



NIRB File No.: 09MN003

July 13, 2012

Tammy Van Lambalgen
Vice President, Regulatory Affairs & General Counsel
AREVA Resources Canada Inc.
817 – 45th Street West
Saskatoon, SK S7K 3X5

Sent via email: Tammy.VanLambalgen@areva.ca

Re: Information Requests received from Parties regarding AREVA's Draft EIS for the Kiggavik project

Dear Tammy Van Lambalgen:

On May 4, 2012 the Nunavut Impact Review Board (NIRB or Board) initiated the public technical review period for the *Draft* Environmental Impact Statement (DEIS) submitted by AREVA Resources Canada Inc. (AREVA or Proponent) for the Kiggavik project proposal (the Project). During the initial 30 day period the NIRB invited interested parties to submit Information Requests (IR) to the Board on or before June 4, 2012 to facilitate their technical review of the DEIS and the development of technical review comments for this stage of the Review. The deadline for the submission of IRs to the NIRB was later extended to June 29, 2012 at the request of parties.

On or before June 29, 2012 the NIRB received IR submissions from the following parties:

- Kivalliq Inuit Association/Nunavut Tunngavik Inc. (KIA/NTI)
 - 30 IRs directed to the Proponent
- Government of Nunavut (GN):
 - 86 IRs directed to the Proponent
- Aboriginal Affairs and Northern Development Canada (AANDC)
 - 69 IRs directed to the Proponent
- Canadian Nuclear Safety Commission (CNSC)
 - 39 IRs directed to the Proponent
- Environment Canada (EC)
 - 31 IRs directed to the Proponent
- Fisheries and Oceans Canada (DFO)
 - 17 IRs directed to the Proponent
- Health Canada (HC)
 - 12 IRs directed to the Proponent

- Natural Resources Canada (NRCan)
 - 11 IRs directed to the Proponent
- Transport Canada (TC)
 - 8 IRs directed to the Proponent
- Baker Lake HTO (BL HTO)
 - 33 IRs directed to the Proponent
- Beverly and Qamanirjuaq Caribou Management Board (BQCMB)
 - 21 IRs directed to the Proponent
- Canadian Arctic Resources Committee (CARC)
 - 23 IRs directed to the Proponent
- Lutsel K'e Dene First Nation
 - 9 IRs directed to the Proponent
- Nunavummiut Makitaganarngit (NM)
 - 17 IRs directed to the Proponent

All IR submissions are available from the NIRB's online registry at the following link:

<http://ftp.nirb.ca/02-REVIEWS/ACTIVE%20REVIEWS/09MN003-AREVA%20KIGGAVIK/2-REVIEW/07-INFO%20REQUESTS%20%26%20TECH%20REVIEW/02-INFORMATION%20REQUESTS/>.

The Board has completed its review of all IRs received to date and will now forward IRs to the Proponent where it has been determined that IRs appear to be relevant to the current stage of the Review process and are necessary to facilitate parties' technical review of the DEIS and the development of technical review comments. While the majority of requests are directed to the Proponent, some IRs request responses from other parties participating in the Review process. The NIRB will forward these IRs to the attention of parties under separate cover, inviting those parties to also provide responses to these submissions.

Following a review of parties' IR submissions to the Board, the NIRB is also providing twenty (20) additional Information Requests directed to AREVA for its consideration and response (see Appendix A). The NIRB's development of these IRs considered issues which do not appear to have been raised by other parties through IR submissions but which warrant that additional information or clarification be provided by AREVA.

A small number of the IRs contained within parties' submissions appear to be somewhat outside the scope of an Information Request and/or what is required for this phase of the Review process and might therefore be more appropriately addressed through technical review comment submissions for this stage in the Review. While all IRs are being forwarded to the Proponent's attention, at this time the NIRB is not directing the Proponent to address the specific requests as identified in Appendix B within its response to IRs (IR Response Package). Where several submissions have raised questions or issues related to the NIRB's Review Process, the NIRB will respond to these items under separate cover.

The NIRB notes that a number of parties identified significant concerns with the overall quality of the Proponent's DEIS submission, including issues associated with the organization of the

document, the lack of incorporation of Inuit Qaujimajatuqangit, the number of alternatives still under consideration and the need for better definition of the project scope, as well as various technical assessments requiring additional baseline data collection, significant revision and/or reinterpretation. While the Board expects that the technical review of any DEIS submission will identify deficiencies, the NIRB recognizes that a substantial effort will be required by AREVA to adequately address these concerns to the degree necessary to facilitate the remainder of the technical review period. Where information requested cannot be made available at the present time, the Proponent should clearly identify when it will be forthcoming and whether it intends to include the information within its Final EIS submission. When preparing its IR Response Package, the NIRB recommends that the Proponent consult with parties as necessary to ensure the information being made available will meet the expectations of reviewers moving forward. Furthermore, where multiple IRs request the same or similar information, the Proponent is advised to provide one response that will adequately address the requests and avoids unnecessary duplication.

Given the volume of IRs submitted, the Board is requesting that the Proponent review the submissions and supply the NIRB with an indication of an anticipated date for submission of its IR Response Package, on or before **Tuesday, July 31, 2012**. The NIRB will also provide other parties from whom a response has been requested with separate correspondence requesting that they also provide the NIRB with an indication regarding their readiness or ability to respond to IRs.

Following the submission the Proponent's response to IRs, the NIRB will host a meeting of technical experts where the NIRB staff will facilitate discussions between the Proponent, responsible authorities and interested parties with the objective of addressing and/or resolving outstanding technical issues associated with the Proponent's DEIS, as identified through parties' technical review comment submissions. A draft meeting agenda will be circulated as far in advance as possible to allow for planning and preparation of all parties, as well as input into the items scheduled for discussion.

Please direct all forthcoming submissions to the NIRB at info@nirb.ca or by fax at (867) 983-2594.

If you have any questions or require further clarification regarding the NIRB's Review process, please contact Sophia Granchinho, Technical Advisor, at (867) 793-4633 or sgranchinho@nirb.ca.

