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Honorable Bernard Valcourt Minister of Aboriginal Affairs and Northern Development 10 Wellington, 21<sup>st</sup> Floor Gatineau, Quebec K1A 0H4

Tuesday, August 11, 2015

## **Honorable Valcourt**;

This letter is to indicate the Kivalliq Wildlife Board's (KWB) support for the Baker Lake Hunters and Trappers Organization's (HTO) July 14, 2015 letter regarding AREVA Resources Canada's proposed Kiggavik uranium mine. The KWB supports the Nunavut Impact Review Board's (NIRB) Final Hearing Report and recommendation for AREVA's proposed Kiggavik uranium mine. I urge you to accept the NIRB's report. AREVA's proposed mine should not be approved at this time, and you should reject AREVA's request to not accept the NIRB recommendation.

The KWB represents the hunters and trappers in the Kivalliq region. As a Regional Wildlife Office, the KWB is constituted under the Nunavut Land Claims Agreement (NLCA). The KWB board consists of representatives from each HTO in the Kivalliq region. HTOs, in turn, consist of boards elected directly by the Inuit residents of the communities they represent. As such, the KWB and HTOs are representative Inuit organizations, tasked with protecting the Aboriginal and land claim harvesting rights protected by the NLCA and Constitution of Canada.

First and foremost, if you reject the NIRB report and recommendation, it will erode the confidence the Inuit of Nunavut have in the regulatory system created under the NLCA. Residents and institutions of Nunavut have spent considerable time and resources participating in the NIRB screening and review of AREVA's proposal since it was first proposed in 2008. If you reject the NIRB report and recommendation, residents of Nunavut will question what the point of their participation in this process was, and rightfully so. The value of the entire NLCA will be seriously questionable if you grant AREVA's request and overturn the NIRB recommendation. This would be a political disaster for Nunavut, and for Canada.

Furthermore, the KWB is firmly in support of the NIRB report and recommendation. The KWB does not agree with reviewing and permitting proposals for major development projects that do not have project start dates in the reasonably foreseeable future. To do so undermines the ability of Inuit hunters



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and elders to meaningfully participate in such processes. Inuit Qaujimajatuqangit (IQ) – also known as Inuit Traditional Knowledge – is time-sensitive knowledge. If IQ is to be meaningfully used in environmental reviews, it must be used for decisions being made in a timely manner. Our environment, our communities, our culture, and our society can change quite drastically over 10 or 20 years (the amount of time which it may take before AREVA's project could become economically viable). This would make the knowledge shared by hunters and elders throughout the review process entirely outdated by the time AREVA's project gets off the ground. The entire public participation process would therefore have to be repeated at that time, if AREVA's project and related mitigation measures are to be meaningfully informed by IQ. As I am sure you are aware, the NIRB guidelines stipulate that Inuit Traditional Knowledge must be meaningfully considered in assessments of development proposals in Nunavut.

The KWB also does not agree with permitting AREVA's proposed mine until a land use plan or government legislation bans mining and exploration in core caribou calving and post calving grounds. It is AREVA's stated intention to provide a base of operations for further uranium development in the region. The milling infrastructure proposed by AREVA would have the capacity to mill much more uranium than the proposed Kiggavik mine would produce. We are aware that there are uranium deposits and exploration projects located in caribou calving and post calving grounds. We know that, if AREVA's mine is approved, industry interest in these areas will increase dramatically, which will put our region's caribou herds at great risk. We are aware that other herds in the NWT and Nunavut are currently subject to a hunting moratorium to ensure that they do not collapse entirely. We do not want to create a similar situation in the Kivalliq region.

Please find attached a February 23, 2015 resolution that further explains the KWB position on AREVA's proposed uranium mine. As you will see, the KWB is not necessarily opposed to the proposed Kiggavik uranium mine. However, the KWB does not agree with approving the Kiggavik proposal at this time. Again, I urge you to accept the NIRB recommendation and reject AREVA's proposed Kiggavik uranium mine.

Thank you for your time;

Stanley Adjuk KWB President

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