



Nunavummiut Makitagunarningit

December 3, 2012

Amanda Hanson
Director of Technical Services
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Dear Ms. Hanson,

We are writing in regards to the revised timeline for the review of AREVA's Kiggavik project proposal, distributed by the Nunavut Impact Review Board on October 15, 2012. We are disappointed that, according to the new review schedule, the technical meetings and community hearings will be held in late May and early June of 2013. We are also writing to request an additional extension and second Information Request period, given the nature of the deficiencies and omissions in AREVA's draft Environmental Impact Statement.

According to article 12.2.27 of the Nunavut Land Claim Agreement "All necessary steps shall be taken by way of notice, dissemination of information, and scheduling and location of hearings *to provide and promote public awareness of and participation at hearings.*" (Emphasis added). NIRB therefore has a duty to schedule meetings to maximize public participation. Holding these meetings in the spring would serve to do the opposite.

As you are fully aware, during the spring many Inuit in Baker Lake and other communities spend a great deal of time on the land. The long daylight hours and mild weather is the time for family camping, hunting and fishing. This is also the time of the year when families in Baker Lake prepare for the coming summer and the migration of caribou herds.

By holding community hearings during the spring, the NIRB is not simply inconveniencing residents of Baker Lake – it is preventing their proper participation in an important political process. The camping, hunting, fishing and other land activities Nunavummiut do during the spring months are not merely leisure activities, they are vitally important for culture and food security for many families.

Holding the meetings in the spring will make it difficult for many residents to attend the community hearings at all. Doing so may discredit NIRB as an institution that really serves Nunavummiut. More importantly, it will make it almost impossible for some in Baker Lake to properly prepare for the community hearings. The communication and organizing that would be required to properly inform residents of Baker Lake about the criticisms of AREVA's DEIS (made by various intervening parties) will be impossible because so many of the residents will be out on the land in the weeks leading up to community hearings. What is more, the intervening parties will lack adequate feedback and advice from Inuit in the weeks leading up to the community hearings. Together, this means that the perspective of hunters – the demographic that may have the most to lose from a uranium mine and that has much to offer in the way of land knowledge – will not be able to play its full role in community hearings. The NIRB guidelines specify that it must “give due regard and weight to the tradition of Inuit oral communication and decision-making”. If NIRB is to follow through with this provision, they must reconsider the scheduling of community hearings.

Several hunters and Elders raised the issue of the inappropriateness of holding community meetings in the spring during community information sessions in Baker Lake in the spring of 2012. It is important for all parties interested in AREVA's Kiggavik proposal to take note of the implications the review timeline is having for the opportunity to have full participation of Nunavummiut.

AREVA has also indicated that they are in no hurry to complete the environmental assessment process. In a letter to NIRB, dated September 28, 2012, AREVA stated that “Kiggavik Project advancement will vary from previous Nunavut development experience, and ultimate development of the project will coincide with viable future markets.” Current market trends seem far from optimal for project advancement. Under these circumstances, it seems more than reasonable for NIRB to exercise flexibility and ensure proper community participation.

Accordingly, we are formally requesting that the NIRB delay community hearings until the fall of 2013.

In addition to providing a better schedule for community participation, scheduling of this sort would also provide the opportunity for a more thorough analysis of AREVA's DEIS on the part of various interveners. The number and character of information requests submitted to AREVA indicated that there were some serious deficiencies in the information AREVA provided. The Government of Nunavut's information request package included a cover letter which indicated that there was “consensus across the government departments reviewing the Draft EIS that the documentation has not met the GN's expectations in term of level of detail regarding commitments to project design and mitigation nor analysis.” According to the GN, in some sections of the DEIS, the data, the methods and the analyses used by AREVA “are not sufficient to allow the GN to conduct a technical review of the Draft EIS” at that time. The GN also indicated that the information requests it submitted are “priority items” and do not “reflect the full range of questions that remain unanswered”.

Given these issues, it would seem reasonable to have a second information request period following the receipt of AREVA's information request package in January 2013. Due to the wide range of new information that will be made available in the information request package, we anticipate that we will have several follow-up questions for AREVA. The fact that AREVA has indicated that they will not respond to several unidentified information requests at their choosing also has us concerned that a second round of information requests may be required for interested parties to be able to properly analyze AREVA's draft EIS.

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