URAVAN MINERALS INC.

January 12, 2008

VIA ELECTRONIC MAIL

Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
X0B 0C0

NIRB No.: 08EN037
KIA No: KVL106B208
INAC No.: N2008C0009
NWB No.: 2BE-GAR0710

Attention: Leslie Payette
Manager Environmental Administration

RE: Response – Draft NIRB EIS Guidelines - Uravan Minerals Inc ("Uravan") Garry Lake project proposal

With respect to the Nunavut Impact Review Board (NIRB) ***Draft Guidelines To The Preparation Of An Environmental Impact Statement For Uravan Minerals Inc's Garry Lake Project (the "Draft EIS Guidelines")***, dated November 20, 2008, Uravan Minerals Inc. ("Uravan" or the "Proponent") has the following comments and recommendations.

Workshop Comments

On November 5 – 7, 2008 NIRB hosted a ***Public Scoping and EIR Guideline Development Workshop (the "Workshop")*** in Baker Lake, Nunavut (NU). The Workshop was held as part of NIRB's Part 5 Review of Uravan's Garry Lake project proposal. Subsequent to the Workshop, Uravan received a Summary Report dated November 14, 2008 detailing the Workshop presentations and discussions. Subsequent to Uravan's review of the Summary Report, the attached comments (Schedule A) are made to correct certain statements made in the Summary Report and other related correspondence that Uravan believes inaccurate. For your review, Uravan's comments with respect to the Summary Report are attached as Schedule A.

Summary Description - Garry Lake Project Proposal

Introduction
The Garry Lake uranium property consists of 355 mining claims, totalling 829,170 acres that covers the northern margin of the Thelon Basin, Nunavut Territory (NU) and extends southward into the basin (Figure1 and 2). The nearest community to the Garry Lake property is Baker Lake, NU, located approximately 235 Kilometers to the southeast. Access to the area is by helicopter or fixed wing aircraft primarily based in Baker Lake.

The Thelon Basin is an ancient sedimentary basin (1.7 billion years old) that is geologically analogous to the Athabasca Basin, Saskatchewan. This geological comparison and other compelling similarities strengthen the potential for the Thelon Basin to host 'unconformity-type' uranium deposits similar to the high-grade 'unconformity-type' uranium deposits currently being mined in the Athabasca Basin.

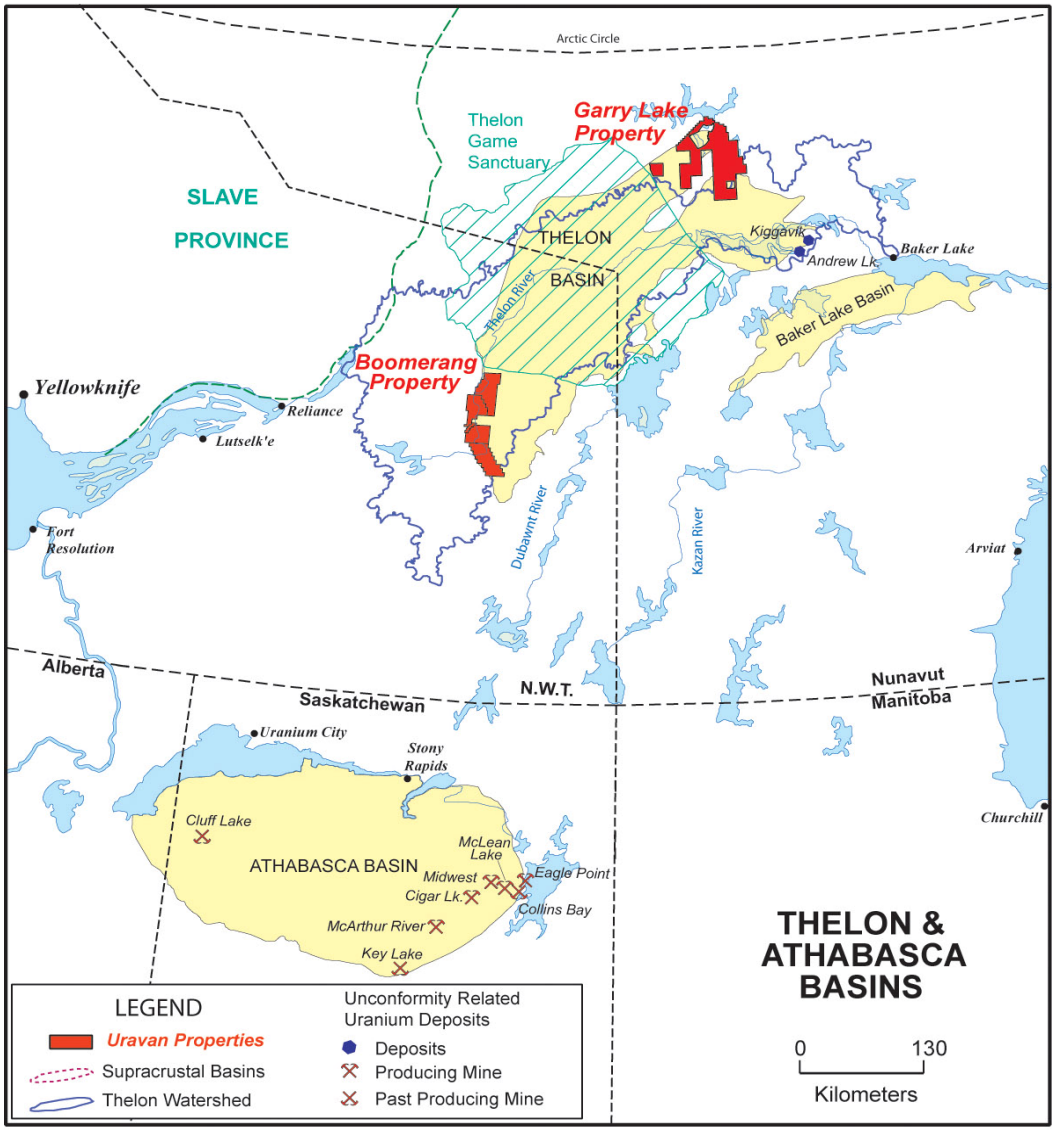
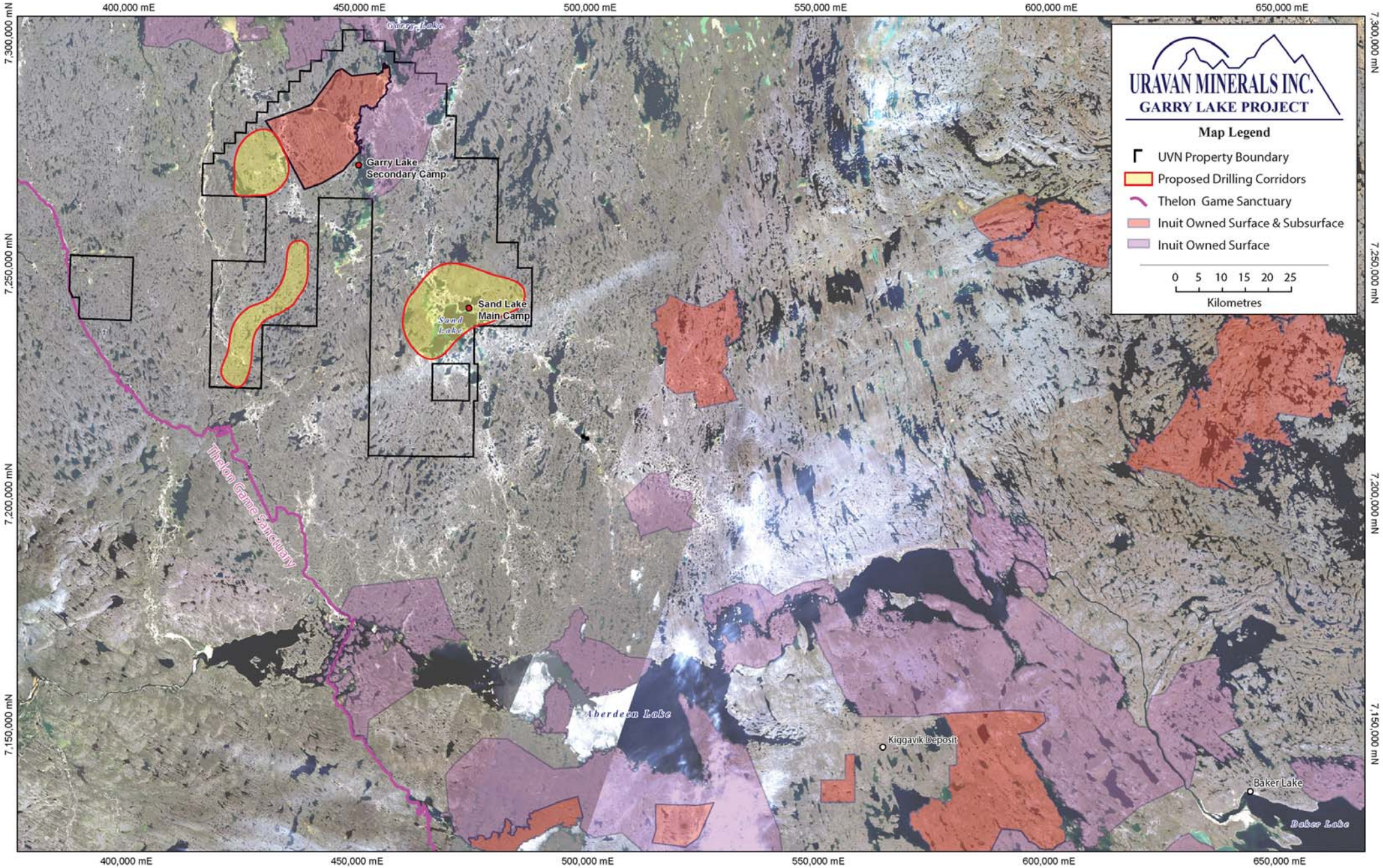


