

Ministre des Affaires indiennes et  
du Nord canadien et interlocuteur fédéral  
auprès des Métis et des Indiens non inscrits



Minister of Indian Affairs and  
Northern Development and Federal Interlocutor  
for Métis and Non-Status Indians

Ottawa, Canada K1A 0H4

FEB 23 2010

Mr. Lucassie Arragutainaq  
Chair  
Nunavut Impact Review Board  
PO Box 1360  
CAMBRIDGE BAY NU X0B 0C0



Dear Mr. Arragutainaq:

Thank you for your Screening Decision Report (Report) of March 13, 2009, regarding Areva Resources Canada's Kiggavik Project Proposal (Proposal). As noted in its Report, the Nunavut Impact Review Board (Board) has determined that the size and nature of the Proposal indicates that it may have significant adverse effects on the ecosystem; it may have significant adverse socio-economic effects on Northerners; will cause public concern; and involves technological innovations for which the effects are unknown. Accordingly, the Board has determined that the Proposal requires a review under Part 5 or 6 of Article 12 of the Nunavut Land Claims Agreement (Agreement).

I have reviewed the Report and I concur with the Board's determination. Pursuant to section 12.4.7(b), I am referring the Proposal to the Board for a review under Article 12, Part 5 of the Agreement. The federal departments of Fisheries and Oceans Canada, Natural Resources Canada, and Transport Canada also have jurisdictional responsibility for authorizing the Proposal to proceed, and concur that a Part 5 review is appropriate.

As the Board notes in its Report, there are a number of issues relating to the Proposal that require further consideration. I agree that these are all important issues. Pursuant to section 12.5.1 of the Agreement, I would like to highlight specific issues for the Board to pay particular attention to during the course of its review. Areva's proposal to use technological innovations previously untested in the Arctic introduces a measure of uncertainty regarding their potential impacts. My primary concerns relate to the use of

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new technology for mine design, and operation and tailings containment. It is essential that these aspects of the Proposal are thoroughly assessed in order to ensure impact predictions to surface and ground water are accurate.

Given that this is the second major project to be proposed near the hamlet of Baker Lake, I would also like to highlight the importance of a thorough cumulative impacts assessment. Cumulative impacts of particular concern include those to caribou, caribou migration and calving grounds, and related socio-economic impacts to Baker Lake and other impacted communities.

I note that Areva has made reference to the transportation of yellowcake to southern Canada and that the Board has identified this as an issue of concern in its Report. I trust that the Board will scope the Proposal according to its jurisdictional authority.

As the Board has determined that the Proposal has and will continue to raise significant public concern, it is important that meaningful participation of the public is enabled and supported. In order to ensure these concerns are considered, I would encourage the Board to conduct its review of the Proposal in a manner that will facilitate thorough public consultation. The very technical nature of some of the issues that have raised concern may, for example, warrant additional community information sessions. I agree with the Board's comment that intervenor funding may be necessary to allow affected parties to participate fully in the review. In light of this, I would ask the Board to provide advice regarding the identification of intervenors whose contribution is important for the review, and the level of funding required to facilitate their participation.

I appreciate the work the Board has done in screening the Proposal and I look forward to reviewing the Final Hearing Report upon completion of the Board's review.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chuck Strahl', with a stylized flourish at the end.

Chuck Strahl