



NIRB File No. 09MN003

April 7, 2011

Richard Aksawnee
President, Baker Lake HTO
P.O Box 255
Baker Lake, NU
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Sent via email, regular mail and fax: bakerhto@qiniq.com and (867) 793-2334

Re: Baker Lake HTO comments regarding the NIRB's review of AREVA Resources Canada Inc.'s Kiggavik project proposal

Dear Richard Aksawnee:

The Nunavut Impact Review Board (NIRB or Board) would like to thank the Baker Lake Hunters and Trappers Organization (HTO) for its continued contribution to the NIRB's ongoing review of AREVA Resources Canada Inc.'s Kiggavik project proposal. As indicated by the Board's staff during the NIRB's Environmental Impact Statement (EIS) Guidelines development workshop held in Baker Lake, March 22 – 24, 2011, the concerns and recommendations presented by the HTO at the workshop and as provided in written form¹ were recently presented to the Board for our consideration and response. On behalf of the Board, I would like to take this opportunity to respond to the HTO's concerns and recommendations.

One of the central concerns raised by the HTO is that, to date, the Elders and other members of the HTO have not had the opportunity to absorb and process what is being proposed by AREVA Resources Canada Inc., nor to understand the process by which the project proposal is being reviewed. The NIRB is therefore prepared to host a focused information session specifically designed for the HTO membership to address these issues. This information session would be supported by written presentation materials that would be translated into Inuktitut and provided to the HTO in advance of the session. The NIRB proposes to provide an overview of the primary content of the EIS Guidelines, along with a clear outline regarding the remaining steps of the review process for the Kiggavik project proposal. The NIRB could, for the benefit of the HTO membership, identify the current and future opportunities for the HTO and community members to make their concerns about the project proposal known, and request information on the proposal through the NIRB review process. In addition, at this information session the NIRB could also make available the information materials that have been developed by the NIRB for

¹ Preliminary Report on the Inuit Qaujimatuganit Regarding Areva's "Road Options", prepared for the Baker Lake Hunters and Trappers Organization by JT Consulting (received on March 23, 2011)

the public regarding uranium, radiation and related concepts and issues (available in Inuktitut and English).

To arrange a time for a HTO-specific information session regarding the ongoing review of the Kiggavik project, I would encourage you to contact the NIRB's Executive Director, Stephanie Autut, at sautut@nirb.ca or (867) 983-4612. The NIRB staff will work with the HTO to identify a mutually acceptable time and arrange the necessary logistics.

The Board is also aware of the HTO's recommendation that NIRB ensure that Inuit are informed as to which of the concerns and opinions they have expressed will be dealt with and will be incorporated into the review of the Kiggavik project proposal. More specifically, the HTO recommended that the NIRB fully implement the requests made by the HTO in its comments on the *Revised Draft* EIS Guidelines for the review of the Kiggavik project. I want to assure you that as an Institution of Public Government created through the Nunavut Land Claims Agreement, the NIRB places great value on transparency and accountability throughout its processes, and as such, the NIRB has committed to continue providing feedback to all parties, including the HTO, regarding which comments and advice have been incorporated into the EIS Guidelines for the Kiggavik review. In addition, where the NIRB has not incorporated comments and advice into the EIS Guidelines, the NIRB will provide to all parties the supporting rationale for its decision not to incorporate the comments into the EIS Guidelines.

With respect to the HTO's suggestions regarding providing sufficient public notice of meetings and meaningful Inuktitut translations of materials, the Board is bound by the NIRB's Rules of Procedures, to provide adequate notification to the public in advance of its community meetings in order to promote awareness and encourage attendance, and we have endeavoured to do so for the previous scoping meetings and the more recent workshop in Baker Lake. The Board also recognizes the importance of providing fully translated materials and simultaneous interpretation at all of its public meetings, and this is our standard practice. When possible the NIRB will also make meeting materials available in advance of its public meetings, to ensure that parties have as much time as possible to prepare and become involved in the process. As the Board's staff indicated at the workshop, the NIRB recognizes that there are currently some significant limitations with providing meaningful translations for much of the technical terminology associated with the Kiggavik project proposal, but the NIRB is working with the appropriate language authorities and other parties to address these limitations. We are optimistic that progress in developing a glossary of technical terms is being made.

The Board recognizes that the HTO has recommended slowing down the review process to allow for more meaningful participation by hunters and Elders. In response, I must point out that, while the NIRB has an obligation to promote public participation, it must also adhere as closely as possible to its published review timeline.² To date, the review timeline for the Kiggavik project proposal has been extended considerably to allow for full and meaningful participation by the public, including those parties granted participant funding. As the Board prepares to issue the EIS Guidelines for this project proposal, the review process has now been ongoing for just over one year. The actual submission of the Environmental Impact Statement from the proponent which will form the basis of the NIRB's review of the ecosystemic and socio-economic impacts of this proposal may not occur for a few years. Consequently, there will be

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

time and many opportunities for the HTO and all parties to continue to participate in the review process moving forward.

In closing, I want to thank the HTO for its constructive feedback and providing valuable advice to the NIRB in our review to date. The NIRB looks forward to working with your organization to ensure that the HTO continues to contribute effectively to the review of the Kiggavik project proposal.

If you have any further questions or concerns regarding the ongoing review of the Kiggavik project, please contact the NIRB's Executive Director, Stephanie Autut, at sautut@nirb.ca or (867) 983-4612.

Sincerely,



Lucassie Arragutainaq
Chairperson
Nunavut Impact Review Board

cc: Kiggavik Distribution List