

December 12, 2008

I am writing with comments on the Draft Guidelines for the Uravan Garry Lake EIS (NIRB Project ID #08EN037). My name is Ed Labenski. I am a recreational paddler and have taken several trips to Nunavut and the Northwest Territories. I have a blog ([Northern Waterways](#)) on northern lands, recreational canoeing, and the arts. I have also lived and worked in the North, and produced (in collaboration with the Dene language instructor in Tadoule Lake) a draft curriculum for the Peter Yassie Memorial School: "Sayisi Dene Language and Culture Curriculum Project." I am writing to express my own views, and concern for the protection and long term viability of Inuit and Dene caribou harvesting practices, ecosystem protection, and advocacy for recreational tourism and environmental stewardship in Nunavut.

I am aware that such exploratory projects are typically very small and operate on a limited time frame in the North, but I feel that recent population estimates for the Beverly herd and concern over the impact of industrial activities in caribou calving grounds and post-calving areas dictate that this project be given a full review, and subject to stringent guidelines and full participation from the public. I see an emerging consensus among wildlife managers, ecotourism operators, northern First Nations and Tribal Councils, delegates to the 2007 Caribou Summit, mining companies and business concerns (notably De Beers, Areva, and Cameco), environmental NGOs, and other groups regarding caribou calving grounds and post-calving areas, and the need for strong protections for such areas. The BQCBM has recommended rejection of the Garry Lake proposal; delegates to the 2007 Caribou Summit voted to prioritize the protection of calving grounds; De Beers, Areva, and Cameco will no longer conduct activities on caribou calving and post-calving areas (according to company press releases); and recent decisions by the Mackenzie Valley Environmental Impact Review Board in the upper Thelon River Basin have been firm in the defense of indigenous cultural rights and practices, and a balance of interests for the region. I am writing to provide my full support to these prior findings and determinations, and argue for strong guidelines to protect caribou calving grounds and post-calving areas from additional industrial activities that may threaten the long term viability, health, and well-being of migratory caribou herds.

Before such a project could be approved, I would like to see credible science and a serious consideration of the possible long-term cumulative impacts of industrial activity in calving and post-calving areas (particularly with the construction of permanent camps, airfields and touchdown areas, year round storage of materials, transportation by air and all terrain vehicle), and whether the public would view as favorable an eventual operating mine in these areas (since this is the goal of exploration). I would also like to see a balance of interests and a coordinated approach to caribou management decisions (primarily the implementation of existing long term land use plans ... such as the Thelon Wildlife Sanctuary Management Plan). In addition, I would like to see a recognition of the multiple stakeholders involved in management decisions for the Beverly herd, notably Dene communities from Manitoba who continue to maintain a vital, long-standing, and culturally significant relationship to the herd. Section 2.4 of the Draft Guidelines for the

Garry Lake EIS makes specific note of a precautionary approach to meeting long term environmental and stakeholder interests. I would like to emphasize two points from this section: particularly the public acceptability of the proposal, and protection against serious and irreversible damage to the environment. Until Uravan can assure members of the public that it's activities won't cause serious or irreversible harm, and that it's proposals are consistent with current knowledge and practices (as affirmed by other mining companies in the region, caribou management specialists, local land use and management boards, and others), I firmly believe the Nunavut Impact Review Board should reject this proposal, and recommend stronger protections for caribou calving and post-calving areas. I appreciate the chance to make my comments to the Board, and I look forward to participating in further steps of the review process.

Very best,

Ed Labenski

Chicago, Illinois

[Northern Waterways](http://northernwaterways.com/blog/)

<http://northernwaterways.com/blog/>