



## Beverly and Qamanirjuaq Caribou Management Board

23 May 2013

Sophia Granchinho  
Senior Technical Advisor  
Nunavut Impact Review Board  
Cambridge Bay NU X0B 0C0  
By e-mail: [sgranchinho@nirb.ca](mailto:sgranchinho@nirb.ca)

Dear Ms. Granchinho:

### **NIRB 09MN003: Technical Review of the Kiggavik Project**

I am writing to provide comments from the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) following the Board's recent biannual meeting held May 7-9th. We hope these comments will assist the NIRB with the detailed technical review of AREVA's DEIS for the Kiggavik Project and with identifying requirements for the Final EIS.

The BQCMB continues to be concerned that the Draft EIS and AREVA's response to BQCMB information requests and technical review comments do not adequately address the concerns of BQCMB board members and caribou range communities about effects on caribou and caribou harvesters. The Board does not accept AREVA's conclusions that there will not be significant project specific and cumulative effects on caribou or on the well-being of the people who depend on caribou across their annual ranges.

The BQCMB would like to reiterate our concerns that sufficient opportunity has not been provided for meaningful input from people from communities who are most likely to be impacted by project effects and cumulative effects, including people from Athabasca Denesuline communities, who have direct experience with uranium mines in northern Saskatchewan. Notes on the BQCMB's May 2013 board meeting summarize relevant discussion as follows: "The Saskatchewan communities continue to have first-hand experience in mining and community impacts. . . There is still concern that the Manitoba, Saskatchewan and NWT communities have not been fully consulted, in fact AREVA has not held meetings to explain the project with MB and SK communities, despite invitations to do so."

Comments from Athabasca Denesuline communities about the Kiggavik project have been collected for use in the BQCMB's review of AREVA's DEIS (see attachment). Concerns have been summarized under the following general themes: roads; powerlines; blasting, dust, and waste stockpiles; cumulative impacts; consultation; and traditional ecological knowledge. These comments are provided now in part to illustrate that harvesters from communities across the caribou ranges have information relevant to the Kiggavik project about caribou, exploration and development impacts, and uranium mining specifically. This information could be shared if the opportunity was provided to do so.

If you have any questions about these comments, please contact BQCMB Executive Director Ross Thompson ([rossthompson@mymts.net](mailto:rossthompson@mymts.net)) or contract biologist Leslie Wakelyn ([wakelyn@theedge.ca](mailto:wakelyn@theedge.ca)).

Sincerely,

A handwritten signature in blue ink, appearing to read "Earl Evans".

Earl Evans  
BQCMB Chairperson

cc. Caroline Ducros, Canadian Nuclear Safety Commission  
Diane Martens, AREVA  
Ron Robillard, Athabasca Denesuline  
Vice Chief Joseph Tsannie, Prince Alberta Grand Council

## **Attachment. Issues raised by Athabasca Denesuline Communities regarding the Kiggavik Project.**

The following input was obtained by the Athabasca Denesuline NeNe Corp. (ADNC) to support BQCMB participation in the Nunavut Impact Review Board's review of the AREVA-Kiggavik Project. Input was obtained during meetings held by the ADNC with Athabasca Denesuline (AD) community members, Chiefs & councils, Elders, hunters, and youth. Presentations and discussions were held during five meetings: at the July 2012 Athabasca Denesuline Assembly; at a November 2012 Athabasca Denesuline Negotiation Team meeting; and during separate meetings with the communities of Hatchet Lake, Black Lake and Fond du Lac in April 2013.

Key themes emerged from discussions held during these meetings. The following comments are excerpted from the May 2013 report from the ADNC to the BQCMB<sup>1</sup>.

### **1. Roads**

Roads are identified as being one of the main threats to the caribou populations. Members from all three Athabasca communities and at every meeting mentioned this as a concern. Elders specifically talk about how roads prevent the movement and migration of caribou across large tracks of land.

### **2. Powerlines**

It is believed that one of the main factors (along with roads) that have diverted barren-ground caribou migration to the Athabasca Denesuline region are powerlines. This is a consistent concern raised by Elders in the communities. Caribou are noticeably bothered by these lines and will divert from their route to avoid them.

### **3. Blasting, Dust, Waste stockpiles**

Concern was also raised about the impact that blasting, dust and wasterock will have on the environment and the caribou. Blasting is regularly felt across Wollaston Lake in the community of Hatchet Lake. It is believed that this is also a reason why the caribou no longer move south of Wollaston Lake, but remain to the northeast, to avoid the sounds, sights and rumblings of the mines.

Numerous residents of the Athabasca Denesuline that have worked at the mines mentioned the wasterock piles, and how they believe these rocks are still radioactive. These piles, along with the dust can contaminate areas around the mine. This effect can be exasperated due to the tundra ecosystem surrounding the proposed Kiggavik mine.

### **4. Cumulative Impacts**

Although most AD do not use the word "cumulative effects", a lot of discussions centered on how the mines, in general, keep caribou away. This is due to impacts of the roads, powerlines, blasting, dust, noise, aircraft, tailings ponds, etc. "Caribou suffer because of the mines" said one Elder. However, another aspect of cumulative impacts was all the other developments that are occurring or proposed to be developed on the caribou range. There seems to be many exploration and mining permits issued within the region, causing much concern to the AD over the caribou. In addition to the forest fires that destroyed much prime caribou forage. It is felt that the caribou and their habitat are not being respected.

### **5. Consultation**

The Athabasca Denesuline were not adequately consulted. This was discussed in detail at most meetings/community updates. The majority of people in the meetings did not know anything about the new proposed AREVA mine. They asked why AREVA was not there speaking to them. They do not believe neither

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<sup>1</sup> Athabasca Denesuline Review of AREVA'S Proposed Kiggavik Uranium Mine - Information Requests & Draft EIS. Submitted to Beverly-Qamanirjuaq Caribou Management Board by Athabasca Denesuline NeNe Corp. May 3, 2013.

AREVA nor NIRB takes them seriously, even though they have decades of experience living with uranium mines, and caribou. This mine has the potential to disturb caribou populations that the AD are highly dependent upon. Even though a request has been made numerous times to AREVA, only poster sessions were presented to the communities.

Generally, community feedback and discussions centered on not being in support of developing another uranium mine in the Baker Lake area. Mostly, the reason for this was impact to caribou, however, they did indicate other reasons: unfair treatment of aboriginal workforce, the danger of uranium, risk is too high for caribou, how can we survive without them, need to develop protected areas, uncertainty of what will happen to area after 15 years.

#### 6. Traditional Ecological Knowledge

AREVA did not include Athabasca Denesuline specific TEK within their DEIS. Many of the points of concern identified in the community, and listed above, were backed with stories, observations and rich TEK. This level of detail was not included within the report as it was not identified if the Elders who told the story were comfortable with it. However, it was very apparent to all that this information is needed within the DEIS.