Figure 1 Regional map showing Thelon and Athabasca Basins

Exploration Work

In 2007 Uravan completed a property-wide multi-phased airborne geophysical survey consisting of a helicopter-borne AeroTem III System Electromagnetic & Magnetic Survey and a Fixed-wing Terraquest High-resolution Tri-Sensor Magnetic & Radiometric Airborne Survey (i.e. EM, Magnetic and Radiometric surveys). In conjunction with the geophysical surveys, Uravan created a GIS database by compiling all historic geological, structural and surface geochemical data over the northern Thelon Basin and surrounding area. The interpretation and integration of these multiple data sets have identified a number of surface uranium anomalies and geophysical trends that highlights specific region drill targets. The attached satellite imagery property map (Figure 2) shows, among other things, three large regional drill target areas or corridors.


400,000 mE
450,000 mE
500,000 mE
550,000 mE
600,000 mE
650,000 mE
7,300,000 mN
7,250,000 mN
7,200,000 mN
7,150,000 mN
URAVAN MINERALS INC.
GARRY LAKE PROJECT
Map Legend
UVN Property Boundary
Proposed Drilling Corridors
Thelon Game Sanctuary
Inuit Owned Surface & Subsurface
Inuit Owned Surface
0 5 10 15 20 25
Kilometres
Garry Lake
Garry Lake Secondary Camp
Sand Lake Main Camp
Sand Lake
Thelon Game Sanctuary
Aberdeen Lake
Kiggavik Deposit
Baker Lake
Baker Lake

URAVAN MINERALS INC.

Garry Lake Project Proposal

The Garry Lake project proposal, as detailed in Uravan's Land Use Permit application (LUP application # N2008C0009LUP attached as Schedule B), was submitted on January 21 2008 to Indian and Northern Affairs Canada (INAC), Nunavut Impact Review Board (NIRB), Kivalliq Inuit Association (KIA), Nunavut Planning Commission (NPC) and the Nunavut Water Board (NWB).

The proposed uranium exploration programs (the "Program") are reconnaissance in nature, primarily consisting of: (1) ground follow-up mapping and surface sampling (soils, vegetation, radon with multi-element analysis) programs and surveys, (2) ground geophysical surveys (Fixed and Moving Loop EM) over interpreted favourable areas (previously defined by the airborne geophysical surveys described above and other anomalies identified through surface sampling surveys) followed by, (3) core drilling (i.e. 'diamond drilling'). The total number of drill holes and the specific locations can only be determined as the technical work progress (as described above), however, based on the size of the potential geological and geophysical target area and corridors, as identified by Figure 2, it is estimated that between 30 and 40 diamond drill holes would be required to evaluate the property over 4 to 6 field seasons (i.e. potentially 4 to 6 years). Once specific drill locations are determined based on more detailed surveys, as described above, Uravan will notify the designated land use inspector.

Initially, Program activities will be carried out annually from July 15th – September 21st. Once a sufficient drill target database is established, Uravan anticipates two annual drilling seasons: (1) during late winter from March 1st – May 15th and (2) a summer drilling season from July 15th – September 21st. The winter drilling operations will be supported utilizing Sno-Cat (snow groomer) for equipment moves and positioning and a mobile camp; the summer drill program will be helicopter supported for movement of equipment and positioning of personnel from a stationary camp located at the Lower Garry Lake or Sand Lake Camps (Figure 2).

