



Frederic Guerin
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Re: Results of the NIRB's Conformity Review of AREVA's Draft EIS Submission for the Kiggavik project

On January 3, 2012 the Nunavut Impact Review Board (NIRB or Board) formally acknowledged receipt of AREVA Resources Canada Inc.'s (AREVA or Proponent) Draft Environmental Impact Statement (DEIS) submission for the Kiggavik Project (the Project) and initiated an internal review of the submission for conformity with the EIS Guidelines issued by the Board on May 3, 2011.¹ The NIRB has now completed its conformity review of AREVA's DEIS submission and determined that the DEIS does not conform to the NIRB's EIS Guidelines, as the submission contains deficiencies which must be addressed in order to facilitate an efficient technical review of the document by all parties. Until the deficiencies in the submission as identified by the NIRB in this letter have been addressed and the NIRB subsequently determines that the DEIS conforms with the EIS Guidelines, the technical review of the submission will not commence.

1) **Concordance table:** The NIRB was unable to locate information in the DEIS documents using the concordance table supplied by AREVA in Volume 1, Appendix 1A. Inconsistencies in the format of cross-referencing of DEIS volume/section/page with the

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instructions in the EIS Guidelines complicated the NIRB's conformity review and would unduly complicate the technical review process.

- 2) **Sections do not meet requirements of EIS Guidelines:** Certain sections within the DEIS submission do not address the requirements of EIS Guidelines or contain significant deficiencies in the information provided.
- 3) **Sections may require significant revision:** Certain sections within the DEIS submission may require significant revision and/or the inclusion of additional information in order to meet the expectations of reviewers. While it is possible that some information may be forthcoming at a later date (i.e. Final EIS), there is often no indication in the current document which sections, if any, may be supplemented in future submissions.
- 4) **Sections requiring clarification:** Numerous areas within the DEIS require additional information or clarification in order facilitate the NIRB's conformity review with the EIS Guidelines.

Specific deficiencies in the DEIS submission as identified by the NIRB are highlighted in the enclosed table. Items highlighted in red signify that the section does not appear to meet the requirements of the EIS Guidelines. Items highlighted in purple signify that the section may require significant revision and/or additional information in order to meet with the expectations of reviewers. Finally, items highlighted in yellow signify that the section requires clarification and/or additional information to assist with determining its conformity with the EIS Guidelines.

As outlined above, the format of the concordance table provided within the DEIS submission presented a significant obstacle to the NIRB's conformity review. A revised concordance table is therefore needed and must include the name of the relevant volume/document/appendix where the information can be found as well as both section number(s) and page number(s) as required by Section 4.2 of the NIRB's EIS Guidelines:

"the EIS shall contain a concordance table directing reviewers to the location (document, section, and page number) where specific information addressing the Guidelines and the NIRB's Minimum EIS Requirements may be found."

The NIRB requests that AREVA review the enclosed table and advise the Board of its anticipated submission date for a revised DEIS submission which adequately addresses the identified deficiencies. Upon receipt of a revised DEIS submission, the Board will endeavour to conduct a conformity review of the submission against the EIS Guidelines and the enclosed table within 15 days, and will communicate its determination prior to initiating the technical review period.

In closing, I would invite AREVA to contact Amanda Hanson, NIRB's Director of Technical Services, at (867) 983-4615 or ahanson@nirb.ca to receive any additional clarification regarding the Board's information requirements or the conformity review process which may be required.

Sincerely,



Ryan Barry
Executive Director
Nunavut Impact Review Board

cc: Kiggavik Distribution List

Enclosed: NIRB Conformity Review Table (*January 18, 2012*)