

June 6, 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 of Environmental Administration

RE: Comments on the Nunavut Impact Review Board letter dated May 23, 2008 with respect to the Garry Lake project proposal

Dear Parties:

The following is in response to a letter from the Nunavut Impact Review Board (NIRB) dated May 23, 2008 (Appendix A) in connection with Uravan Minerals Inc. ("Uravan") Land Use Permit (LUP) application on its Garry Lake project proposal.

Uravan submitted an LUP application dated January 25, 2008 pertaining to its Garry Lake project proposal to Indian and Northern Affairs Canada (INAC), Nunavut Territory (NU), which was also distributed to other Nunavut government land use regulators, such as the Nunavut Impact Review Board (NIRB), Kivalliq Inuit Association (KIA), Nunavut Planning Commission (NPC), Nunavut Water Board (NWB) and the Nunavut Planning Commission (NPC). Subsequently, the NPC completed its review of the Garry Lake LUP application, as required by the Keewatin Regional Land Use Plan (KRLUP) and the Nunavut Land Claims Agreement (NLCA), and on April 1, 2008 provided the NIRB with a positive conformity determination for the Garry Lake project proposal. Uravan's record indicates that on April 3, 2008 the NIRB commenced Screening of the Garry Lake project proposal, requiring all comments from Interested Parties by April 23, 2008. To Uravan's knowledge no further review or information on this project proposal was requested of Uravan by any party other than the normal clarifications. However, on May 15, 2008 (one day prior to the issuance of Uravan's LUP) the NIRB requested additional time from the INAC Minister's office for further review of the Garry Lake project proposal. Subsequently, on May 23, 2008 the NIRB requested, ".....input on a couple issues that, in the Board's mind, are prominently called into question with this current application". Based on the NIRB letter dated May 23, 2008, Uravan understands that the potential issues the NIRB requested further comment on are:

1. The proposed *Aberdeen Lake Special Management Area* as it may relate to the NIRB's propriety of making decisions in the proposed SMA without first having the proposed *Thelon Game Sanctuary Management plan* finalized and;
2. Potential cumulative impacts of these types of project proposals.

With respect to item one above, Uravan appreciates and supports the need for appropriate management of exploration activities in the caribou migration and caribou calving areas as outlined in NIRB's May 23rd letter. However, until such time as the proposed *Thelon Game Sanctuary Management Plan* or *Aberdeen Lake SMA* can be implemented (which can only be accomplished between governments and not Uravan) and in lieu of such a plan, Uravan supports the propriety of the NIRB, plus other land use administrators in the region and

operators, like Uravan, in making sound land use decisions and developing best management practices in support of preserving caribou environments and the integrity of the Beverly Caribou Herd. Uravan believes that all interested parties should keep in mind that the caribou migration and caribou calving areas, which covers a vast landscape within the subarctic 'barren lands', have experienced many, many years of exploration activities, similar to Uravan's Garry Lake project proposal, without any impact on the caribou herds, caribou calving and caribou habitats. Uravan believes the reason this excellent record has been accomplished is that there always has been in place: (1) strong government regulatory land management, (2) a set of well developed and implemented best management practices and (3) operators, like Uravan, that appreciate and support good land management practices with the intent on protecting the environment. Uravan wonders, if a land management plan for this region were in place, whether it would add any substantive value to what is currently known and practiced.

With respect to item two above, i.e. potential for cumulative impacts in this region, Uravan believes that the record speaks to this potential issue very clearly. As stated previously, exploration activity in this remote region has taken place for many, many years resulting in no 'foot-print' left behind and for the most part no cumulative impacts. The idea expressed by the NIRB, ".....impacts can arise from individually small but collectively significant actions that takes place over a period of time", Uravan believes is a well-meaning statement but is simple not true. It's not that this possibility of 'collective impacts' can't happen but is more about what has happened and importantly, the effort that has gone into not letting it happen. Protection of the 'barren lands' has clearly been one of the highest priorities for the Inuit people, Federal Government land use administrators and all other stakeholders throughout the exploration history in this region. All one has to do is read Uravan's LUP application on its Garry Lake project proposal to understand the care and detail that has evolved into these applications with the goal to maintain the pristine integrity of this environment and how much government regulators and organizations have involved all stakeholders and specialist in developing the rules and guidelines for operating on the 'barren lands' with the highest regard for the environment. Uravan believes the exploration and mining industry is one of the most diligent environmental group's operating in these remote areas not only because this is the philosophy that has evolved through experience and out of consciousness over time but also because we want to be invited back.

Further to the discussion above, Uravan would ask all interested parties to step back and view Uravan's Garry Lake project proposal for what it really is. Uravan believes there is minimal to no cumulative impact to the environment or the caribou herds with regard to the Garry Lake project proposal as evidence by:

- The short duration and low impact nature of the proposed exploration operations as outlined in Uravan's Garry Lake LUP application and;
- The exploration and environmental safeguards currently in place, to include, company operating standards, government requirements and established government and industry best management practices, which are also detailed in Uravan's Garry Lake LUP application.

However, if more monitoring or safety measures are required to protect the water, flora and fauna, to include caribou habitat, then I am certain Environment Canada, the Nunavut government land use administrators, other knowledgeable organizations and specialist and foremost the Inuit people can suggest further guidelines and recommendations to mitigate potential concerns. Uravan believes all stakeholders need to be proactive to solve land use issues and potential conflicts versus creating new ones, such as the question around the implementation of the *Thelon Game Sanctuary Management Plan and the Aberdeen SMA*, which Uravan has no part to play and believes its implementation is not germane to the Garry Lake project proposal.

Please give these comments your highest consideration with respect the Garry Lake project proposal.



Respectfully Submitted
Uravan Minerals Inc

Signed: "Larry Lahusen"

Larry Lahusen, CEO

CC: Honorable Minister Chuck Strahl, Indian and Northern Affairs Canada
Honorable Minister John Baird, Environment Canada
Mr. Ric Stryde, Policy Advisor, Honorable INAC Minister's Office

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APPENDIX A

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

NIRB Letter dated May 23, 21008



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

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