Camp Site Preparation, Construction and Operations

Initial exploration activities will be helicopter support and conducted primarily in the summer-fall field seasons (mid July – mid September). Exploration activities will be positioned from an all-seasons permanent camp located on the north shore of Sand Lake (Sand Lake Camp: 65°17'35" N / 99°32'35" W or 474691.83 m E / 7241130.73m N NAD83 Zone 13)(Figure 2). The camp will consist of about 12 – 14'x20' aluminum framed oval tent-type structures with ply-wood floors, covering an area measuring approximately 300'x300' (100m x 100m). The camp facility is designed to support up to 20 personnel plus working amenities, such as: sleep quarters, kitchen, first aid, dry/shower, office, core handling/logging/sampling, and storage and power facilities. Further, Uravan proposes a mobile-type camp facility to accommodate possible diamond drilling operations conducted in late winter (March to May). This mobile-camp will be a scaled down version of the permanent camp described above and sized for mounting on slays to be moved from drill location to drill location by wide track Sno-Cat type vehicle. In May 2008 the above referenced 20 man camp structures, camp equipment and a Boyles 25A diamond drill and equipment was positioned and stored at the Sand Lake camp pending approval of a Land Use Permit (LUP). For details on camp operations, particularly with respect to disposal methods for garbage and sewage (sanitary and gray water), see the attached Schedule B – Garry Lake Land Use Application dated January 21, 2008.

Exploration Operations

The proposed exploration program (ground follow up and diamond drilling) is reconnaissance in nature designed to explore for uranium mineralization in the north-eastern Thelon Basin. Diamond drilling operations will primarily be conducted initially in the summer-fall field seasons (roughly from mid July – mid September). Uravan has also proposed conducting diamond drilling operation in the late winter season (March to June); however, due to logistical uncertainties (safety considerations with respect to ground visibility and unstable weather may result in questionable aircraft support) this operation may not be feasible. The summer-fall field seasons will be helicopter supported and the

late winter operations will be conduct for a track Sno-Cat machine. All other exploration activity, i.e. surface mapping, sampling and geophysical surveys will be conducted in the summer-fall field season for the Sand Lake camp, as described above, and crews positioned in the field by helicopter.

Diamond drilling activities are considered reconnaissance in nature. What this means is that drill hole locations will be widely spaced (minimum of 2 kilometer distance between drill holes). Drill hole locations will be position to best test certain geological/geophysical anomalies determined through prior surface sampling results, and the interpretation of ground and airborne geophysical surveys. It is anticipated that drill depths will be variable, from 200 meter to 800 meter depths. The ground follow up work followed by diamond drilling is designed to evaluate the mineral potential of the identified large target areas with a minimum amount of drill holes. Given this approach, all drilling operations proposed are considered entry-level having minimal-impact with respect to the surface and flora disturbance, drill water discharge, interruption of wild life foraging, migration and habitat, resulting in minimal cumulative impacts.

Diamond drilling operations would be continuous on a 24-7 basis, consisting of two, 2-man shifts. The positioning of diamond drill and equipment on location is carried out by helicopter. The drill rig is constructed on each drill site basically from the ground up; totalling about 30 helicopter sling loads (lifts). The 25A Boyle's diamond drill is small and compact compared to oil and gas exploration drilling equipment. Once the diamond drill is on location the 'footprint' is small, measuring about 20 feet x 20 feet (400 sq. feet) and the maximum drill hole diameter measures 3 inches. The total surface area utilized for the diamond drill and auxiliary equipment lay-down area measures about 50 feet x 50 feet (Figure 3 below)

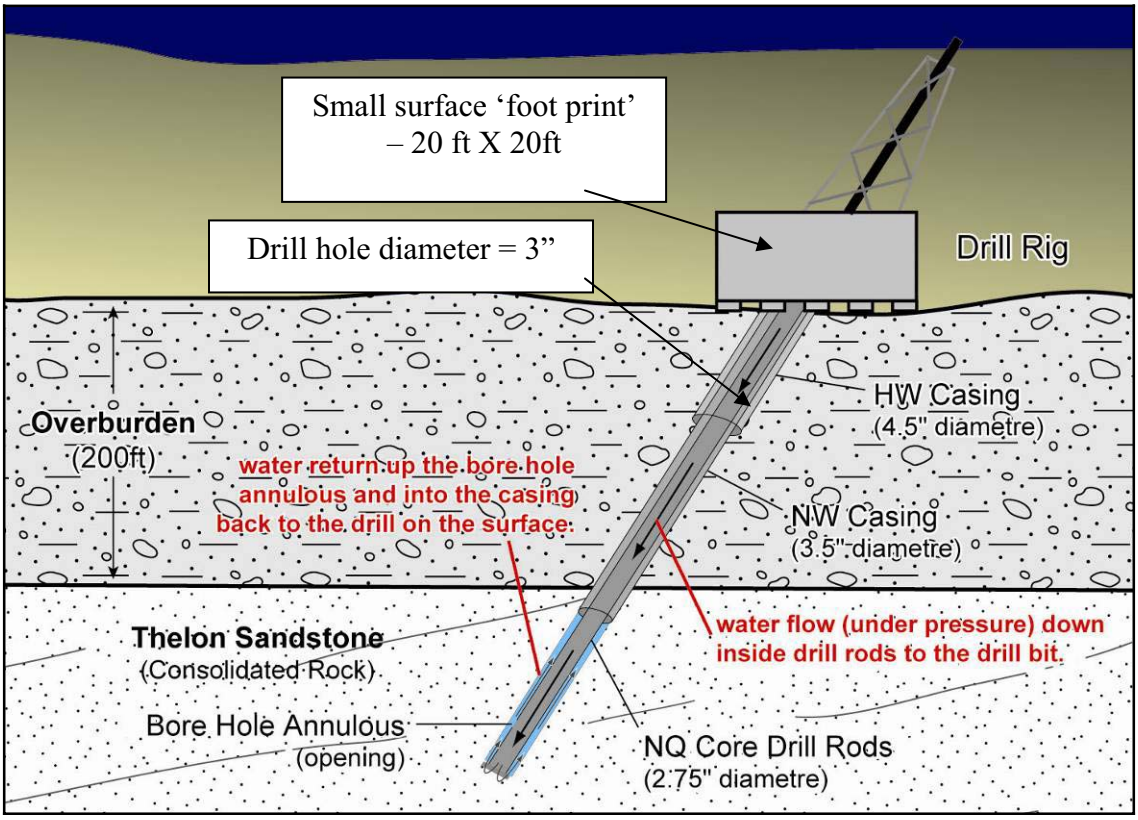


Figure 3 – Graphic representation of drilling operation

Diamond Drilling Operations

- As the drilling advances, water and rock cuttings are contained within annulus of drill hole
- Water and cuttings discharged back to tanks on surface or allowed to sump in low areas on the surface.
- All drilling additives area biodegradable
- Drill water is heated using propane to allow drilling through permafrost and to prevent drill rods from freezing in the hole.
- All drill casing is retrieved after the drill hole is completed
- Once the drill rig and other equipment have been removed, the drill site is restored.