Sincerely,



Amanda Hanson
Director, Technical Services
Nunavut Impact Review Board

cc: Diane Martens, AREVA Resources Canada
Kiggavik Distribution List

Attached: Appendix A: NIRB Information Requests to AREVA Resources Canada Inc. for the Draft
Environmental Impact Statement for the Kiggavik Project
Appendix B: Information Requests identified by the NIRB as not requiring a response

APPENDIX A:
**NIRB INFORMATION REQUESTS TO AREVA RESOURCES CANADA INC. FOR THE DRAFT
ENVIRONMENTAL IMPACT STATEMENT FOR THE KIGGAVIK PROJECT**

Information Request #1: Project Description

Reference: Volumes 1 to 10

Issue/Comment:

It was noted that there are some inconsistencies in the project description throughout the DEIS volumes. For example:

- 1) The life of the mine is identified as 12 years on page 2 and 14 years on page 24 in Volume 1;
- 2) Reference to the transportation of yellowcake via barge in appendices (Appendix 2K, Section 2.1.1);
- 3) Reference to storage of yellowcake at the Baker Lake Storage facility (Volume 9, part 1, page no. viii); and
- 4) Figures still include the proposed south all-weather road (Figure 6.3-1, Volume 1).

Without a consistent project description within the DEIS, it is difficult to determine what components remain a part of the project proposal and which have been removed from the Proponent's scope of proposed activities and alternatives.

Request:

1. Please confirm the following:
 - a. Life of mine
 - b. Transportation and storage of yellow-cake
 - c. Preferred routing and description of all ground transportation roads proposed
2. Please submit a revised project description which provides clarification with respect to the inconsistencies as outlined above.

Information Request #2: Valued Components and Key Indicators

Reference: Volume 1

Issue/Comment:

The valued ecosystemic and socio-economic components and key indicators that were selected are not listed or referred to in Volume 1 of the DEIS.

Without a complete listing of the valued ecosystemic and socio-economic components and key indicators selected, it may be difficult for reviewers to determine what was assessed in the DEIS and what is proposed to be monitored in order to determine potential impacts.

Request:

1. Please provide a table that lists the valued ecosystemic and socio-economic components and key indicators that have been selected for the Kiggavik project.

Information Request #3: Relative importance of each broad category as summarized during community meetings

Reference: Volume 1; Section 5.3, Figure 5.3-1

Issue/Comment:

Figure 5.3-1 does not include a reference to comments received against (or not in favour) of the Kiggavik project. The figure representation appears to indicate that all comments received from the community members were in favour of the project.

It would be useful to the reader to be able to compare comments received from community members with a clear indication of comments received for and against the project.

Request:

1. Please indicate what percentage of total comments received were against (or not in favour) of the Kiggavik project.

Information Request #4: Too much information provided in figures

Reference: Volume 1; Figure 6.3-1 and Figure 6.3-2 (IQ Figures)

Issue/Comment:

Too much information is provided in the figures leading to confusion to the reader on what is being presented by the Proponent. For example, figures 6.3-1 and 6.3-2 show several starting routes for the proposed north all-weather road (the lines in red) some originating from the Baker Lake airport. Further, it appears that some human travel routes were not identified or included within Figure 6.3-2. Some routes that appear to be missing include snow machine travel routes to the east and the west of Baker Lake, All-Terrain Vehicle travel routes to the east of Baker Lake and boat routes within Baker Lake itself.

In order to assess the potential effects of the project on human travel routes and on Inuit harvesting, it is important that the discussions within the DEIS include information on all human travel routes and traditional usage of the areas.

Request:

1. Please confirm the preferred routing and description of all ground transportation roads proposed.
2. Please clarify why some human travel routes around Baker Lake were not included within the assessment.

Information Request #5: Reference to new technology

Reference: Volume 1; Section 2.3.1.2 (p. 29)

Issue/Comment:

The DEIS refers to the application of a newly developed jet-boring technology deployed at the surface to extract mineralization beneath the Main Zone open pit. It is not clear within the DEIS whether AREVA proposes to utilize this new technology for the Kiggavik project, or whether this technology has been used in the Arctic environment or at other northern mines and finally, the difficulty that may apply to its utilization in an Arctic environment.

The potential use of new technology or technologies that have not been tested in Arctic conditions must be clearly identified by AREVA and include supporting information on how the technology would be utilized or adapted for the Kiggavik project.

Request:

1. Please provide clarification on whether AREVA is considering the use of jet-boring technology for the Kiggavik project.
2. If utilization of this technology is being considered, please clarify what experience AREVA or other users have with this technology, specifically in the Arctic environment and how it has informed AREVA's selection and planned procedures.

Information Request #6: Environmental Protection Plan

Reference: Volume 2; Section 17 (pp. 17-1 to 17-7)
Appendix 2T

Issue/Comment:

Sections within Volume 2 and Appendix 2T discuss the generalities of an Environmental Protection Framework for the project, but there is no direct reference to the Environmental Protection Plan (EPP) as referred by the NIRB's EIS Guidelines. AREVA is reminded that it is expected to clearly demonstrate how it is meeting the information requirements as established by the NIRB's EIS Guidelines issued for the preparation of an EIS.

In the resubmitted conformity table, AREVA gives the rationale that "Further details of construction activities associated with the Project will be known during the licensing/permitting stage, allowing for EPP's to be developed to address specific environmental issues associated with the activity". This provides clarification on the fact that AREVA expects to address relevant plans at some later stage in the project development. However, the NIRB's EIS Guidelines specifically requested that "...the Proponent, based on its impact predictions for identified VECs and VSECs, prepare an EPP in accordance with its EMP...". All discussion currently in the DEIS on mitigation measures is done in reference to either the Environmental Management Plan (EMP) or Environmental Code of Practice (ECOP) and does not specify if or when plans in addition to the EMP, such as the requested EPP, will be submitted. As AREVA has used other names for items directly asked for in the Guidelines (such as RAA for RSA),

AREVA may choose to give this requested EPP another name, but it is not currently noted in the document that this material would be submitted as an “EPP” or as labelled by another name.

Request:

1. Please clarify whether or not an Environmental Protection Plan has been provided as part of the DEIS under another name.
2. If an EPP was not provided, please indicate when this document will be provided for review.

