



NIRB File No.: 08EN037
KIA No.: KVL106B208
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May 23, 2008

To: Uravan 08EN037 Distribution List

and: *Thelon Game Sanctuary Management Plan* Parties

and: Ian Fraser, Senior Geologist
Uravan Minerals Inc.

Via email

Re: **Comments on the Uravan Minerals Inc. Garry Lake Project Proposal and the Thelon Game Sanctuary Management Plan**

Dear Parties:

Last week the Nunavut Impact Review Board (NIRB or Board) requested additional time from the Minister under section 12.4.5(b) of the Nunavut Land Claims Agreement (NLCA) to make a screening decision on Uravan Minerals Inc.'s Garry Lake Project Proposal. In making that decision, and the reason for the additional time requested, the Board would like your input on a couple of issues that, in the Board's mind, are prominently called into question with this current application.

First, the Board views the Thelon Game Sanctuary Management Plan (Thelon Plan) as a fundamental document that obviously guides activities in the region, and appears to have significance in NIRB determinations in this area. The updated Thelon Plan has not yet been finalized to date and the Special Management Areas (SMAs) identified in Appendix #2 have not yet been established. The specific SMA related to this particular file, referred to as the Aberdeen Lake SMA, is defined on page 42 of the Thelon Plan as follows:

The second Special Management Area proposed lies along the existing northeastern boundary of the Sanctuary and extends over the area between the Garry Lakes and the Aberdeen Lake area. This area, referred to as the Aberdeen Lake SMA, is locally recognized as a calving area for the Beverly Caribou Herd. The area extends southward to Marjorie Lake and the Dubwant River to encompass important crossing areas along the Thelon River. Like the Tyrrell Lake SMA in the southeast, this area is critical to protect a natural resource at the heart of the Sanctuary and its conservation mandate. The caribou herds of this region are a critical resource to both the Inuit and Dene people of the Thelon region and the success of maintaining those herds in healthy numbers is essential. Special considerations for the management of the area to the northeast of the existing Sanctuary must be consistent with the intent of the Management Plan for the Sanctuary while land use is administered locally through the appropriately designated regulatory body. (*Thelon Game Sanctuary Management Plan*)

The Board wonders about the propriety of making continued decisions in those areas without first having the Thelon Plan, and its SMAs, finalized with the input of parties like our sister Board, the Nunavut Wildlife Management Board (NWMB), and others identified in the Thelon Plan, such that the proper impact assessment considerations are before the Board and impact assessment decisions can be made. There is no doubt in the Board's mind that this plan gives relevant guidance to NIRB in that area.

Second, and related to the first concern, is the potential for cumulative impacts in that region. These impacts can arise from individually small but collectively significant actions that take place over a period of time. The Board is attaching a map illustrating current projects present in the area.

NIRB is also mindful of its decision options under the NLCA; these options are restricted to the language found in section 12.4.4 (a) through 12.4.4 (d), and one of these four decisions must be made by the NIRB for Uravan as follows:

- a) the proposal may be processed without a review under Part 5 or 6; NIRB may recommend specific terms and conditions to be attached to any approval, reflecting the primary objectives set out in Section 12.2.5;
- b) the proposal requires review under Part 5 or 6; NIRB shall identify particular issues or concerns which should be considered in such a review;
- c) the proposal is insufficiently developed to permit proper screening, and should be returned to the proponent for clarification; or
- d) the potential adverse impacts of the proposal are so unacceptable that it should be modified or abandoned.

The Board requests your views on which of the four decision options as listed above best lends itself to the significant issues raised above (the need to finalize the Thelon Plan, and cumulative effects) as these are prominent issues facing NIRB in this project proposal.

The project proposal itself, which we would like you to review again, can be obtained from NIRB's ftp site at:

<http://ftp.nirb.ca/SCREENINGS/ACTIVE%20SCREENINGS/08EN037-Uravan%20Minerals%20Inc/1-SCREENING/01-APPLICATION/>

The Board is copying interested Parties most affected by Uravan's project proposal with this letter, including the Parties identified within the Thelon Plan, as the importance of that Plan has been raised before the NIRB by the Beverly and Qamanirjuaq Caribou Management Board (BQCMB).

Please send your comments to the NIRB on or before **Monday, June 9, 2008** to the attention of NIRB's Manager of Environmental Administration Leslie Payette by email at lpayette@nirb.ca or via fax at **(867) 983-2594**.

Following the review of those comments, the Board will finalize its decision and communicate it to parties as soon as possible.

If you have any questions or concerns, feel free to contact NIRB's Director of Technical Services, Jeff Rusk at 867-983-4611 or jrusk@nirb.ca.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Stephanie Autut', is positioned above the printed name.

Stephanie Autut
Executive Director
Nunavut Impact Review Board

cc: Honourable Minister Chuck Strahl, Indian and Northern Affairs Canada
Honourable Minister John Baird, Environment Canada

Attachment: Appendix A - Kivalliq Exploration Projects