



for a living planet®

WWF-Canada
World Wildlife Fund Canada

245 Eglinton Avenue East
Suite 410
Toronto, Ontario
Canada M4P 3J1

Tel: (416) 489-8800
Toll-free: 1-800-26-PANDA
(1-800-267-2632)
Fax: (416) 489-3611
panda@wwfcanada.org
wwf.ca

Leslie Payette,
Manager of Environmental Administration,
NIRB,
Box 1360, Cambridge Bay,
Nunavut,
X0B 0C0
Dec 7, 2008.

Dear Ms Payette,

I would like to make a revision to WWF's submission regarding the Uravan Project at Garry Lake.

In the last section regarding Caribou Protection Measures (CPMs) on page 3, I have deleted the third point and replaced it with more accurate copy in the attached revised version of our submission, because it is "Critical Wildlife Areas" (CWAs), not "Caribou Protection Areas" (CPAs) that are incorrectly mapped and referenced in the Nunavut Wildlife Regulations. These were established to describe caribou calving areas in the NWT (before Nunavut), but have no relation to the Caribou Protection Measures.

In the place of this point, however, I have added further comment re CPAs to which the CPMs ARE meant to apply, namely:

-CPAs were established with the expectation that their boundaries would be based on annual monitoring conducted as part of the CPM program, but INAC cut the funding that GNWT used to conduct that monitoring in 1990. Therefore, CPAs have not been adjusted based on recent caribou use during the calving and post-calving periods as intended. This poses a potential problem for both caribou conservation and mineral exploration, as the areas to which the CPMs apply could at some point have little or no relevance to the area in which caribou and calves should be protected from disturbance.

-All this having been noted, the biggest issues regarding CPMs are the inadequacy of the protection provided (they don't really prevent disturbance to caribou, and they provide for no habitat protection), the lack of enforcement, and the possibility of exemption.

I apologize for having to make these changes, but I'd rather get it right, so I hope you will accept the attached revised version of our submission for the record.

Sincerely,

Monte Hummel O.C.
President Emeritus
WWF-Canada