Information Request #7: Marine Shipping Plan

Reference: Volume 2; Section 10.3.2 (p. 10-5)

Issue/Comment:

The Proponent indicated that the proposed Marine Shipping Plan (MSP) was based on a conservative operating season estimate of 60 days; however, there is no indication on the estimated number or rate of return trips that would be conducted by the barges through Chesterfield Inlet to Baker Lake. Any potential increase in traffic through Chesterfield Inlet and Baker Lake is relevant in understanding and predicting the potential effects this traffic may have on the marine environment and Inuit harvesting activities. This discussion is also expected to include reference to the current traffic in the area (including that related to the Meadowbank Gold Mine, community sealift, local business, and community resident and harvesting-related travel) and should discuss the potential for cumulative impacts to the marine environment and impacts to hunting/fishing activities. Specifically, no discussion was provided regarding how increased barge traffic may impact Inuit harvesting activities in Baker Lake and Chesterfield Inlet.

Request:

1. Please clarify the planned number or rate of return trips (per day/week/month) that would be conducted by the barges through Chesterfield Inlet to Baker Lake.

Information Request #8: Winter Road Report

Reference: Volume 2
Appendix 2K

Issue/Comment:

The winter road report contained in Appendix 2 K indicates that two potential routes for a winter road with minor alternative segments are being considered for the Kiggavik project. The two alternatives considered are a northern route option which crosses the Thelon River and a southern route option which follows a chain of lakes south of the Thelon River. The analysis and discussion in this appendix focusses mainly on the southern winter route with minimal or no discussion on the northern winter route. Further, it appears that minimal to no data were collected for the northern winter route option (e.g. bathymetry profiles) and the report indicates that additional information would be required for the northern winter route alternative to develop

operating procedures. Figure 2.1.1 also does not include the northern winter route option but includes the southern all-weather road option which has been removed from the project proposal. The DEIS identifies that the preferred transportation option includes having a winter road, with the option being either a northern winter route or southern winter route. Without sufficient information collected on the northern winter route option, it is difficult to determine if this route could be used by AREVA as a preferred transportation alternative and to determine the potential impacts that use of this route may have to the environment.

Request:

1. Please clarify why the northern winter route option was not included in the analyses and discussion as one of the preferred winter route options.
2. If additional information is required to conduct the analysis required to determine the feasibility of this route, when will this information be collected and be made available to reviewers?

Information Request #9: Barge emissions during construction phase for air quality assessment

Reference: Volume 2; Section 4.5
Volume 4, Part A; Section 6.1.2.1 (p. 6.3)

Issue/Comment:

The assessment for ambient air quality did not account for potential gaseous emissions (i.e., NO_x, SO₂ and fine particulate matter) generated by barges and marine vessels, the Dock and Storage Facility and the use of the winter road during the construction phase. The assessment should include all possible emission sources of ambient constituents of potential concern (COPCs) for each phase of the project.

Request:

1. Please discuss why potential emissions generated by the use of barge and marine vessels, the Baker Lake dock and storage facility and winter road were not included in the assessment for air quality.
2. Please re-evaluate assumptions used in the air quality assessment and revise to include all the possible emission sources of COPCs as listed above, including the construction phase of the project.

Information Request #10: Radon concentrations at closure

Reference: Volume 4, Part A; Section 6.1.4.3

Issue/Comment:

The assessment indicates that radon concentrations are predicted to be higher at final closure at the Judge Sissons Lake Cabin (0.43 Bq/m³; Table 6.1-13) compared to the operation phase (0.29 Bq/m³; see Table 6.1-7). It is not clear why radon concentrations would not be decreasing at final closure compared to the operation phase.

Request:

1. Please provide clarification as to why radon concentrations at the Judge Sissons Lake Cabin are predicted to be higher at final closure compared to during the operations phase.

Information Request #11: Noise level impacts

Reference: Volume 4, Part B; Section 4.4.1

Issue/Comment:

The discussion on impacts of increased noise levels from project activities appears to focus on the human health effects to residential areas of Baker Lake and at the semi-permanent hunting camps surrounding the mine development area. The assessment of noise level impacts within the DEIS did not include a discussion on potential impacts to employees at site.

Request:

1. Please clarify why the assessment within the DEIS did not give consideration to the potential for noise levels to have human health effects on the employees at site.

Information Request #12: Assessment of change in noise - other options

Reference: Volume 4, Part B; Section 6.2

Issue/Comment:

The DEIS does not discuss the potential noise and associated disturbance or other impacts from the construction and use of the proposed north all-weather road or the north winter road option on cabins located within that area or on other recreational users that may frequent the area. The DEIS also indicates that the closest receptor for the alternate dock sites (#2 and #3) is greater than 6 kilometres (km) away and is located in Baker Lake. The DEIS does not give consideration to the presence of cabins or other recreational users that may frequent areas located near these alternate dock sites and within the 6 km range.

Request:

1. Please indicate at what range any cabins or other recreational users are located near these proposed activities and why these were not included in the assessment.

Information Request #13: Control or reference stations

Reference: Volume 5
Appendix 5M

Issue/Comment:

Sections within Volume 5 and Appendix 5M of the DEIS discuss the generalities of the Aquatic Effects Monitoring Plan but no details were provided on the selection of control or reference waterbodies that would be used for the proposed monitoring program. The only referral to a reference site was Judge Sissons Lake where it is proposed to use areas within the lake as both a

reference area and an exposure area for the environmental effects monitoring (EEM) program (Table 6.0-1, Appendix 5M). It is unclear how Judge Sissons could be used as a reference lake when effluent will be discharged into the lake at two locations (one from the Kiggavik site and one from the Sissons site).

Control stations or reference sites should be selected as soon as possible to ensure that baseline data are collected in a manner that allows for results to be compared to the potentially affected sites and to ensure that these reference sites are of similar order to the potentially impacted sites.

Request:

1. Please clarify which waterbodies will be used as control or reference sites for the aquatic effects monitoring program and Environmental Effects Monitoring program?
2. Please clarify why Judge Sissons Lake is being used as both a reference and exposure site? Further, please clarify where the reference site would be located within the Judge Sissons Lake?

