Canada
- Mary Jo Cullen from Toronto, Ontario
- Barbara Mueller from Baker Lake, Nunavut
- Environment Canada
- Baker Lake Concerned Citizens Committee
- Transport Canada
- MiningWatch Canada
- Beverly and Qamanirjuaq Caribou Management Board
- Forum Uranium Corp.
- Fisheries and Oceans Canada
- Natural Resources Canada
- Parks Canada
- Lutsel K'e Dene First Nation, Wildlife, Lands and Environment Department
- Government of Nunavut, Department of Executive & Intergovernmental Affairs
- Paula Hughson from Baker Lake, Nunavut
- Baker Lake Residents (various)
- AREVA Community Liaison Officer

Please see Appendix B for all Parties comments received by the NIRB.

To accommodate the Government of Nunavut's request for additional time to comment on this file, on February 24, 2009 the NIRB applied for an extension for this screening to the Minister of Indian and Northern Affairs in accordance with Section 12.4.5 (b) of the NLCA.

NIRB Assessment and Decision

In determining whether or not a public review is necessary, the NIRB considered a number of factors, in addition to soliciting and reviewing comments received from interested Parties. Upon completion of NIRB's internal technical review, and consistent with the criteria stated in 12.4.2 (a) of the NLCA, the NIRB determined that the size and nature of the Kiggavik project indicate that:

1. The project may have significant adverse effects on the ecosystem - 12.4.2 (a) (i):

The NIRB and other commenting Parties have identified a number of potential significant adverse effects that could be associated with this project. Selections of those comments identifying such adverse effects are listed below:

We feel that a Part 5 review is required as the project may have significant adverse effects on the ecosystem, wildlife habitat or Inuit harvesting activities. The project may have significant

adverse socio-economic effects on northerners. And the project will cause significant public concern. (Nunavut Tunngavik Inc. and the Kivalliq Inuit Association)

The Kiggavik project covers a relatively large geographical area with multiple mine pits and associated facilities for which a potential for significant adverse environmental and socioeconomic effects exist. Examples include potential effects on caribou migration and heritage resources from the siting of project infrastructure and potential effects on groundwater quality due to permafrost degradation during operation, decommissioning, and post-closure of the tailings management facilities (TMFs). (Canadian Nuclear Safety Commission)

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 Denesuliné. (Athabasca Denesuliné Negotiation Team)

Research indicates that there is no safe way to mine uranium, the risk of contamination of the environment is long lasting and far reaching. Contaminated waste rock (sand), leaching from tailings ponds into the water systems and onto the land will impact negatively on the environment for many generations...the negative impacts on the wildlife and more specifically caribou, their calving grounds and migration patterns. (Barbara Mueller, Baker Lake, Nunavut)

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. (Baker Lake Concerned Citizens Committee)

The proposed project is likely to cause significant adverse eco-systemic and socio-economic effects, including effects on caribou, caribou habitat and caribou harvesting activities. (Beverly and Qamanirjuaq Caribou Management Board)

Environment Canada (EC) is of the opinion that the proposed project may cause significant adverse effects on the ecosystem and wildlife habitat. This advice is based on the scale of the proposed project and the anticipated environmental impacts that may occur if this project proceeds. Potentially impacted ecosystem components include, but may not be limited to:

- O Surface freshwater as a result of the deposit of treated effluent into a lake, nutrient input from blasting and sewage treatment, suspended sediment as a result of construction activities, surface runoff from ore and waste rock, and accidents and malfunctions;
- o Marine water quality as a result of the potential for accidents and malfunctions along the proposed shipping route.
- O Air quality as a result of the operation of the incinerator, mine site activities and the hauling of ore concentrate along the haul and access roads;
- o Migratory birds as a result of habitat loss and disturbances at the proposed site facilities, roads, airstrip, dock facilities, and shipping routes; and.
- o Species at risk as a result of habitat loss and disturbance at the proposed site facilities, roads, airstrip, dock facilities, and shipping routes. (Environment Canada)

Overall, INAC is of the view that the project, due to the nature and scale of proposed activities and components, may have the potential to cause significant adverse environmental impacts, significant adverse socio-economic effects on northerners as well as be a cause of significant public concern. (Indian and Northern Affairs Canada)

While management of wastes is one of the most serious problems associated with uranium development, there are also other likely and potential impacts on the surrounding ecosystems and the well-being of people who depend on those ecosystems for sustenance. We would specifically note that the project may have significant adverse effects on the ecosystem and wildlife habitat, especially in relation to critical caribou habitat, including calving and staging areas, and therefore on Inuit harvesting activities. (MiningWatch Canada)

Based upon this initial review, several works identified in the project 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 can be a cause of significant public concern. (Transport Canada)

DFO has concluded that the dewatering of a portion of Andrew Lake will cause a harmful alteration, disruption or destruction of fish habitat. It is DFO's opinion that the following works and undertakings in relation to the development could also result in impacts to fish and fish habitat:

- O Construction of stream diversions in the proposed location of the Centre Pit, temporary special waste pile and clean waste rock pile;
- o Construction of a dam across the outlet of Sik Sik Lake;
- Construction of a dock in Baker Lake;
- Construction of water crossing structures along site haul road and access road from Baker Lake to the Kiggavik Mine site;
- o Construction of berms to collect site drainage; and,
- o Installation of water intake structures. (Fisheries and Oceans Canada)

The project is of a scale and type that has potential to have negative effects on the environment and on the socio-economics of the local communities. Through the review these potential effects must be identified, assessed, and mitigated. (Government of Nunavut)

Further to many other various comments already submitted, recommending that no exploration or development activities should be permitted on the traditional calving and migratory routs 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 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. (Lutsel K'e Dene First Nation)

With tailings and AREVA's plans for storage of mine waste there is high potential of the wind carrying radioactive mine waste to the surrounding tundra landscape and having repercussion effects on wildlife, water and people not associated with the mine site. The potential for contaminating the fresh water and ecosystems is very high with the possibility of the permafrost melting. (Paula Hughson, Baker Lake, Nunavut)

2. The project may have significant adverse socio-economic effects on Northerners - 12.4.2 (a) (ii):

The NIRB and other commenting parties have identified both positive and negative socio-economic effects that could be caused by this project. Selections of those comments raising major issues are shown below:

Since the yearly migration of the Beverly-Qamanirjuaq caribou herd is integral to the Athabasca Denesuliné economic, social and cultural identity, any potential disturbance to the caribou is potential risk to the Athabasca Denesuliné identity. (Athabasca Denesuliné Negotiation Team)

The potential adverse socio-economic effects of this proposed project are not limited to effects on Inuit or residents of Nunavut, but could extend to traditional harvesters and other users of caribou across the caribou range in the Northwest Territories and Saskatchewan as well. (Beverly and Qamanirjuaq Caribou Management Board)

We would specifically note that the project may have significant adverse socio-economic effects on northerners, especially those who rely on the caribou for a significant part of their traditional activities and diet. (MiningWatch Canada)

The Kiggavik Project has substantial potential to contribute to economic development in Nunavut. Expenditures over the Project lifetime will amount to several billion dollars, and AREVA is proposing measures to maximize the economic benefits to the region. Local employment will be facilitated by preferential hiring for people in the Kivalliq region, and there will be employee fly in/fly-out pick-up points at each of the seven communities in Kivalliq. AREVA will also provide extensive on-the job training and recognizes the need for a broad based education and training strategy to prepare people for employment. Local business development will be facilitated; there will be opportunities for existing businesses to expand, and for new businesses to form, in response to Project needs for goods and services. The experience Kivalliq workers and businesses will gain in meeting the needs of the Project will enhance their capacity to realize economic benefits from any other new mining projects in the Kivalliq region or elsewhere in Nunavut. (Forum Uranium Corp.)

3. The project will cause significant public concern - 12.4.2 (a) (iii):

The Kiggavik project has raised concerns which the Board considers significant, in particular the potential effects of uranium mining on the environment and the concerns for public health and safety. During the screening process, the majority of Parties expressed significant public concerns. The concerns were:

There is a potential for the Kiggavik project to cause significant public concern due to uranium not having been mined in the territory in the past. (Canadian Nuclear Safety Commission)

The project proposal is likely to arouse significant public concern, including concern from traditional caribou harvesters in Nunavut, the Northwest Territories, and Saskatchewan. (Beverly and Qamanirjuaq Caribou Management Board)

Uranium related projects have been the cause of particular public concern for public health and safety in the past. (Indian and Northern Affairs Canada)

We would specifically note that the project will cause significant public concern, as would any planned large-scale release of radiation into the environment, even where it is presumed to be regulated and controlled. (MiningWatch Canada)

What is the rush to mine uranium or resources that may harm people, environment, cultural heritage, air quality and the economy of people who may in the future have effects from the mine ranging in health effects, animal health effects, to name a few. (Paula Hughson, Baker Lake, Nunavut)

4. The project involves technological innovations for which the effects are unknown - 12.4.2 (a) (iv):

The Kiggavik project appears to include components which have not been implemented in Canada's Arctic before. Such components include the establishment of in-pit tailings mine facility (TMF), and underground excavation with the additional influence of underlying fractured rock. Accordingly, there exists potential uncertainty relating to the effects resulting from technologies being implemented in Arctic environments. A few Parties also expressed their concerns on these matters as follows:

The Kiggavik project is of a type where technological innovation could apply, with consequent unknown effects. Examples include mine pit and TMF design and underground excavation in a permafrost environment with the additional influence of underlying fractured rock. (Canadian Nuclear Safety Commission)

The potential adverse effects of the project on caribou are not highly predictable and it is not known if they are mitigable with known technology. (Beverly and Qamanirjuaq Caribou Management Board)

We would specifically note that the project involves technological innovations for which the effects are unknown, specifically related to the long-term control of uranium mill tailings and contaminated water. (MiningWatch Canada)

The uranium is not going anywhere and it might be prudent to be very cautious about this new endeavor to mine uranium. A uranium mine has never been started in permafrost in Canada. If a mine did go ahead in the future, then the all the uranium and waste rock should be shipped out as well to reduce the effects of toxic radioactive waste from entering the disturbed local regional environment (Paula Hughson, Baker Lake, Nunavut)

Most commenting Parties, including Environment Canada (EC), Government of Nunavut (GN), Baker Lake Concerned Citizens Committee (BLCCC), Beverly and Qamanirjuaq Caribou Management Board, Natural Resources Canada, MiningWatch Canada, Barbara Mueller, Fisheries and Oceans Canada, Indian and Northern Affairs Canada, Canadian Nuclear Safety Commission, Kivalliq Inuit Association (KIA) & Nunavut Tunngavik Inc (NTI), recommended that the project proposal requires a Review as per Section 12.4.4 (b) of the NLCA. Further, EC, GN and KIA & NTI explicitly indicated that a Part 5 Review was most appropriate for this file. Furthermore, Barbara Mueller, BLCCC and MiningWatch Canada recommended a review by a federal assessment panel as per Section 12.6.1 of the NLCA. Their justification for a Part 6 review was based on the following:

- 1) Capacity issues associated with government agencies to monitor mining industries (especially uranium).
- 2) Safety concerns associated with uranium mining.
- 3) Cumulative impacts of all likely future uranium and other mining development in the region.
- 4) Availability of Participant Funding for the review process.

- 5) Transboundary impacts through release of radionuclides and impacts on caribou herds that range in Northwest Territories (NWT), Manitoba and Saskatchewan.
- 6) Nuclear development and uranium mining have had and continue to have impacts at a national level.

Lutsel K'e Dene First Nation recommended that the project should be abandoned as per Section 12.4.4 (d) of the NLCA since the potential adverse impacts of the Kiggavik project are so unacceptable.

The NIRB recognizes that the determination of whether the project is referred to a Part 5 Review or Part 6 Federal Panel Review is yours alone to make in accordance with Section 12.4.7 of the NLCA.

Issues of Concern to NIRB

Following the Board's internal technical review of the project and considerations of the type of project development (uranium), as well as the public concerns expressed; there are a number of issues which require further attention and clarification by the Proponent. As recommended above, the NIRB thinks this best done through a full public review process in order that the concerns of those directly impacted are better known and where appropriate, mitigated prior to the project proceeding. These issues, which are caught by different portions of Section 12.4.2 of the NLCA, include:

- Works in and around water such as the construction of bridge crossings or cable-ferry/ice bridge crossing over the Thelon River
- Center and Main Zone Tailings Management Facilities (TMF) based on the "in-pit" disposal concept
- Potential seepage from the subaqueous disposal of mill tailings from TMF
- The dyking and dewatering of a portion of Andrew Lake
- Potential impacts to wildlife, especially caribou, caribou migration and caribou calving grounds
- Potential effects on heritage resources
- Potential impacts to surface water quality from deposition of tailings and mine effluent, and from contact water runoff from landfill sites
- Potential impacts to surface water quality from the use of explosives
- Potential for acid rock drainage (ARD) and metal leaching from open pit mine surfaces, waste rock stockpiles, potential all season road construction materials, and ARD related alteration of groundwater during underground mining below permafrost
- Effects of construction, closure and post-closure activities relating to site runoff and road crossings on surface water quality of natural waterbodies and adjacent areas
- 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
- Potential impacts from underground mine (East Grid) to groundwater quality
- Anticipated impacts of construction, operation, and closure activities on specific vegetation associations and geomorphological structures
- Potential of cumulative impacts resulting from ongoing and incremental land use activities associated with this and other mining, terrestrial transportation and marine shipping in the Kivalliq region
- Potential impacts to air quality
- Potential impacts to human health associated with uranium mining
- Potential impacts to marine water quality
- Potential impacts to wildlife resulting from human activities and habitat loss associated with mining activities
- Species at risk as a result of habitat loss and disturbance from project activities
- Migratory birds as a results of habitat loss and disturbance from project activities

- Transportation of ore concentrate (yellowcake)
- Impacts resulting from accidents or malfunctions which may occur during transportation
- Permafrost conditions (pre-operational, operational and decommissioning) and climate change impacts on permafrost
- Alternatives design options
- Thelon River status as a Canadian Heritage River

RECOMMENDATION TO THE MINISTER

Collectively, the Board has carefully considered the factors set out in sections 12.4.2 (a) and 12.4.2 (b) of the NLCA. The Board has no doubt, based on the submissions of the Parties as set out in the preceding sections of this Screening Decision, that this Project may have significant adverse effects on the ecosystem, wildlife habitat or Inuit harvesting activities; adverse socio-economic effects on northerners; will cause significant public concern; and involves technological innovations for which the effects are unknown.

Therefore, pursuant to Section 12.4.4 (b) of the NLCA, the Board recommends to the Minister that the Project Proposal requires reviews under Part 5 or 6.

Furthermore, the Board believes it is also important to raise the matter of intervener funding which may be required for any Review of this file. A number of Parties raised the issue of Participant Funding and expressed concern that a Review process might not have the direct ability to provide funding assistance to interested interveners. Concerns were raised specifically as follows:

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. (Baker Lake Concerned Citizens Committee)

As well, the Canadian Environmental Assessment Agency, unlike the NIRB, has a Participant Funding Program to facilitate the participation of public intervenors. While this fund is insignificant in comparison with the hundreds of thousands or even millions of dollars the proponent will spend preparing its documentation, or in comparison with the funds required by community and public interest groups to review and critique that documentation effectively and intervene effectively in the review process, it is nonetheless important and may well mean the difference between having a degree of meaningful public involvement and having none. (MiningWatch Canada)

The Board believes that intervener funding may be necessary to allow affected parties the ability to participate fully in any Review of this file and you may wish to consider this matter in any decision you issue regarding our recommendations. Incidentally, there is precedent for intervener funding mechanisms should your decision be a Part 5 Review.

The NIRB looks forward to your decision, whatever it is, and once we have it, will act quickly to address the next steps in any review of the Kiggavik project.

Yours truly,

Lucassie Arragutainaq

Chairperson

Attachments: Appendix A: Executive Summary

Appendix B: Comments from Parties

APPENDIX A Executive Summary

EXECUTIVE SUMMARY

The Kiggavik Project is a proposed uranium ore mining and milling operation located in the Kivalliq region of Nunavut approximately 80 km west of the community of Baker Lake. Uranium in the Kiggavik area was identified during the 1970s and 1980s. In 1993, AREVA Resources Canada Inc. (AREVA) became the operator of the Kiggavik Project, and further exploration was carried out between 1993 and 1997. The Project was put in care and maintenance mode in 1998. As the uranium market improved during the first half of 2005, AREVA re-established a number of community and territory contacts in Baker Lake and Nunavut. Field activities, engineering studies and environmental assessment studies resumed in 2007.

AREVA Resources Canada Inc. is a Canadian company headquartered in Saskatoon, Saskatchewan. The company is part of the AREVA Group of companies, headquartered in France, and a world leader in nuclear energy, and electricity transmission and distribution. Sustainable development is at the core of the Group's business strategy. AREVA, and its predecessor companies, have been involved in uranium exploration and in project development and operation in Saskatchewan's Athabasca Basin for the past 40 years. The social partnerships and high level of safety and environmental protection achieved by these operations have enabled economic development to occur in northern Saskatchewan without compromising the future of the land or the people. AREVA is committed to developing a similar outcome for the Kiggavik Project.

The Kiggavik Project has substantial potential to contribute to economic development in Nunavut, particularly in the Kivalliq region. Capital and operating expenditures over the Project lifetime will amount to several billion dollars. AREVA is committed to maximizing the economic benefits to the region. Local employment will be facilitated by preferential hiring for people in the Kivalliq region, combined with employee pick-up points at each community. AREVA also provides extensive on-the-job training and recognizes the need for a broad based education and training strategy to prepare people for employment. AREVA will facilitate local business development; there will be opportunities for existing businesses to expand, and for new businesses to form, in response to Project needs for goods and services.

The objective of this Project Proposal is to introduce the Kiggavik Project to the public and regulatory agencies and to initiate the formal Project review process. This Project Proposal presents AREVA's proposed plans to develop, operate and decommission the Kiggavik Project. It also provides a broad description of the existing biophysical and socioeconomic conditions with the objective of identifying potential interactions with Project components. Preliminary environmental impact studies were used to design key components of the Project. These studies are included in this Project Proposal.

Project Description

There are three main geographical areas incorporated in the Kiggavik Project; these are the Kiggavik site, the Sissons site and the Baker Lake dock site. The main base of operations will be the Kiggavik site, which will include open pit mining, power generation, ore processing, warehousing, administration

and personnel accommodation. The proposed activities at Sissons include open pit mining, underground mining, and the ancillary activities required to support these mining operations. The dock site at Baker Lake will serve as a transfer and storage facility for materials and supplies en route to Kiggavik.

The Project includes the development of three open pit mines (East Zone, Center Zone, and Main Zone) at Kiggavik and both an open pit mine (Andrew Lake) and an underground mine (End Grid) at Sissons. The ore would be mined using excavating equipment and then trucked to an ore stockpile. The ore would then be directed to the mill to produce between 2,000 and 4,000 tonnes of uranium (U) as a concentrate, commonly referred to as yellowcake, per year. Clean waste rock from the mines would be used as construction material or placed on the land in designated areas. Subeconomic mineralized waste rock (termed special waste) would be temporarily placed on surface in managed stockpiles during operation and then backfilled in the mined-out open pits after mining is complete. Tailings resulting from the extraction of uranium from the ore would be treated and deposited below ground in two mined-out open pits converted for use as tailings management facilities. A small mined-out open pit (East Zone) would also be used as a water management facility to maximize water storage and recycling. Any water discharged would be treated to meet regulatory discharge requirements for protection of the environment.

Reagents, fuel and supplies would be barged to a storage facility near Baker Lake and then transported to Kiggavik via truck on a 90 - 100 km access road. Several options for this access road will be further considered during the Project review process. An airstrip would be constructed on site for the transport of both employees and materials. The airstrip would also be used to transport drums of uranium concentrate by air to southern Canada. A limited number of concentrate drums may be shipped by barge during the open water season.

The Project would also include construction of an accommodation complex for employees, warehouse and maintenance facilities, fuel tanks, explosives storage, water treatment plants, administration buildings, and haul roads.

Currently the Kiggavik Project is estimated to contain geological resources representing approximately 52,000 tonnes U with a grade of approximately 0.23% U. Mining reserves in the order of 44,000 tonnes U were considered to design the Project. Based on these reserves and production schedule, mining and milling is complete after 17 years of operation.

