



**NIRB File No. 09MN003**

October 21, 2011

Elisapee Sheutiapik  
President  
Pauktuutit Inuit Women of Canada  
520-1 Nicholas Street  
Ottawa, ON K1N 7B7

*Sent via email:* [esheutiapik@pauktuutit.ca](mailto:esheutiapik@pauktuutit.ca)

**Re: Potential Impacts of Resource Extraction on Inuit Women**

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Dear Elisapee Sheutiapik:

I would like to thank you for your recent correspondence to the Nunavut Impact Review Board (NIRB or Board) outlining the concerns of Pauktuutit Inuit Women of Canada (Pauktuutit) regarding the potential impacts of resource extraction on Inuit women. The Board appreciates the comments and concerns expressed by Pauktuutit as the development of meaningful, consistent and timely environmental reviews is a constantly evolving process which is continually improved by active participation of the public and the parties to the review.

I would like to provide you with a brief update on the current status of the Board's review of AREVA Resources Canada Inc.'s (AREVA or the Proponent) "Kiggavik" project proposal; relevant recent NIRB correspondence and a current review process map have also been attached for your information. Following screening of the Kiggavik project proposal by the Board, on March 13, 2009 the NIRB recommended to the Minister of Indian and Northern Affairs Canada (now the Minister of Aboriginal Affairs and Northern Development) that the proposal required review pursuant to Part 5 or 6, Article 12 of the Nunavut Land Claims Agreement (NLCA). On March 2, 2010 the Minister accepted the NIRB's report and referred the Kiggavik proposal to the Board for review under Part 5 of NLCA Article 12. Following the soliciting of requests for, and subsequent awarding of, participant funding for this review, the NIRB conducted extensive scoping and guidelines development, issuing final guidelines for the preparation of an Environmental Impact Statement (EIS Guidelines) to the Proponent on May 3, 2011.

Recently, AREVA has notified the Board that it intends to submit its Draft EIS for the NIRB's consideration on December 21, 2011. Once the Draft EIS is accepted by the Board, there will be time given to the parties and the public to review and comment on any deficiencies, make additional information requests and identify information gaps prior to the submission of the Final EIS and much in advance of proceeding to a Final Hearing for this file.


Given that the EIS Guidelines have previously been finalized and issued to the Proponent and a Draft EIS submission is pending, it would be difficult for the NIRB to accommodate Pauktuutit's request to revise the EIS Guidelines at this time. However, while the EIS Guidelines provide guidance to the proponent and the parties regarding the content to be presented in the Draft EIS and covered in the review, proponents can and often do, in response to public comments and concerns, develop information that goes beyond the parameters set out in the EIS Guidelines based on their agreements and commitments to parties and affected communities. To that end, the NIRB encourages proponents and participants to meet outside the review process to work together to identify gaps, develop new approaches and determine how best to provide meaningful information in the review. The NIRB would encourage Pauktuutit to engage with AREVA and other participants in the Kiggavik review to undertake this kind of collaborative work.

While the NIRB clearly recognizes the importance of the concerns raised by Pauktuutit, I feel it is important to also acknowledge that the scope of the Board's inquiry and decision-making authority into socio-economic impacts that are unrelated to ecosystemic impacts is somewhat limited. Specifically, NLCA Section 12.5.11 makes it clear that when the NIRB issues a determination that is based on an analysis of socio-economic impacts that are not related to ecosystemic impacts, such determinations are received by the Minister as recommendations only and the Minister has no limits on whether they are accepted, rejected or varied by him/her. Although the NIRB recognizes that it is the position of Pauktuutit that the EIS Guidelines for the Kiggavik review are not as detailed and prescriptive as Pauktuutit believes are necessary, I can assure you that other parties to the review have raised some of the fundamental issues identified by the Pauktuutit in its letter and it is the expectation of the NIRB that these will continue to be addressed as the review progresses.

As requested, the Board will post Pauktuutit's correspondence and the NIRB's response to its online public registry for the Kiggavik review and will issue notice to our Kiggavik Distribution List regarding where these documents can be accessed. Additionally, the NIRB will add Pauktuutit ([info@pauktuutit.ca](mailto:info@pauktuutit.ca)) to the Kiggavik Distribution List as well as the distribution lists for the Board's other ongoing reviews and monitoring programs for major development projects; if there are any specific contacts within your organization which might also be appropriate to include, please advise us accordingly.

In closing, please know that the NIRB appreciates receiving your comments and looks forward to further collaboration with Pauktuutit moving forward. If staff within your organization would like to discuss any of the project proposals currently undergoing assessment by the NIRB, I would welcome them to contact our Technical Services department toll free at 1-866-233-3033 or via email at [info@nirb.ca](mailto:info@nirb.ca), where they will be directed to the most appropriate contact person.

Sincerely,



Ryan Barry  
Executive Director  
Nunavut Impact Review Board

cc: Barry McCallum, Manager, AREVA Nunavut Affairs Office  
Erik Madsen, VP Sustainable Development, Health, Safety & Environment, Baffinland Iron Mines Corp.  
Tracy O'Hearn, Executive Director, Pauktuutit Inuit Women of Canada  
Lucille Villaseñor-Caron, Special Projects Manager, Pauktuutit Inuit Women of Canada  
AREVA Distribution List

Enclosed: AREVA Letter to NIRB Re Updated DEIS Submission Date (September 9, 2011)  
NIRB Letter to Kiggavik Distribution Re Updated Review Timeline (July 6, 2011)  
Updated NIRB Review Process Map (September 26, 2011)