Information Request #14: Aquatic Baseline Sampling Program and Figures

Reference: Volume 5; Figures 5.3-1 and 5.3-2
Appendix 5C, Part 2

Issue/Comment:

Figures 5.3-1, 5.3-2, X.I-1 and X.I-2 appear to indicate that the data were collected at each sampling location for each year (2007 – 2010). The DEIS indicates however, that samples were collected randomly each year and within each season. Further, sampling locations represented in the figures do not represent the true locations of where data were collected (e.g. Figure 5.3-1 indicates that one location was sampled for Judge Sissons, when in fact nine locations were sampled for aquatic data). The figures provided should include the actual locations of the sampling stations to assist the reviewer.

Figures 5.3-3 and X.I-3 do not provide a legend that describes the type of aquatic samples collected at each station within Baker Lake (e.g. water quality, limnology, etc.). Further, Figure X.I-3 does not provide sufficient detail of the layout of Baker Lake and it is suggested that Figure 5.3-3 be used instead.

Request:

1. Please update the figures in the Aquatic Environment section to include all sampling locations and to be consistent with the tables presented in the DEIS.
2. Please provide a map of Baker Lake that includes a description of which aquatic samples were collected at each station.

Information Request #15: Two airstrips at the Kiggavik site

Reference: Appendix 5C, Part 3; Figures X-IX-1a to X-IX-3a
Appendix 2A

Issue/Comment:

The figures in Appendix 5C show two proposed airstrips, one south of Pointer Lake and one south of Siamese Lake. It is not clear to the reviewer why two airstrips are being presented in these figures as the project proposal indicated that the airstrip would be constructed south of the Kiggavik site with a temporary ice airstrip on Pointer Lake that may also be used for materials and personnel transport during the construction phase. The alternative section in the DEIS discusses the Drumlin airstrip as an alternative but the sensitivity analysis and raw data indicate that Pointer Lake is the most likely and preferred alternative.

Request:

1. Did the assessment for aquatic habitat and fish distribution include both airstrips?
2. If yes, please provide rationale for inclusion of both airstrips.

Information Request #16: Baker Lake Dock Facilities

Reference: Volume 2; Section 10.3.5
Appendix 2A; Section 12
Volume 5; Section 5.5.5.2.5
Appendix 5C, Part 1; Section 4.2.2.3.1 and Section 6.2.2.3.2
Appendix 5C, Part 2; Table X.IV-5

Issue/Comment:

Within the project proposal and alternative analysis section of the DEIS, the preferred option for the proposed Baker Lake Facility was identified as Site #1, however within Volume 5 of the DEIS, Site #2 was referred to as being the preferred option (noting that it had a steep slope close to shore making it well suited for docking facilities and vessel traffic). The reviewer is unclear as to which dock site is the preferred option.

Further, with the exception of figures, no raw data for bathymetry and limnology surveys at the five Baker Lake stations were provided in the DEIS.

Request:

1. Please clarify which site is the preferred location for the Baker Lake Dock Facility.

Information Request #17: Aquatic Sampling Program

Reference: Volume 5

Issue/Comment:

The aquatic baseline report provided information on the existing aquatic environment that may be affected directly or indirectly by the project. Many of the waterbodies were sampled for aquatic baseline data a minimum of two times, however some lakes and streams were only sampled once and some not at all. No explanation was provided in the discussion as to why some of the waterbodies were not included in the assessment or why they were only sampled once.

Further, the DEIS identified that fish were not found in the upper tributary to the northeast inflow of Pointer Lake but noted that the survey was only done in one season (p. 5-67).

Comprehensive baseline data collection is required to support assessment of the potential project impacts and in the development of a robust monitoring program.

Request:

1. Please provide clarification as to why certain waterbodies were not sampled or were sampled only once for the aquatic baseline program.
2. Please confirm whether any benthic data were collected in 2010.

Information Request #18: Ranking of incineration of burnable refuse and wastes

Reference: Volume 6; Section 5.6, Table 5.6-1; Section 8.1, Table 8.1-1; Section 9.1, Table 9.1-1

Issue/Comment:

The ranking of incineration of burnable refuse and wastes does not appear to be consistent throughout Volume 6. Table 5.6-1 ranks the interaction of waste incineration and disposal during construction for soils and vegetation as 1. The same ranking was given for the interaction of incineration and handling of burnables during construction for soils and vegetation. However, in the discussion that follows under Air Emissions (p. 5-13), the Proponent suggest that burnable refuse and wastes are anticipated to produce large quantities of air emissions and will likely operate for extended periods of time during the operation phase of the project. These project activities were ranked as 2 and were carried forward into the effects assessment. There is no reference in the text to which section of Table 5.6-1 this is linked to and why there is a difference with ranking as presented in the table. In the discussion of Waste Management (p. 5-14), the DEIS provides a discussion on how waste products would be handled and suggests that burnable wastes would likely be incinerated while sewage would be treated prior to discharge. The residual effects from these waste management practices on soils and vegetation are anticipated to be negligible and the interaction is ranked as 1 and was not carried forward for further assessment.

The effects assessment for soils and vegetation rank the environmental effects as 2 for changes in soil quality and changes in vegetation quality from the incineration and handling of burnables.

Requests:

1. Please clarify which ranking was applied for the interaction of incineration and handling of burnable refuse on soils and vegetation. If different rankings were applied under different circumstances, please provide clarification on why this was done.
2. Please provide clarification on how ranking for the interaction was determined for the incineration of burnable refuse and wastes for soils and vegetation.

Information Request #19: Clarification on listed species

Reference: Volume 6; Section 6.3.1 (p. 6-14)

Issue/Comment:

The DEIS refers to listed species as follows:

“Field surveys completed between 1979 and 2009 within the Kiggavik area identified 170 vascular plant species, 21 bryophyte species and 75 lichen species. During the 2008/2009 vegetation baseline surveys, 88 vascular plants and 20 lichen species were identified within the RAA. No listed species were observed within the mine LAA, road LAAs or RAA.”

It is not clear as to what listed species are being referred to.

Request:

1. Please clarify what is meant by “listed species” within the DEIS.

Information Request #20: Transportation Risk Assessment

Reference: Appendix 10A; Section 5.2.3.2

Issue/Comment:

The scenario for release of yellowcake on land and subsequent exposure of terrestrial wildlife does not appear to consider a winter accident scenario or on-snow/on-ice dispersal options.