On completion of mining and milling activities, all Project sites would be returned as close as practical to their natural states. The decommissioning plans include demolition and removal of site facilities and remediation of all site areas that may have become contaminated. Closure of the two tailings management facilities will include the placement of a cover layer and an erosion barrier of waste rock over the tailings. The surface of the final cover will be graded to blend into the existing topography. Closure of the waste rock piles will include the placement of a layer of compacted waste rock, which will be then covered with clean overburden material to encourage revegetation prior to final monitoring. The final surface of the waste rock piles will be regraded to blend into the existing topography and to enhance conditions for wildlife access.

The Kiggavik Project is summarized as follows:

Location

Kivalliq Region of Nunavut, approximately 80 km west of Baker Lake.

Property

The Project includes two properties: Kiggavik and Sissons (collectively called the Kiggavik Project). The Kiggavik site, located at approximately 64°26'N and 97°37'W is composed of 17 mineral leases, covering 9,808 acres. The Sissons site, located approximately 17 km south-west of Kiggavik at 64°20'N and 97°52'W, is composed of 22 mineral leases, covering 36,371.5 acres.

Resources & Reserves

The total quantity of geological resources is currently estimated at 52,000 tonnes U (134 million lbs U_3O_8) at an average grade of 0.23% U. The total quantity of recoverable reserves is currently estimated at approximately 44,000 tonnes U (114 million lbs U_3O_8). Approximately 35% of these reserves are associated with the Kiggavik deposits, while the remainder are associated with the Sissons deposits.

Mining

There are five individual mines proposed for the Project: East Zone, Center Zone and Main Zone at Kiggavik; End Grid and Andrew Lake at Sissons. The three Kiggavik deposits and Andrew Lake deposit would be mined via truck-shovel open pit, while End Grid would be an underground mine using underhand drift-and-fill.

Waste Rock

Mine waste rock would be segregated into clean and subeconomic mineralized material and managed in surface stockpiles. Clean waste would be used for construction material when possible. Upon completion of mining, subeconomic mineralized waste rock would be backfilled into mined-out pits.

Process

The ore would be processed in an on-site mill at Kiggavik to produce approximately 3,000 tonnes U (7.8 million lbs U_3O_8) per year as uranium concentrate, commonly referred to as yellowcake.

Tailings

The mill tailings would be managed via in-pit tailings management facilities constructed using the mined-out Center Zone and Main Zone open pits at Kiggavik.

Water Management

Site drainage, recycled tailings water, and fresh water from nearby lakes would be used in the mill process. All effluent would be treated prior to discharge.

Life of Mine

Approximately 17 years of operation, based on studies to date. It is currently anticipated that pre-operational construction would require 3 years while post-operational decommissioning would require 5 years.

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Access

Access to the site would be provided by either an all-season road or a winter road between Baker Lake and Kiggavik. Supplies would be shipped to a Baker Lake dock facility during the summer barge season and trucked to Kiggavik via the road. An airstrip would be constructed and operated at site for transportation of personnel and yellowcake. During construction, a winter road would be required for interim site access.

Personnel

The Project is expected to employ 400-600 people during operations. The operation would be fly-in/fly-out on a 7 to 14 day schedule with onsite employees housed in a permanent accommodations complex.

Public Consultation

Public participation is an essential component of AREVA's sustainable development model for mining projects and is one of the 5 guiding principles used by the Nunavut Impact Review Board. AREVA began public participation initiatives for the Kiggavik Project in 2005, two years prior to the resumption of work on the site.

AREVA places a high emphasis on maintaining a consistent presence in Baker Lake. To that end, a Community Liaison Officer was hired in May 2006 and an information office was opened in Baker Lake in August 2006. Ongoing dialogue between AREVA and the community ensures that the community is aware of, and has input into, Project activities. AREVA and the Baker Lake Hamlet Council have therefore cooperated to establish a community liaison committee to facilitate this dialogue. In addition, as the Project has the potential to impact the Kivalliq region, both economically and environmentally, a regional liaison committee that includes members from all seven Kivalliq communities has been in place since 2007.

To supplement the dialogue established through the liaison committees, the Project team frequently participates in meetings within Kivalliq communities to provide Project updates and obtain stakeholder feedback. Over the past three years, meetings have been held with: local residents at community meetings, Hamlet councils, Hunter and Trapper Organizations, Community Land and Resources Committees, wildlife organizations, educational institutions, Inuit organizations, Institutions of Public Government, and regulators. AREVA has also hosted tours of both the Kiggavik site and northern Saskatchewan uranium operations for several of these groups.

Consultation activities for the Kiggavik Project are modified to meet the requirements of each Project phase. The next phase for consultation is the environmental assessment phase. While consultation

during this phase will be guided by NIRB, AREVA will continue the consultation activities that have been developed thus far to support further Project design.

Traditional Knowledge

Traditional knowledge, or Inuit Qaujimajatuqangit (IQ), includes Inuit knowledge and insights and incorporates values (including consensus building, collaboration and environmental stewardship) that guide Inuit relationships with the land and its resources, as well as social and cultural life. IQ is invaluable to environmental and social impact assessment, because it includes a wealth of information both on biophysical resources over time and on factors that have affected, and will continue to affect, community health and well being.

The integration of IQ into the Kiggavik Project development work, including the environmental assessment work, is therefore a priority of AREVA. The importance of integration of IQ into Project development on the part of communities has been clear during numerous meetings with people, governments at all levels and local organizations. To date, Inuit traditional knowledge has been sought to advance Project decision making and to inform baseline data collection.

In order to capture the knowledge and experience of community members about the environment, work planning for the Environmental Assessment includes an IQ component. AREVA has obtained a socioeconomic and traditional knowledge research licence from the Nunavut Research Institute to research IQ. IQ results, as well as socioeconomic results as may be relevant, are important to obtain early, as these results will be used as input into Project development, including environmental baseline programs, identification of valuable environmental and socioeconomic components, impact assessments, framing of mitigation and benefit enhancement measures and design decisions as the Project advances.

Existing Biophysical and Socioeconomic Environments

Baseline studies on the biophysical environment for the Kiggavik Project have been scoped to include all Project components and associated sites, including the Kiggavik and Sissons mine facilities, the access road, the Baker Lake port facility and the marine transportation route. In terms of socioeconomics, the closest settlement to the Kiggavik Project site is Baker Lake, approximately 80 km to the east; while Chesterfield Inlet is a further 190 km east, and is located on the Project's marine transportation route. There is potential for both environmental and socioeconomic effects and benefits in these two settlements. The other five settlements in the Kivalliq Region – Rankin Inlet, Whale Cove, Arviat, Coral Harbour and Repulse Bay – are also expected to be affected by the Project, primarily through the potential for employment, training and business opportunities. All seven Kivalliq communities would therefore be included in the socioeconomic study area for the Project.

Based on the above scope, informal community consultation and previous Part 5 reviews in Nunavut, AREVA has developed a list of potential valued ecosystem (VECs) and socioeconomic (VSECs) components for the Project. The potential VECs and VSECs are summarized as follows:

- Biophysical Environment:
 - o Air quality and noise
 - o Freshwater environment, including surface water and sediments
 - o Freshwater fish and fish habitat
 - Permafrost
 - Groundwater
 - Soils and landforms
 - o Terrestrial wildlife, including caribou, muskoxen, grizzly bear, and wolverine
 - o Birds, including raptors and upland breeding birds
 - Vegetation and associated biodiversity
 - o Marine environment, including water, sediments, fish, marine mammals and habitats
- Human and Socioeconomic Environment:
 - Employment
 - Education and training
 - o Business opportunities
 - o Community health and well being
 - Traditional culture
 - Social and physical services and infrastructure
 - Economic and fiscal benefits
 - Heritage sites

It is anticipated that the identified ecosystem and socioeconomic valued components will be further refined through the regulatory scoping process and through continued public consultation.

For most components, recent baseline data from 2007 and historical baseline data gathered during the 1980s and early 1990s is currently available and has been summarized in this Project Proposal. It is expected that, through on-going studies during 2008 and 2009, an additional one to two years of baseline data, including associated traditional knowledge, will be incorporated in the draft Environmental Impact Statement (DEIS).

Potential Environmental Effects and Proposed Mitigation

The Kiggavik Project has the potential to impact the biophysical and human environments through components associated with all phases of the Project life, including construction, operation, decommissioning, and post-decommissioning periods. Preliminary assessments of effects have considered the full scope of the Project, including the mine sites and associated infrastructure, the access road, and the marine transportation route.

The components of the biophysical environment that could potentially be affected by the Project are as follows:

- Air quality
- Noise

- · Ground stability and permafrost
- Groundwater quality
- Surface water drainage
- Freshwater and marine sediment and water quality
- Freshwater and marine aquatic organisms, fish and fish habitat
- Terrestrial and marine wildlife
- Soils, landforms and vegetation

The potential human and socioeconomic components that may be affected by the Project are as follows:

- Human health
- Heritage sites
- Employment opportunities and incomes
- Education and training opportunities
- Business opportunities
- Traditional lifestyles and community well-being
- Infrastructure and social services

Mitigation measures for many of the above potential effects have been developed and incorporated in the Project design and/or the proposed management and operating strategies. These measures are described in this Proposal and will be further developed during the environmental assessment phase.

The three Project operational sites (Kiggavik site, Sissons site, and Baker Lake dock and storage site), the access road connecting them, and the marine transportation route through Baker Lake and Chesterfield Inlet, are all within the territory of Nunavut. The majority of the potential effects of the Project will be at, or in close proximity to, these operational areas. However, several species, including caribou, migratory birds, and grizzly bears, found in the Kiggavik area may travel outside the territory of Nunavut. Similarly, marine wildlife, including seals, beluga and narwhal, may migrate throughout Hudson Bay and beyond. Mitigation measures are expected to minimize impacts to these species in the vicinity of the Project sites.

Some Project residual effects may overlap spatially and temporally with other existing or possible future projects in the region, creating the potential for cumulative effects. These effects could include:

- reduction in air quality
- increase in noise
- degradation of unique landforms
- degradation of heritage sites
- impacts on surface water and groundwater quality
- habitat loss or alteration,
- increased human interaction with terrestrial wildlife, birds, marine mammals and marine and freshwater fish, potentially causing disturbance or disruption of movement patterns, indirect or direct mortality, or acoustic disturbance.

Page vii

AREVA continues to improve Project design and to evaluate the potential effects of the Project on the people, environment and wildlife of the Kivalliq. AREVA is committed to regulatory compliance and public consultation to ensure that the Project is carried out safely, potential environmental effects are mitigated, and that the Project benefits the people of the region.

Organizational Management and Key Programs

AREVA has identified seven key areas that will be integral to the successful operation of the Kiggavik site. These are:

- Quality
- Health and Safety
- Radiation Protection
- Environmental Protection
- Human Resources and Training
- Economic Viability
- Social Aspects

The Project will draw extensively on the organizational and operating experience of the Saskatchewan sites currently operated by AREVA; however the Kiggavik programs will be adapted to reflect the unique characteristics of the Kivalliq region through public consultations, regulatory processes and benchmarking with existing Arctic operations.

Management plans have been developed to administer the Environment, Health and Safety Program at the active Kiggavik exploration site; including the:

- Radiation Protection Plan
- Waste Management Plan
- Emergency Response Plan
- Wildlife Mitigation and Monitoring Plan
- Spill Contingency Plan
- Abandonment and Restoration Plan
- Noise Abatement Plan

These plans will continue to be implemented and improved at Kiggavik. As these plans represent AREVA's growing experience in Nunavut, they will be used, in concert with existing operational programs and plans, as a reference point for the creation of plans specific to Project development, operation and closure.

Summary

This Project Proposal presents AREVA's proposed plans to develop, operate and decommission the Kiggavik Project. It also provides a broad description of the existing biophysical and socioeconomic baseline conditions. Preliminary environmental impact studies, as well as a range of measures to

mitigate potential adverse effects from the Project and to enhance potential positive effects, have been used to design key aspects. Based on the work completed to date, and many years of successful experience in northern Saskatchewan, AREVA believes that the Kiggavik Project can be carried out safely, that all potential environmental effects can be mitigated, and that benefits to the people of the Kivalliq region can be realized. AREVA is committed to achieving this outcome through further optimization and assessment of the Project, which will result through the consultation processes and regulatory reviews associated with the environmental assessment process.

APPENDIX B

Comments from Parties

- **B-1** Kivalliq Inuit Association & Nunavut Tunngavik Inc.
- **B-2** The Community Coalition Against Mining Uranium The Community Coalition Against Mining Uranium
- **B-3** Canadian Nuclear Safety Commission
- **B-4** Athabasca Denesuliné Negation Team
- **B-5** Baker Lake (Kangiqliniq) Hunters and Trappers Organization (various)
- **B-6** Barbara Mueller from Baker Lake, Nunavut
- **B-7** Baker Lake Concerned Citizens Committee
- **B-8** Beverly and Qamanirjuaq Caribou Management Board
- **B-9** Environment Canada
- **B-10** Forum Uranium
- **B-11** Indian and Northern Affairs Canada
- **B-12** Mary Jo Cullen from Toronto, Ontario
- **B-13** MiningWatch Canada
- **B-14** Transport Canada
- **B-15** Fisheries and Oceans Canada
- **B-16** Natural Resources Canada
- **B-17** Parks Canada
- B-18 Government of Nunavut, Department of Executive & Intergovernmental Affairs
- B-19 Lutsel K'e Dene First Nation, Wildlife, Lands and Environment Department
- **B-20** Baker Lake Residents (various)
- **B-21** Paula Hughson from Baker Lake, Nunavut
- **B-22** AREVA Community Liaison Officer

B-1 Kivalliq Inuit Association & Nunavut Tunngavik Inc.





By e-mail: lpayette@nirb.nunavut.ca

January 23, 2009

Leslie Payette
Manager of Environmental Administration
Nunavut Impact Review Board
Cambridge Bay, Nunavut

Dear Leslie,

Re: 09MN003, AREVA Resources Canada Inc. - Kiggavik Project

Thank you for your letter dated January 20, 2009 regarding the above project proposal screening and request for comments by February 10, 2009.

The Kivalliq Inuit Association (KIA) and Nunavut Tunngavik Incorporated (NTI) have reviewed the project proposal and we feel that the proposal is sufficiently developed to permit proper screening.

We would like to take this opportunity to submit to the Nunavut Impact Review Board a Policy Concerning Uranium Mining in Nunavut and Background Paper that were approved and adopted by the KIA and NTI Board of Directors in 2007. In accordance with the policy, KIA and NTI will support uranium exploration and mining in Nunavut if these activities are carried out in accordance with the objectives and policy statements set out in this policy, KIA and NTI's other policies, and all regulatory requirements.

The project proposal has significant impact potential, and therefore the KIA and NTI recommend that the Nunavut Impact Review Board indicate to the Minister in writing that the proposal requires review under Part 5 of the Nunavut Land Claim Agreement.

We feel that a Part 5 review is required as the project may have significant adverse effects on the ecosystem, wildlife habitat or Inuit harvesting activities. The project may have significant adverse socio-economic effects on northerners. And the project will cause significant public concern.

We look forward to working with NIRB, Areva and others in reviewing the Kiggavik Project.

Sincerely,

Luis Manzo Director, Department of Lands and Resources Kivalliq Inuit Association

Carson Gillis Director, Department of Lands and Resources Nunavut Tunngavik Incorporated

- *Policy Concerning Uranium Mining in Nunavut* by Nunavut Tunngavik Inc. available from the NIRB's ftp site at http://ftp.nirb.ca/SCREENINGS/09MN003-AREVA/1-SCREENING/02-DISTRIBUTION/COMMENTS/
- Background Paper on the NTI Uranium Policy by Department of Lands and Resources, Nunavut Tunngavik Inc., November 2006 available from the NIRB's ftp site at http://ftp.nirb.ca/SCREENINGS/ACTIVE%20SCREENINGS/09MN003-AREVA/1-SCREENING/02-DISTRIBUTION/COMMENTS/

B-2 The Community Coalition Against Mining Uranium The Community Coalition Against Mining Uranium

Phone: (867) 983-4600 Fax: (867) 983-2594



To: Leslie Payette

Manager of Environmental Administration

Nunavut Impact Review Board

Re: Screening for AREVA Resources Canada's "Kiggavik" project proposal file number 09MN003.

The Community Coalition Against Mining Uranium appreciates the opportunity to provide a comment to the NIRB on the proposal by Areva Resources to open a uranium mine in the Kivalliq Region, west of Baker Lake.

The CCAMU is a grassroots organization and, while located in Eastern Ontario, has the support of thousands of people across Canada and beyond. The group was formed in response to the proposed exploration for and potential development of a uranium mine north of Sharbot Lake in the Ottawa River watershed.

CCAMU convened The Citizens' Inquiry into the Impacts of the Uranium Cycle which was held February through May 2008 and, subsequently, on June 24, 2008, released a 56-page report entitled, 'Staking out Claim for a Healthy Future.' The report captures the essence of 387 presentations and submissions from individuals and groups and embodies the comments of many people and organizations, from civil society to experts. The majority of submissions and presentations expressed concern and provided information related to the uranium cycle and were not specific to the situation near Sharbot Lake. For this reason, we request that you consider both the report and submissions to the Citizen's Inquiry, before moving forward.

Since The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut, we feel that it is important to review the complete uranium cycle when considering development that involves uranium. It is through knowing the full cost and impact of mining and use of

uranium that a reasoned decision can be made whether or not to proceed with development.

The report, "Staking our Claim for a Healthy Future," is attached, although parts relating to Ontario legislation for the staking of claims and exploration and to the Mining Act, that we feel would not be relevant to your process, have been removed. Other sections, including Appendix 5: Key Events, have been removed as they pertain to the events around Sharbot Lake. The full report and submissions can be viewed at www.uraniumcitizensinquiry.com. We have added an extra appendix to the report as we feel that it would be of interest to your Review Board. Appendix 7 is a list of submission titles relating to Uranium & Daughter Products, Mining & Processing, Waste, Health & Safety Risks.

We trust that NIRB will consider the full uranium cycle in the screening process for AREVA Resources Canada's "Kiggavik" project proposal.

Sincerely, Marilyn Crawford CCAMU

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, 200	9	NIRB #:	09MN003
Indicate your concerns about the project proposal below: concerns marked with X			
\square no concerns	X trac	ditional uses o	of land
X water quality	\square Inu	it harvesting	activities
X terrain	□ con	nmunity invol	vement and consultation
X air quality	X loc	al developme	nt in the area
X wildlife and their habitat	□ tou	ourism in the area	
X marine mammals and their habitat	X hui	human health issues	
X birds and their habitat			
X fish and their habitat			
□ heritage resources in area			
□ other: CCAMU is concerned about the impacts of the complete uranium cycle, from mining to			
the uses of uranium			
Please describe the concerns indicated above:			
Details are included in submission.			
Do you have any suggestions or recommendations for this application?			
CCAMU recommends that the NIRB consider all environmental and health issues related to			
mining uranium of the Kiggavik Project. A full examination of the cumulative impacts of these			
activities on air, land, and water should be undertaken. NIRB should recommend to the Minister			
that the review process include consideration of the impacts of the full uranium cycle.			
Do you support the project proposal? No			
Do you support the project proposur.			
Any additional comments?			
CCAMU recommends that any licencing and authorization at the territorial level be denied.			
Please see submission.			
Name of person commenting: Marilyn	Crawford	of (Godfrey Ontario
Position: member	Organization:	Community	Coalition Against
	_	Mining Ura	
Signature:	Date:	Feb.	

Staking our Claim for a Healthy Future by the Community Coalition against Mining Uranium, June 24, 2008 (www.ccamu.ca) available from the NIRB's ftp site at http://ftp.nirb.ca/SCREENINGS/ACTIVE%20SCREENINGS/09MN003-AREVA/1-SCREENING/02-DISTRIBUTION/COMMENTS/

B-3 Canadian Nuclear Safety Commission

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Phone: (867) 983-4600 Fax: (867) 983-2594

Directorate of Environmental and Radiation Protection and Assessment

February 6, 2009 File: 2.04

e-DOC: 3333038

Via electronic mail to: lpayette@nirb.ca

Ms. Leslie Payette Manager of Environmental Administration Nunavut Impact Review Board P.O. Box 1360 Cambridge Bay, NU XOB OCO

Dear Ms. Payette:

Subject: Notice of Part 4 Screening for AREVA Resources Canada's "Kiggavik"

Project Proposal

Thank you for your January 20th, 2009 correspondence in which you ask Interested Parties to comment on the Kiggavik uranium mine proposal by AREVA Resources Canada Inc.

