



Beverly and Qamanirjuaq Caribou Management Board

21 March 2011

Nunavut Impact Review Board
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NIRB File No. 11EN006 – Uranium North Resources Corp. “Mallery Lake” Project Proposal

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the proposal from Uranium North Resources Corp. (Uranium North) for mineral exploration on their properties south and west of Mallery Lake, approximately 135 km southwest of the community of Baker Lake. This is 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.

Concerns about Cumulative Effects of Activities in this Area

As we have stated in comments on various applications for land use permits for mineral exploration in this area over the past four years, the BQCMB is concerned about the increasing amount of mineral exploration and proposed development and the potential cumulative effects of these activities on caribou and caribou habitat, as well as consequences for subsistence harvesters of the herds across their ranges. Comments were submitted to the NIRB by the BQCMB as part of screening processes for applications for mineral exploration by AREVA (Kiggavik-Sissons, 12 Mar/07), Cameco (Aberdeen, 24 Mar/07), Forum Uranium (North Thelon, 22 Jun/07, 29 Jun/08), and Uranium North (Dubawnt Lake, 17 Jun/08).

Please refer to these past submissions for details about: seasonal use of the area by caribou; the BQCMB's general concerns about potential impacts on caribou of disturbance, habitat loss, and contamination resulting from mineral exploration; and the cumulative impacts from land use activities that have taken place across the caribou ranges for decades, ongoing activities, and levels of activity that are likely to accelerate (i.e., past, present, and future activities). These include the impacts from loss of winter range resulting from forest fires and climate change.

In summary, the BQCMB remains concerned about both the cumulative effects of mineral exploration activity occurring across the Beverly and Qamanirjuaq caribou ranges and the lack of cumulative effects assessment and land use planning underway throughout the region, including the Kivalliq region of Nunavut. Reviewing single projects in isolation is clearly not adequate to ensure protection of caribou and caribou habitat, or protection of the irreplaceable renewable resource upon which subsistence harvesters from across the caribou ranges depend.

Comments on Uranium North's Project Proposal

Following are comments on Uranium North's Mallery Lake project proposal as outlined in their application to Indian and Northern Affairs Canada for a land use permit, the commitments made to the Nunavut Planning Commission as part of their review of conformity to the regional land use plan, the information provided in their Part 1 and Part 2 forms to the NIRB and their non-technical project summary.

Importance of the area to caribou - Although Uranium North is correct in stating that the Mallery Lake area is not located in the traditional calving grounds of the Beverly or Qamanirjuaq herds, caribou from these and possibly other herds (Lorillard and Wager Bay) may use this area during the proposed exploration period (April to September 2011 to 2016), and therefore individual caribou and their herds may potentially be impacted by the increasing level of exploration activity in the area, and by this proposed project's contribution to range-wide cumulative effects.

Timing of activities in relation to caribou. - It is unclear how Uranium North will ensure that their "Activities also take into consideration resource management windows such as caribou migration, calving season, nesting and brooding as well as traditional harvesting activities etc." They make several references to timing of activities in relation to caribou migration and calving, including:

- "The annual work period will run from April to September but this is expected to be broken into two season – April to May and July to August."
- "Spring operations will be conducted prior to caribou migration while summer activities will resume once migration and calving seasons have ended."

However, there is no information provided on how they will determine when migration or calving periods begin or end.

Caribou Protection Measures – Uranium North has made a commitment to adhere to the Caribou Protection Measures (CPM) in their responses to NPC's conformity check. However, they say that their mitigation measures will include "Adhering to the Caribou Protection Measures; specifically not working in any core calving areas." This suggests that they do not understand the requirements of the CPM, which include restrictions on activities wherever calving occurs, including outside core calving areas. It is not clear if Uranium North understands that they will be required to stop operations in areas occupied by cows and/or calves between May 15 and July 15 as well as any activities that may interfere with migration, including aircraft flights at heights below 300 m above ground level.

Disturbance from low level flights – Uranium North says that their mitigation measures will include "Adhering to the Recommended Environmentally Acceptable Minimum Flight Altitudes", and that "when feasible" they will conduct flights for servicing the camp above 610 metres (2000 feet) above ground level "so as not to disturb any wildlife in the area". We welcome this commitment and acknowledge that flight altitudes must be determined by the pilots as per weather and safety conditions. In addition, Uranium North says that geophysical airborne surveys at heights of only 60 metres above ground "will only occur when no wildlife are present", but no information is provided regarding how the presence of wildlife will be determined prior to initiation of surveys.

Disturbance from noise – The statement "Noise levels in the project area are negligible due to its remote location" clearly does not make sense regarding potential disturbance to caribou and other wildlife that project-related noise may cause. Noise from drills, helicopters and other aircraft, low-level survey flights, camp activities, and people working on the ground could potentially result in changes to behaviour of caribou groups. This could be particularly significant for cows during spring migration, for cows and newborn calves during post-calving, and for all caribou during the summer when they need to feed continuously to ensure they are in good condition for the demands of fall migration, rut, pregnancy, winter and spring migration. Yet Uranium North makes no commitment to mitigate this.

Residual impacts - Uranium North states that “Helicopter usage for purposes of supporting drilling operations is and has been the standard practice of many exploration companies now and in the past with no impact to wildlife or the environment.”, but the claim of no impact is not substantiated. Despite this, they state that “All potential environmental effects associated with this proposed program are minor, localized effects which can be mitigated. No significant, residual impacts are expected to occur as a result of the implementation of this program. These statements are not supported by any evidence.

Cumulative effects – The following statement is clearly not correct “No other mineral exploration activities or other industrial development projects are currently known or planned for the area, which minimizes the potential for cumulative effects.” Recent, ongoing, and proposed mineral exploration projects in the area between Dubawnt Lake and Baker Lake include the four referenced above, which notably includes mineral exploration by Uranium North itself, as well as the proposed Kiggavik mine and mill project.

Recommendations

If NIRB permits the proposed project:

1. Project activities must be prohibited between May 15th and July 15th if caribou are in the project area, as per NPC’s conformity requirements regarding the caribou protection measures (2.6 and 2.15.7).
2. All activities must be suspended if caribou approach the area during spring migration prior to May 15th.
3. Activities should be allowed to resume after July 15th only if post-calving caribou are not in the area.
4. The proponent should be required to establish a rigorous caribou monitoring program. An independent caribou monitor should be hired (preferably from Baker Lake) to determine when caribou are moving toward the project area.
5. The monitoring system should ensure that at least one day’s advance notification is received for shutting down project activities (including drilling and geophysical surveys) if caribou are approaching. This will be necessary to ensure that potential disturbance is discontinued before caribou reach the project area.
6. NIRB should ensure that regular inspection of project operations is conducted, and that NIRB’s permit terms and conditions and NPC’s conformity requirements are enforced.

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

Sincerely,



Leslie Wakelyn
BQCMB Biologist

cc: Albert Thorassie, BQCMB Chairperson
Baker Lake HTO