In addition, this section of the DEIS refers the reader to “Section 0” for the pathways analysis. This is an incorrect or incomplete reference.

Request:

1. Please provide clarification as to why certain scenario options were not included in the accident dispersion calculation and potential remediation response time.
2. Please provide the correct reference for the pathway analysis.

APPENDIX B:
INFORMATION REQUESTS IDENTIFIED BY THE NIRB AS NOT REQUIRING A RESPONSE

In the table below the NIRB has attempted to identify those Information Requests (IRs) which do not appear to meet the criteria to qualify as an IR required for the development of technical review comments as part of this stage of the Review for the Kiggavik project proposal. Generally, each of the following items appeared to be either: editorial comments on content; issues more appropriately addressed through technical review comments; requests for data to facilitate independent analysis; or it was unclear to the NIRB how the IR in question would facilitate development of technical review comments (e.g. comments on items outside of the scope of the NIRB's Review).

While the Proponent will not be explicitly required to address the following items within its IR Response Package, the NIRB strongly recommends that AREVA thoroughly review each item and make its own determination regarding the need for, or ability to, provide an appropriate response.

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
Kivalliq Inuit Association / Nunavut Tunngavik Inc.				
KIA/NTI	1	AREVA	The Proponent should re-assess the current wildlife assessment in order to more fully incorporate IQ data currently available by either collecting or identifying IQ that is specific to local caribou herd seasonal use, migration, and designation.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
KIA/NTI	2 (1,2)	AREVA	1. The Proponent should provide a more comprehensive analysis of the cumulative effects assessment, including a qualitative analysis of factors included in the assessment... 2. The Proponent should acknowledge that uncertainty in data and assumptions used in the assessment renders many of the conclusions unsupportive	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
KIA/NTI	3 (2)	AREVA	The Proponent should develop a monitoring and mitigation plan that will test whether mine infrastructure is resulting in deflection of individuals, and propose mitigation to minimize the impacts if significant deflection or barrier effects are detected.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
KIA/NTI	6 (1)	AREVA	The Proponent should conduct a suite of lichen and snow station monitoring of ash, metals, uranium and isotopes.	Does not meet criteria for IRs – more appropriately

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
				addressed through technical review comments.
KIA/NTI	4	AREVA	The Proponent should re-examine the influence of project access on harvesting of caribou, acknowledging the uncertainty in herd delineation and range, current harvest rates, harvest proportion by herd and current caribou population numbers and trends.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
KIA/NTI	25	AREVA	Please clearly state in the main body of the report that up to 1,000,000 tonnes of ore will be stockpiled at the beginning of mine life and that a residual pile of not less than 200,000 tonnes will be stockpiled throughout mine life...	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
Government of Nunavut				
GN	6 (a,b)	AREVA	The Proponent is requested to include the following information in its Archaeological Mitigation Plan: <ul style="list-style-type: none"> a) Its program for the completion of the archaeological assessment, including a description of any sampling procedures, identification of priority areas of sites, timing/work schedule, and proposed consultations with stakeholders b) Adaptive management measures for unforeseen circumstances, such as weather 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	7 (a,b)	AREVA	The following information is requested for inclusion in the Road Management Plan: <ul style="list-style-type: none"> a) The criteria used or to be used in selecting snow storage areas or snow berms b) The proposed locations for snow storage areas or snow berms (if known) 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	10	AREVA	The Proponent is requested to provide an analysis of alternatives to the management of mine tailings on-site and alternative methods for the	Does not meet criteria for IRs – more appropriately addressed through

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			management of tailings on-site; provide a discussion of the acceptance criteria for materials likely to be disposed of in the TMF; provide estimates of the contaminant life spans of materials likely to be disposed of in the TMF; If any toxic/hazardous material is going to be dispose in the Tailings Management Facility, a list of all of them is necessary.	technical review comments.
GN	16	AREVA	The GN requests that the proponent provide a comprehensive labour force analysis of available skilled labour from LAA communities for the construction and operations phase for the project.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	21 (i, ii, iii)	AREVA	The proponent is requested to provide an ecosystem-based rationale for the definition of the spatial boundaries for the RSA and LSA. An ecosystem based rationale would consider such items as: <ul style="list-style-type: none"> i. The types of impacts on wildlife and habitats; ii. The geographic scale of impacts that are being considered; iii. The potential for cumulative impacts with nearby uses (present and reasonably anticipate project) of the land (e.g. presence of Meadowbank). 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	22 (a-j)	AREVA	The Proponent is requested to provide the following: <ul style="list-style-type: none"> a) An analysis of the potential effects of an all season road on wildlife, including a discussion of the methods used and sources of data/information. This analysis must include an examination of the long term population stability of wildlife VECs given the potential for increased access to harvesting. Consideration should also be given to the effects during sensitive lifecycle stages of wildlife (e.g. calving for caribou) 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			<ul style="list-style-type: none"> b) An analysis of the cumulative effects of other potential projects operating and proposed for the region that might utilize the proposed infrastructure; c) An analysis of the cumulative effects that includes consideration of the potential Points North Road on wildlife; d) A comparison of effects on wildlife from a winter versus an all season road. 	
GN	23 (1)	AREVA	<p>The Proponent is requested to provide:</p> <ul style="list-style-type: none"> 1. An analysis of the cumulative and transboundary effect of increased access to caribou by other peoples of Canada within the RSA 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	28 (a)	AREVA	<p>The proponent is requested to provide:</p> <ul style="list-style-type: none"> a) a description of these population-level effects, taking into consideration the current populations status (i.e., increasing, stable or declining) of focal migratory species and shorebirds and providing a projected estimate of the additional reduction in population growth rates of focal migratory species and shorebirds attributed to project in the RAA and LAA. 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	34 (a,b)	AREVA	<p>Specifically, the proponent is requested to provide:</p> <ul style="list-style-type: none"> a) An updated Spill Contingency and Landfarm Management Plan that addresses each facility capable of storing or containing contaminants (e.g. fuels) b) For each facility, the Proponent should include the following relevant information required under Section 4(2) of the <i>Spill Contingency Planning and Reporting Regulations</i>: (items a-j as listed in the GN document). 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	51	AREVA	The Proponent is requested to:	Does not meet