The Canadian Nuclear Safety Commission (CNSC) is an Authorizing Agency for this project, as licences would need to be issued to the proponent for site preparation and construction, operation, decommissioning, and abandonment, as per Section 24(2) of the *Nuclear Safety and Control Act*, in order for the project to proceed.

The mission of the CNSC is to protect the health, safety and security of Canadians as well as the environment, and to respect Canada's international commitments on the peaceful use of nuclear energy. As Canada's nuclear regulator, we are pleased to bring our expertise to the Nunavut Impact Review Board (NIRB) process.

We have reviewed the proponent's November 14, 2008 project proposal and their January 9, 2009 documentation that addressed the CNSC's application requirements. We found the project proposal to be well written and comprehensive for the purposes of initiating an environmental assessment process.

We offer the following comments based on our review:

- There is a potential for the Kiggavik project to cause significant public concern due to uranium not having been mined in the territory in the past.
- The Kiggavik project covers a relatively large geographical area with multiple
 mine pits and associated facilities for which a potential for significant adverse
 environmental and socio-economic effects exist. Examples include potential
 effects on caribou migration and heritage resources from the siting of project
 infrastructure and potential effects on groundwater quality due to permafrost
 degradation during operation, decommissioning, and post-closure of the tailings
 management facilities (TMFs).
- The Kiggavik project is of a type where technological innovation could apply, with consequent unknown effects. Examples include mine pit and TMF design and underground excavation in a permafrost environment with the additional influence of underlying fractured rock.

As these comments are consistent with the items listed in Section 12.4.2 (a) of the Nunavut Land Claims Agreement (NLCA), the CNSC believes that the project requires a review under Part 5 or Part 6, as per Section 12.4.4 (b) of the NLCA.

The CNSC recognizes that the Guidelines developed for this project will direct the proponent on the content that is to be included in the Environmental Impact Statement (EIS). The proponent's submission appears to adequately identify the core facility design considerations and their potential interactions with the environment that will require detailed assessment in the EIS, though the CNSC would like to highlight certain elements:

- The continued importance of traditional hunting and harvesting activities and the significance of country foods within the diet of the stakeholder communities requires emphasis on the potential influence of the Kiggavik project on the traditional diet. This requires up-to-date dietary surveys, baseline characterization of the human country food dietary exposure pathways and prediction of the influence of the project on these pathways.
- The socio-economic and environmental importance of caribou further highlights the importance of the assessment of potential influences of the project on caribou habitat and migration activities.
- Permafrost conditions (pre-operational, operational and upon decommissioning) have the potential to strongly influence the project. The CNSC will be particularly interested in the proponent's characterization of present permafrost conditions, its predicted behavior upon disturbance by mining activities and how these may influence the short-and long-term performance of the TMFs. Climate change impacts on permafrost and performance of the TMFs are also of interest for this project. The present understanding of site fault lines and potential influence of rock fractures on TMF performance and the potential for influencing deep groundwater quality will require careful scrutiny.

e-Doc:3333038

• Further decisions by the proponent with respect to final proposed mine, mill, and TMF designs (e.g. mill processes to be used, the location of the final effluent discharge point, the use of a tailings thickener and in-pit under-drain layer) are required or alternative design options are to be carried forward for detailed assessment within the EIS as a means of determining the most appropriate final mine, mill and TMF designs.

The CNSC looks forward to working with NIRB on this environmental assessment. Please call Brian Torrie at 613-992-7231 if you have any questions regarding these comments.

Sincerely,

Patsy Thompson, Ph.D. Director General

c.c.: B. Torrie, R. Jammal, T. Jamieson, M. Leblanc

B-4 Athabasca Denesuliné Negation Team

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Phone: (867) 983-4600 Fax: (867) 983-2594







Athabasca Denesuliné Negotiation Team

February 10, 2009

Leslie Payette Manager of Environmental Administration NIRB Box 1360 Cambridge Bay, NU XOB OCO 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

ADNI Chief Negotiator, Prince Albert Grand Council

c/o Prince Albert Grand Council

Suite 208-1904 - 1st Avenue West, Prince Albert, Gask, S6V 1Y4

Email: rrobillard@pagc.sk.ca or rgood@pagc.sk.ca

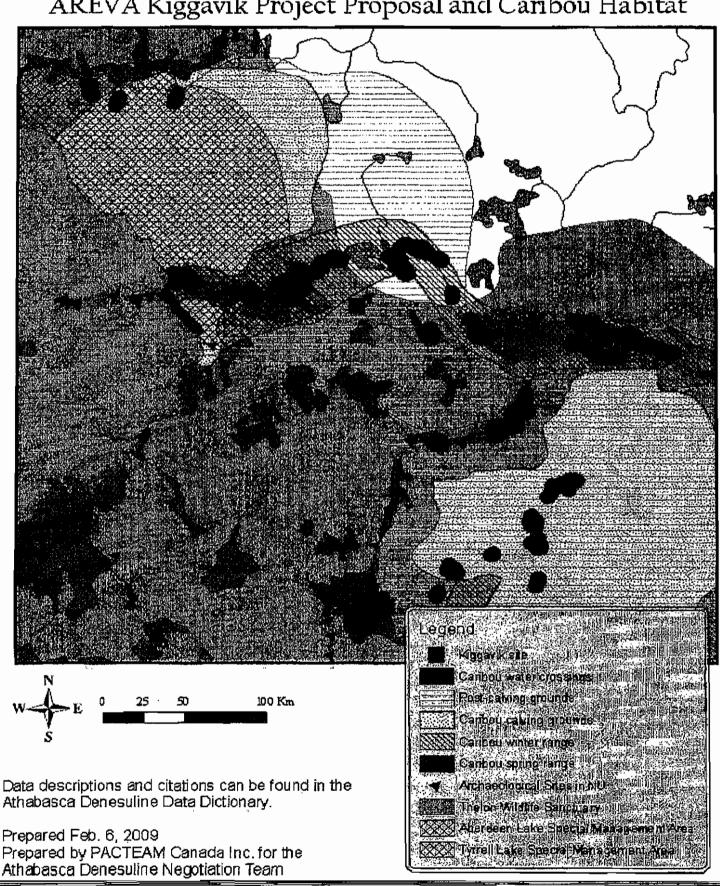
Mailing Address: P.O. Box 2350, Prince Albert, Sask. S6V 6Z1 Phone: 306-922-7612 or 306-922-7613 Fax: 306-763-2973

COMMENT FORM FOR NIRB SCREENINGS

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:	
□ no concerns	X traditional uses of land	
☐ water quality	☐ Inuit harvesting activities	
□ terrain ·	☐ community involvement and consultation	
□ air quality	□ local development in the area	
X wildlife and their habitat	□ tourism in the area	
☐ marine mammals and their habitat	□ human health issues	
□ birds and their habitat	□ other:	
☐ fish and their habitat		
X heritage resources in area		
Please describe the concerns indicated a	bove:	
potential risk to the Athabasca Denesuline calving and migration of caribou that we dedisturbance at water crossings, many of which shown on our map and stated in AREVA's of the proposed site, and post-calving group spring ranges are also in that area. Due to that mitigation measures may not be sufficient there are also archaeological sites in the arise little or no impact on these.	dentity, any potential disturbance to the caribou is identity. This specific area is integral habitat for the epend on. Caribou are especially sensitive to ich are in the vicinity of the proposed mine. As proposal, Beverley calving grounds are NW and SE ands are in and around the project area. The winter and he size and nature of this project, we are concerned tent enough to minimize negative effects on caribou. The sea and all activities should be conducted so that there	
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? Ye	es D No X Any additional comments?	
At this time, the project proposal provides is caribou, heritage resources and Athabasca linear of person commenting: Ron Robinson		
Lights of herson commentaris: Voti kno	mara a ADM1	

Position: Chief Negotiator	Organization:	Prince Albert Grand Council
Signature:	Date:	February 10, 2009
der Row Robellard		

AREVA Kiggavik Project Proposal and Caribou Habitat



B-5 Baker Lake (Kangiqliniq) Hunters and Trappers Organization (various)

P.O. Box 1360 Cambridge Bay, NU X0B 0C0 Phone: (867) 983-4600 Fax: (867) 983-2594

FEB 0 9 2009

8. Comment Form Distribution

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik P	
Proponent: AREVA Resources Ca	mada Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 2	009 NIRB #: 09MN003
Indicate your concerns about the product on concerns I water quality I terrain I air quality I wildlife and their habitat I marine mammals and their habitat I birds and their habitat I fish and their habitat	Ject proposal below: Traditional uses of land Inuit harvesting activities community involvement and consultation local development in the area tourism in the area human health issues other:
heritage resources in area Please describe the concerns indicate	d above:
I don't want the	
Do you have any suggestions or recor	mmendations for this application?
-	he uraniun to open.
Do you support the project proposal On two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No D} \) 3 Open-pit uranium mines? Yes \(\text{No D} \) Under-ground mine at Sissons? Yes \(\text{No D} \) Any additional comments?	
	of Baker Lake, NU
Name of person commenting: Fior Signature: Angula Angula	wall Date: 2/6/09

COMMENT FORM FOR NIRB SCREENINGS

	n Region
ocation: Kivalliq	
omments Due by:	February 10, 2009 NIRB #: 09MN003
adicate vour concer	rns about the project proposal below:
no concerns	☐ maditional uses of land
water quality	☐ Inuit harvesting activities
terrain	Community involvement and consultation
air quality	□ local development in the area
wildlife and their habita	at Stourism in the area
marine mammals and th	heir habitat U human health issues
birds and their habitat	Oother:
fish and their habitat	
heritage resources in are	
lease describe the c	tecke pictures or chase them
not Flo	, so low even though you
3) Co 4	Lines or chase they
want to	take pictores
	•
away	•
o you have any sug	ggestions or recommendations for this application?
o you have any sug	gestions or recommendations for this application?
	project proposal? Yes 🗆 No 🗆
o you support the p	project proposal? Yes 🗆 No 🗆

COMMENT FORM FOR NIRB SCREENINGS

ocation: Kivalliq Region	
Comments Due By: February 1	0, 2009 NIRB #: 09MN003
ndicate your concerns about the	project proposal below:
no concerns	② traditional uses of land
water quality	E Inuit harvesting activities
terrain	Z community involvement and consultation
air quality	□ local development in the area
wildlife and their habitat	C tourism in the area
marine mammals and their habitat	Thurnan health issues
birds and their habitat	C other:
fish and their habitat	
heritage resources in area	
lease describe the concerns indic	ated above:
	•
Laws and augmentions of we	ecommendations for this application?
o you have any suggestions or re	commendations for this application?
o you have any suggestions or re	ecommendations for this application?
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o you have any suggestions or re	commendations for this application?
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o you support the project propo	
o you support the project propo	
To you support the project proportion two properties: Sissons & Kiggavik	
n two properties: Sissons & Kiggavik	
o you support the project propose two properties: Sissons & Kiggavik the mining & milling Yes \(\text{No.} \) Open-pit granium mines? Yes \(\text{No.} \)	sal? Yes No
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o you support the project propose two properties: Sissons & Kiggavik tre mining & milling Yes \(No both	sal? Yes No

COMMENT FORM FOR NIRB SCREENINGS

ocation: Kivalliq Region	4000
Comments Due By: February 10,	2009 NIRB #: 09MN003
ndicate your concerns about the pr	roject proposal below:
no concerns	traditional uses of land
water quality	2 Inuit harvesting activities
terrain	Z community involvement and consultation
air quality	Iocal development in the area
wildlife and their habitat	☐ tourism in the area
marine mammals and their habitat	human health issues
birds and their habitat	YS other:
fish and their habitat	
heritage resources in area	And above
lease describe the concerns indica	for important subject
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Do you have any suggestions or rec	commendations for this application?
Do you have any suggestions or rec	commendations for this application?
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o you have any suggestions or rec	commendations for this application?
o you have any suggestions or rec	commendations for this application?
o you have any suggestions or rec	commendations for this application?
Do you have any suggestions or rec	commendations for this application?
)o you support the project propose	
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Do you support the project propose on two properties: Sissons & Kiggavik	
Do you support the project propose on two properties: Sissons & Kiggavik	
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COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Project	
Proponent: AREVA Resources Canada Inc.	
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB #: 09MN003
ndicate your concerns about the project prope	osat below
no concerns about the project proper	itional uses of land
	t harvesting activities
	nmunity involvement and consultation
	il development in the area
	rism in the area
marine mammals and their habitat thum	nan health issues
The state of the s	
Notice and discussion	
fish and their habitat	
heritage resources in area	The will be now a post of the of them a sing
Please describe the concerns indicated above: Water - might contaminate the water	er - beritage - might domand - traditional - keep the tradition try and keep it traditional for
Water - Might Contraction have the	-traditional - keep the tradition
Air Quality pollutition	try and keep it traditional to
wildlife- might get into the meat	
Maria 0 - might contaminate the wa	
1st - 11 same".	hazardous to our health
Do you have any suggestions or recommendati	
Do you support the project proposal? Yes D Non two properties: Sissons & Kiggavik	No
Ore mining & milling Yes No X 3 Open-pit uranium mines? Yes No X Under-ground mine at Sissons? Yes No X Any additional comments?	
	of Baker Lake, NU
Name of person commenting:	
Signature: PATRICIA ATTUNIZALA	Date: Jeb. 66 2009

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title			····	
Proponent: AREV.		a Inc.		
Location: Kivalliq	Region			
Comments Due By:	February 10, 2009		NIRB #:	09MN003
· · · · · · · · · · · · · · · · · · ·				
Indicate your concern	ns about the project	proposal below	N:	
☐ no concerns		☐ Traditional uses		
Twater quality		Muit harvesting		
☐ terrain		Community inv		nsultation
Tair quality		S local developme		
⊋ wildlife and their habitat		G tourism in the a Whuman health is		
marine mammals and the	ar naoitat		-	
Shirds and their habitat		C other:		
heritage resources in area				
Bloom decombs the co	de bateaibni arream	oove:		
air quality of	shad water	natity ra	use Cem	ier and
word grander of	The contract of	dan a sid a	o.U.	
booth oughert	: and all of	rect 41ea	orn	
Do you have any sugg	ractions or recommi	ndations for th	ris annlicatio	177
Do you have any sogi	gestions of recommit	-0	and the best of the	-
Mare Com	mound work	للسلا		
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Do you support the p	roject proposai? Ye	3 LJ 140 BZ		
On two properties: Sissons	or Miggavik			
Ore mining & milling Yes	17 No 2			
3 Open-pit uranium mines?	Yes O No 2			
Under-ground mine at Siss	ons? Yes D No 2			
Any additional comm	ients?			
				•
Name of person com	menting:		of ?	Baker Lake, NU
Signature: 0)	Date:	Telo 6	109
DISTRIBUTED AND TOWN				-

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavík Pro	
Proponent: AREVA Resources Cana	da Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 200	9 NIRB#: 09MN003
Indicate your concerns about the project	- , -
☐ no concerns	Diraditional uses of land
Water quality	2 Inuit harvesting activities
□ terrain	Scornmunity involvement and consultation
☐ air quality	Clocal development in the area
wildlife and their habitat	3 tourism in the area
☐ marine mammals and their habitat	C) human health issues
Ebirds and their habitat	Cother:
Shish and their habitat	
☐ heritage resources in area Please describe the concerns indicated a	bove:
Picase describe the concerns material	- the above concerns: It it appoals that
Will any fragest activities assess	bove: the above concerns? Its it apped or bad
orpact.	
paex.	
Do you have any suggestions or recomm	
Ensure regular community me	nbers are fully ensulted.
Do you support the project proposal? Y	OS FI NO FI
On two properties: Sissons & Kiggavik	the season of the seasons and seasons are seasons as the seasons are seasons are seasons as the seasons are seasons as the seasons are seasons are seasons as the seasons are seasons as the seasons are seasons are seasons as the seasons are seasons are seasons as the seasons are seasons are seasons as the seasons are seasons are seasons are seasons as the seasons are seasons are seasons are seasons are seasons as the seasons are season
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Ore mining & milling Yes I No E	
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Under-ground mine at Sissons? Yes 2 No [a - 11. inin/.
Any additional comments?	make intermed decimin
1 t Know enough details To	nake intimed decision.
1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	
Name of person commenting: Act	of Baker Lake, NU
Signature: Australia	Date: 669

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COMMENT FORM FOR NIRB SCREENINGS

The Numerus Impact Review Board (NRB) has a mandate to project the integrity of the ecosystem for the existing and future residents of Numerus. To aspec the environmental and socio-accounts impacts of the project proposal, NRRs would like to bear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Kiggavik	Project
Proponent: AREVA Resources Ca	
Location: Kivalliq Region	
Comments Due By: February 10,	2009 NIRB #: 09MN0Q3
Indicate your concerns about the pr	oject proposal below:
□ po concerns	Straditional uses of land
2 water quality	Of nuit harvesting activities
C) tecrain	Community involvement and consultation
Sair quality	☐ local development in the area
Wwildlife and their habitus	i tourism in the area
I marine manuals and their hebitat	E button health issues
Shirds and their habitat	I other;
Offish and their habitat	
il betinge resources in area Please describe the concerns indicate	ad shows
All nature related	
Do you have any suggestions or reco	mmendations for this application?
Do you support the project proposal On two proporties: Simons & Kiggavik Ore mining & milling Yes a No. 3 Open-pit uranium mines? Yes a Man	N/A No E M
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moved amount look	+ now from employmen?
I him hear somption 1.0.	
•	Con on toxas
Name of person commenting:	wah Kadade of Baker Lake, NU
Name of person commenting:	Date: fry vary 1, 2009

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COMMENT FORM FOR NIRB SCREENINGS

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

Project Proposal Title Proponent: AREVA			
	Resources Canada Inc		
Location: KivaRiq I			
Comments Due By:		NIRB#:	09MN 803
Indicate your concern	s about the project proj	pegal below:	
Dan contems		ditional uses of land	
Gwater quality	□ Inc	it huvesting activities	
Citocrain	<u> २५६</u>	minumity involvement and co	noitation
Car quality	C) lor	al development in the area	
wildlife and their habitat	•	arism in the area	
I marine resemble and their	r habitari 🗆 Dhu	man health issues	
🖟 birds and their habitat	. □ Cod	her;	
C fish and their hubitet			
gera ni ascruoter egarical 🗅			
Please describe the cor	neorns indicated above:		
recommend for	community much	veneus a fine	immicat.
	V	υ	1
Do you have any sugg	estions or recommendat	tions for this application	19 .7
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6	roject proposal? Yes (2) k Kiggavik		
Do you support the properties: Sissons &	k Kiggavik		
Do you support the pr On two properties: Sissons &	k Kiggavik		
Do you support the properties: Sissons & Ore mining & milling Yes is 3 Open-pit uranism mines?	E Kiggavik No G Yes S/ No G 142 Yes S/ No G	No 🗆	
Do you support the properties: Sissons & Ore mining & milling Yes is 3 Open-pit uranism mines?	E Kiggavik No G Yes S/ No G 142 Yes S/ No G	No 🗆	
Do you support the pronounce of the properties: Sissons is the properties of the pro	e Kiggavik Yns o' No C ons? Yas o' No C ents? The Jubs that	No 🗆	
Do you support the pronounce properties: Sissons & Core mining & milling Yes is a Open-pit uranium mines? Under-ground mine at Sissons Any additional camama Oponic & Lov	e Kiggavik Yns o' No C ons? Yas o' No C ents? The Jubs that	No 🗆	
Do you support the pront on two properties: Sissons is a Open-pit uranium mines? Under-ground mine at Sisson Any additional comme going to Solve the Solve Solve to S	exigavite YELD' NOD ME? YELD' NOD ME? YELD' NOD METS? The jubs that Ty of cur	No D	Palee to B.I.
Do you support the pront on two properties: Sissons is a Open-pit uranium mines? Under-ground mine at Sisson Any additional comme of the comment of the comm	exiganic Vies of No B na? Yes of No B ents? The jubs that Ty of cair	No D	Pale to B.1. Baker Lake, NU

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COMMENT FORM FOR NIRB SCREENINGS

The Nuneve imper Linker Board (NIRB) has a mendate to prober the integrity of the socupoism for the extering and future residence of Nunevel. To assess the extensional and notice accessoric impacts of the project proposal, NIRB would like to hear your opposal, comments and suggestions about the following project proposal application:

