



Indian and Northern  
Affairs Canada

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Your file - Votre référence  
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N2008C0009

June 9, 2008

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

*Via electronic mail to: [lpayette@nirb.ca](mailto:lpayette@nirb.ca)*

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

Dear Ms. Payette,

INAC has considered the issues raised by NIRB, in their letter of May 23, 2008, requesting views on which of the four decision options available as per section 12.4.4 of the NLCA best lends itself to the screening of the Uravan Mineral's Inc. Garry Lake Project Proposal, and offers the following comments for the consideration of the Board.

As noted by NIRB, section 12.4.4 of the NLCA outlines the choices available to the Board in dealing with the screening of a project proposal. We note that NIRB has not suggested that the proposal is insufficiently developed to permit a proper screening. Furthermore, the nature of the issues raised in NIRB's letter do not seem to indicate that the Board is considering whether the potential adverse impacts are so unacceptable that the proposal should be modified or abandoned without further review.

Therefore, INAC has focused its comments on the question of whether the proposal may be processed without a review, or whether further review under Article 12, Part 5 or 6 of the NLCA is required

NIRB has brought forth two issues it feels warrant consideration in screening the proposal: 1) The current status of the Thelon Game Sanctuary Management Plan and the option of establishing special management areas; and 2) the issue of

cumulative impacts in the region.

With respect to the first consideration, INAC agrees that the Management Authority to be established under this plan could be a valuable source of guidance to the NIRB on various matters relating to the Thelon Game Sanctuary and its proposed special management areas. INAC does not believe that there is any impropriety in NIRB making continued determinations on project proposals within the areas proposed as special management areas. In discharging its functions, NIRB is mandated to carry out its functions according to the Board's best assessment of 'significant impact potential', and the principles stated in section 12.4.2 of the NLCA.

With respect to cumulative effects, INAC is not in possession of special expertise on the specific topic of caribou and may therefore not advise NIRB in its judgement of whether the impacts of this proposal, when added to other past, present and reasonably foreseeable future developments, has significant impact potential, and therefore whether it requires review under Part 5 or 6.

However, INAC is able to provide NIRB with information on land use activities the Department has permitted in the area, and hopes this may be of use to the board in making its determination. Please find attached a map illustrating land use activities on Crown land in the calving ground of the Beverly Caribou Herd. INAC would be pleased to provide more extensive information on these permits upon request.

Should you have any questions, please do not hesitate to contact Margaux Brisco at (867) 975-4567 by phone or at [brisco@inac-ainc.gc.ca](mailto:brisco@inac-ainc.gc.ca) by email.

Sincerely,

[original signed by]

Robyn Abernethy-Gillis  
Manager of Environment Division