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	(a,b)		<ul style="list-style-type: none"> a) Provide an analysis that demonstrates how the project is likely to contribute to each of the GN's main tax streams (Corporate Income Tax, Fuel Tax, Personal Income Tax, Payroll Tax, and Property Tax) for each year of the project's life. b) Clearly identify and explain the assumptions underlying their estimates. 	criteria for IRs – more appropriately addressed through technical review comments.
GN	61 (a-f)	AREVA	<p>The Proponent is requested to:</p> <ul style="list-style-type: none"> a) Provide a description or examples of healthy lifestyle educational programs proposed; b) Describe the anticipated role of the GN in the provision of Company sponsored or delivered programs related to healthy lifestyles; c) Provide any evidence that assists in demonstrating the effectiveness of such programs; d) Describe whether the company would provide financial resources for employees and their families to participated in comparable program offered by the Department of Health and Social Services; e) Describe any public promotion campaigns to address public concerns regarding healthy lifestyles; f) Describe how the Company intends to maintain effective communications and share program related information with the GN Department of Health and Social Services to ensure that health promotion is consistent with government messaging. 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	65	AREVA	The GN requests further assessment on the impact of reduced country food access on those community members who may not hunt, but rely on hunters	Does not meet criteria for IRs – more appropriately addressed through

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			for country food.	technical review comments.
GN	76 (a,b,c)	AREVA	The GN requests the Proponent: a) Complete and provide an analysis on the risk of substance importation via all potential direct modes of transportation to the mine site and via indirect means (e.g. through communities); b) Provide a detailed protocol to control substance importation; and c) Confirm whether or not it will monitor instances of importation and share this information with the Q-SEMC. If not, the Proponent should provide a rationale.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	79 (b)	AREVA	The NHC is requesting the proponent to: b) Broaden the assessment and include housing demand drivers in all 7 Kivalliq communities.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	85	AREVA	The Proponent is requested to include the GN in the updated list of regulatory agencies to be involved in the design, review and implementation of the Environmental Management Plan.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
GN	86	AREVA	The proponent is requested to include the <i>Scientists Act</i> among the list of regulatory authorizations required for the AEMP	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
Aboriginal Affairs and Northern Development Canada				
AANDC	18	AREVA	AANDC requests the Proponent provide a comparison of sectoral employment in the Regional Study Area communities with sectoral employment in Nunavut and Canada, as well as an analysis of any differences at the regional, territorial	Does not meet criteria for IRs – more appropriately addressed through technical review comments.

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			and national levels, in its description of the Project's socio-economic baseline.	
AANDC	36	AREVA	AANDC Canada requests the Proponent conduct a drill hole field program with hydraulic conductivity testing along the proposed Andrew Lake Pit Dewatering Structure alignment and design of the structure based on seepage analyses.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	38	AREVA	AANDC requests the Proponent obtain near surface unfrozen bedrock hydraulic conductivity values measured in adjacent lakes, complete an analysis of these, and if necessary, propose design measures to reduce the flow, outline potential mitigation measures and the design of an appropriate monitoring plan to assess groundwater movement should near surface permafrost start to thaw in the long term. This should include Andrew Lake where a diversion dam will be constructed.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	40	AREVA	AANDC requests the Proponent prepare a Water Management Plan that consolidates all water management issues and addresses all phases of Project from construction through to decommissioning.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	46	AREVA	AANDC requests the Proponent develop a stand-alone Landfill Management Plan or provide references to all required components of such a Plan (i.e., as delineated in NIRB Guideline Section 9.4.6 including monitoring and mitigation measures). If appropriate, the Proponent may refer to existing management plans and practices used at similar facilities with an indication that they are representative of their own expected plans.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	51	AREVA	AANDC requests the Proponent append MSDS for all hazardous materials to be used on the Project.	Does not meet criteria for IRs – more appropriately addressed through

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
				technical review comments.
AANDC	55	AREVA	AANDC requests the Proponent amend the Spill Contingency and Landfarm Management Plan to include a discussion on the impact of the Arctic climate on spill response times and strategies, and include more detail on anticipated response times to the spill scenarios presented in Section 5 of Appendix 10B in Volume 10.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	57	AREVA	AANDC requests the Proponent update the Explosives Management Plan to consider all scenarios in which ANFO and its constituents can be spilled, particularly the spill of ANFO during transport including spill into freshwater environment.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	58	AREVA	AANDC requests the Proponent provide a Spill Contingency Plan to address potential contaminated incinerator ash spill in Appendix 10B.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	60	AREVA	<p>AANDC requests the Proponent provide a preliminary decommissioning and reclamation plan that addresses all requirements outlined in NIRB guidelines Section 9.6, and site components described in NIRB Guideline 6.0, including the landfarm facilities and the incinerator. The preliminary Plan should include, but not be limited to:</p> <ul style="list-style-type: none"> • Detailed and more specific goals for reclamation of lands potentially affected by the Project. These goals should be included in a separate section of the reclamation plan. • A discussion of research programs to address challenges to reclamation should be provided. Given the local conditions, AANDC requests the proponent identify the specific closure and 	Does not meet criteria for IRs – more appropriately addressed through technical review comments.

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			reclamation questions that will be researched and provide a general description of research plans and needs.	
AANDC	62	AREVA	The Proponent provides a mitigation plan for the effects the fly-in/fly-out rotation system on health and wellness of all Nunavummiut. If no such plan is anticipated, the Proponent should provide a rationale.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	63	AREVA	AANDC requests the Proponent provide a description, based upon the reclamation plans, of post remediation exposure levels and risks in the closure plan. Radiological risks and environmental risks associated with tailings and waste rock disposal above and below ground surface should be included. How the reclamation plans will minimize those risks should be described.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	66	AREVA	Additional information on mine closure and reclamation is required to provide a description of closure and post-closure monitoring of environmental components and maintenance that may be required once physical and chemical stability of reclaimed areas have been established.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
AANDC	68	AREVA	AANDC requests the Proponent provide an assessment of temporary closure scenarios, in both the construction and operations phases, with a qualitative description of potential effects of such closure on the local (and if applicable) regional population and demographics.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
Environment Canada				
EC	9	AREVA	Please provide on-site baseline measurements along the proposed channel alignment to verify the depth of the active layer.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
Fisheries and Oceans Canada				