Project Proposal Title: Kippavik Pro Proposent: AREVA Resources Cana	da Juc.
ocation: Kivallic Region	
comments Due By: February 10, 200	NIRE #: 09MN083
milicate year concerns about the projec	t proposal below:
an concerns	Microditional uses of land
water publicy	X finals harvesting activities
Correlat	2 community is volvement and consultation
air quality	汉(onal development in the area
(wild) is and their hebits	C) southful in the area
marine spenneds and their hebitet	M human health issues
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to her small trail settlements of the services	garantee that everything
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ow much money is inv	volves don't say yes!! EVER!!
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er mining & milling Vat 3 No.7	
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av additional comments?	
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raterials of any Kind	composito uch Autre
naturals of any Kind	
nationals of any Kind	

COMMENT FORM FOR NIRB SCREENINGS

Proponent: AREVA Resources C	'anada Inc.
I nanting a Kinglin Dagion	
Location: Kivalliq Region	
Comments Due By: February 10,	, 2009 NIRB #: 09MN003
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Indicate your concerns about the p	reject proposar below. ☐ traditional uses of land
no concerns	☐ Inuit harvesting activities
N water quality ☐ terrain	Community involvement and consultation
Sair quality	□ local development in the area
Wildlife and their habitat	☐ tourism in the area
marine mammals and their habitat	Thuman health issues
a Marine maintains and their habitat	3 other:
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Diagra describe the concerns indice	ted above; will come continuated in to Thebritisms, then to Tailing special be blown away for hundreds of Kilmeters destroying the bold Hunan health 155005 15 mls a by concern, Aleun a bad slott; tailings on Invitation for our fiture generations
The sail pears like in Fr	nace, water become continuated in to Thebritiser, then to
politicians at the local and comed bad effects of universe men	commendations for this application? Executed the standard the standard on the good
alreadyhave.	gather they
already have.	
Do you support the project propose On two properties: Sissons & Kiggavik	
Do you support the project propose	al? Yes 🛘 No 🗗
Do you support the project proposa On two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No } \text{V} \) 3 Open-pit uranium mines? Yes \(\text{No } \text{V} \) Under-ground mine at Sissons? Yes \(\text{No } \text{V} \)	al? Yes No P
Do you support the project proposa On two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No } \text{V} \) 3 Open-pit uranium mines? Yes \(\text{No } \text{V} \) Under-ground mine at Sissons? Yes \(\text{No } \text{V} \)	al? Yes D No D

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Project		
Proponent: AREVA Resources Can	ada Inc.	
Location: Kivalliq Region		
Comments Due By: February 10, 20	09 NIRB#: 09MN003	
Indicate your concerns about the proje	ect proposal below:	
☐ no concerns	☐ traditional uses of land	
₹ water quality	☐ Inuit harvesting activities	
☐ terrain	☐ community involvement and consultation	
☐ air quality	© local development in the area	
☐ wildlife and their habitat	Courism in the area	
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图 birds and their habitat	C other:	
fish and their habitat		
© heritage resources in area Please describe the concerns indicated	ahoves	
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Do you have any suggestions or recom	mendations for this application?	
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Do you support the project proposal?	A 62 FA MO M	
On two properties: Sissons & Kiggavik		
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Ore mining & milling Yes 2 No 2 3 Open-pit uranium mines? Yes 2 No 2		
Under-ground mine at Sissons? Yes No D		
Amagaditional appropries		
Any additional comments?		
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	Tuesde	
SALONON 12 10	of Baker Lake, NU	
Name of person commenting:	of Baker Lake, NU	
Signature:	Date: FFR 6,2009	
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COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Proje	ect	
Proponent: AREVA Resources Canada Inc.		
Location: Kivalliq Region		
Comments Due By: February 10, 2009	NIRB #: 09MN003	
Indicate your concerns about the project	proposal below:	
□ no concerns	IX traditional uses of land	
■ water quality	图 Inuit harvesting activities	
□ terrain	☐ community involvement and consultation	
□ air quality	□ local development in the area	
M wildlife and their habitat	O tourism in the area	
☐ marine mammals and their habitat	□ human health issues	
D birds and their habitat	Other:	
試fish and their habitat		
☐ heritage resources in area		
Please describe the concerns indicated a	bove:	
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have an impact on the fren	and ocher wridiffe.	
I being there are som	bove: It in to the 600 munity, which will and ocher writelife. eld granesiter that wie	
be disturbed,		
Do you have any suggestions or recomm	endations for this application?	
strong in an hold of co	mounter meeting or phone in short	
NIKE SELECT TOTAL OF	ppropriate people 1. e. KIA.	
	14	
HTO, Hamlet.		
Do you support the project proposal? Yo	es 🖸 No 🖟	
On two properties: Sissons & Kiggavik		
O LA A DE NA DE NA DE		
Ore mining & milling Yes □ No ■		
3 Open-pit uranium mines? Yes 🗆 No 🗔		
Under-ground mine at Sissons? Yes D No &		
Any additional comments?		
Name of person commenting:	AH ATTUNGALA of Baker Lake, NU	
Signature: Saiah artungal	Date: February 6, 2009.	

COMMENT FORM FOR NIRB SCREENINGS

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 projec	t proposal below:	
Ino concerns	☐ traditional uses of land	
□ water quality	☐ Inuit harvesting activities	
□ terrain	☐ community involvement and consultation	
☐ air quality	□ local development in the area	
D wildlife and their habitat	🗆 tourism in the area	
marine mammals and their habitat	O human health issues	
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☐ fish and their habitat		
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Please describe the concerns indicated a	wove;	
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weth play tech	cology, no y very much,	
ad anothing appelled	world to a	
g way should	westy of the	
Do you have any suggestions or recomm	iendations for this application?	
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Do you support the project proposal? Y	es 🗆 No 🗀	
On two properties: Sissons & Kiggavik		
Ore mining & milling Yes. No C		
3 Open-pit uranium mines? Yes ℓ No □		
Under-ground mine at Sissons? Yes □ No.2		
Any additional comments?		
Name of person commenting:	w 100tw of Baker Lake, NU	
Signature:	Date: [ed 6/09	

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik P		
Proponent: AREVA Resources Canada Inc.		
Location: Kivalliq Region		
Comments Due By: February 10, 2	009 NIRB#: 09MN003	
Indicate your concerns about the pro	ject proposal below:	
no concerns	☐ traditional uses of land	
☐ water quality	☐ Inuit harvesting activities	
□ terrain	□ community involvement and consultation	
☐ air quality	☐ local development in the area	
☐ wildlife and their habitat	tourism in the area	
I marine mammals and their habitat	© human health issues	
birds and their habitat	Xother: not enough Into	
☐ fish and their habitat	In a short time	
heritage resources in area		
Please describe the concerns indicate	d above:	
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Do you have any suggestions or recor	nmendations for this application?	
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	school.	
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Do you support the project proposal	Ves I No II	
On two properties: Sissons & Kiggavik		
On two properties. Sissons & Kiggaria		
Ore mining & milling Yes a No a		
3 Open-pit uranium mines? Yes \(\text{No} \)		
Under-ground mine at Sissons? Yes \(\text{No} \)		
Any additional comments?		
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	VSter Toob of Baker Lake, NU	
Name of person commenting:		
Signature:	Date: The blog	

COMMENT FORM FOR NIRB SCREENINGS

ocation: Kivalliq Region	2000
omments Due By: February 10	0, 2009 NIRB #: 09MN003
adicate your concerns about the p	project proposal below:
no concerns	☐ traditional uses of land
water quality	☐ Inuit harvesting activities
terrain	Acommunity involvement and consultation
air quality	
wildlife and their habitat	a tourism in the area
marine mammals and their habitat	□ human health issues
birds and their habitat	🖸 other:
fish and their habitat	
heritage resources in area	
Libelieve the lesidents of weather any action is made gives us jobs o	bafeclake Should be involved and consulted bafeclake should be involved and consulted be. It do approve of the minus cause it
Do you have any suggestions or rec	commendations for this application?
Do you have any suggestions or re	commendations for this application?
Do you have any suggestions or re	commendations for this application?
Do you have any suggestions or re	commendations for this application?
Do you have any suggestions or re	commendations for this application?
Do you support the project propos	
Do you support the project propos	
Do you support the project propos On two properties: Sissons & Kiggavik	
Do you support the project propos On two properties: Sissons & Kiggavik One mining & milling Yes & No.	
Do you support the project proposed two properties: Sissons & Kiggavik Ore mining & milling Yes V No/C	sal? Yes No 🗅
On you support the project propose on two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No} \) \(\text{No} \) \(\text{Open-pit uranium mines? Yes \(\text{No} \)	sal? Yes No 🗅
Do you support the project propos on two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No} \) Open-pit uranium mines? Yes \(\text{No} \) Inder-ground mine at Sissons? Yes \(\text{No} \)	sal? Yes No 🗅
Do you support the project propos On two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No} \) Open-pit uranium mines? Yes \(\text{No} \) Under-ground mine at Sissons? Yes \(\text{No} \)	sal? Yes No 🗅
Do you support the project propos on two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No} \) Open-pit uranium mines? Yes \(\text{No} \) Inder-ground mine at Sissons? Yes \(\text{No} \)	sal? Yes No 🗅
Open-pit uranium mines? Yes No Inder-ground mine at Sissons?	sal? Yes No 🗅
Do you support the project propose on two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No}\) \(\text{Open-pit uranium mines? Yes \(\text{No}\) \(sal? Yes 🖟 No 🗅
Do you support the project propos On two properties: Sissons & Kiggavik Ore mining & milling Yes \(\mathbb{N}\) No \(\mathbb{D}\) Open-pit tranium mines? Yes \(\mathbb{N}\) No \(\mathbb{D}\) Under-ground mine at Sissons? Yes \(\mathbb{N}\) No \(\mathbb{N}\) Any additional comments?	sal? Yes 🖟 No 🗅

COMMENT FORM FOR NIRB SCREENINGS

roponent: AREVA Resources Car	nada Inc.
ocation: Kivalliq Region	
Comments Due By: February 10, 20	009 NIRB #: 09MN003
ndicate your concerns about the pro	
no concerns	traditional uses of land
water quality	Inuit harvesting activities
terrain	community involvement and consultation
sir quality	☐ local development in the area
wildlife and their habitat	☐ tourism in the area
marine mammals and their habitat	human health issues
birds and their habitat	C other:
fish and their habitat	
heritage resources in area	
lease describe the concerns indicates	d above:
Do you have any suggestions or recon	amendations for this application?
Do you have any suggestions or recon	amendations for this application?
Do you have any suggestions or recon	
Or you support the project proposal? On two properties: Sissons & Kiggavik Ore mining & milling Yes No Open-pit uranium mines? Yes No Inder-ground mine at Sissons? Yes No	
Do you support the project proposal? In two properties: Sissons & Kiggavik Ore mining & milling Yes D No D Open-pit uranium mines? Yes V No D	
Or you support the project proposal? On two properties: Sissons & Kiggavik Ore mining & milling Yes No Open-pit uranium mines? Yes No Inder-ground mine at Sissons? Yes No	

COMMENT FORM FOR NIRB SCREENINGS

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: no concerns
Please describe the concerns indicated above: My Grand Chuldren and their future
Do you have any suggestions or recommendations for this application?
Always come and see my people first before anyone else makes and plans with any thing.
Do you support the project proposal? Yes I No I On two properties: Sissons & Kiggavik
Ore mining & milling Yes No S 3 Open-pit uranium mines? Yes No V Under-ground mine at Sissons? Yes No V Any additional comments?
No drilling, no opening my
ancestral grounds.
Name of person commenting: LUCY NIEGO of Baker Lake, NU
Signature: Date: planamy 6, 2009

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik	
Proponent: AREVA Resources C	anada Inc.
Location: Kivalliq Region	,
Comments Due By: February 10,	2009 NIRB #: 09MN003
Indicate your concerns about the pr	roject proposal below:
☐ no concerns	B'iraditional uses of land
d water quality	☐ Inuit harvesting activities
☐ terrain	Community involvement and consultation
□ air quality	 □ local development in the area
wildlife and their habitat	Courism in the area
Imarine mammals and their habitat	🛘 human health issues
☐ birds and their habitat	O other:
☐ fish and their habitat	
Theritage resources in area	
Please describe the concerns indicat	ted above:
Do you have any suggestions or reco	ommendations for this application?
Do you have any suggestions or reco	ommendations for this application?
Do you have any suggestions or reco	
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COMMENT FORM FOR NIRB SCREENINGS

Proponent: AREVA Resources Canad Location: Kivalliq Region	a Inc.	
Location: Kivalliq Region		
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Comments Due By: February 10, 2009	NIRB#: 09MN003	
Indicate your concerns about the project	proposal below:	
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Wwater quality	Mnuit harvesting activities	
☐ terrain	☐ community involvement and consultation	
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	Other:	
Drish and their habitat		
□ heritage resources in area		
Please describe the concerns indicated a	boye:	
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Under-ground mine at Sissons? Yes U No &		
Any additional comments?		
und annimitat enimitaties:	•	
Name of person commenting:	Runk of Baker Lake, NU	
Signature: back Kings	Date: Felman le 2009	

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Project		
Proponent: AREVA Resources Can	ada Inc.	
Location: Kivalliq Region		
Comments Due By: February 10, 20	09 NIRB #:	09MN003
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Do you have any suggestions or recom	mendations for this applicatio	m?
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Name of person commenting: Christian Signature:		Baker Lake, NU

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Project	
Proponent: AREVA Resources Canad	la Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB#: 09MN003
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Name of person commenting:	e Kalyrag, of Baker Lake, NU
Signature: Chew MALORAG	Date: February 8, 710

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Project		
Proponent: AREVA Resources Canad	la Inc.	
Location: Kivalliq Region		
Comments Due By: February 10, 2009	NIRB#: 09MN003	
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Name of person commenting:	of Baker Lake, NU Date: 07-06-09.	
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COMMENT FORM FOR NIRB SCREENINGS

Proponent: AREVA Resources C	anada Inc.
Location: Kivalliq Region	
Comments Due By: February 10,	2009 NIRB#: 09MN003
Indicate your concerns about the p	roject proposal below:
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Fáir quality	☐ local development in the area
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in marine mammals and their habitat	Phuman health issues
birds and their habitat	□ other:
() fish and their habitat	
Meritage resources in area	4-4-1-1
Please describe the concerns indica	ted above:
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Do you have any suggestions or rec	ommendations for this application?
Do you have any suggestions or rec	ommendations for this application?
Do you have any suggestions or rec	ommendations for this application?
Do you have any suggestions or rec	ommendations for this application?
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Do you support the project propose On two properties: Sissons & Kiggavik Ore mining & milling Yes \(\text{No } \text{V} \) 3 Open-pit uranium mines? Yes \(\text{No } \text{V} \) Under-ground mine at Sissons? Yes \(\text{No } \text{U} \)	al? Yes 🗆 No 🖻

Janet Ikuutaq:

Concern about traditional grave sites, breathing contaminates, fishing sites, caribou calving grounds. Future birth defects & other deformed babies.

Contaminates on wildlife. Illnesses are going to become major problem even from drilling (diamond). I am opposed to the project proposal.

Environment, community is down-wind, down-stream-receiving end from the project proposed. Drilling & project proposal may have negative impact. Also to our caribouthey will disappear.

<u>Jacob Ikinilik</u>

Once I went on tour where old, previous diamond drill holes were cleaned & debris put in shed. I was told 'now they're safe & won't harm wildlife'. Later, at different site & date I saw drill hole exposed & oozing redish water. I asked 'is this harmful to wildlife?' 'No', came the answer.

When mining industry is determine to get what they want, they are not going to provide you with (honest answers) answers that are dangerous.

Phillippa Iksiraq

The fish, birds, caribou, muskox, migration routes, & caribou calving grounds should be protected.

Thomas Oovayuk

I opposed to docking site, all-weather road at Hagli. I opposed to building of bridges over Thelon River. My reasons for opposing all-weather roads: This is our traditional hunting ground-summer & winter.

The whole environment surrounding Baker Lake is our fishing & caribou hunting ground.

Lucy Kownak

Uranium mining, & all the revenues is not worth our cultural & traditional life-we have too much to lose

James Kalluk

Caribou ARE like million dollars to Inuit, to Inuit, the caribou is worth million dollars

Lucy Tunguad

If uranium mine is going to open, Mark Pukirluk Tunguaq found uranium deposit. I want him to be given money. He is my child, who has many children.

Alex Iqaat

Only, if there will be no negative impacts, no dangerous contaminates, then, only then it (project proposal) can be allowed-something you want.

Elizabeth Quinangnaq Sr.

I have not been provided enough with information. I can't phantom what is being discussed her. Although, I have many concerns.

Joseph Scottie

I am opposed to all-weather road anywhere across the community. Across the lake. Absolutely no roads should be built in our hunting areas. All is caribou traditional migration route. It would be more acceptable if bridge is built by near Halfway Hills.

Irene Kaluraq

If uranium mine is opening, strict rules & regulations has to be placed & enforced. My late husband helped to find the uranium deposits. Give me money. If diamond drilling is approved-it has to be acceptable to us (only way)

<u>Winnie Ikinilik</u>

Fish & caribou are my only diet of food. I opposed the project proposal.

Jean Simailak

Answers to questions (arising from screening & comment request) should be provided at meeting. People who has knowledge about uranium mining to give answers. Also another expert to answer questions about harmful aspects.

The comment form is insufficient, hard to understand for Inuit. Inuit language should be used also more space for comments

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Proj	ect
Proponent: AREVA Resources Canac	da Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB #: 09MN003
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ndicate your concerns about the projec	t proposal below:
no concerns	☐ traditional uses of land
3 water quality	☐ Inuit harvesting activities
terrain	2 community involvement and consultation
lair quality	□ local development in the area
l wildlife and their habitat	3 tourism in the area
I marine mammals and their habitat	I human health issues
birds and their habitat	Cother:
fish and their habitat	
heritage resources in area	
lease describe the concerns indicated a	bove:
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100-46/20 44	1660 POODA.20
2000 XX	42-25-62,
Do you have any suggestions or recomm	endations for this application?
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かっち カハダレーヤイーし	. Pryha: 140641-1°
Do you support the project proposal? Y	es () No fit
On two properties: Sissons & Kiggavik	
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100	an Simulak of Baker Lake, NU
Name of person commenting:	Date: Tol 57 2000
signature: Change Territoria	Date: 1 De Continue de Continu

COMMENT FORM FOR NIRB SCREENINGS

Linket lynhosat line: .	Kiggavik Project
Proponent: AREVA Re	
Location: Kivalliq Region	
Comments Due By: Feb	
	1122 77. 07/11/10/03
Indicate your concerns ab	out the project proposal below:
☐ no concerns	& traditional uses of land
water quality	Pinuit harvesting activities
2 terrain	D'community involvement and consultation
Dair quality	Vocal development in the area
wildlife and their habitat	
Difinarine mammals and their habi	itat Shuman health issues Ad-19.678.
Dirds and their habitat	Zother:
Fish and their habitat	grave sites, artifacts
Wheritage resources in area	
Please describe the concer-	ns indicated above:
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On two properties: Sissons & Kig Ore mining & milling Yes No 3 Open-pit uranium mines? Yes Under-ground mine at Sissons? Y	They are cultural land a old grave sites

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 Proje	ect
Proponent: AREVA Resources Canad	a Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB #: 09MN003
Indicate your concerns about the project I no concerns We water quality Gerrain Wair quality Wildlife and their habitat Description:	proposal below: Viraditional uses of land Vinuit harvesting activities Community involvement and consultation Clocal development in the area Zourism in the area Human health issues
birds and their habitat	O other:
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Please describe the concerns indicated al	
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	Zaulyot of Baker Lake, NU
Name of person commenting:	Date: February 7, 2002

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COMMENT FORM FOR NIRB SCREENINGS

ocation: Kivalliq Region	7000	BITTOTI U	001411002
Comments Due By: February 1	, 2009	NIRB #:	09MN003
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wildlife and their habitat	☐ tourism in the area		•
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h birds and their habitat	☐ other:		
2 fish and their habitat	* · · · · · · · · · · · · · · · · · · ·	 _	
heritage resources in area	4-1-1		
Please describe the concerns indic	nted above:	= 161	- 1220-180
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3 Open-pit uranium mines? Yes 🗀 No 🗹	ميسيم		
Under-ground mine at Sissons? Yes 🗆 No	the state of the s		
Any additional comments?			
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Name of person commenting:	homas Covervit	of B	laker Lake, NU

