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Your file - Votre référence  
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5510-5-27

January 12, 2008

Leslie Payette  
Manager of Administration  
Nunavut Impact Review Board P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

*Via e-mail to: [lpayette@nirb.nunavut.ca](mailto:lpayette@nirb.nunavut.ca)*

**Re: Comments on the Uravan Minerals Inc's Garry Lake Project Draft Guidelines**

Dear Ms. Payette,

Indian and Northern Affairs Canada (INAC) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the Draft Guidelines for Uravan Minerals Inc's Garry Lake Project. As such, INAC has prepared the following comments for its consideration, as requested in NIRB's letter of November 20, 2008.

In general, INAC would like to reiterate that although our past comments and those contained within this submission recommend that the proponent assess a broad range of impacts, we do support NIRB's recommendation of a specific focus in this review. This should be taken to mean that a more detailed and extensive assessment is only expected for those elements that are included in the focus of the assessment, however, sufficient justification and information should be provided to assure reviewers that the elements outside the focus of the assessment are not of concern.

**Section-specific comments:**

**Section 2.7 Use of Existing Information (p.11)**

With respect to information gathered for this assessment, INAC suggests it would be useful if the Proponent described any information gaps that were encountered in existing literature, and how these gaps may affect the ability to draw conclusions and the reliability of those conclusions drawn in the assessment.



### **Section 3.4 Scoping List (p. 13)**

INAC would like to suggest two additions to the scoping list, consistent with previous comments made recommending a broad scope : 1. monitoring and follow-up, 2. accidents and malfunctions

Also, it would be more precise to refer to “environmental and social components” or “factors to be considered” rather than “environmental components”.

### **4.0 Project Definition (p.14)**

Under i), it is a recommendation that the sources, characteristics and *magnitudes* of any potential risks be identified by the Proponent.

### **Section 5.1 Presentation of the EIS (p. 15)**

INAC suggests that this section include a statement indicating that the EIS must be organized in a way that will facilitate review, including minimizing the need to cross-reference different sections of the EIS and also including adequate referencing between sections when it is needed.

### **Section 5.4 Format (p. 16)**

The list of sections is missing a heading for transboundary impacts as well cumulative effects. A section indicating how the Proponent is to approach the transboundary impact assessment, including a description of what the assessment is to contain and what the expected geographic scope of the transboundary assessment should also be included in the guidelines document.

### **Section 5.5 Data Presentation (p. 17)**

INAC suggests that a statement be added to indicate that all charts, diagrams, photographs and maps provided should be clearly referenced in the text, especially if they are included in a separate volume or section.

### **Section 6.7 Analysis of Need and Purpose (p. 21)**

a) It is not clear how discussing the benefit of the project to Kivalliq communities is related to the general feasibility of the project – perhaps these are two separate points, or additional clarification is needed.

c) It is a recommendation to specify that *net* economic benefits are based upon an analysis of positive and negative impacts discounted over the timeframe of the proposed project. An alternative version of the guideline could be:

*c) How the Project will provide a net economic benefit to Nunavut and Canada as a whole. This should be supported by an analysis of the positive and negative social and economic effects on existing industries, markets and communities over the life of the project.*



In addition, although it may be desirable to assess the net economic benefit, INAC suggests that an assessment of the net benefit, including consideration of all other non-economic impacts and benefits (such as environmental, social and cultural) should also be included, and is more essential than an economics-only analysis.

Also, INAC would ask whether NIRB considers that it may be appropriate to ask the Proponent to discuss what is the future purpose of the exploration they are proposing to undertake and whether it is possible that they may in the future propose a mining development project in the Beverly caribou calving grounds.

### **Section 6.9 Methodology (p. 21)**

INAC suggests that this section discuss how the Proponent should address information gaps, such as details in the design that have not yet been determined. The Proponent should be advised to explain when the information will be determined, to describe whether the predicted impacts may depend on details that are yet to come and if so, describe how the potential impacts of all possible options will be managed.

### **6.10 Public Consultation (p.22)**

It is a recommendation that the proponent not only develop two-way communications with the concerned communities, but to also minimally present a summary of all dialogue between the proponent and community members in the DEIS (this could be a separate appendix). This will enable responsible agencies to assess the transparency and meaningfulness of community consultation efforts and the messages communicated within the process of dialogue, and to subsequently assess how public participation will influence the development of the project. It will also help to understand the expectations held within communities based upon responses to specific issues raised.

In addition it is recommended that the DEIS describe how communication was facilitated with the public through accommodating regional languages/dialects, not only through translation but through live translation/interpretation at community/public meetings.

### **Section 7.0 Detailed Project Proposal Description (p. 23)**

It is not clear how this section differs from Section 4.0 (Project Definition), it would be helpful if this was either clarified, or the two sections were joined into one. This will ensure a more concise document and consistent messaging.

Also, with respect to d), it is suggested that “Scale” be changed to “Temporal and Spatial Scales”.