The graphical representation of a drilling operation shown in cross section above (Figure 3) and the pictures shown below (Figures 4 & 5 below) will hopefully allow the reader to understand more about the low impact nature of entry-level drilling operations as it pertains to potential cumulative impacts. The details of diamond drilling operations with respect to water use, drilling additives, uranium drilling best practices, remediation of fuel spills and site restoration see the attached Schedule B – Garry Lake Land Use Application dated January 21, 2008 (LUP application # N2008C0009).

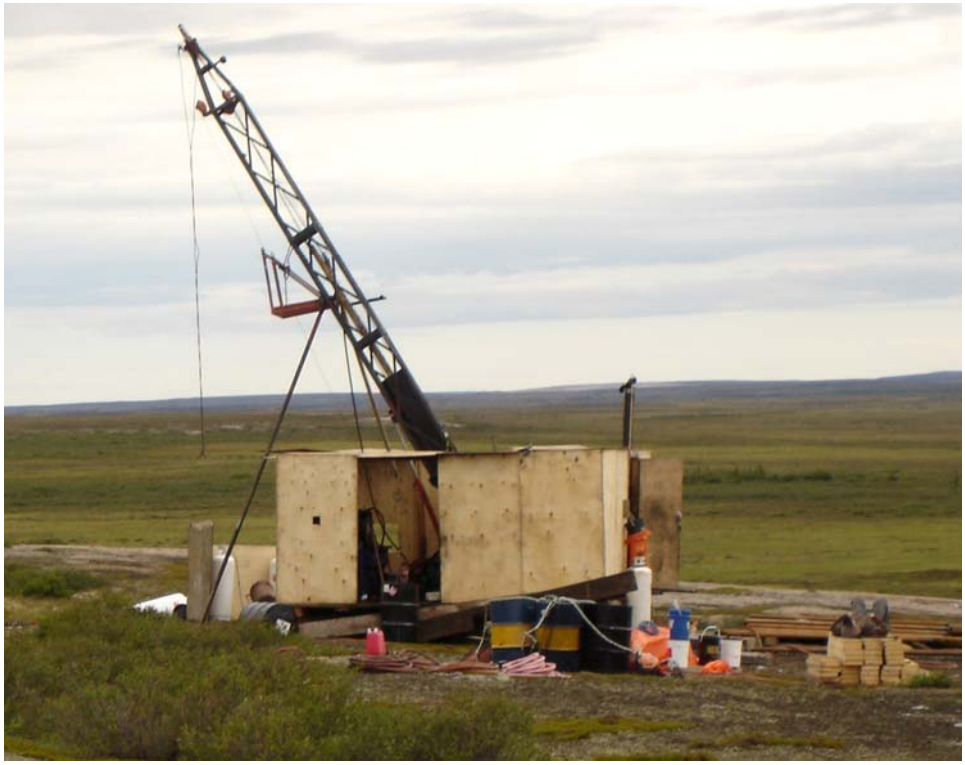


Figure 4 - Diamond drill operating on the tundra including lay-down area for auxiliary equipment.

Figure 5 - Diamond drill operating on the tundra.

NIRB Garry Lake Draft EIS Guidelines

Counter Position

Given the technical geological merits of the Garry Lake project, Uravan is committed to participate in the Part 5 - EIS Review process, however, based on the size, scope and low impact entry-level exploration program proposed for the Garry Lake project (LUP application # N2008C0009) Uravan does not agree that a Part 5 - EIS Review is necessary or required. Uravan believes the current and existing land use regulations and guidelines, regulatory oversight, operating standards and industry best management practices have been established and tested over time to mitigate public concerns regarding the impacts on the environment and on caribou, particularly given the scope of work and small duration of time (about 45-50 days) annually the Garry Lake project would be active. Uravan believes the recommendation by NIRB to conduct a Part 5 Review on a low impact entry-level exploration drill program is without merit and unprecedented any where in the world. Uravan believes this type of 'over-the-top' regulatory compliance and oversight carries a negative-cost-benefit directly into the land thereby reducing its value for the residence of Nunavut, the tax payers of Canada and Uravan's mineral tenure and potential value. Uravan believes this extreme regulatory oversight is a misallocation of human resources and government capital given the more valuable activities that the land use regulators should be involved and focused.

Further, based on the pre-Workshop correspondence, it appears the Inuit organizations, specifically the Kivalliq Inuit Association (KIA) and the Nunavut Tunngavik Incorporated (NTI) did not support a Part 5 Review of the Garry Lake project, as evidenced by the attached correspondence (Schedule C). If the Inuit leadership doesn't support a Part 5 Review (EIS) for the Garry Lake project proposal,

URAVAN MINERALS INC.

Uravan wonders, as should others, whose concerns was the NIRB representing with respect to Section 12.2.5 of the Nunavut Land Claim Agreement (NLCA), and its *Screening Decision Report* dated June 27, 2008 (Schedule D)?
The fundamental question and reality for all interested parties is does this Garry Lake EIS undertaking provide any cost-benefit or value added to the protection of the sub arctic environment for the people of the Nunavut Territory or Canada? Can the people of the Nunavut Territory, Government of Canada and the mineral exploration industry really afford to pursue Part 5 Review-EIS on entry-level low impact mineral exploration programs?

Uravan Garry Lake Draft EIS Recommendations

The following are Uravan's comments and recommendations on the Draft EIS Guidelines for the Garry Lake project. Based on the forgoing project description and attached project details, Uravan believes these recommendations support a meaningful and constructive approach to the potential impacts and cumulative impacts on wildlife habitat and Inuit wildlife harvesting that is commensurate with the level of activity represented in the Garry Lake project proposal.

Uravan Recommends eliminating the following requirements from the Draft EIS Guidelines

1. **Community Engagement beyond Baker Lake:** Given the low impact entry-level reconnaissance programs with short work seasons (30 – 50 days), as proposed in the Garry Lake project and described above, Uravan does not agree that multiple community meetings or engagements are require or necessary. Uravan favours engaging the residents and organizations of Baker Lake, as the closest and the only potentially affected community. Although Uravan is not apposed to inviting the area wide public, as outlined section 2.2 of the Draft EIS Guidelines to participate in the Baker Lake engagements, to physically engage communities further away from the project area than Baker Lake would not be cost-effective or add any value to meaningful public participation.