COMMENT FORM FOR NIRB SCREENINGS

Peterian Tair quality — Secondary involvement and consultation And Add Pair quality — Swiddlife and their habitat Area — Program in the area — Program in	Project Proposal Title: Kiggavik Proj	ect
Indicate your concerns about the project proposal below: Indicate your concerns Indicate your dinton the tradition of the area Indicate your dinton the tradition of the area Indicate your dinton the project proposal yes Indicated above: Indicate your dinton the project proposal yes Indicated above: Indicate your dinton the area Indicate your dinton Indica		
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Indicate your concerns about the project proposal below: Caltural + traditional Caltural Community involvement and consultation Countries Conmunity involvement Count	Comments Due By: February 10, 2009	NIRB #: 09MN603
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COMMENT FORM FOR NIRB SCREENINGS

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	t proposal below:	
□ no concerns	√traditional uses of land	
	Inuit harvesting activities	
₹ terrain	Z community involvement and consultation	
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wildlife and their habitat	Z tourism in the area	
marine mammals and their habitat	human health issues	
birds and their habitat	Zother:	
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Theritage resources in area	1	
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Any additional comments?		
Name of person commenting: HIEX	1000t of Baker Lake, NU	
Signature: Je Ashle	Date: FANGETY 7, 2009	

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:

Proponent: AREVA Resources Canada Inc. Location: Kivalliq Region Comments Due By: February 10, 2009 NIRB #: 09MN003 Indicate your concerns about the project proposal below: no concerns Finallity February 10, 2009 NIRB #: 09MN003 Indicate your concerns about the project proposal below: Finallity F		oject
Comments Due By: February 10, 2009 NIRB #: 09MN003 Indicate your concerns about the project proposal below: Indicate your concerns		ada inc.
Indicate your concerns about the project proposal below: In concerns Finality Figure quality		AG NUMBER OF THE ORDER
The concerns Figure quality	Comments Due By:February 10, 200	NIKB#; U9MNUU3
marine mammals and their habitat District District	no concerns water quality terrain air quality wildlife and their habitat marine mammals and their habitat birds and their habitat fish and their habitat heritage resources in area	Wraditional uses of land Pinuit harvesting activities Pcommunity involvement and consultation local development in the area Courism in the area United the land of the la
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Phenitage resources in area Please describe the concerns indicated above:	上ゥリロ・シャントの	- 84771760)1
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COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Pro	
Proponent: AREVA Resources Can	ada Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 20	09 NIRB#: 09MN003
Indicate your concerns about the proje	Q preditional uses of land
yater quality	Inuit harvesting activities
Oterrain	Decommunity involvement and consultation
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Please describe the concerns indicated	ahove:
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Do you have any suggestions or recom	mendations for this application?
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Under-ground mine at Sissons? Yes a No Q	·
Any additional comments?	
Name of person commenting:	ES BALLUB of Baker Lake, NU
Signature: James Kal	1017 Date: FPBMQY 1, 2001
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COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Project	
Proponent: AREVA Resources Canada I	ac.
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB #: 09MN003
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4	nuit harvesting activities
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I fish and their habitat	
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Do you support the project proposal? Yes	No N
On two properties: Sissons & Kiggavik	1 TO 144
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3 Ocen-pit uranium mines? Yes 🗓 No 🗓	•
Under-ground mine at Sissons? Yes □ No ♥	
Any additional comments?	
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- Image	hallunaa of Baker Lake, NU
Name of person commenting: Trene	Date Dave Die 10 7009
Signature: 1065	Date: February 7, 7007

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Proponent: AREVA Resources C	
Location: Kivalliq Region	
Comments Due By: February 10.	, 2009 NIRB #: 09MN003
Indicate your concerns about the p	releat proposal belows
Indicate your concerns about the p	Draditional uses of land
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Vair quality	☐ local development in the area
wildlife and their habitat	☐ tourism in the area
marine mammals and their habitat	Shuman health issues
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Sheritage resources in area	**************************************
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Do you have any suggestions or rec	ommendations for this application?
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Do you support the project proposa	M: X62 FL MA Ch
On two properties: Sissons & Kiggavik	
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3 Open-pit uranium mines? Yes a No	,
Under-ground mine at Sissons? Yes 🗆 No 🖟	
Any additional comments?	•
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	OFSCOTTIE of Baker Lake, NU
Name of person commenting:	Date: FPhruary 7, 200

COMMENT FORM FOR NIRB SCREENINGS

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Project Proposal Title: Kiggavik Project	ect
Proponent: AREVA Resources Canad	
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB #: 09MN003
Indicate your concerns about the project	t proposal below:
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Water quality	✓ Ipuit harvesting activities
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Please describe the concerns indicated a	bove:
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On two properties: Sissons & Kiggavik	and the
Ore mining & milling Yes C No	SN-NOT ENOUGH THEO
3 Open-pit uranium mines? Yes O No S	DN - Not Proof
Under-ground mine at Sissons? Yes 3 No 3	
Any additional comments?	
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	OF Polon Lake MII
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	OBETH of Baker Lake, NU
Signature: A CAN DA 4 70	Date: Triuny 1, 700 4

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COMMENT FORM FOR NIRB SCREENINGS

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Project Proposal Title: Kiggavik Proje	
Proponent: AREVA Resources Canad	
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB#: 09MN003_
Indicate your concerns about the project	proposal below:
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Wheritage resources in area	house
Please describe the concerns indicated all $\triangle dC \oplus dC $	5.11.11 mg 6 10 0 1660) 96
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Do you have any suggestions or recomm	endations for this application?
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Do you support the project proposal? You	es 🗆 No 🛭
On two properties: Sissons & Kiggavik	
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Ore mining & milling Yes a No 2	
3 Open-pit uranium mines? Yes 🖸 No 🗹	
Under-ground mine at Sissons? Yes C No 2	
Any additional comments?	
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Name of person commenting: Signature:	6 Think of Baker Lake, NU
Mame of herson commences.	Date: FPhyllary 7, 7017
Signature: 70 DV	

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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 (
Location: Kivalliq Region	
Comments Due By: February 10.	, 2009 NIRB #: 09MN003
indicate your concerns about the p	roject proposal below:
□ no concerns	Diraditional uses of land
Water quality	D'Inuit harvesting activities
D'ierrain	D'community involvement and consultation
Vair quality	Vlocal development in the area
wildlife and their habitat	17 tourism in the area
marine mammals and their habitat	Q'human health issues
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On two properties: Sissons & Kiggavik	MIA A THO LA A TWO EA
On two properties: 31550115 or Killings	
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ore mining at mining result to the	
3 Open-pit uranium mines? Yes a No 1	
Under-ground mine at Sissons? Yes U No	
Any additional comments?	
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- 16	INET IKUUTAG
Name of person commenting:	of Baker Lake, NU
	Date: 1242 7 2009
Signature:	Date: 1742 7 2009

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COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik	Project
Proponent: AREVA Resources C	anada Inc.
Location: Kivalliq Region	
Comments Due By: February 10,	2009 NIRB#: 09MN003
Indicate your concerns about the pr	oject proposal below:
☐ no concerns	Traditional uses of land
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Eair quality	Ekocal development in the area
wildlife and their habitat	I tourism in the area
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birds and their habitat	Dother:
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Please describe the concerns indicat	ted above:
	ommendations for this application?
Do you support the project proposa On two properties: Sissons & Kiggavik	I? Yes D No B
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Any additional comments? Name of person commenting: The	DWAC TEXCIGAT of Baker Lake, NU
Signature: Theres S	Date: Feb. 1. 2009.

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 Proje		
Proponent: AREVA Resources Canad		
Location: Kivalliq Region		
Comments Due By: February 10, 2009	NIRB#:	09MN003
Indicate your concerns about the project on concerns water quality terrain air quality wildlife and their habitat of marine mammals and their habitat of birds and their habitat wher tage resources in area	traditional uses of land I four harvesting activities community involvement and con local development in the area tourism in the area human health issues cother:	
Please describe the concerns indicated al	oove:	
Do you have any suggestions or recomme	endations for this applicatio	n?
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Name of person commenting:		Baker Lake, NU
Signature: Hay by Justice wife	Date: Fol Z	7-

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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
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Do you have any suggestions or recommendation	s for this application?
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Name of person commenting: Emily Afon Signature: 2 - 5	Date: FENNALY 16 -7019

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COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik	Project
Proponent: AREVA Resources	
Location: Kivalliq Region	
Comments Due By: February 10	, 2009 NIRB #: 09MN003
Indicate your concerns about the p	project proposal below:
I no concerns	G'iraditional uses of land
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D terrain	Community involvement and consultation
ar quality	Socal development in the area
wildlife and their habitat	☐ tourism in the area
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Theritage resources in area	nted above: C Elders should be consulted many are absent. They have more Ip
D60 109 6 25(P)	commendations for this application?
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Do you support the project propos: On two properties: Sissons & Kiggavík	al? Yes 🗆 No 🗹
Ore mining & milling Yes No 3 Open-pit uranium mines? Yes No Under-ground mine at Sissons? Yes No Any additional comments?	ם
	Mora Southe of Baker Lake, NU
Name of person commenting:	<u> </u>
Signature: //see / 6/1	Date: $7/2/29$

COMMENT FORM FOR NIRB SCREENINGS

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NIRB #: 09MN003	
NIRB #: 09MN003	
MIRB#: UMMUU3	
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of Baker Lake, Ni ate: 2 7 200 9	<u>j</u>
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Project Proposal Title: Kiggavik Proje	eet
Proponent: AREVA Resources Canad	
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB #: 09MN003
Indicate your concerns about the project	proposal below:
□ no concerns	D'iraditional uses of land
B water quality	2/Inuit harvesting activities
1 terrain	Community involvement and consultation
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Do you support the project proposal? You	NOT INC. INC. IN . IN
On two properties: Sissons & Kiggavik	BONO HES, YES, YNO
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Ore mining & milling Yes P No D	
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Under-ground mine at Sissons? Yes \(\text{No }\text{D}\)	
Any additional comments?	
Any additional comments:	
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Name of person commenting:	Tool political Sy. of Baker Lake, NU
Signature:	Date: Date. Color.
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8. Comment Form Distribution

COMMENT FORM FOR NIRB SCREENINGS

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LINDSWAY - VERAVE	ouress Canada Inc.
Location: Kivalliq Regis	M M
Comments Due By: Feb	
Indicate your concerns ab	out the project proposal below:
ns concerns	nraditional ases of land
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() tecrain	Community involvement and consultation
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Please describe the concer	es indicated above:
D' weige has conted	life and water be disturbed?
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Do you have any suggestio	as or recommendations for this application?
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COMMENT FORM FOR NIRB SCREENINGS

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Project Proposal Title: Kiggavik Proj	ect
Proponent: AREVA Resources Cana	
Location: Kivalliq Region	
Comments Due By: February 10, 200	9 NIRB #: 09MN003
	7144011 071411000
Indicate your concerns about the project	t proposal below:
Ino concerns	□ traditional uses of land
Wwater quality	☐ Inuit harvesting activities
O terrain	Community involvement and consultation
☐ air quality	□ local development in the area
Wildlife and their habitat	□ tourism in the area
I marine mammals and their habitat	Xhuman health issues
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☐ heritage resources in area	
Please describe the concerns indicated a	ibove:
about wildlife and he	man wellbeing
and if there is any	,
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Do you have any suggestions or recomm	iendations for this application?
Do you support the project proposal? Y	es I No I UNDECIDED
On two properties: Sissons & Kiggavik	BU NOW UNDECIDED
On two properties: Sissons at Riggavik	
Ore mining & milling Yes 3 No 3	
3 Open-pit uranium mines? Yes 🗆 No 🖯	
Under-ground mine at Sissons? Yes \(\text{No }\text{O}\)	
Any additional comments?	
Any additional comments.	
	- Company of the National Comp
Name of person commenting: Jack	Too too of Baker Lake, NU
Signature: Val My	Date:

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COMMENT FORM FOR NIRB SCREENINGS

Proponent: AREVA Resources C	Project
<u> - </u>	anada Inc.
Location: Kivalliq Region	
Comments Due By: February 10,	2009 NIRB#: 09MN003
Indicate your concerns about the pi	miact proposal halows
Dino concerns	☐ traditional uses of land
Prior concerns Privater quality	Inuit harvesting activities
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why didn't like know 4 Mouth	the people of Baker Lake
Do you support the project proposa	the people of Baker Lake ago.?
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Do you support the project proposa On two properties: Sissons & Kiggavik Ore mining & milling Yes & No B 3 Open-pit uranium mines? Yes & No B Under-ground mine at Sissons? Yes & No B Any additional comments?	thre people of Baker Lake ago?

COMMENT FORM FOR NIRB SCREENINGS

The Numeric impact Review Board (NIRB) has a residue to protect the integrity of the ecosystem for the existing and figure residents of Planevut. To assess the environmental and social-economic impacts of the project proposal, NIRB would like to hear your cascerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Kies	avik Project
Propenent: AREVA Resour	ees Canada Inc.
Lucation: Kivatka Region	
Comments Due By: Februar	y 10, 2009 NTRB #: 09MN043
Indicate your concerns about t	he project proposal below:
I no concerns	Efgeditismal uses of land
Bunjer quality	C Inuit harvesting activities
Pierrain	O community involvement and consultation
& Er quality	@ local development in the area
Dividuals and their habitat	© tourism in the stes
Officering maramals and their habitat	O hansao health isisses
Strinds and their habitet	C) other:
G-Cials and their habitat	
Dherites receses in and Please describe the concerns in	distant aknyas
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and the second	Wat the ENWONIMENT
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to the street	·
to the water I want to reson place FROM STA	Development of project will take
to the water I want it repow Place FROM 377 Do you support the project pro	Development of project will take per to Fraish improced IT will HANG.
to the water I want it renow PLACE FROM 377. Do you support the project pre On two preparties: Sissons & Kiggsvik	Development of project will take per to Fraish improced IT will HANG.
to the water I want it repaid PLACE FROM 377 Do you support the project pre On two preparities: Sissons & Kiggavik Creminias & railling Yes & No. 13	Development of project will take per to Exals HAME.
to the water I want it repaid PLACE FROM 377 Do you support the project pre On two preparties: Sissons & Kiggsvik Cremining & milling Yes & No. 3 Composite washing mines? Yes & No. 3	Development of project will take per to Eraish improce IT will HADE.
T want it repaid Do you support the project pre On two preparities: Sissons & Kiggsvik Ore mining & railling Yes & No. 3 Open-pic uranium minus? Yes & No. Under-ground mine at Sissons? Yes &	Development of project will take per to Eraish improce it air HANG.
T want it repaid Dayou support the project pre On two preperties: Sissons & Riggsvik Cremining & radiling Yes & No. 3 Open-pix wranium mines? Yes & No. Under-pound mine at Sissons? Yes &	Development of project will take per to Ermish improcent it will through
T want it repaid Dayou support the project pre On two preperties: Sissons & Riggsvik Ore mining & radiling Yes & No. 3 Open-pic uranium minus? Yes & No. Under-pound mine at Sissons? Yes &	Development of project will take per to Ermish improcent it will through
to the water I want it repaid Place From 377 Do you support the project pro On two preparities: Sissons & Riggsvik Oraminias & railling Yes & No. 13	Development of project will take per to Ermish improcent it will through
T want it repaid Dayou support the project pre On two preperties: Sissons & Riggsvik Ore mining & radiling Yes & No. 3 Open-pic uranium minus? Yes & No. Under-pound mine at Sissons? Yes &	Development of project will take per to Errush improce IT will HANG.
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T want it repaired project properties project pro Do you support the project pro On two preparties: Sissons & Kiggsvik Ore mining & rastling Yes & No. 13 3 Open-pix uranium mines? Yes & No. 13 Under-ground miner at Sissons? Yes & Any additional comments?	Development of project will take per to Errush improce IT will HANG.
T want it repaid Do you support the project pre On two preparities: Sissons & Riggsvik Cremining & radiling Yes & No. 3 Open-pix washing mines? Yes & No. Under ground mine at Sissons? Yes &	PREARA UTATIONA

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E. Comment Perm Distribution

COMMENT FORM FOR NIRE SCREENINGS

The biogeness impact Acting Bases (PARA) has a metadam to proceed the unagenty of the appropriate for the explaint state and and mediconspectate impacts of the project property. NIMAS required the to how you despite conveniency and suggestions about the following project property applications:

Project Proposal Title: ACceptable Project	et
Proposers AREVA Mesoures Coned	4 Pre
Locations Kiveling Region	
Community Dun By: February 18, 2009	MINE III DANINGS
indicate your tonerrn about the project	proposal below:
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& Single quality	Office ingressing extrition Description in the contraction
D-ffirs in	C local development in the spen
gan ganty Definitions we have habited	C Levrieta in the gres
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Crisis and state habitat Crisis and their habitat	Dathtr.
Coffice and Choir habita	
C) hartege runnurses in area Pleana describe the concerns spains ted at	
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HOW ACTIVITIES WILL OF	REALLY AFFECT ENVIRONMENT
FOR THE FUTERE.	
Ann last Livinger	
Do you have any suggestions or seconds	endations for this application?
(WANT TO KAIN HOW	DEVELOPMENT OF PROJECT
LULY TAKE OLDE ER	OW START & FINISH AND
Poter tues	
WHAT INDAET IT WILL	LL HAVEON THE ABOVE
Do you suggest the project proposel? Y	MA NO LONGEUS
Cor and bedeaties: Sistems & Kiddylyyr	A sacration
Crambing & milling Yes & No Li	
1 Open-pix uncomm raince? Yes (2 No.)27 Linder-presed mine at Sissente? Yes (2 Mo.)2	
Any additional seminants?	
orl decimals assessed.	
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Name of portion posterostings ALEX	S WI A LUTTUE Baker Lake MU
Memoriane;	Batel
(Com	
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Project Proposal Title: Kiggavik Proje	et
Proponent: AREVA Resources Canad	a Inc.
Location: Kivalliq Region	-
Comments Due By: February 10, 2009	NIRB#: 09MN003
<u> </u>	
Indicate your concerns about the project	proposal below:
□ no concerns	traditional uses of land
₩water quality	B Inuit harvesting activities
□ terrain	Community involvement and consultation
Vair quality	Plocal development in the area
wildlife and their habitat	□ tourism in the area
marine mammals and their habitat	Phuman health issues
☐ birds and their habitat	O other:
☑ fish and their habitat	
☐ heritage resources in area	
Please describe the concerns indicated al	sildlife consuming food s. hocal lost people boing ch
Hoalth hazards and co	many with the
La ditional torols in	of lattle consumera, 1000
Transcentistics of the second	- bora Quest people boese
around mining area	5, robation of the Ch
involved i consulted Pr	ior to one Mining activity of
Do you have any suggestions or recommo	endations for this application?
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House 40 house vi-	endations for this application? at cons to snake all shave a chance to participall suited.
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and are being to	
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Do you support the project proposal? Ye	es No NOECIDED!
On two properties: Sissons & Kiggavik	ONDECTAL :
Ore mining & milling Yes No	
3 Open-pit uranium mines? Yes □ No □	·
Under-ground mine at Sissons? Yes □ No □	
Any additional comments?	
Name of person commenting	of Baker Lake, NU
1	Date: Fob D(c/D9
Signature:	100.00
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COMMENT FORM FOR NIRB SCREENINGS

