



Athabasca Denesuline Negotiation Team

04 December 2013

Nunavut Impact Review Board
Attn: Ryan Barry
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

RE: AREVA KIGGAVIK URANIUM PROJECT – ATHABASCA DENESULINE, NIRB FILE
#09MN003

Dear Mr. Barry,

The Athabasca Denesuline were recently made aware that there have been significant changes in AREVA's proposed Kiggavik Uranium Mine proposal. These changes, namely the decision to now fly the yellowcake from Kiggavik to Points North in Northern Saskatchewan, are of major concern to the Athabasca Denesuline (AD).

First, the AD were not made aware of this significant change in the project. The communities were NOT consulted (even prior to this change) by AREVA or the Crown. This change has the potential to significantly and severely increase the impact on aboriginal and Treaty Rights of the AD. It is very troubling that AREVA or the Government has not felt it necessary to discuss these changes with the communities that would be impacted. There must be full engagement on consultation obligation, as well as to accommodate and reconcile, where necessary, with aboriginal peoples whose aboriginal and Treaty Rights may be adversely affected by the proposed project. As identified previously, our participation in the Beverly-Qaminirjuaq Caribou Management Board (BQCMB) does not and should never be interpreted as consultation with the AD. Our involvement with the BQCMB ensures that our primary concern over impacts on caribou populations are identified and included.

Due to lack of consultation, the AD do not know at this time the details of the changes involved. It is understood that a Hercules C130 aircraft would be transporting 4000 tonnes of yellowcake per year to an airstrip at Points North, Saskatchewan. The flight path of this aircraft would be almost entirely over Athabasca Denesuline traditional territory. This is a critical area, where the AD practice their culture and earn their livelihood. The risk of one of these aircrafts crashing onto land or water would be

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critically and irreversibly destructive to the entire ecosystem of the area. Water systems connect throughout the north, and containment would be difficult, if not impossible. In addition, the AD are seriously concerned how the barren-ground caribou populations would be adversely affected if such a catastrophe would occur. AREVA, at this time, is unable to answer how a catastrophic spill of this magnitude could be cleaned up effectively, especially in such remote locations. Aware of the potential problem they are apparently working on these calculations. The risk of losing a healthy ecosystem for countless generations is not something that the AD are willing to gamble with.

In addition, an increase in large trucks hauling yellowcake will result in the increased likelihood of motor vehicle accidents along the route, both in collisions and in wildlife mortalities. Has this been considered in the EIS? This concerns the AD, as it is our people who will be impacted, as we use those roads to travel south. Also, can the roads and more specifically the bridges support the increased traffic over time? The AD request that these questions be addressed in detail within the Environmental Impact Statement.

The concerns mentioned above are not an inclusive list of issues that the AD have with the proposed project. In the event we are consulted in a more meaningful way and receive further information, we will be able to more comprehensively describe our concerns/questions.

We invite AREVA and the regulatory agencies to the Athabasca Denesuline communities for community consultations. Please coordinate through the Athabasca Denesuline Né Né Land Corporation office by contacting Connie Cheecham at ccheecham@adnlc.ca or (306) 765-2560.

We thank you for your prompt response to this letter. If you have any questions please do not hesitate to contact me at (306) 765-2560 or email: rrobillard@adnlc.ca

Regards,

A handwritten signature in black ink, appearing to read 'R. Robillard', with a stylized flourish at the end.

Ron Robillard
President – Athabasca Denesuline Né Né Land Corp.

Cc:

Diane Martens – AREVA Resources Canada Inc.

Tammy Van Lambalgen, AREVA Resources Canada Inc.

Caroline Ducros, Canadian Nuclear Safety Commission

Earl Evans – Chair BQCMB

Chief Earl Lidguerre – Fond du Lac Denesuline First Nation

Chief Rick Robillard – Black Lake Denesuline First Nation

Chief Bart Tsannie – Hatchet Lake Denesuline First Nation

Hugh Ikoe – Baker Lake Hunters Trappers Organization