2. **Collection of Baseline Information (Section 11): T**he Garry Lake project area is bounded by a very large remote area of the sub-arctic. The collection and documentation of any 'Baseline Information' (Secrion11, Draft EIS Guidelines) (the "Baseline Information") would need to be extracted from the public or government record, which minimal. To physically collect Baseline Information (based on the criteria outlined in Section 11 of the Draft EIS Guidelines) in this remote area, keeping in mind the scope of the Garry Lake project work proposed and further described above, Uravan believes would result in the compilation of many one time random events, therefore statistically meaningless; resulting in only hypothetical conclusions. Therefore, any Baseline Information, beyond the intuitively obvious, to predict the potential adverse or beneficial impacts with respect to any collected or archived Baseline Information, Uravan believes would add no value to existing understanding or Traditional Knowledge therefore, redundant, extremely random and not cost effective.

3. **Impact Assessment (Section 12), Impacts of the Environment (Section 13) and Impacts of Project Components and Activities (Section 14):** Again, considering the size and scope of the Garry Lake project and for all the reasons stated in paragraph 2 above, Uravan does not believe any public information, beyond our own Traditional Knowledge, would be meaningful with respect to Sections 12, 13 and 14 of the Draft EIS Guidelines.

In lieu of eliminating the forgoing requirements from the Draft EIS Guidelines Uravan would recommend the following:

In consideration of the concerns with respect to potential cumulative impacts related directly to the Garry Lake project proposals, Uravan would propose a proactive hands-on approach for assessing these potential impacts. This proactive approach would entail the 'real time' monitoring of the exploration activities carried out by Uravan on the Garry Lake projects as defined above and more

particularly described in its LUP applications (LUP application # N2008C0009 - Schedule B attached). The direct monitoring of exploration activities would have a greater chance of determining, understanding and mitigation of potential cumulative impacts on wildlife habitat and Inuit wildlife harvesting, as well as caribou calving and caribou migration. Uravan believes this is an approach that would provide opportunity for concerned parties to observe real time exploration activity thereby forming a factual basis (enhancing Traditional Knowledge) for addressing concerns and potential cumulative impacts. This activity could potentially lead to developing different or revised operational guidelines that would address and resolve potential impacts or concerns and could help sort out the level(s) of impacts that are the basis of concern. The monitoring process could involve individuals or a group of individuals from the concerned Aboriginal communities plus other government technical observers. Uravan believes this process has the potential to shed light on the concerns, confusion and possible misconceptions (myths) that surround exploration activity and the impacts they may have on this remote environment. Uravan believes visits to its operations together with regular monitoring of its activities will provide clarity around the issues and help resolve concerns.

Statement of Principle

Uravan honors the Inuit people's desire and need to preserve their cultural values and connection to the land. Uravan believes it is important to preserve the environment; to include water, flora and fauna, and importantly, the caribou herds. Uravan is committed to working with the Inuit people and Inuit organizations to identify and resolving specific areas of concern in a mutually beneficial way.

Uravan believes the exploration and mining industry is one of the most environmentally conscious groups working in these remote barren-land areas of the Canadian sub-arctic. This awareness is not just a philosophy that has evolved through experience and out of consciousness over time but because we want to be invited back.

Respectfully Submitted,
Uravan Minerals Inc

Signed: *Larry Lahusen*
Larry Lahusen, CEO

CC: Honorable Minister Chuck Strahl, Indian and Northern Affairs Canada

Larry Lahusen, CEO
Uravan Minerals Inc.
Office Phone: (403) 264-2630
Cell Phone: 607-5908
E-mail: llahusen@uravanminerals.com

SCHEDULE A

URAVAN COMMENTS TO NIRB SUMMARY REPORT

- Immediately following the receipt of NIRB's Part 5 notice and scheduling of the Workshop dated October 8, 2008, Uravan contact Jeff Rusk (NIRB Director Technical Services) and requested the Workshop date of November 5th – 7th be moved slightly to either the prior or the following week as Uravan had prior commitments and could not attend based on the current Workshop schedule. As Uravan is the Proponent with respect to the Part 5 Review and Garry Lake project, the preeminent reason for conducting a 'public scoping workshop', Uravan considers it odd and unfortunate that the scheduled Workshop date could not be adjusted to allow for Uravan's attendance.

- With respect to Uravan's absence at the Workshop, Uravan advised Stephanie Autut (NIRB Executive Director) that Uravan would have a person attending the Workshop to observe and take notes; however, this individual would not be attending in a capacity to provide direct company or project information with regard to the Garry Lake project proposal. In the Summary Report of the Workshop, NIRB indicated that no Uravan representative identified themselves at the meeting. For the record, Uravan did have a representative(s) at the Workshop. These representative(s) are well known and long time residents of Baker Lake and very knowledgeable regarding caribou and other ecosystems of the barren lands.

- **Summary Report, page 9 under heading: 1. The Garry Lake Project, paragraph a:** NIRB stated "Community has not been consulted previously about this project. For the record:

  > On April 19th and 20th 2007 Allan Miller, previously the VP Exploration for Uravan and Garth Drever, previously Senior Geologist with Cameco Corporation (currently Global Exploration Manager for Uravan) undertook a joint community consultation in Baker Lake, NU. These community meetings were organized and set up with the excellent assistance of Russell Toolooktook, Community Liaison Officer, Kivalliq Inuit Association (KIA). Allan Miller and Garth Drever made presentations regarding their respective projects as to there whereabouts, activities proposed and timing of exploration. These presentations were made to the Baker Lake Hamlet Mayor and Councilors and representatives for CLARC, Baker Lake Hunters and Trappers, the Baker Lake Elders and the Baker Lake Concerned Citizens Committee.