The Nunavur 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 Proje	
Proponent: AREVA Resources Canada	a Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB#: 09MN003
Indicate your concerns about the project	proposal below:
□ no concerns	2 traditional uses of land
Water quality	☐ Inuit harvesting activities
E terrain	© community involvement and consultation
Wair quality	✓ local development in the area ☐ tourism in the area
Wildlife and their habitat	Y human health issues
Imarine mammals and their habitat	O other;
Shirds and their habitat If fish and their habitat	
Ci hamitaga recourage in 2002	
Please describe the concerns indicated ab	eve: Pollution of lound + animals,
we ent the animals the	nus goes to our system, which
Live as lovit or pal who	eat the meat get sick, also
hand also excess a to have	nan + animals PLUS waters
THOUGH THE PROPERTY TO NOT	and annous reus woders
or have to throw/weisk	sickly meat,
further, educate people mo	endations for this application? Extend it one, on the Uranium mine,
Do you support the project proposal? Ye	ST NOW
On two properties: Sissons & Kiggavik	
Ore mining & milling Yes \(\text{No } \text{V} \) 3 Open-pit uranium mines? Yes \(\text{No } \text{V} \) Under-ground mine at Sissons? Yes \(\text{No } \text{V} \) Any additional comments? NO more	roads be built anymore & Roads
Name of person commenting: 100 K	ree lak of Baker Lake, NU
Signature: Phillip	Date: Howary 6,2008.
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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 Pro	oject
Proponent: AREVA Resources Can	
Location: Kivalliq Region	
Comments Due By: February 10, 20	09 NIRB#: 09MN003
Indicate your concerns about the proje	
☐ no concerns	☐ traditional uses of land
(1) water quality	☐ Inuit harvesting activities
# terrain	© community involvement and consultation
air quality	☐ local development in the area ☐ tourism in the area
il wildlife and their habitat	Thuman health issues
marine mammals and their habitat	S other:
a birds and their habitat	3 other,
⊋ fish and their habitat □ heritage resources in area	i
Disease describe the concerns indicated	above:
Please describe the concerns indicated Hunters may be more	ionamont to risks
HUNTERS MAY BE MORE	19/10/01
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Do you have any suggestions or recom	mendations for this application?
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Prostect wildlife +	Their law is
402	,
Do you support the project proposal?	Vas C. No TV
Do you support the project proposat:	163 G 140 A
On two properties: Sissons & Kiggavik	
Ore mining & milling Yes [] No	
3 Open-pit uranium mines? Yes □ No.	-
Under-ground mine at Sissons? Yes No	
Any additional comments?	
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	Alekile a miles a miles
Name of person commenting: M. Signature: L.C. II	NUKIK of Baker Lake, NU
Signature: L. C. St	Date: 7-65ruar 4 8, 2604
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8. Comment Form Distribution

COMMENT FORM FOR MIRE SCREENINGS

The Nucevet Impact Review Board (NIRB) has a mendate to protest the integrity of the consystem for the anigsing and finure residence of Ninetwal. To assume the anti-constantal and accidenteesale impacts of the project proposal, MIRB would like to hear your pencerus, comments and suggestions should be following project personal application:

Comments Due By: February 10,	2009 NTRB #: 09MEV003
indicate your concerns about the pr	
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terrein	Community involvement and consultation
Zair qualky	Niceal development in the area
Ewildlife and their babins	Atherism is the 1965
Couring majornals and their habitat	Minuman health intues Contact
Chirds and their habites Crish and their habites	
Parisana rescuestas in aces	
Pieges describe the conserna indicate	that, WILL The WILDLIFE BE WAY I WANT THE WILD LIFE AND
My main concerned is	THAT, WILL THE WILD LIFE AND INTERNATION
IMPACTED IN A NEGATIVE	CTED MEANING NO CONDAMINATION
ביית פס יטית כואראאאן ציין	
OR PULLUTION INVOIVE	D.
Do you have any suggestions or reco	mmendations for this application?
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the Section of act band	water etc. are not being damaged
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nospect to them	and Survive out on the Land-in
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De you support the project proposal	
Die you support the project propositi On ero propertie: Sissons & Kingevik	•
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The you support the project proposal or ever proposal or	
De you support the project proposal in ero proposal Sissons & Kiggevik Ore mining & culting Yes No D Copen-pit tremples arters? Yes No D Inderspressed mine at Sissons? Yes No D	
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The you support the project proposal or ever proposal or	·
De you support the project proposal On eero properties: Skeons & Kiggevik One mining & military Yes & No D	

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Project Proposal Title: Kiggavik Pr	oject
Proponent: AREVA Resources Can	
Location: Kivalliq Region	
Comments Due By: February 10, 20	009 NIRB#: 09MN003
<u> </u>	
Indicate your concerns about the proj	ect proposal below:
□ no concerns	traditional uses of land
Water quality	□ Inult harvesting activities
Eterrain	a community involvement and consultation
wair quality	□ local development in the area
☐ wildlife and their habitat	€ tourism in the area
marine mammals and their habitat	Thuman health issues
☐ birds and their habitat	□ other:
If fish and their habitat	
☐ heritage resources in area	
Please describe the concerns indicated	above:
we have clean water, onces	our water
a open pit it will destoly	our water
<i>y</i>	•
Do you support the project proposal? On two properties: Sissons & Kiggavik Ore mining & milling Yes No b	Yes 🗆 No 🕏
3 Open-pit uranium mines? Yes □ No to	
Under-ground mine at Sissons? Yes □ No C	
Any additional comments?	
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Name of person commenting:	of Raker Lake NII
name of beison commentants:	Date: 44 66 2009
Signature: Dannes agent	Date: for OD - ACN !
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8. Comment Form Distribution		+
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COMMENT FOR	M FOR NIRB SCREENINGS	V)
The Nunavut Impact Review Board (NIRB) has a mandaresidents of Nunavut. To assess the environmental and syour concerns, comments and suggestions about the following	ate to protect the integrity of the ecosystem for the existing and future ocio-economic impacts of the project proposal, NIRB would like to hear owing project proposal application:	to get that "wild noit/fox" produce portact
Project Proposal Title: Kiggavik Proj	ect] 🕉
Proponent: AREVA Resources Canad		9
Location: Kivalliq Region		1 3
Comments Due By: February 10, 2009	NIRB #: 09MN003	1 B
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Indicate your concerns about the project	t proposal below:	<u></u>
☐ no concerns	B'fraditional uses of land	×
@water quality	@Inuit harvesting activities	1 2
2 terrain	☐ community involvement and consultation	
Z'air quality	2 local development in the area	\ \frac{1}{2}
2 wildlife and their habitat	O tourism in the area	1 2
marine mammals and their habitat Obirds and their habitat	∀human health issues □ other:	
Shish and their habitat	Dutet.	\mathscr{P}
Wheritage resources in area		75
Please describe the concerns indicated a	bove:	=>
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Do you have any suggestions or recomm	endations for this application?	1 %
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Do you support the project proposal? Y	es 🛘 No🔽]
On two properties: Sissons & Kiggavik		3
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Ore mining & milling Yes \(\text{No } \(\text{V} \)		4
3 Open-pit uranium mines? Yes □ No □	,.	9
Under-ground mine at Sissons? Yes a No C	and and fall during the) 2
Any additional comments: TN()	last continue to pass	2
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the manimisting rout	e toxes volves are really	The 3
for for	e fley tend to go to The carries to	1 2
The southerner, there	post early fall during the ribon was he sitating to pass in foxes, wolves are fed by a fire tend to go to the camps for NCY TOOKOME of Baker Lake, NU	,
Maine of beland commenting.	10-11 (00/100-10)	1
Signature: 1 100 10001	Date: 100 6 2000	_

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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 Proje		
Proponent: AREVA Resources Canad	a Inc.	
Location: Kivallic Region	•	
Comments Due By: February 10, 2009	NIRB #	¥: 09MN003
Indicate your concerns about the project	proposal below:	
□ no concerns	E traditional uses of land	
D water quality	Inuit harvesting activities	
Ø terrain	Community involvement and	i consultation
air quality	Zlocal development in the are	a.
e wildlife and their habitat	🗆 tourism in the area	
marine mammals and their habitat	Thuman health issues	
Doirds and their habitat	C other:	
P fish and their habitat		
☐ heritage resources in area	_ ``,	
Please describe the concerns indicated all fin a hover further a	ove:	1 1111
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I'm a hovered fore	and the	
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to move primer o	action .)	,
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Do you have any suggestions or recomme	endations for this applica	ition?
Do you have any suggestions of terroris		
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Do you support the project proposal? Ye	es 🗆 No 🗷	
On two properties: Sissons & Kiggavik		
Ore mining & milling Yes No 2		
3 Open-pit aranium mines? Yes . No E		
Under-ground mine at Sissons? Yes Down Now Any additional comments? FRATURE THAT UNDER TO SAFE 100% SAFE		AN
Any additional comments?	PANIAM MINING	7
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EVEK DE 10010 1111	and and	MUNITY
EVER BE 100% JAM WRANIUM MINING CO	052 16 119 001	er
Name of person commenting:	THY TUNGUAD OF	Baker Lake, NU
Signature:	Date: FC	6/09
Signature.		
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2009 Feb 09 5:54PM

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	e: Kiggavik Proje	ect
Proponent: AREV	A Resources Canada	a Inc.
Location: Kivalliq		
Comments Due By:	February 10, 2009	NIRB #: 09MN003
Indicate your concern	ns about the project	proposal below:
no concerns	to appear the broless	Traditional uses of land
Water quality		2 Inuit harvesting activities
aterrain		Z community involvement and consultation
Zair quality		≥local development in the area
wildlife and their habitat		Ztourism in the area
marine mammals and the	ir habitat	Thurnan health issues
Thirds and their habitat		Oother:
If fish and their habitat		
Theritage resources in area	, ,== , , ==	
Please describe the co	incerns indicated ab	œye:
Fifteen	years ago	we said "No" to Uranium
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We	Still Jay IV	
Do you support the p On two properties: Sissons	roject proposal? Ye & Kiggavik	s□ No∯
Ore mining & milling Yes 3 Open-pit cranium mines? Under-ground mine at Sisse Any additional comm	?Yes급 No Z ons?Yes급 No Z	
		•
NY	mantings TANA	TUM QUA Of Baker Lake, NU
Name of person com	nenting:	Tunguag of Baker Lake, NU Date: Feb 6, 2009
Signature:	aunjumy	DAIL. TED WIND
	HU	NTER

2009 Feb 09 5:54PM

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COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Proj	ect
Proponent: AREVA Resources Cann	da Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 200	9 NIRB#: 99MN003
Indicate your concerns about the project	rt proposal below:
□ no ponceme	🗅 traditional uses of land
a water duality	🛊 Inuit harvesting Accivities
interior	☐ community involvement and consultation
Dair quality	🗆 local development in the area
Wwithin and their babitat	C tourism in the area
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M birck and their habitet	O other:
A fish and their habitat	
Dharitage resources in area	
	above:
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many restricted areas	s.oneuna suce care.
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Do you imprort the project proposal? I On two properties: Sissons & Kingavik	MA NOW NO, YES
Ore mining & milling Yes No. 13 Open-pit arenium mines? Yes & No. 13 Under-ground mine at Sissons? Yes & No. 14	- N \$
3 Open-pit uranium mines? Yes in No.	
Under-ground mint at \$1550687 Years No.	
Any additional comments?	
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Dr. University	a area too. There are lets in would work there too.
Name of person commenting Share	Pupis of Baker Lake, NU
Signature:	Date: Cabo to 09
SHEETHIC: A CHARLES OF THE PROPERTY OF THE PRO	

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:	
🗆 no concerns 🔻 raditions		
	esting activities	
**	ty involvement and cor	nsultation
E am querry	elopment in the area	
☐ wildlife and their habitat ☐ tourism i ☐ marine mammals and their habitat ☐ human h		1 .
D birds and their habitat	Washed CA	lying areas
☐ fish and their habitat ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	ration race	re
© heritage resources in area		
Please describe the concerns indicated above:		
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Do you have any suggestions or recommendations	for this applicatio	n? /. / /
Do you have any suggestions or recommendations Approval of this uvanum mine tranium mining in our hunting af the fullings & the	e will lead	to unlimited
property of pris or other hunding	o areas. T	he safty:
tranium mining in our huntings of the	of possible	impact on our
security of metallings & me	عادر وعدال الر	1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
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Do you support the project proposal? Yes \(\text{No } \text{E}\)	1 10 0118	Water-Sklom
Do you support the project proposal: 1es 1 140 2	1 211 66 251	noting laker
On two properties: Sissons & Kiggavik	TSWIDE	ncling lakes
Ore mining & milling Yes U No d		
3 Open-pit uranium mines? Yes 🛭 No 🗹		
Under-ground mine at Sissons? Yes O No D	, , ,	1
Under-ground mine at Sissons? Yes Note Any additional comments? NTI + KIA 16 in Conflict become that they completely have a significant to be conflicted to the conflicted t	more thos	x act revenue
NTI & KID IS IN CONTLICT DEC	was in	2 mmunities
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that they completely	b	
do herefit unless tou dor		
Name of person/commenting: Cirilii 2017/8	GIE	Baker Lake, NU
Signature: // / D	ate: Februa	ery
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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	nc.
Location: Kivalliq Region	TATATA W. CONTRACTO
Comments Due By: February 10, 2009	NIRB #: 09MN003
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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:

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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:

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B-6 Barbara Mueller from Baker Lake, Nunavut

P.O. Box 1360 Cambridge Bay, NU X0B 0C0 Pl

Phone: (867) 983-4600 Fax: (867) 983-2594

February 10, 2009

Leslie Payette
Manager of Environmental Administration
Nunavut Impact Review Board
PO Box 1350
Cambridge Bay, NU
X0B 0C0
Ipayette@nirb.ca

Dear Ms. Payette

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

Please accept this as an unsolicited personal comment on the Areva Resources proposed Kiggavik Project. I am opposed to uranium mining globally, as a resident of Baker Lake I have concerns regarding this proposal. My concerns are outlined below.

- my research indicates that there is no safe way to mine uranium, the risk of contamination of
 the environment is long lasting and far reaching. Contaminated waste rock (sand), leaching
 from tailings ponds into the water systems and onto the land will impact negatively on the
 environment for many generations. Carbon emissions generated from the processing of yellow
 cake will impact on global warming.
- the negative impacts on the wildlife and more specifically caribou, their calving grounds and migration patterns. Caribou are an essential traditional dietary source for Inuit in the community—stats Canada recently released a report that 68% of Inuit maintain a traditional diet of country food. The lack of which will impact on the overall health of the community.
- moral issues associated with uranium mining, nuclear power and weapons.
- the inability of the governments to monitor the mining industry, especially uranium mining. This is seen worldwide.
- the unwillingness of mining (uranium) companies to report spills etc. either in a timely fashion or at all.
- the Thelon River is a heritage river and was designated so that future generations would benefit.

The Nunavut Planning Commission held a meeting in 2007 and deemed from that process that uranium mining was accepted by the people of Baker Lake and other organizations that were present. I attended as a community member and would not assume from those meeting that the people of Baker Lake were in agreement. The people were not allowed to give their full presentations, they were allotted 5 minutes to speak and then cut off by the moderator.

I would recommend that this proposal be referred to the Minister of Indian and Northern Affairs to the Federal Minister of the Environment for a public federal environmental review as per Sec. 12.6.1 of the Nunavut Land Claims agreement.

Barbara Mueller

B-7 Baker Lake Concerned Citizens Committee

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

February 10, 2009

Leslie Payette Manager of Environmental Administration Nunavut Impact Review Board PO Box 1350 Cambridge Bay, NU X0B 0C0 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 are 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 **B-8** Beverly and Qamanirjuaq Caribou Management Board

P.O. Box 1360 Cambridge Bay, NU X0B 0C0 Phone: (867) 983-4600 Fax: (867) 983-2594

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

10 February 2009

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

Dear Ms. Payette:

NIRB File No. 09MN003 - AREVA's Kiggavik Mine Project Proposal

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am responding to your request for comments on the proposal from AREVA Resources Canada Inc. (AREVA) for development of the Kiggavik Project west of Baker Lake. This is in accordance with the mandate of the BQCMB, which is to advise governments and caribou range communities on conservation and management of the Beverly and Qamanirjuaq caribou herds and their ranges.

Recommendations:

The BQCMB agrees with AREVA that the Kiggavik project has significant impact potential and therefore the NIRB should recommend to the Minister that a Review be conducted under Part 5 or 6 in accordance with Article 12 of the Nunavut Land Claims Agreement (NLCA).

A formal review of the proposal should be conducted which ensures that a full and transparent public discussion takes place, in which all interested parties have the opportunity to present their views. We believe this is necessary because:

- the proposed project is likely to cause significant adverse eco-systemic and socioeconomic effects, including effects on caribou, caribou habitat and caribou harvesting activities:
- the potential adverse effects of the project on caribou are not highly predictable and it is not known if they are mitigable with known technology; and
- the project proposal is likely to arouse significant public concern, including concern from traditional caribou harvesters in Nunavut, the Northwest Territories, and Saskatchewan.

According to NLCA Article12.4.2, NIRB shall determine that a review is required when this situation is identified during screening of a project proposal.

In accordance with Article 12.11.2 of the NLCA, the NIRB should determine if agreements with other jurisdictions are needed to provide for collaboration in the review of this project proposal. This may be necessary because of the trans-boundary eco-systemic and socio-economic cumulative effects of exploration and development on caribou that migrate through the Kiggavik-Sissons area. The potential adverse socio-economic effects of this proposed project are not limited to effects on Inuit or residents of Nunavut, but could extend to traditional harvesters and other users of caribou across the caribou range in the Northwest Territories and Saskatchewan as well. We disagree with AREVA's statement (14 November 2008 letter to NPC) that "The ecosystemic and socio-economic impacts are within the NSA."

Secretariat Address: P.O. Box 629 Stonewall MB ROC 2Z0 Tel: (204) 467-2438 e-mail: rossthompson@mts.net

website: www.arctic-caribou.com

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BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

Concerns:

In our previous letters (12 March 2007 and 16 December 2008) submitted to the NIRB during screening of AREVA's proposals for uranium exploration on the Kiggavik and Sissons properties (NIRB File No. 06AN085), we outlined the importance of this area to caribou, our concerns about potential disturbance to caribou from exploration activities, and the vulnerable status of the Beverly caribou herd, which has undergone a serious decline.

We have also previously indicated which aspects of AREVA's exploration activities are of greatest concern to the BQCMB. These primary concerns regarding potential impacts on caribou are also of concern for activities associated with development of the mine:

- activities on post-calving area the BQCMB has recommended establishing long-term legislated protection for calving and post-calving areas¹;
- low level flights (below 300 m), particularly if the flight path of aircraft crosses over large groups of pregnant female caribou during spring migration, or cow/calf groups during post-calving and late summer; and
- the cumulative effects of continued exploration and development across caribou ranges.

Our initial concerns about AREVA's proposed development project include the following potential adverse effects on caribou, caribou habitat, and caribou harvesting. One or more of these types of effects apply to each of the main project activities and components listed by NIRB in its 20 January 2009 notice of part 4 screening and request for comments.

- Loss of habitat, obstruction of caribou movements from roads, mine pits, withdrawing water from lakes, construction of mine facilities, bridge crossing over the Thelon River etc.
- Contamination of water, soil and vegetation from transportation of ore, explosives, chemical and hazardous materials; wastewater and sewage treatment facilities, discharge of effluent; deposition from incineration of domestic wastes; increased dust from mining activities, including extraction, transportation, waste rock piles, etc.
 Contamination issues specific to uranium mining are of concern with regard to the health of caribou and people consuming caribou.
- Disturbance to caribou from all transportation by ground or air of personnel, materials and supplies; and from the noise associated with construction and operation of all facilities.
 - Note that this differs from AREVA's assessment in their "Identification of Environmental Impacts" (Part 2 NIRB forms submission, Table 1). They indicate no expected impact resulting from transportation of personnel and supplies by air during the construction phase, or from transportation of personnel and yellowcake by air during the operation phase.
- Increased hunting access to caribou resulting from all roads, particularly those from Baker Lake to the mine site. This could result in reduced availability to caribou for people in Baker Lake over the project period.

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¹ Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuag Caribou: A Position Paper (BQCMB 2004)

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

Beverly caribou may use AREVA's project area during post-calving and late summer periods, when disturbance from project activities could reduce feeding times and lead to decreases in condition and general health of animals. Project activities that occur near caribou while they are particularly sensitive to disturbance (e.g., while caring for young calves) could have the greatest negative effects. This could lessen the animal's ability to cope with other stresses encountered elsewhere during their seasonal migrations across their year-round range, resulting in potentially significant cumulative effects.

Conclusions:

As we have described before, the Beverly caribou herd is in a vulnerable state, and needs to be given the opportunity to recover from its population decline. This means the herd must be protected from disturbance and other adverse effects of land use activities, including mineral exploration and development. Other caribou herds that use the project area also need to be protected from adverse effects. We believe that a Part 5 or 6 Review of this project proposal is necessary to determine if the potential adverse effects of the project on caribou, caribou habitat and caribou harvesting can be mitigated adequately.

This is a precedent-setting project in many ways. The potential effects of a project of this magnitude and type on the eco-systemic integrity of Nunavut and the existing and future well-being of people that depend on caribou (within and outside Nunavut) need to be carefully considered and evaluated.

Please let me know if you require further information or have any questions about these comments from the BQCMB.