### **Section 8.2 Exploration for Uranium Mineralization (p. 24)**

f) INAC would like to request that the Proponent delineate Inuit Owned Land and Crown Land as appropriate on maps of exploration activity



## **Section 8.8 Waste Management (p. 27)**

d) It is recommended that the Proponent be asked to include descriptions of spill contingency plans.

## **Section 11.2 Biophysical Environment (p. 31)**

It is recommended that the Proponent be directed to describe and justify the methodologies and/or sources used to collect baseline data.

### **11.1.2. Valued Socio-Economic Components (p.31)**

INAC recommends the addition of “Education and Training” and “Employment Opportunities” to the list

### **11.2.7 Inuit and Aboriginal Harvesting (p.33)**

Where possible, drawing from sources of Inuit Qaujimajatuqangit (IQ) and scientific knowledge, it is a recommendation that the proponent describe the traditional Inuit and Aboriginal practices related to harvesting and managing the Beverly caribou herd and other wildlife in the relevant study area.

## **Section 12.0 Assessment and Mitigation of Impacts (p. 34)**

INAC suggests the analysis of biophysical and socio-economic effects should also describe and justify how the significance of the effect was determined.

In addition, discussing the residual impacts along with the identification of effects and mitigation may also be useful in avoiding repetition in the EIS.

### **14.1.1 General Biophysical Environment (p. 37)**

The following items are missing from the list of potential impacts: impacts to air quality, impacts to aquatic organisms and habitats, and impacts to all other wildlife that are not caribou, raptors and migratory birds.

### **14.1.6 Cumulative Effects of the Project (p.39)**

This section appears to use both “reasonably foreseeable future projects” and “probable future development”. Only the latter is defined in the text. To avoid confusion, INAC suggests that it would be helpful to either, differentiate the two, indicate that they are interchangeable, or use consistent wording.

Throughout the draft guideline document, the cumulative effects assessment is described as “cumulative effects of the project in relation to other similar projects in the region, to caribou, caribou calving grounds, and across caribou ranges.” INAC would suggest that the wording be changed to “cumulative effects of the project in relation to other similar projects in the region, **with a focus** on caribou, caribou calving grounds, and across caribou ranges” as one would expect the possibility of other cumulative



effects, including socio-economic impacts, should be addressed in the assessment, even if they are not the focus.

In addition, the description of the expected cumulative impacts assessment (on p. 39) appears to have some contradictions. The second paragraph on the page directs the proponent to, at a minimum consider the effects of mines, exploration camps and mineral leases; however the last paragraph directs the proponent to include several other factors, including other types of human activity and natural phenomenon, such as interspecific competition. It is suggested that the scope of the cumulative effects assessment be clarified and consistent throughout the document. This should include clarifying whether the proponent is only to consider impacts from other similar projects, or whether other factors that may act cumulatively on caribou must be considered as well. INAC suggests that including all possible impacts, to the extent reasonable, would provide a more realistic assessment of the actual impacts that are expected to occur. A conclusion pertaining to the magnitude and acceptability of the sum of all types of impacts would also be useful.

If other factors are to be considered, INAC would ask NIRB to consider whether the apparent decline and consequent vulnerability of the Beverly herd that was presented by the BQCMB at the scoping and guidelines workshop in November should not also be explicitly addressed in the cumulative effects assessment, as one of many factors that may act cumulatively on the Beverly caribou herd.

That the assessment is to consider activity outside the NSA should be clarified as well.

#### **14.1.7 Inuit and Aboriginal harvesting (p.40)**

The analysis should also include an assessment of the potential impacts of project activities on:

- c) The traditional and contemporary Inuit and Aboriginal practices of wildlife management and harvesting.

#### **15.0 Environmental Management and Mitigation (p. 40)**

INAC suggests that the Proponent should be directed to describe what follow-up measures will be taken with respect to mitigation, including commitments to adaptive management. In addition, in conclusions made by the Proponent with respect to mitigation measures, it should be clear whether the Proponent will certainly apply the measures and if not, in what circumstances they will be applied.

#### **17.0 Conclusions and Recommendations (p. 44)**

INAC recommends that this section include direction that all conclusions made should be adequately supported and clearly follow from the findings presented throughout the EIS.



## **18.0 List of Consultants and Organizations (p. 44)**

It is a recommendation that the Proponent include a summary of the dialogue held at each meeting and a complete list of participants in their accounts of consultations with organizations.

INAC looks forward to continuing collaboration with NIRB and other parties, including Uravan, in the assessment process for this Project. Should you have any questions or like any further clarification, please do not hesitate to contact Margaux Brisco at (867) 975-4567 by phone or at [margaux.brisco@inac-ainc.gc.ca](mailto:margaux.brisco@inac-ainc.gc.ca) by email.

Sincerely,

Robyn Abernethy-Gillis  
Manager of Environment Division