- **Summary Report, page 9 under heading: 1. The Garry Lake Project, paragraph f:** NIRB stated …"Uravan's [Garry Lake camp] is not located as indicated on the map…… For the record on March 14, 2008, Ian Fraser, Uravan's Senior Geologist, sent a letter with attached map to Jeff Holwell, INAC Land Administrator stating the following:

  > In reference to our Application of Land Use Permit #N2008C0009, we would like to amend the application to reflect an additional camp location. Due to the size of the property we envision utilizing the camp location on record, and a second camp location to perform our exploration programs. Please note it is our intention to use only one camp location per exploration program.
  > The second proposed camp location is located on Sand Lake, NU at: 65°17'35" N / 99°32'35" W (474691.83 m E / 7241130.73m N). See the attached maps.
  > Nothing else has changed with respect to the application.
  > I trust this meets with your approval and that this amendment notification will be distributed to all parties without delay.
  > Sincerely,
  > Ian Fraser, P.Geo., Senior Geologist

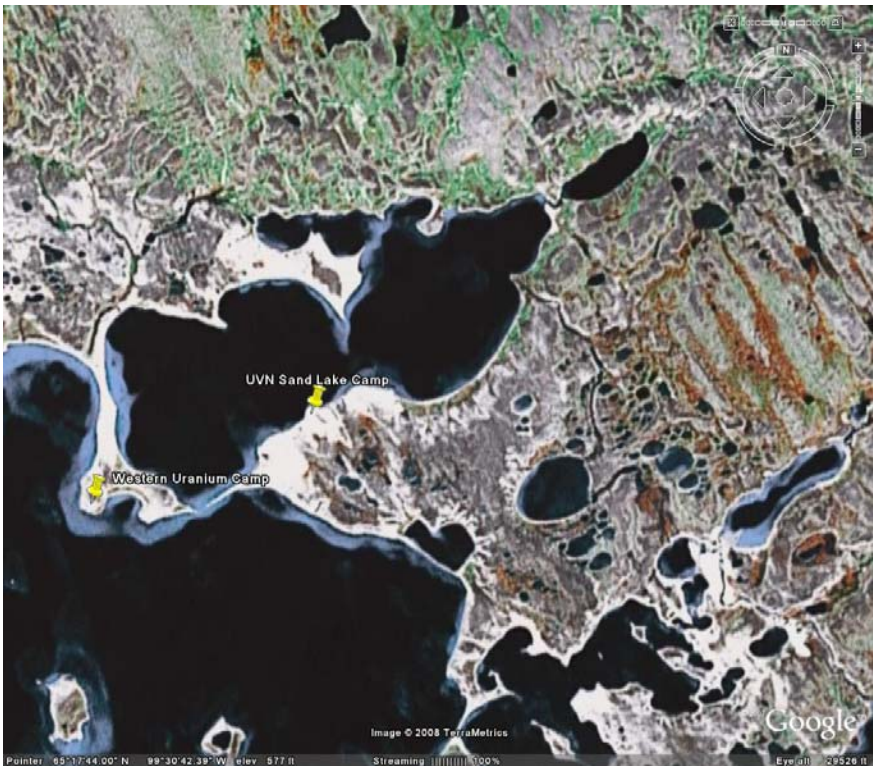


Figure 1: Land satellite photo over the north end of Sand Lake showing the locations of the Western Uranium and Uravan Sand Lake camps.

DATED NOVEMBER 14, 2008

SCHEDULE C

NIT & KIA JOINT LETTER TO NIRB

DATED

October 31, 2008

October 31, 2008

Ryan Barry
Technical Advisor
Nunavut Impact Review Board
Box 2379
Cambridge Bay, NU
X0B 0C0

Dear Mr. Barry:

Re: NIRB 08EN037 – Uravan Minerals Inc.

In a letter to NIRB dated October 29, 2008 the Government of Nunavut made the following statement;

> *"We reiterate our screening comments to NIRB that in the absence of up-to-date land use plans, environmental assessment will be forced to continue addressing broad land use issues in the context of specific projects. Additional pieces of the territory's resource management system are also missing, including implementation of key special management areas of the Thelon Game Sanctuary Management Plan. Until these issues are resolved, the GN remains concerned about the potential for cumulative impacts of projects to the Beverly herd and the potential effects on Inuit harvesting and human health."*

We would like to take this opportunity to remind all parties that DIAND and the Government Nunavut signed and approved the Nunavut Planning Commission's Keewatin Regional Land Use Plan in June of 2000. The Keewatin Regional Land Use Plan must be implemented (followed) by government and it's agencies….and amendments made as needed by applying for such to the Nunavut Planning Commission….if it is deemed out-of-date.

Concerning the Thelon Management Plan and proposed Special Management Areas. KIA and NTI support the current and long standing boundaries of the Thelon Game Sanctuary in Nunavut. However, KIA and NTI have not agreed to the establishment of the Special Management Areas in Nunavut proposed as future considerations in the current Thelon Management Plan (which is not yet finalized or approved). There are Inuit Owned Lands in this area, some of which

where Inuit own the mineral title and where Inuit have the right to explore and mine.

Regards,

Luis Manzo
Director, Department of Lands and Resources
Kivalliq Inuit Association

SCHEDULE D

NIRB SCREENING DECEISION REPORT

NIRB FILE NO: 08EN037

GARRY LAKE PROJECT PROPOSAL

DATED

JUNE 27, 2008

SCREENING DECISION REPORT
NIRB FILE NO.: 08EN037

INAC No.: N2008C0009
KIA No.: KVL106B208
NWB No.: 2BE-GAR0710

June 27, 2008

Honourable Minister Chuck Strahl
Minister of Indian Affairs and Northern Development
10 Wellington, 21st Floor
Gatineau, QC
K1A 0H4

Via email: Strahl.C@parl.gc.ca

Re: Screening Decision for Uravan Minerals Inc.'s Garry Lake Project Proposal

---

Dear Honourable Minister Strahl:

The primary objectives of the Nunavut Land Claims Agreement (NLCA) are set out in Section 12.2.5 of the Land Claims Agreement. This section reads:

> *In carrying out its functions, the primary objectives of NIRB shall be at all times to protect and promote the existing and future well-being of the residents and communities of the Nunavut Settlement Area, and to protect the ecosystemic integrity of the Nunavut Settlement Area. NIRB shall take into account the well-being of the residents of Canada outside the Nunavut Settlement Area.*

Subsection 12.4.2 (a) of the NLCA directs the Nunavut Impact Review Board (NIRB or Board), when screening a project, to recommend a public review when in its judgement:

(i) the project may have significant adverse effects on the ecosystem, wildlife habitat or Inuit harvesting activities,
(ii) the project may have significant adverse socio-economic effects on northerners,
(iii) the project will cause significant concern, or
(iv) the project involves technological innovations for which the effects are unknown

Pursuant to Subsection 12.4.2 (b), a review is generally not required when, in NIRB's judgement, the project is unlikely to arouse significant public concern and;

(i) the adverse ecosystemic and socio-economic effects are not likely to be significant, or
(ii) the project is of a type where the potential adverse effects are highly predictable and mitigable with known technology

Subsection 12.4.2 (c) instructs the NIRB to give greater weight to the provisions of 12.4.2 (a) in determining whether a review is required or not.

