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October 29, 2008

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

*Via email to: [lpayette@nirb.nunavut.ca](mailto:lpayette@nirb.nunavut.ca)*

Dear Ms. Payette,

Indian and Northern Affairs Canada (INAC) has reviewed the Nunavut Impact Review Board (NIRB) Draft Scope for Uravan Minerals's Garry Lake Project, and has prepared the following comments, as requested by the NIRB in its letter of October 8, 2008.

### **Scope of assessment**

The department supports a focused and expedited review of this project. However, the department also recognizes that Articles 12.5.2 and 12.5.5 place requirements on the NIRB to consider a broad range of concerns in any project review. To strike a balance between the imperative of a focused and expedited review and the need for a thorough consideration of the project, INAC suggests that the NIRB may wish to conduct a fulsome assessment, but vary the depth of assessment for each aspect of the project consistent with the key focuses of the review established by the NIRB and confirmed by the Minister of Indian and Northern Affairs.

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## **Project description**

NIRB's October 8 letter refers the reader to the Garry Lake project proposal on NIRB's ftp site. The materials available on the ftp site do not appear to meet the NIRB project proposal requirements established in section 5 of the NIRB Guide 3 (for Part 5 Reviews). For example information on cumulative impacts has not been provided. INAC recommends that a project description that meets these requirements be provided by the Proponent in one comprehensive and accessible document.

## **Cumulative effects**

The NIRB has indicated that the focus of the review of this project will largely be on "the cumulative impacts of this project, in relation to other similar projects in the region, to caribou, caribou calving grounds, and across caribou ranges". INAC observes that the quality of any review of these impacts will be based on the depth of information provided by the Proponent. For this reason, INAC recommends that the scoping document establish the level and type of detail required of the Proponent in its assessment of these impacts and that guidance to the Proponent should go beyond simply including cumulative effects in the scoping list.

In addition, INAC would observe that the information on cumulative impacts, including information on other similar projects in the area, included in the project description may not, at this time, be sufficient to allow parties, including the public, to comment on the scope of assessment or the formulation of guidelines. Such information should be made available to ensure a common understanding of this critical aspect of the environmental assessment.

## **Project Components**

It is recommended that it be made clear that the scope includes impacts of project activities and not only project components. This should also be clarified in the scoping list section.

INAC also recommends that traffic frequency with respect to ground and airborne transportation be included in the scope of review.

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## Scoping List

The Scoping List includes factors to be considered in the environmental assessment. It is stated that the impacts of Project components on these factors are to be assessed. However, some of these factors are not necessarily environmental factors that may be affected by the Project. Rather, they are either types of impacts or other types of factors to be considered in the assessment (such as cumulative effects, traditional knowledge). It would be helpful if this were clearer in the scoping document.

In addition, consistent with INAC's recommendation on the scope of assessment the scope of impact analysis for this project should meet the requirements of Articles 12.5.2 and 12.5.5 of the Nunavut Land Claims Agreement with more extensive assessment being conducted only for issues on which NIRB wishes to focus, INAC recommends that the following factors be considered for the scoping list :

- human and ecological health;
- socioeconomics;
- archaeological resources;
- accidents and malfunctions; and
- monitoring and follow up.

Also, no specific spatial or temporal boundaries have been detailed. It seems appropriate to include criteria to determine what these assessment boundaries would be.

Although NIRB's 10 minimum EIS requirements are briefly mentioned in the accompanying letter, INAC notes that these were not all included in the draft scoping document. Those missing include a sustainability analysis, a statement of consultation principles and practices, project alternatives and an assessment of the severity of impacts. As one would expect that these requirements will have to be met in the assessment (as suggested by the NIRB) INAC recommends that all of the NIRB's minimum environmental impact statement requirements be included in the scoping document.

Lastly, INAC would like to support NIRB's correspondence to the Proponent advising that their attendance at the scoping and guidelines workshop is strongly encouraged. The Proponent's active participation is important and would be of benefit to all parties, including the Proponent. The goal of a high quality and efficient environmental assessment process for this project may be compromised should the Proponent choose not to actively participate. If a modest scheduling change would permit the Proponent to actively contribute to the process without

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compromising the effectiveness or efficiency of the review, INAC would suggest that NIRB may wish to consider this alternative.

Also in the interest of efficiency, INAC would like to request that draft guidelines for the Uruvau project be made available to participants before the scoping and guidelines workshop so that participants may adequately prepare to participate in these meetings.

INAC looks forward to working with the NIRB on the ongoing environmental assessment of Uruvau's Garry Lake Project. Should you have any questions, please do not hesitate to contact Margaux Brisco at 867-975-4567 or by email at [brisco@inac-ainc.gc.ca](mailto:brisco@inac-ainc.gc.ca).

Sincerely,

*[original signed by]*

Michael Nadler  
Regional Director General  
Nunavut Regional Office