



NIRB File No. 09MN003

March 11, 2011

Albert Thorassie
Chairperson
Beverly and Qamanirjuaq Caribou Management Board
P.O. Box 629
Stonewall, MB, R0C 2Z0

Sent via fax: (204) 684-2450

Re: NIRB Review of AREVA Resources Canada Inc.'s "Kiggavik" Project Proposal

Dear Albert Thorassie:

On behalf of the Nunavut Impact Review Board (NIRB or Board), I would like to take this opportunity to respond to correspondence received recently from the Beverly and Qamanirjuaq Caribou Management Board¹ (BQCMB) regarding the NIRB's ongoing review of AREVA Resources Canada Inc.'s Kiggavik project proposal. The NIRB wishes to thank the BQCMB for providing clarification on its intended role in this ongoing review, as well as to respond to the input received regarding the timeframe for the second phase of the NIRB's review process, specifically the time made available for submission of information requests.

Once the NIRB accepts a *Draft* Environmental Impact Statement (*Draft* EIS) submission from the Proponent and commences the technical review period, 30 days are typically allocated for the submission of information requests. These requests for information are meant to identify significant information gaps within the *Draft* EIS which need to be addressed so that parties can develop their respective technical review comments. The BQCMB has indicated it believes this 30 day period would be insufficient for the review of the Kiggavik proposal, given the time provided for the review of the *Draft* EIS Guidelines (70 days), the anticipated size of a future *Draft* EIS submission, and the time that might be taken by the Proponent to supply digital copies of the *Draft* EIS to reviewers. Also, having received participant funding to conduct community meetings, the BQCMB has expressed concern that 30 days would not allow adequate time for it to hold community meetings which would assist in the development of its information requests.

To clarify, the 30 days provided within the NIRB's review timeline for the provision of information requests by parties is *not* meant to include time taken by the Proponent to supply digital copies of the *Draft* EIS to reviewers. Prior to issuing *Final* EIS Guidelines for the Kiggavik review, the NIRB will canvas all parties on its distribution list to determine which

¹ Letter from the BQCMB to NIRB Re Comments on NIRB Kiggavik Review Process (received February 2, 2011)

reviewers would like to have copies of a future *Draft* EIS submission sent to them directly by the Proponent. Following acceptance of a *Draft* EIS by the NIRB and prior to commencing the 30 day information request period, the NIRB ensures that the full *Draft* EIS is made available to the public through the Board's online registry at <http://ftp.nirb.ca>. Therefore, all parties will have access to this document for the full technical review period.

Having received participant funding to conduct community meetings, the BQCMB has expressed concern that 30 days would not allow adequate time to hold meetings which might assist in the development of its information requests. The NIRB notes that the anticipated review timeline for the Kiggavik project proposal has been communicated consistently to all parties since the commencement of this review, including within the guidance provided to those parties which applied for participant funding. While 70 days were provided for the review of the *Draft* EIS Guidelines for the Kiggavik project proposal and, comparatively, 30 days are typically provided for the submission of information requests during the technical review of a *Draft* EIS, the objectives of both steps make a direct comparison difficult. Additional time was provided for the review of the *Draft* EIS Guidelines for the Kiggavik project proposal to account for the holiday season and the importance of providing clear guidance for developing a comprehensive *Draft* EIS which, it is hoped, will limit the need for extensive information requests during the technical review period.

The NIRB has an obligation to adhere as closely as possible to its published review timeline² and expects that all parties will endeavour to structure their participation in the review process in accordance with the timelines set by the Board. Once a *Draft* EIS submission has been received and accepted by the NIRB for the review of the Kiggavik project, the Board will give consideration to the relative size and complexity of the submission when determining whether additional time for the technical review period and submission of information requests may be warranted.

In closing, the Board looks forward to the continued participation of the BQCMB in the NIRB's ongoing review of the Kiggavik project proposal and appreciates the opportunity to provide clarification on the process moving forward.

If you have any questions or require additional clarification, please contact Sophia Granchinho, Technical Advisor, at sgranchinho@nirb.ca or (867) 793-4633.

Sincerely,



Ryan Barry
Director, Technical Services

cc: Ross Thompson, BQCMB
Leslie Wakelyn, BQCMB
Kiggavik Distribution List

² NIRB Guide 5: Guide to the NIRB Review Process, Appendix A