Procedural History and Background

On January 25, 2008 the NIRB received an application for a land use permit from Uravan Minerals Inc. (Uravan or Proponent) for its Garry Lake uranium exploration project proposal (see Appendix A for a project summary). On February 4, 2008 the NIRB wrote to the Proponent and advised that the project appeared to be in an area which required a conformity determination from the Nunavut Planning Commission (NPC). Additionally, the Proponent was advised that the NIRB would require a request from an authorizing agency to screen the application for the Garry Lake project proposal.

On March 14, 2008 the Board received a land use application from the Kivalliq Inuit Association (KIA) for the Garry Lake project proposal. Then, on April 17, 2008 the NIRB received a request from Indian and Northern Affairs Canada (INAC) to screen the land use application for the activities on crown land associated with this project proposal. On April 1, 2008 NIRB received a positive conformity determination with the Keewatin Regional Land Use Plan (KRLUP) from the NPC for this project. Additionally, the NIRB requested additional information from the Proponent to be submitted by April 16, 2008. The requested information was received on April 14, 2008.

This application was distributed to the Baker Lake Hunters' and Trappers' Organization, Hamlet, Community Lands and Resource Committee, to interested Federal and Territorial Agencies and other interested Inuit organizations and non-government organizations/persons. The NIRB requested that interested Parties review the application and provide the Board with comments by April 23, 2008 regarding:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic and socio-economic effects; and if so, why;
- Whether the project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures); and
- Any matter of importance to the Party related to the project proposal.

On or before April 23, 2008, the NIRB received initial comments from the following interested Parties (see Appendix B):

- Beverly and Qamanirjuaq Caribou Management Board (BQCMB)
- Government of Nunavut – Department of Environment (GN-DoE)

On May 15, 2008 the NIRB requested more time to screen this project proposal pursuant to Section 12.4.5 (b) of the NLCA. On May 23, 2008, the Board requested further input from Parties on several pertinent issues, including the status of the Thelon Game Sanctuary Management Plan (the Thelon Plan). Specifically, the Board asked for input regarding the establishment of the Special Management Areas (SMAs) in the Thelon Plan (as the location of Uravan's Garry Lake project is within the proposed Aberdeen Lake SMA), and the impacts associated with approving projects without a final plan. In addition, the Board outlined concerns regarding the potential for cumulative impacts in that region.

On or before June 9, 2008 additional comments were received from the following interested Parties (see Appendix B):

- Uravan Minerals Inc.,
- Athabasca Denesuline Negotiation Team (ADNT),
- GN-DoE ,
- INAC, and
- BQCMB.

NIRB Assessment and Decision

In determining whether or not a public review is necessary, the NIRB considered a number of factors, in addition to soliciting and reviewing comments received from interested parties. Upon completion of the internal technical review, the NIRB determined that the nature, timing, and location of the Garry Lake project indicated that, consistent with the criteria identified in 12.4.2(a) of the NLCA, i) this project has the potential to cause significant adverse ecosystemic effects, (ii) the project may have significant adverse socio-economic effects on northerners and iii) there is significant public concern regarding this project. The NIRB and other commenting parties have identified a number of significant issues that could be associated with this project. Details of the significant issues identified are:

1. The project may have significant adverse effects on the ecosystem, wildlife habitat or Inuit harvesting activities - 12.4.2(a) (i):

There is the potential for impact to wildlife habitat, particularly caribou calving grounds, as a result of exploration activities including drilling, airborne surveys, and associated camp use. The Garry Lake project is located in the traditional calving grounds of the Beverly caribou herd and, as proposed, has the potential for direct impacts to caribou and caribou calving grounds. These concerns were raised by a number of parties:

> The project is located within the calving grounds of the Beverly barren-ground caribou herd. Recent research has strengthened the information basis for concerns about how caribou responses to human activities on calving and post-calving areas can accumulate to the level that affect caribou. (GN-DoE)
>
> Nunavut's caribou herds are currently cycling down. During declines and times of low number, caribou are especially vulnerable to disturbance caused by exploration activities. (GN-DoE)
>
> There is a clear potential for Uravan's proposed activities to impact caribou and important caribou habitat. (BQCMB)
>
> The most recent data from calving ground surveys (2007, 2002, 1994, 1993) and from tracking satellite-collared Beverly and Ahiak caribou over the past few years has shown that Uravan's project area is in the **core calving area** for Beverly caribou, may be used by Beverly caribou during the post-calving period and is also used by Ahiak caribou during spring migration to their calving ground further north. (BQCMB)
>
> … the current context means that a proper assessment of projects of this nature must recognize that caribou protection is critical. This situation includes documented declines in five NWT caribou herds, limited information about Beverly and Ahiak herds, and the uncertain but likely declining population status of these herds. (BQCMB)

> Uravan does not appear to recognize the need to minimize the potential impacts of their operations on caribou on the calving grounds. They have inadequately addressed this issue in both their application and mitigation plan. It is not clear that the company is prepared to seriously address these issues. (BQCMB)

Additionally, concerns have been raised regarding the potential for cumulative impacts of this project in relation to other projects in the region, specifically on caribou and caribou calving grounds:

> The BQCMB is concerned about the amount of mineral exploration underway and proposed across the range of Beverly and Qamanirjuaq caribou herds, and particularly on the calving and post-calving areas of Beverly caribou. Potential cumulative effects are an issue at several scales, including within calving grounds and across caribou ranges, since caribou accumulate impacts as they move from one seasonal range to another. (BQCMB)

> DOE cautions that cumulative disturbances between May and August will likely have a negative impact [on caribou]. (GN-DoE)

2. The project may have significant adverse socio-economic effects on northerners – 12.4.2 (ii):

The importance of caribou to northerners' social and cultural values cannot be understated. Reliance of many northerners on caribou as a food source also means the health of caribou herds factor prominently into the local economy. These concerns were raised specifically as follows:

> Since the yearly migration of the Beverly-Qamanirjuaq caribou herd is integral to Athabasca Denesuline economic, social and cultural identity, any potential disturbance to the caribou is potential risk to the Athabasca Denesuline identity. (ADNT)

> There is clear potential for Uravan's proposed activities to impact caribou and important caribou habitat. This issue should be given serious consideration at any time, given the importance of caribou to Aboriginal and other people across the caribou ranges – communities in Nunavut, the Northwest Territories (NWT) and northern Saskatchewan rely on the Beverly and Ahiak herds. (BQCMB)

> While the BQCMB's mandate provides a focus on caribou and caribou range, board members are also concerned about the broader ecological effects of human land use activities and the long-term impacts these activities will have on the sustainability of traditional lifestyles and livelihoods for northern communities. (BQCMB)

3. The project will cause significant public concern – 12.4.2(a) (iii):

Several Parties have provided the NIRB with strong comments against the approval of the project without further review of the potential impacts related to caribou, caribou calving grounds, and cumulative impacts. The Board considers that the concerns, such as the following, constitute significant public concern:

> No exploration or development activities should be permitted on the traditional calving ground of the Beverly caribou herd. The BQCMB does not agree with permitting exploration activities on calving and post-calving areas, and recommends that Uravan's application not be approved. (BQCMB)

> A full review of the proposal should be conducted which ensures that a full and transparent public discussion takes place, in which all interested parties have the opportunity to present their views. (BQCMB)
>
> We feel that exploration and development should not take place on caribou calving grounds such as these, and that no permits should be issued for this project… (ADNT)
>
> … NIRB should ensure that the proponent works with the parties to address potential cumulative impacts and provides parties with the necessary information and assistance to assess cumulative effects on caribou. (GN-DoE)

After examining both the Project Proposal and comments received, the NIRB has determined that, pursuant to Section 12.4.4 (b), the proposal requires a public review under Part 5 or 6 of the NLCA.