Sincerely,

[original signed by]

Leslie Wakelyn BQCMB Biologist

cc: Albert Thorassie, BQCMB Chairperson

Baker Lake HTO

Secretariat Address: P.O. Box 629 Stonewall MB ROC 2Z0 Tel: (204) 467-2438 e-mail: rossthompson@mts.net

website: www.arctic-caribou.com

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B-9 Environment Canada

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Environment Canada Prairie and Northern Region Room 200, 4999-98 Avenue Edmonton, AB T6B 2X3

February 10th, 2009

Our file: 4703 001 006 Your File: NIRB 09MN003

Via email: lpayette@nirb.ca

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

Re: 09MN003-Notice of Part 4 Screening and Comment Request for AREVA Resources Canada's Kiggavik Project Proposal

Thank you for the opportunity to provide input into the Nunavut Impact Review Board's (NIRB) Part 4 screening decision for the AREVA Resources Canada's Kiggavik Project Proposal. The following specialist advice has been provided pursuant to Environment Canada's mandated responsibilities arising from the Canadian Environmental Protection Act, Section 36(3) of the Fisheries Act, the Migratory Birds Convention Act, and the Species at Risk Act.

After reviewing the project proposal and supporting documents, Environment Canada (EC) is of the opinion that the proposed project may cause significant adverse effects on the ecosystem and wildlife habitat. This advice is based on the scale of the proposed project and the anticipated environmental impacts that may occur if this project proceeds. As outlined in the project proposal, the Kiggavik Mine Proposal includes, among other components:

- The construction, operation, decommissioning and reclamation of a uranium mine that includes four open pit mines and an underground mine;
- On-site processing of 675,000 tonnes of ore per year with an approximate mill production rate of 3,000 tonnes uranium (U) per year;
- Construction of a mill facility, tailings management facilities, backfill plant, and fuel storage facilities;
- Landfill construction, solid waste management, incineration of domestic wastes, and industrial/non-combustible wastes deposited in landfills;
- Construction of waste rock stockpile and special waste management facilities;
- Use of clean waste rock for the construction of haul roads, pads, berms, etc.;
- Construction of ore storage pads at Kiggavik and Sissons;
- Transportation of ore from Sissons to the Kiggavik ore storage pad for mill processing;
- Construction of a 2,000 metre long airstrip, and airport facilities for the transportation of employees and materials;
- Explosives transportation, storage and on-site manufacture;
- Chemical and hazardous material transportation and storage;
- Construction of water storage, wastewater treatment and sewage treatment facilities;
- Water withdrawal from lakes to the north and east of Kiggavik site;
- Dewatering of a portion of Andrew Lake;
- Discharge of treated effluent into receiving environment;



- Construction of an access road from the community of Baker Lake to Kiggavik and the
 potential construction of bridge crossing or cable-ferry/ice bridge crossing over the Thelon
 River;
- Construction of an approximately 20 km long all season Kiggavik-Sissons site haul road;
- Construction of additional site infrastructure to support the mine including: power supply and facilities, warehouse, maintenance shops, administration complexes, offices and a permanent accommodation complex for capacity of approximately 300 people;
- Construction of facilities at Baker Lake including wharf, fuel storage tank farm, storage facility, laydown area, satellite administration and community liaison office;
- Marine shipment of reagents, fuel and supplies to the storage facility near Baker Lake and continued shipment via truck to the Kiggavik site; and,
- Shipment of yellowcake (~ 3,000 tonnes as U annually or 3,600 tonnes yellowcake) from the Kiggavik site to southern Canada via truck, barge and/or air.

EC is of the opinion that there is potential for this project to cause significant adverse environmental impacts. Potentially impacted ecosystem components include, but may not be limited to:

- Surface freshwater as result of the deposit of treated effluent into a lake, nutrient input from blasting and sewage treatment, suspended sediment as a result of construction activities, surface runoff from ore and waste rock, and accidents and malfunctions;
- Marine water quality as a result of the potential for accidents and malfunctions along the proposed shipping route;
- Air quality as a result of the operation of the incinerator, mine site activities and the hauling of ore concentrate along the haul and access roads;
- Migratory birds as a result of habitat loss and disturbances at the proposed site facilities, roads, airstrip, dock facilities and shipping routes; and
- Species at risk as a result of habitat loss and disturbance at proposed site facilities, roads, airstrip, dock facilities and shipping routes.

Due to the potentially significant adverse impacts to these ecosystem components resulting from the project, it is EC's opinion that at a minimum a Part 5 Review under Section 12.4.4(b) of the NLCA would be appropriate.

Should you have any further questions please contact Carrie Spavor at (867) 975-4631 or via email at carrie.spavor@ec.gc.ca.

Yours truly,

Mike Norton

A/Manager, Environmental Assessment Program Prairie and Northern Region

Environmental Protection Operations

Environment Canada

cc: Carey Ogilvie (Head, Environmental Assessment North, Yellowknife NT)
Anne Wilson (Water Pollution Specialist, Environment Canada, Yellowknife, NT)
Carrie Spavor (Environmental Assessment Coordinator, Environment Canada, Iqaluit, NU)

B-10 Forum Uranium

P.O. Box 1360 Cambridge Bay, NU X0B 0C0 Phone: (867) 983-4600 Fax: (867) 983-2594



910 - 475 Howe Street Vancouver, B.C. V6C 2B3

Phone: 604-630-1585 Fax: 604-689-3609

VIA EMAIL: lpayette@nirb.nunavut.ca

www.forumuranium.com

February 10, 2009

Nunavut Impact Review Board P.O. Box 1360 Cambridge Bay, Nunavut X0B 0C0

Attn: Leslie Payette

Manager of Environmental Administration

Dear NIRB Board Members:

RE: AREVA's Kiggavik Project Proposal

Forum Uranium Corporation is a Canadian based energy company with a focus on the acquisition, exploration and development of Canadian uranium projects in the Athabasca Basin, Saskatchewan and the Thelon Basin, Nunavut. Forum is pleased to offer this letter in support of AREVA's Kiggavik Project, a proposed uranium ore mining and milling operation located in the Kivalliq region of Nunavut approximately 80 km west of the community of Baker Lake. The Kiggavik Project is estimated to have an operational life of 17 years based on studies to date. It is currently anticipated that pre-operational construction would require 3 years while post-operational decommissioning would require an additional 5 years. The Project is expected to employ 400-600 people during operations. Further discoveries in adjacent lands, such as those explored by Forum, will only add years to the operational life of the mine, extending the benefits of the Project to the region and its inhabitants.

The Kiggavik Project has substantial potential to contribute to economic development in Nunavut. Expenditures over the Project lifetime will amount to several billion dollars, and AREVA is proposing measures to maximize the economic benefits to the region. Local employment will be facilitated by preferential hiring for people in the Kivalliq region, and there will be employee fly in/fly-out pick-up points at each of the seven communities in Kivalliq. AREVA will also provide extensive on-the job training and recognizes the need for a broad based education and training strategy to prepare people

for employment. Local business development will be facilitated; there will be opportunities for existing businesses to expand, and for new businesses to form, in response to Project needs for goods and services. The experience Kivalliq workers and businesses will gain in meeting the needs of the Project will enhance their capacity to realize economic benefits from any other new mining projects in the Kivalliq region or elsewhere in Nunavut.

It has been Forum's experience that the local communities are supportive of mining activity in the area. Forum has conducted community consultation sessions in the Kivalliq region since 2006 to support our own exploration activities in the area. In community sessions in Baker Lake, Chesterfield Inlet and Rankin Inlet, the response to Forum's proposed uranium exploration activities adjacent to the Kiggavik deposits were well received. Local attendees were pleased to be consulted before any work commenced, were anxious to reap the economic benefits of the activity and were also very mindful of potential environmental impacts. When Forum conducted exploration in the field during the past two summers we were able to employ several people from Baker Lake. It was a pleasure for us to utilise the local workforce and be able to contribute to the local economy by using local services. Our experience to date has been very positive, and proof that mining is the future of this region. It also reflects the excellent and thorough consultation efforts of AREVA, who have done extensive consultations with the seven communities in the Kivalliq region.

Economic development in the north is increasingly being done with an improved understanding of impacts, respect for the unique culture of the Inuit, and local social and economic benefits in mind. The capacity to ensure that mineral resource extraction benefits Inuit communities increases with every project proposed and developed. Based on the work completed to date, and AREVA's many years of successful experience in northern Saskatchewan, Forum believes that the Kiggavik Project can be carried out safely, that all potential environmental effects can be mitigated, and that substantial benefits to the people of the Kivalliq region can be realized. The mining industry is committed to achieving these outcomes through well developed projects such as the Kiggavik Project, and we look forward to the work ahead.

Sincerely,

Signed, "Rex Grant"

Rex Grant Community Relations Manager Forum Uranium Corp.

Cc: Rick Mazur, President & CEO, Forum Ken Wheatley, VP, Exploration, Forum

B-11 Indian and Northern Affairs Canada

P.O. Box 1360 Cambridge Bay, NU X0B 0C0 Pl

Nunavut Regional Office P.O. Box 100 Igaluit, NU, X0A 0H0

> Your file - Votre référence 09MN003 Our file - Notre référence 5510-5-25

February 10, 2009

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

Via electronic mail to: lpayette @nirb.ca

Re: Comments on the Part 4 Screening for AREVA's Kiggavik Project Proposal

Dear Ms. Payette,

Indian and Northern Affairs Canada (INAC) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the Part 4 screening of AREVA Resources Canada's Kiggavik Project. As requested in NIRB's letter of January 20, 2009, INAC has reviewed AREVA's project proposal and applications and has prepared the following comments for NIRB's consideration.

Overall, INAC is of the view that the project, due to the nature and scale of proposed activities and components, may have the potential to cause significant adverse environmental impacts, significant adverse socio-economic effects on northerners as well as be a cause of significant public concern. INAC believes that the project warrants a review as per Section 12.4.2 of the Nunavut Land Claims Agreement.

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.

INAC looks forward to continuing collaboration with NIRB and other parties in the assessment process for this Project. Should you have any questions or like any further clarification, please do not hesitate to contact Margaux Brisco at (867) 975-4567 by phone or at margaux.brisco@inac-ainc.gc.ca by email.

Sincerely,

[original signed by]

Robyn Abernethy-Gillis Manager of Environment Division



B-12 Mary Jo Cullen from Toronto, Ontario

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Subject: FW: Comment form: Kiggavik Project

From: Mary Jo Cullen [mailto:maryjocullen@onlink.net]

Sent: February 10, 2009 9:07 PM

To: Leslie Payette

Subject: Comment form: Kiggavik Project

Thank you for the opportunity to comment on what I consider a dangerous and ill advised project. Mary Jo

Cullen

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:

Location: Kivalliq	A Resources Canada In			
Comments Due By:		NIRB #: 09MN003		
Comments Due by.	repruary 10, 2009	NIKD π. UPWINUUS		
Indicate your concerns	s about the project prop	osal below:		
ž no concerns		X traditional uses of land		
X water quality		X Inuit harvesting activities		
X terrain		ž community involvement and consultation		
X air quality		X local development in the area		
X wildlife and their habitat		X tourism in the area		
X marine mammals and their habitat		X human health issues		
X birds and their habitat		ž		
other:				
X fish and their habitat				
ž heritage resources in a	rea			

Please see the CCAMU submission re this project, whose concerns I share, and which clearly and in detail, describes the extreme and longterm environmental harm to the land, water, plants and animals from uranium mining, and the **h**ealth impacts to local people.

Do you have any suggestions or recommendations for this application?

I agree with CCAMU in a moratorium on all uranium mining. I believe this moratorium should include all of Canada. A uranium mine in the Baker Lake region is particularly incompatible with the dependence of local people on a healthy, safe, sustainable and unpolluted natural environment to their health and livelihood, and that of their children and grandchildren.

1 of 2 11/03/2009 8:45 AM

Do you support the project proposal? Yes ž No X Any additional comments?

I agree with CCAMU that any licencing and authorization at the territorial level be denied, and believe the justification for this position is made abundantly clear in the CCAMU submission.

Name of person commenting:		Mary Jo Cullen	of	Toronto, Ontario
Position:		Organization:		
Signature:	Mary Jo Cullen	Date:	Feb. 10/09	1

2 of 2 11/03/2009 8:45 AM

B-13 MiningWatch Canada

P.O. Box 1360 Cambridge Bay, NU X0B 0C0



MiningWatch Canada Mines Alerte

Suite 508, 250 City Centre Avenue, Ottawa, Ontario, Canada K1R 6K7 tel. (613) 569-3439 — fax: (613) 569-5138 — info@miningwatch.ca — www.miningwatch.ca

February 10, 2009

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

Phone: (867) 983-4600 Fax: (867) 983-2594 lpayette@nirb.ca

Dear Ms. Payette,

Re: NIRB file no. 09MN003 - Areva Resources Canada Inc.'s proposed Kiggavik Project

Please accept this as MiningWatch Canada's submission regarding the environmental assessment of the proposed Kiggavik project. MiningWatch Canada is a coalition of nineteen labour, Aboriginal, environmental, social justice and development organizations from across Canada with a mandate to support communities affected by mining in Canada, and affected by Canadian mining companies around the world. We respond to concerns regarding public health, water and air quality, fish and wildlife habitat, and community interests arising from irresponsible mineral policies and practices. We have participated in a variety of important mining environmental assessments including Voisey's Bay, Diavik, and Kemess North.

I have attached MiningWatch's *Policy Statement on Uranium Mining*, which specifically recommends that 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.

The present project proposal is being brought forward in the absence of any resolution of these conditions, or even any meaningful movement towards their resolution. It would add to the burden being placed on future generations for the management of radioactive mill tailings and mine waste, effectively in perpetuity. While management of wastes is one of the most serious problems associated with uranium development, there are also other likely and potential impacts on the surrounding ecosystems and the well-being of people who depend on those ecosystems for sustenance.

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; MiningWatch Canada offered to attend this workshop but was not invited, and contrary to what participants were told there was no follow-up workshop – or other public or expert involvement of any kind. The respective deliberations of the NIRB, the Nunavut Water Board, and the Nunavut Wildlife Management Board have not been made public to the best of our knowledge.

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.

It is our observation that the project proposal has significant negative impact potential, and therefore requires review under Part 6 of the Nunavut Land Claim Agreement. We would specifically note that the project:

- (a) may have significant adverse effects on the ecosystem and wildlife habitat, especially in relation to critical caribou habitat, including calving and staging areas, and therefore on Inuit harvesting activities;
- (b) may have significant adverse socio-economic effects on northerners, especially those who rely on the caribou for a significant part of their traditional activities and diet;
- (c) will cause significant public concern, as would any planned large-scale release of radiation into the environment, even where it is presumed to be regulated and controlled; and
- (d) involves technological innovations for which the effects are unknown, specifically related to the long-term control of uranium mill tailings and contaminated water.

Additionally, at least two key aspects of this proposal present strong arguments for review by a federal environmental assessment panel rather than NIRB. Firstly, it could generate trans-boundary impacts through the release of radionuclides, especially radon gas, into the air and water, and through any impact on the Beverly and Qaminirjuaq caribou herds that range into the Northwest Territories, Manitoba, and Saskatchewan and are hunted by the Denesuliné as well as the Inuit. Secondly, nuclear development in general and uranium mining in particular have had and continue to have impacts at a national level – from past mines in the Northwest Territories, Saskatchewan, and Ontario, to uranium processing facilities in Ontario, to the recent explosion in exploration activity across the country – and there is significant interest, experience, and expertise to bring to bear on this topic. Both of these aspects can only effectively be addressed by a federal panel.

Assessing this proposal within the context of a federal panel review would also be advantageous because the federal environmental review process is well-defined, with clear procedures, while the NIRB has not yet released its own rules of procedure. As well, the Canadian Environmental Assessment Agency, unlike the NIRB, has a Participant Funding Program to facilitate the participation of public intervenors. While this fund is insignificant in comparison with the hundreds of thousands or even millions of dollars the proponent will spend preparing its documentation, or in comparison with the funds required by community and public interest groups to review and critique that documentation effectively and intervene effectively in the review process, it is nonetheless important and may well mean the difference between having a degree of meaningful public involvement and having none.

For all the above reasons, we respectfully ask the NIRB to recommend to the Minister of Indian and Northern Affairs that he 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.

Yours sincerely,

Jamie Kneen

Communications and Outreach Coordinator

Attachments:

- MiningWatch Canada Policy Statement on Uranium Mining
- Comment Form for NIRB Screenings

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 projec	t proposal helow:				
no concerns	☐ traditional uses of land				
X water quality	Inuit harvesting activities				
X terrain	community involvement and consultation				
X air quality	local development in the area				
X wildlife and their habitat	☐ tourism in the area				
X marine mammals and their habitat	X human health issues				
X birds and their habitat	other:				
X fish and their habitat					
heritage resources in area					
Please describe the concerns indicated a	hove:				
The section of the content of the co					
(Dlease see attached)					
(Please see attached.)					
Do you have any suggestions or recomm	endations for this application?				
(Please see attached.)					
Do you gummout the must set muoness 19 V	as T. No.V. Any additional comments?				
Do you support the project proposal? Y	es No A Any additional comments?				
(Please see attached.)					
Name of person commenting:	Jamie Kneen of Ottawa				
Communications &	Junie Riech Ol Ottawa				
	Ouganization MinimaW-t-1-C1-				
Position: Outreach Coordinator	Organization: MiningWatch Canada				
1/					
Signature:					
Signature:	Date: 10 February 2009				



MiningWatch Canada Mines Alerte

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.*

B-14 Transport Canada

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

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. Kiggavík 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 (ME) 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 Aquirre - TC - Environmental Officer Sophia Gamick - TC - Environmental Officer

Greg Black - TC - NWPP

B-15 Fisheries and Oceans Canada

P.O. Box 1360 Cambridge Bay, NU X0B 0C0 Ph



Fisheries and Oceans Pêches et Océans Canada

Eastern Arctic Area P.O. Box 358 Iqaluit, NU X0A 0H0

Phone: (867) 979-8000 Fax: (867) 979-8039

Canada

Secteur de l'Arctique de l'est

Boîte postale 358 Iqaluit, NU X0A 0H0 Tél: (867) 979-8000

Télécopieur: (867) 979-8039

DFO file: 08-HCAA-CA7-00052

NIRB file: 09MN003

February 10th, 2009

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

Via E-mail to: lpayette@nirb.ca

Dear Ms. Payette:

Subject: AREVA Resources Canada Inc. - Kiggavik Project

Fisheries and Oceans Canada (DFO) received the Nunavut Impact Review Board's (NIRB) letter dated January 20th, 2009 regarding the commencement of the Part 4 Screening review of the AREVA Resources Canada Inc's project proposal of the Kiggavik uranium mine.

DFO has reviewed the "The Kiggavik Project – Project Proposal" dated November 2008 and concluded that the dewatering of a portion of Andrew Lake will cause a harmful alteration, disruption or destruction of fish habitat, thus requiring an authorization under subsection 35(2) of the Fisheries Act. It is DFO's opinion that the following works and undertakings in relation to the development could also result in impacts to fish and fish habitat:

- Construction of stream diversions in the proposed location of the Centre Pit, temporary special waste pile and clean waste rock pile;
- o Construction of a dam across the outlet of Sik Sik Lake;
- o Construction of a dock in Baker Lake;
- Construction of watercrossing structures along site haul road and the access road from Baker Lake to the Kiggavik Mine site;
- o Construction of berms to collect site drainage; and,
- Installation of water intake structures.

Please note that DFO has not yet received a Fisheries Act authorization application from AREVA for all works that may be determined to result in the harmful alteration, disruption, or destruction of fish habitat. DFO will send a letter to the proponent in this regard, including a copy of the application form.



DFO has considered the information in the project description, including the mitigation measures proposed therein, and is of the opinion that there is a potential for the development to cause significant adverse environmental effects to fish and fish habitat. Therefore we recommend that the Kiggavik mine development be reviewed under Article 12, Part 5 or 6, of the *Nunavut Land Claim Agreement*.

In closing, DFO would like to thank the NIRB for the opportunity to provide comments and we look forward to continued discussions related to this development proposal. If there are any questions or clarification needed on any of these matters, please contact Sarah Olivier at (867) 669-4919.