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
DFO	8 (a)	AREVA	DFO requests that the proponent provide: a) the culvert size and hydrological channel assessment in the final EIS concurrent with the habitat mapping, detailed habitat assessment information and quantification of the HADD for each watercourse crossing;	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
Health Canada				
HC	5	AREVA	Remove all references to the outdated document "Health and Welfare Canada. 1989. National Guidelines for Environmental Noise Control. Prepared by Working Group on Environmental Noise of Federal/Provincial Advisory Committee on Environmental and Occupational Health. Ottawa, ON". Please update the relevant sections of the Draft EIS to indicate that there are no national guidelines for noise in Canada related to this project.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
HC	6	AREVA	Add the reference for the "WHO 1999" document cited on page 1 02 to the "Literature Cited" list.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
HC	7	AREVA	The reference to ISO (1969) standard is incorrect (see 'Rationale' for correct reference). In addition, the ISO 1996:1971 recommendation has been withdrawn and the updated information is now provided in ISO 1996-1:2003. Please revise the discussion of airborne noise, and any related discussions where the outdated recommendation is referenced, as appropriate.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
HC	9	AREVA	Add the omitted equations that show, "Calculation methods used for determining the percentage of people that are highly annoyed by their	Does not meet criteria for IRs – more appropriately addressed through

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			exposure to noise at various levels", on page 2-7. Clarify if there is a parameter for night-time hours.	technical review comments.
Transport Canada				
TC	4	AREVA	Specific details are required in order to assess: <ol style="list-style-type: none"> 1. the compliance of vessel operators not related with the project; 2. coordination with existing marine communication centre NORDREG; 3. use of radio frequency and capability of radio equipment's on vessels, and; 4. coordination of SAR activities with the Canadian Coast Guard. 	Does not meet criteria for IRs – no specific request for information is apparent
TC	6	AREVA	There is no project specific Oil Handling Facility, Oil Pollution Prevention Plan and Oil Pollution Emergency Plan identified.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
TC	7	AREVA	Transport Canada requires specific details in order: <ul style="list-style-type: none"> • to ensure that there are an adequate number of pilots; • to ensure that there is no congestion at port, and; • to assess the Proponent's plan to train additional pilots and to obtain exemptions for Tugs and Barges. 	Does not meet criteria for IRs – no specific request for information is apparent.
Beverly and Qamanirjuaq Caribou Management Board (BQCMB)				
BQCMB	1.1 1.3	AREVA	1.1 - AREVA to conduct specific interviews to re-examine baseline information on annual and seasonal caribou distribution in the LSA and RSA including water-crossings. 1.3 - AREVA to re-consider mitigation and monitoring to demonstrate the use of IQ principles.	Do not meet criteria for IRs – appear to be initial technical review comments.
BQCMB	2.2	AREVA	2.2 - AREVA to commit to providing	Do not meet criteria

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
	2.3		<p>information about the Project and educational materials about uranium and food-chain effects of radio-active materials for Beverly and Qamanirjuaq caribou range communities outside Nunavut, and to facilitate those communities efforts to provide input on their concerns to AREVA.</p> <p>2.3 - AREVA to summarize and utilize this information to assess the effects and cumulative effects of their Project on Beverly and Qamanirjuaq caribou and to develop mitigation measures and monitoring programs for caribou.</p>	for IRs – appear to be initial technical review comments.
BQCMB	5.1 5.2	AREVA	<p>5.1 - AREVA to re-write baseline information for assessing change in movement (Section 13.2.3.2) to draw on a wider range of knowledge, including IQ, archaeology and the scientific literature.</p> <p>5.2 - AREVA to revise the section to address changes in abundance and distribution and how they influence assessment of effects, mitigation and monitoring.</p>	Do not meet criteria for IRs – appear to be initial technical review comments.
BQCMB	9.1 9.2	AREVA	<p>9.1 - AREVA to re-consider the restriction of the Measurable Parameter for habitat to the Ecological Land Classification and to undertake an RSF analysis using other attributes of habitat.</p> <p>9.2 - AREVA to conduct assessment of effects and cumulative effects of frequent disturbance resulting in interruption of foraging activity and long-term effects on caribou health and productivity.</p>	Do not meet criteria for IRs – appear to be initial technical review comments.
BQCMB	13.1	AREVA	13.1 - AREVA to under-take a more quantitative approach including the use of modeling to describe the probability and level of cumulative effects for caribou.	Does not meet criteria for IRs – appears to be an initial technical review comment
BQCMB	14.1	AREVA	14.1 - AREVA to redo the baseline and	Does not meet

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			assessment for climate change effects on caribou across the caribou ranges, including effects on phenology (plants, fresh-water ice formation and break-up) in relation to caribou ecology and effects on anticipated cumulative growth of mining in the area.	criteria for IRs – more appropriately addressed through technical review comments.
BQCMB	18.1	AREVA	18.1 - AREVA to conduct cumulative effects analysis that includes effects of induced road network for far future scenario, including mortalities likely from increased harvest and collisions, functional loss of habitat, and food-chain effects of increased dust.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
BQCMB	19.1 19.2 19.3	AREVA	<p>19.1 - AREVA to expand on the Wildlife Mitigation and Monitoring Plan, detailing how monitoring links back to impact predictions and reducing uncertainty.</p> <p>19.2 - AREVA to explain how Aboriginal Traditional Knowledge (ATK) from Nunavummiut and people in communities on the caribou ranges from outside Nunavut has been used to develop the Plan, and to describe how ATK will be used to assess the effectiveness of mitigation and adapt mitigation and monitoring during the project.</p> <p>19.3 - AREVA to demonstrate inclusion of the principles of IQ during development of the Wildlife Mitigation and Monitoring Plan.</p>	Do not meet criteria for IRs – appear to be initial technical review comments.
BQCMB	25.1 25.2	AREVA	<p>25.1 - AREVA to outline how their monitoring data, including data collected during all project phases from exploration onward, will contribute to the NGMP, and to describe the system to be used to contribute data in a way that AANDC can use for SoK reports.</p> <p>25.2 - AREVA to indicate if and how SoK reports will be used to modify their mitigation and monitoring plan</p>	Do not meet criteria for IRs – appear to be initial technical review comments.