Issues of Concern to NIRB

Following the Board's internal technical review of the project and the consideration of the public comments, there are several issues which require further attention and clarification by the Proponent, which the NIRB thinks is best done through a Review in order that the concerns of those directly impacted are better documented, understood, and potentially mitigated prior to the project being allowed to proceed, if that is the decision. These issues, which are caught by different portions of 12.4.2, include:

- Impacts of the project activities to caribou, with particular emphasis on calving activities.
- Potential impacts to wildlife habitat, particularly the caribou calving grounds of the Beverly herd.
- Potential cumulative impacts of this project, in relation to other similar projects in the region, to caribou, caribou calving grounds, and across caribou ranges
- Other impacts to wildlife including raptor nesting areas, potential human-carnivore conflicts and aircraft disturbances.

Parties have expressed cumulative effects concerns regarding projects in this region on numerous occasions. Subsequent recommendations from the NIRB regarding these concerns have been forwarded to the Minister in previous Board decisions, specifically 08EN024 (UR Energy Inc.), 08EN015 (Cameco Corporation – Turqavik-Aberdeen), 08EN022 (Coronation Minerals), and 08EA038 (Pacific Ridge Exploration Ltd.); and included the following recommendation:

> Territorial and federal government agencies in Nunavut should work together with Regional Inuit Associations, co-management boards and industry to develop an action plan to identify and mitigate potential cumulative effects of human land use activities, including mineral exploration, on barren-ground caribou. This assessment of cumulative effects should occur at a regional scale (i.e. larger than individual project areas).

There is little evidence before the Board that the above recommendation has been acted on by the mentioned Parties and consequently it is necessary to include the cumulative effects issue as an issue of concern to NIRB in relation to the activities of this specific project.

RECOMMENDATION TO THE MINISTER

The NIRB has carefully considered the factors set out in section 12.4.2(a) and 12.4.2(b). Based on the evidence and issues arising as set out in the preceding sections of this Screening Decision, pursuant to section 12.4.4(b) of the NLCA, the Board recommends to the Minister that the Project Proposal requires review under Part 5 or 6.

In making this recommendation, the NIRB acknowledges that it is unusual for a project of this size to be recommended for review. However, the potential for impacts to wildlife habitat, particularly core caribou calving grounds, and Inuit harvesting activities as a result of the proposed exploration activities for the Garry Lake Project and the cumulative effects of similar existing projects have been raised with increasing concern by organizations such as the BQCMB and the GN-DoE. Further, the ADNT stated:

> We feel that exploration and development should not take place on caribou calving grounds such as these, and that no permit should be issued for this project at the very least until [for a variety of reasons] …regional assessments of cumulative impacts of mineral exploration on caribou are conducted….[1]

Given the availability of recent study information from the GN-DoE, the pace of exploration in the area and the strength of the views expressed by Parties, the Board believes that this is the appropriate time to review and fully consider the potential impacts on caribou from this Project Proposal.

Assuming the Minister directs a Part 5 review, and acknowledging the NIRB is bound by the requirements of Sections 12.5.2 and 12.5.5 of the NLCA; in this case, the NIRB believes the appropriate emphasis is limited to caribou-related impacts. Accordingly, and subject to any further direction from the Minister pursuant to Section 12.5.1 of the NLCA, the NIRB will focus the scope of the review on the Project's impacts and cumulative impacts on wildlife habitat and Inuit wildlife harvesting. Furthermore, taking the size of the Project into consideration, and subject to the Minister's direction, the NIRB favours an expeditious review process in the review of the Garry Lake Project Proposal.

The NIRB looks forward to your decision.

Yours truly,

Lucassie Arragutainaq
Acting Chairperson

cc: Stephanie Autut, Executive Director - NIRB
Dionne Filiatrault, Executive Director - NWB
Jose Kusugak, President - KIA

[1] Letter from Ron Robillard, Chief Negotiator, Athabasca Denesuline, to Leslie Payette, Manager, Environmental Administration, NIRB, Re: NIRB: 08EN037 Part 4 Screening of Uravan Minerals Garry Lake Project, June 9, 2008, at p.1.

APPENDIX A
Project Summary

The project is located in the Garry Lakes Area of the Kivalliq Region. The nearest community is Baker Lake, 235 km to the SE. The project is located 65 km ENE of the Thelon Game Reserve and within the Caribou Protection Area and the Caribou Calving Area for the Beverly Caribou herd.

Uravan intends to conduct exploration activities for uranium on their property including constructing permanent and temporary camps, diamond drilling, prospecting, mapping, as well as ground geochemical sampling. The Garry Lake exploration camp would be a permanent camp used during the summer-fall field seasons and late winter (mid March to mid June), then temporarily shut down. Uravan also proposes to use a mobile camp to accommodate winter drilling. The mobile camp would be brought to drilling areas using a wide track Sno-Cat type vehicle.

The proposed project activities include:

- Prospecting, mapping
- Ground geochemical sampling (collection of soils, plant tissues, radon)
- Diamond drilling 10 – 20 holes (2000 – 5000 m)
    - August 15-October 31, 2008
    - March – May 2009
- Building and operation of a permanent exploration camp (9-16 people)
- Hauling and constructing a mobile temporary camp during the winter
- Transportation
    - wheeled aircraft re-supply (weekly) on nearest suitable plateau or esker
    - helicopter (crew and equipment/drill transport) – summer drilling
    - Sno-Cat type vehicle moving mobile camp and for winter drilling
    - snowmobiles
    - ATV (all terrain vehicles) - use around camp, maintenance of landing area
- fuel transport and storage
    - diesel, gasoline, aviation fuel, propane
- Water use
    - drill and campsite
- Production of associated waste
    - Sewage, greywater, combustible and non-combustible wastes