

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

9 June 2008

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

Dear Ms. Payette:

NIRB File No. 08EN037 – Uravan Minerals Inc. Garry Lake Project Proposal

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting additional input on this proposal from Uravan Minerals Inc. (Uravan) in response to NIRB's request of 23 May 2008. These comments are provided in accordance with the mandate of the BQCMB, which is to advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges.

Background

As we described in our 23 April 2008 letter to NIRB, the BQCMB is very concerned about Uravan's proposal to conduct exploration activities on the traditional calving ground of Beverly caribou in an area that has been proposed by parties to the Thelon Game Sanctuary Management Plan for designation as a special management area, specifically to help protect the Beverly caribou herd and its habitat.

The BQCMB has provided consistent input to the NIRB on proposals for mineral exploration and associated activities in this area for several years, recommending repeatedly that these applications not be approved. We have also outlined our concerns about the potential cumulative effects of these and other ongoing exploration and development activities in this area and across the Beverly and Ahiak caribou ranges, and have recommended to both the NIRB and the NWT's Mackenzie Valley Environmental Impact Review Board that regional cumulative effects assessment work be conducted.

Please refer to the BQCMB's 23 April submission for background information on the importance of the proposed project area to Beverly and Ahiak caribou, the BQCMB's concerns with the exploration activities proposed by Uravan, and concerns about the cumulative effects of this and other ongoing activities in this area and across the Beverly and Ahiak caribou ranges. Please also review Attachment A, which provides additional information that we hope will be helpful to NIRB for making its decision.

Recommendations

First, we reiterate the first two recommendations in the BQCMB's 23 April submission to NIRB:

1. 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.

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2. Regulatory and other territorial and federal government agencies (i.e., in Nunavut NIRB, GN, INAC) should be taking action 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), and should include all activities occurring on calving and post-calving areas.

Further to the first recommendation, the BQCMB's position is that long-term legislated protected areas that exclude industrial development must be established for calving and post-calving areas. In absence of this protection, proposals for exploration and development on these areas must be rejected. For more details please refer to the attached paper "Protecting Calving Grounds, Post-Calving Areas and Other Important Habitats for Beverly and Qamanirjuaq Caribou: A Position Paper". This document was distributed by the BQCMB in 2004 to governments and land use planning and regulatory agencies (including NIRB) across the caribou ranges.

The BQCMB's views about which decision option is most appropriate of the four choices available to NIRB under the NLCA are as follows:

- The correct choice is option d, meaning that the project proposal should be rejected or "abandoned" (see our recommendation #1 above). No land use permit should be issued to UraVan, as the potential adverse impacts of the proposal are unacceptable.
- Should NIRB not be convinced that option d is warranted, then at a minimum option b should be selected. 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. The parties should include those identified in the Thelon Game Sanctuary Management Plan, such as the communities of Baker Lake and Lutsel K'e, as well as the Athabasca Denesuline and the BQCMB.

The parties to the Thelon Game Sanctuary Management Plan clearly recognized the critical importance of the caribou herds to both the Inuit and Dene people of the Thelon region, and the need for ensuring protection of the Beverly calving area. We hope that the NIRB will do so as well.

Please let me know if you require further information or have any questions about these comments from the BQCMB.

Sincerely,

[original signed by]

Leslie Wakelyn
BQCMB Biologist

Attachment

cc: Jerome Denechezhe, BQCMB Chairperson
Chair, Baker Lake HTO Board
Iris Catholique, Manager, LKDFN Wildlife, Lands and Environment Department
Ron Robillard, Chief Negotiator, Athabasca Denesuline