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			for caribou.	
Canadian Arctic Resources Committee (CARC)				
CARC	2.1 2.2 2.7 2.8	AREVA	<p>2.1 A cumulative impact assessment that includes direct, indirect, and interactive effects of current and residual project impacts (mentioned below), predation effects, and climate change effects (rationale provided below).</p> <p>2.2 Provide an assessment of other potential factors contributing to changing caribou habitat loss and mortality, and the rationale for why these effects in combination with collisions with vehicles are assumed to be not significant, particularly when it is acknowledged that harvester activities will increase with the further development of roads in the region.</p> <p>Please provide a more adequate assessment of caribou health, such as a measure of stress that can be assessed through the measure of hair cortisol concentrations. Please provide an assessment on change of COPC from baseline (e.g. % change), and not as a screening index based on a threshold. State the source of this threshold and how it is determined.</p> <p>2.7 Use all sources of data when investigating the impact of the RAA on the seasonal behaviours of caribou: calving, post-calving, spring and fall migration, early / late wintering.</p> <p>2.8 Account for dependence on the Beverly and Wager Bay caribou herds in the assessment of significance.</p>	Do not meet criteria for IRs – appear to be initial technical review comments.
CARC	2.14	AREVA	Provide a quantitative assessment of potential habitat loss for all projects in the project inclusion list (i.e. a	Does not meet criteria for IRs – more appropriately

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			cumulative impact assessment). Provide the data to enable CARC to conduct our own analysis of the cumulative effects.	addressed through technical review comments. Provision of raw data is at the discretion of the Proponent
Lutsel K'e Dene First Nation (LKDFN)				
LKDFN	3	AREVA	LKDFN requests that AREVA commit to a larger scale, comprehensive monitoring and management plan for caribou, not only within the footprint, but in the region study area.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
LKDFN	5	AREVA	LKDFN requests that AREVA look beyond the footprint and analyze dust deposition and altered migration routes as contributing factors to habitat loss.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
LKDFN	6	AREVA	LKDFN requests that AREVA commit to monitoring the land outside the footprint to better understand the impact the mine is having on caribou habitat.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
LKDFN	10	AREVA	LKDFN requests that AREVA meet with Lutsel K'e to discuss whether or not caribou have been harvested west of the Thelon in the last decade.	Does not meet criteria for IRs – request forwarded for consideration.
Nunavummiut Makitagunarningit (NM)				
NM	1	AREVA	For each volume of the DEIS, provide a comprehensive discussion of the most substantial knowledge gaps encountered during the analyses carried out. Include in this summary an explanation of how each knowledge gap was dealt with in the various analyses contained in the DEIS.	Does not meet criteria for IRs – more appropriately addressed through technical review comments.
NM	8 (4,5)	AREVA	4) Identify the “three qualified social scientists, working with assistants and translators in each community and with enumerators recruited in Baker Lake to deliver the household survey	The NIRB does not require AREVA to produce any information in responding to the IR

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			<p>questionnaires.”</p> <p>5) Provide copies of all the “Handwritten notes, maps, confidentiality agreements, original questionnaires and stipend receipt sheets [which] are held by Golder Associates Ltd. in Calgary.” (appd. 9A)</p>	that it reasonably considers to be confidential or that raises a privacy concern.
NM	9 (3, 4, 5, 7)	AREVA	<p>3) Append AREVA’s latest feasibility study to the EIS. This would be required if the company were publicly traded in Canada.</p> <p>4) When were the costs for the project last reviewed? Several projects have since substantial increases in their costs and this has called into question the viability of projects in much less challenging environments.</p> <p>5) Table 13.1-3 (the source of the \$1-billion figure) does not seem to include a period for the company to write down capital expenditures on the project. What is the likely period before the project shows a "profit for tax purposes"? How would other developments AREVA might undertake in Canada or elsewhere affect the company's "profits for tax purposes", i.e. would development of other projects in other regions reduce the amount of revenues to GN, NTI and Canada? Can AREVA transfer profits and losses between jurisdictions where they operate?</p> <p>7) The economic impact to Nunavut should be modelled based on a variety of possible employment levels of Inuit and Nunavut residents.</p>	The NIRB does not require AREVA to produce any information in responding to the IR that it reasonably considers to be confidential or that raises a privacy concern.
NM	10 (1, 2)	AREVA	1) Undertake a comparative study with Meadowbank, specifically addressing recent stats on employment turnover/attrition rates, rates of violence and crime, rates of	(1) The NIRB notes that some information requested may not be publicly

Commenting Agency	IR No.	IR directed to:	Request	NIRB Rationale
			<p>STIs, etc., a direct comparison of the Meadowbank and AREVA socioeconomic baselines, and interviews with Meadowbank management and socioeconomic monitoring team to clarify their sense of the impact of Meadowbank on Baker Lake. Which trends are AREVA likely to exacerbate, alleviate, or otherwise impact?</p> <p>2) Include the most recent data from Nunavut Bureau of Statistics for all socio-economic issues considered in the report (i.e., 2010 crime statistics are not included),</p>	<p>available.</p> <p>(2) Does not meet criteria for IRs – more appropriately addressed through technical review comments.</p>
NM	11 (1, 2)	AREVA	<p>1) Provide a more detailed description of the Inuit experience with the Meadowbank gold mine. Provide information about employee turnover rates, disaggregated by gender and ethnicity (e.g. provide statistics for the turnover rate for Inuit women and Inuit men). Provide statistics for each year of the Meadowbank project's construction and operation.</p> <p>2) Provide more information on ethnic and gender stratification in the workplace (e.g. provide the numbers of Inuit men and numbers of Inuit women employed as: labourers, janitors, cooks helpers and cabin cleaners; equipment operators or administrative workers; engineers; foremen; management) Provide statistics for each year of the Meadowbank project's construction and operation.</p>	(1,2)Do not meet criteria for IRs – information requested is not within the scope of the NIRB's Review.
NM	20, 21, 22, 23 (all parts)	AREVA	Various requests regarding uranium usage, policies, referendum voting,	Do not meet criteria for IRs – information requested is not within the scope of the NIRB's Review.