Regards,

Beverley Ross

Regional Manager, Environmental Assessment for Major Projects

Fisheries and Oceans Canada

cc. Ginny Flood, Fisheries and Oceans Canada
Tania Gordanier, Fisheries and Oceans Canada
Eric Kan, Fisheries and Oceans Canada
Barry Briscoe, Fisheries and Oceans Canada
Julie Dahl, Fisheries and Oceans Canada

B-16 Natural Resources Canada

P.O. Box 1360 Cambridge Bay, NU X0B 0C0



February 12, 2009

Leslie Payette Manager, Environmental Administration Nunavut Impact Review Board Cambridge Bay, Nunavut

By e-mail: lpayette@nirb.ca

Subject: NRCan's Comments on the Part 4 Screening of the AREVA Resources Canada Inc.'s proposed Kiggavik Mine Project

Thank you for your e-mail of January 20, 2009, requesting comments from parties on the Nunavut Impact Review Board's (NIRB) Part 4 Screening under the *Nunavut Land Claims Agreement* (NLCA) of the proposed "Kiggavik" mine project from AREVA Resources Canada Inc.

Natural Resources Canada (NRCan) has reviewed the Project Proposal submitted by AREVA in November 2008. The project proposal refers to the potential requirement for licensing under the *Explosives Act*, administered by NRCan, to allow for components of the proposal to be carried out. Specifically, the proponent indicates that explosives will be manufactured on site from ammonium nitrate and diesel fuel, and that materials used in the manufacture of explosives will be stored in two main surface magazines as well as day storage and underground magazines. NRCan expects that the proponent will provide additional information on their explosive requirements to allow the department to confirm its regulatory responsibilities.

The proposal includes open pit mines and underground mining of approximately 675,000 tonnes of uranium ore per year, construction and operation of a mill with an annual production rate of approximately 3,000 tonnes of uranium in concentrate form per year, along with an airstrip, accommodation complex for employees, fuel tanks, water treatment plants and other associated infrastructure. As with previous mining proposals that have been successfully reviewed by the Board, NRCan believes that a review under Part 5 or Part 6 (12.2.4 (b)) of the NLCA would be an appropriate level of assessment.

If you have any questions concerning these comments, please call me at (613) 943-0773.

Sincerely,

Original signed by

John Clarke Regional Team Leader Natural Resources Canada

cc: Tom Calvert, NRCan; Dave McCauley, NRCan



B-17 Parks Canada

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

145 McDermot Ave. Winnipeg, MB R3B 0R9

February 16, 2009

Leslie Payette Manager of Environmental Nunavut Impact Review Board P.O. Box1360 Cambridge Bay, NU X0B 0C0

Re: Comments on the Part 4 Screening for AREVA's Kiggavik Project Proposal

Dear Ms. Payette,

Parks Canada would like to thank you for the opportunity to comment on the Part 4 screening of AREVA Resources Canada's Kiggavik Project. In our review of the project proposal, we noted that one of the road transportation options identified in the project proposal, the all weather access road (north option), requires a bridge across the Thelon River. The bridge would be located within the area of the Thelon River that has been designated a Canadian Heritage River. The Thelon River was designated a Canadian Heritage River in 1990 in recognition of a variety of natural heritage values, human heritage values and recreational values. For further information please see http://www.chrs.ca/Main e.htm. We recommend that the potential impacts to these values be considered as part of the screening.

Thank you.

Sincerely,

Katherine Cumming
Environmental Assessment Scientist
cc:
Nancy Anilniliak, Associate Superintendent, Nunavut Field Unit
Donald Gibson, Canadian Heritage Rivers Program



B-18 Government of Nunavut, Department of Executive & Intergovernmental Affairs

P.O. Box 1360 Cambridge Bay, NU X0B 0C0 Phone: (867) 983-4600 Fax: (867) 983-2594



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Ministère de l'Exécutif et des Affaires Intergouvernementales **Department of Executive & Intergovernmental Affairs**

February 17, 2009

Leslie Payette Manager, Environmental Administration Nunavut Impact Review Board

via Email to: lpayette@nirb.ca

RE: NIRB FILE # 09MN003 – AREVA Resources – NIRB Screening on Kiggavik Project Proposal

Dear Ms. Payette:

On January 20th, 2009, the Government of Nunavut (GN) received correspondence from the Nunavut Impact Review Board (NIRB) requesting comments on the Kiggavik project proposal pursuant to Section 12.4.4 of the Nunavut Land Claims Agreement (NLCA).

Due to the scale and character of the proposed project the Government of Nunavut recommends that the project proceed to a full environmental assessment review as set out under part 5 of Article 12 of the Nunavut Land Claims Agreement.

As the project proposal involves the mining of uranium NIRB is reminded of the Uranium Management Plan Principles approved by the Government of Nunavut on June 4, 2007.

The six principles are:

- 1. The Government of Nunavut regards mining, including uranium mining, as an important source of jobs for Nunavummiut and for revenues to meet the needs of our growing population.
- 2. The Government of Nunavut recognizes that uranium development places special responsibilities on government because of the nature of uranium and its by-products, the history of its use for both peaceful and non-peaceful purposes, and its potential risks to human health and the environment.
- 3. Uranium development must have the support of Nunavummiut, especially in communities close to development.
- 4. The Government of Nunavut will support uranium development in Nunavut provided that the following conditions are satisfied:
 - a. Health and safety standards are issued for workers.
 - b. Environmental standards are assured.
 - c. Nunavummiut must be the major beneficiaries of uranium development.
- 5. The Government of Nunavut believes that nuclear power will be an important part of meeting global energy needs while limiting greenhouse gas emissions.
- The Government of Nunavut believes that Canadian Law and international agreements provide assurance that uranium mined in Nunavut will be used for peaceful purposes.

Following the INAC Minister's decision to send this project to a Part 5 review the Government of Nunavut would be pleased to have an opportunity to provide input on the development of guidelines for the Environmental Impact Statement.

We thank NIRB for the opportunity to review and provide comments on this project proposal, and we look forward to receiving further information on this project from NIRB. Please contact us if you have any



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Ministère de l'Exécutif et des Affaires Intergouvernementales Department of Executive & Intergovernmental Affairs

questions or comments please do not hesitate to contact myself or Laurie-Anne White, our General Monitoring Coordinator at 867 975 6026.

Qujannamiik,

Paul Suvega Assistant Deputy Minister Department of Executive and Intergovernmental Affairs

CC:

Sharon Ehaloak, Executive Director, Nunavut Planning Commission Dionne Filiatrault, A/Executive Director, Nunavut Water Board

Project Proposal Title: Kiggavik Proj	ect
Proponent: AREVA Resources Canad	la Inc.
Location: Kivalliq Region	
Comments Due By: February 10, 2009	NIRB#: 09MN003
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□ no concerns	☐ traditional uses of land
□ water quality	☐ Inuit harvesting activities
□ terrain	□ community involvement and consultation
□ air quality	□ local development in the area
□ wildlife and their habitat	□ tourism in the area
☐ marine mammals and their habitat	□ human health issues
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Please describe the concerns indicated a	bove:
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Do you have any suggestions or recomm	endations for this application?
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proponent must demonstrate that: the proje	ciples on uranium development through the review the ect will not damage the environment and any impacts, the health and safety of workers and Nunavut Junavut benefit from the project.

8. Comment Form Distribution

Do you support the project proposal? Yes □ No □ Any additional comments?		
The Government of Nunavut regards mining, including uranium mining, as an important source of jobs for Nunavummiut and for revenues to meet the needs of our growing population.		
Through the Part 5 Environmental Review process we expect to be able to assess the ability of the proponent to protect the environment, manage and mitigate any impacts, and provide positive and sustainable benefits to the people and communities of Nunavut.		
Name of person commenting: of		
Position: Organization:		
Signature: Date:		

B-19 Lutsel K'e Dene First Nation, Wildlife, Lands and Environment Department

Wildlife, Lands and Environment Department



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

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

February 17, 2009

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, <u>LKDFN</u> believes that the potential adverse impacts of the <u>Kiggavik</u> and <u>Sissons</u> 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.

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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 A/WLED Manager

sonyalmond@hotmail.com

almond

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



MiningWatch Canada Mines Alerte

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. Mining Watch 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.

Mining Watch Canada takes the position that there should be a total moratorium on aranium 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.

MiningWatch Canada Policy Statement on Uranium Mining - December 2007

B-20 Baker Lake Residents (various)

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Phone: (867) 983-4600 Fax: (867) 983-2594

Project Proposal Title: Kiggavik Project	The state of the s	
Proponent: AREVA Resources Canada Inc.		
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Project Proposal Title: Kiggavik Project	
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Position: Calabarer	Organization: P.C. C.
Signature: Joseph	Date: 18 2008

Project Proposal Title: Kiggavik Project		
Proponent: AREVA Resources Canada Inc.		
Location: Kivalliq Region		
Comments Due By: February 10, 2009 NIRB #: 09MN003		
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Proponent: AREVA Resources C	anada Inc.			
Location: Kivalliq Region				
Comments Duc By: February 10,	2009 NFRB#: 09MN003			
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Project Proposal Title: Kiggavik Project				
	A Resources Canada Inc.	, , , , , , , , , , , , , , , , , , , ,		
Location: Kivalliq				
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8. Comment Form Distribution

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: AREY	A Resources Canada Inc			
Location: Kivallio	Region			
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Project Proposal Title: Kiggavik Project				
Proponent: AREVA Resources Canad	a Inc.			
Location: Kivalliq Region				
Comments Due By: February 10, 2009	NIRB#: 09MN003			
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8. Comment Form Distribution

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggayik Projec			
Proponent: AREVA Resources Canada Inc.			
Location: Kivalliq Region			
Comments Due By: February 10, 2009	NRB#: 09MN003		
Indicate your concerns about the project p	proposal below:		
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B-21 Paula Hughson from Baker Lake, Nunavut

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Phone: (867) 983-4600 Fax: (867) 983-2594

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: AREV	A Resources Canad	a Inc.		
Location: Kivalliq	Region			
Comments Due By:	February 10, 2009 extension to 18 th of February 2009		NIRB #:	09MN003
Indicate your concerns about the project proposal below:				
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Please describe the concerns indicated above:

- 1) Caribou, Wildlife and their Habitat with at least 30 uranium exploration companies exploring in the Kivalliq in 2007/08 the cumulative effects of these camps flying around are potentially disturbing the caribou behavior and health.

 http://www.miningnorth.com/docs/NU_ExMap2007_ENGLISH_nov2707.pdf. Caribou have been a staple food source for the Inuit and northerners of the Baker Lake region. Many Inuit and northerners prefer caribou meat to southern meats like beef or chicken. Caribou meat is much healthier to eat and Inuit from other regions ask for caribou meat from the Kivalliq. It is a much cheaper food source as well. Wildlife in the area must be considered as well, Muskox, wolves,, foxes as much as the caribou. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor the caribou and habitat including but not limited to hunters submitting caribou meat for analysis of toxins or basic continuous studies for generations. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 2) Permafrost with temperatures predicted to rise in the future what are the plans for AREVA for remediation IF this project goes ahead? AREVA will have to monitor & maintain for many thousands of years the tailings and mine sites. Water and drainage patterns will change and these future considerations need to be addressed and monies and technologies of the future must be used not technologies of 2009 to monitor current mines and current exploration sites. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor the permafrost. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 3) Water Quality a) Fresh water is a very rich resource itself and Baker Lake and surrounding area is rich in fresh water which is fairly uncontaminated except for possible long rang transport of pollutants from the south or internationally. We now have one lake that will act like a tailings pond for the Meadowbank project for which federal (Canadian government) laws were changed to accommodate this type of storage of tailings in Canada. This lake will be toxic forever. I learned

about this lake on CBC's "the National". The potential for contaminating the fresh water and ecosystems is very high with the possibility of the permafrost melting. Many countries would love to have as much fresh water as we do and we must protect it to ensure it does not become polluted as other water bodies have in the country and worldwide. B) Marine ecosystems – depending on what methods of transport AREVA decides the marine ecosystems must be protected and monitored as well. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor Fresh water and marine ecosystems. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.

- 4) **Air Quality** with tailings and AREVA's plans for storage of mine waste there is high potential of the wind carrying radioactive mine waste to the surrounding tundra landscape and having repercussion effects on wildlife, water and people not associated with the mine site. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 5) **IPG's** NIRB, NPC & NWB must update their websites and some websites are none existent and others with pages still "under construction". NWMB is way more informative and has been for many years including having information in Inuktitut. The following is a link to the Mackenzie Valley Environmental Impact Review Board's website which has a more open and transparent way of informing the public of exploration/mining activities in their region. http://www.mveirb.nt.ca/. This website has regular updates and does not use an FTP site for the public to try and navigate through. This website is not perfect but it is a good start. NIRB would benefit greatly from learning from MVEIRB webmasters to help produce a website for 2009 technologies. Their site has web casts of live public hearing for all to listen to. NWMB has a database of past meetings, conference calls and is more transparent in their way of informing the public about business of the NWMB. NIRB and the other IPG websites have the potential to grow and keep getting better with new advancements in communication tools and technologies. This form is hard to find on the NIRB Website and FTP site. I found it by accident. A clearer way for the General Public to add comments would greatly help plus using maps and not lat/longs of the lease hold land where the interested party is looking to get approval for exploration/mining or other activities. A map is quick and clear and does not involve you having to go look on the map or Internet to look and see where the activity is happening.
 - NPC When did the Keewatin Regional Land Use Plan (KRLUP) change? From the NPC meeting in June of 2006, held in Baker Lake where NPC said the purpose of the meeting was not to make a decision about the KRLUP regarding a moratorium on uranium mines in the region until there was public consultation. The definition of consultation can be broad or very narrow. I could not find any information on the Internet about this new decision. Appendix E of the KRLUP 3.5 ("Uranium development shall not take place until the NPC, NIRB, the NWB and the NWMB have reviewed all the relevant 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" and 3.6 "Any future proposal to mine uranium must be approved by the people of the region" and these two items specifically apply to Uranium. The KRLUP: Chapter Six addresses informing the residents of what is happening in the region, as well residents should have significant input into the regulations and management of these activities. Environmental protection and wildlife protection, with specific concerns addressed to the Thelon game sanctuary area and the numerous cultural heritage this area brings to the local residents and to the region, page 58 shows the numerous sites and this chapter explains the importance to the people of the region for future generations. Heritage resources should be protected and maintained.
 - Additional information like NTI, RIO's, Hamlets, CLARC's, and HTO's should be obligated to submit their minutes of meetings where major decisions are made on behalf of their group which effect many groups of people or individuals who may or may not support their decision. This would make them more accountable and transparent and people would then have more confidence in the system. NIRBs website maybe a potential place for this information to be kept to keep in it central and transparent.
 - NTI/RIO's and IOLs where are the documents outlining the IOL parcels of land and

their purpose for land selection. The NLCA was pushed ahead because the residents of Baker Lake were apposed to uranium development and this infringed on their rights as Inuit so then exploration companies could not seek approval from the Crown (Government of Canada) until the land claims were settled. The Inuit residents of Baker Lake selected many areas that were potentially uranium rich to prevent uranium development and more importantly they were selected for 17.1.2 a, c &d. Where are the documents outline why BL-## is selected? Many people who were on the land selection committees for the areas around Baker Lake have passed on and fought hard to have them protected under IOL status. Do IOL lands have to go through the NIRB process as well?

- CEAA/INAC/NIRB The minister from INAC announced in May or June of 2008 that he was pleased to announce that CEAA will no longer apply in Nunavut and was confident that NIRB was capable to fill this role. I looked at the CEAA website and this site is more open and transparent compared to the NIRB site. CEAA should still apply when it comes to Uranium because Uranium exploration, uranium mining and nuclear power generation is at a different level of danger and health risks associated with the whole process from start to finish. From exploration, closing drill caps and ensuring they are properly sealed, mining and yellowcake transportation, to power generation with cooling water contamination deemed safe after seven years and spent uranium waste disposal for which there is still no safe way to dispose of it. This waste lasts tens of thousands of years. I cannot find this announcement on the CEAA, INAC or NIRB websites, if it it there my apologies but the search engines are not showing it.
- 6) Human Health with many different types of exploration coming in the region baseline studies should be conducted to monitor different toxins that may be increasing, stabilizing or decreasing. Blood tests or other types of tests could be monitored to provide information about a population that lives close to exploration. There is an increase in cancer, which may or may not be attributed to exploration activity but cannot be ruled out unless studies are carried out before exploration turns to a potential mine. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor human health. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 7) Fish and their Habitat fish are an important resource and essential part of the diet of the residents of Baker Lake. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor fish and their habitat. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 8) **Tourism** there is a great opportunity for tourism in this region as it is the only inland community in Nunavut and therefore offers great potential for unique tourism opportunities from sport fishing, hunting, wildlife viewing to traditional activities such as camping in iglus, traveling by dog team, traveling by kayak or motorized trips to name a few. There was once a small but growing traditional camp in Baker Lake and offered tourists opportunities to participate in activities. Promotion of the region as a destination to travel as it is a renewable resource and keeps traditions alive for future generations. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor heritage activities to ensure they do not slip away. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 9) Socio-economic effects the effects of a new lifestyle and way of living need to be monitored and well documented from a variety of levels of governments and agencies. The information should be honest and transparent. IF the data shows there is an increase in violence it should not be covered up or if there is an increase in substance abuse this should not be covered up, or if there is an increase of self confidence this should be explained thoroughly and how the positive and negative impacts can be addressed. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor peoples mental and physical health. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.

10) What is the rush to mine uranium or resources that may harm people, environment, cultural heritage, air quality and the economy of people who may in the future have effects from the mine ranging in health effects, animal health effects, to name a few. The uranium is not going anywhere and it might be prudent to be very cautious about this new endeavor to mine uranium. A uranium mine has never been started in permafrost in Canada. IF a mine did go ahead in the future, then the all the uranium and waste rock should be shipped out as well to reduce the effects of toxic radioactive waste from entering the disturbed local regional environment.

Do you have any suggestions or recommendations for this application?

- More non-industry technical and non-technical information available to the residents of the region and the residents of Baker Lake.
- A more detailed plan as to how much money will be allocated to clean up the site when it is closed and the remediation and monitoring of the site for thousands of years, because that is how many years the toxic waste takes to get to safe levels.
- IPG's, GN, Government of Canada, Hamlet Councils, HTO's, CLARC's to name a few need to communicate and place information accessible to all, must be transparent and honest with both positive and negative information.
- Secondary organizations affected by this new industry need to be involved and provide data and information about the effect both positive and negative in a way that is transparent and honest.
- The NLCA is only 10 years old and we should take a precautionary route to ensure this does not set a precedent.
- The IPGs have an important role and setting the bar high is not a bad idea since uranium mining in permafrost regions have never been done in Canada.
- The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor activities, to ensure the health of the land, animals and people are safe. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.

Do	you support tl	ne project	proposal?	Yes \sqcap	No ∏	Any additional	comments?
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UNDECIDED. More transparent information from all parties needs to be available to understand to enormity of the issue. Parties include, Government of Canada (Health Canada, INAC, DFO, TC, EC to name a few) Nunavut Government (Environment, ED&T, CG&T, Health & Social Services to name a few), NTI, KIA, IPGs, CLARC's, Hamlet Councils, HTO's, industry, non-industry organizations and residents and beneficiaries of KIA and NLCA and Canadians since the uranium is to be used for peaceful purposes. The whole uranium cycle needs to be addressed and assessed not pieces or parts of the cycle.

Name of pe	erson commenting:	Paula Kigjugalik Hughs	son of	The General Public
Position:	Nunavut Beneficiary	Organization	: NLCA	
Signature:	Paula Kigjugalik H	Tughson Date:	February	18, 2009
			·	

B-22 AREVA Community Liaison Officer

P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Phone: (867) 983-4600 Fax: (867) 983-2594

8. Comment Form Distribution

COMMENT FORM FOR NIRB SCREENINGS

Project Proposal Title: Kiggavik Proje	et			
Proponent: AREVA Resources Canad				
Location: Kivalliq Region				
Comments Due By: February 18, 2009	NIRB #: 09MN003			
K				
Indicate your concerns about the project	proposal below:			
Eno concerns	D traditional uses of land			
☐ water quality	☐ Inuit harvesting activities			
🛘 terrain	() community involvement and consultation			
□ air quality	O local development in the area			
D wildlife and their habitat	D tourism in the area			
C marine mammals and their habitat	Dhuman health issues			
C birds and their habitat	□ other:			
☐ fish and their habitat				
☐ heritage resources in area				
Please describe the concerns indicated a	oove:			
Do you have any suggestions or recommo	ecessary right stops.			
right procedures				
Do you support the project proposal? Yes 2 No 1 Any additional comments?				
Name of person commenting: Wille Position: C. L. O Signature: William Moule	Organization: A REVAI RESOURCES Date: Estimony 14. 2009			