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Department of Environment

Ministère de l'Environnement

File No. NIRB06EN003NWB8THE

February 103, 2006

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Via E-mail

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Nunavut Water Board

RE: Titan Uranium- Thelon Project

The Department of the Environment (DOE) thanks Nunavut Impact Review Board/Water Board for the opportunity to provide comments on the Abandonment & Restoration plan (A&R) & Spill Plan of the Thelon claim group. DOE has provided similar comments to NIRB regarding this project.

DOE is aware that the proposed permit concerns exploration for Uranium. We are aware that Nunavut Planning Commission has determined low level exploration for Uranium to be in conformity with the Keewatin Regional Land Use Plan despite the following;

(pg.65) of the Keewatin Regional Land Use Plan states:

3.5 - Uranium development shall not take place until NPC, NIRB, NWB and the NWMB have reviewed all of the issues relevant to uranium exploration and mining. Any review of uranium exploration and mining shall pay particular attention to questions concerning health and environmental protection. (A) (CR)

3.6 – Any future proposal to mine uranium must be approved by the people of the region.

There is concern that the issuing of permits relating to exploration for uranium may lead to an expectation that further development of these projects will be permitted. INAC should clearly indicate to proponent the provisions of the appropriate land use plan.

DOE recommends that the actions and conformity requirements as outlined in the Keewatin Land Use Plan be concluded; whereby NWB, NPC, NIRB, and the NWMB conduct a review of all issues relevant to uranium mining, and that the proponent engage in community consultations.



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that could influence the integrity of resources critical to the sustainability of the Sanctuary even though the resources are not completely contained by the Sanctuary; and, Thelon Game Sanctuary Management Plan Without Prejudice 43 to give a direct local conservation input into the regulatory process for land use adjacent to the Sanctuary. The SMAs are not intended to eliminate development or other land use activity, rather to ensure that such activities are especially sensitive in their approach and timing to the resource values of the area. The role of the Management Authority, therefore, is to provide input to the land use permitting process, outlining resource concerns and optional mitigating measures. Such input should be a recognized step in the process and should precede permit approval. The SMAs highlight the areas of critical resources linked to the Sanctuary and identify the area within which the Management Authority will be a contributing participant in the land use regulatory process’.

DOE asks INAC to be mindful of the sensitivities and importance of the area, and to initiate discussions with the community of Baker Lake, the DIO and the GN on appropriate conservation measures in keeping with the Management Plan recommendations.

2. The Canadian Heritage Rivers System

We also are concerned regarding permit areas requested along Canadian Heritage Rivers in Nunavut, particularly the Thelon River. Please note that The Canadian Heritage Rivers System (CHRS) is Canada's national program for freshwater conservation. In Nunavut (as elsewhere in Canada), it is a cooperative program between the governments of Canada and the Government of Nunavut (other provincial and territorial governments for the rest of Canada). The objectives of the program are to give national recognition to Canada's outstanding rivers and to ensure long-term management that will conserve their natural, cultural and recreational values for the benefit and enjoyment of Canadians, now and in the future.

In Nunavut, three rivers have been designated (Soper, Kazan and Thelon), meaning that management plans detailing how their heritage values will be protected have been lodged with the CHR Board, and one has been nominated (Coppermine). Therefore, we ask that if NIRB grants the prospecting permits within the management areas of the Heritage Rivers that it insures, via conditions within the permits, that the prospectors respect the values of the Heritage Rivers (please see the Management Plans referenced above) and not to engage in any activity that would interfere or otherwise detract from the experience of tourists and Nunavummiut using the Heritage Rivers now and in the future.

3. DIAND Caribou Protection Measures (under the Territorial Lands Act)



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(b) The Permittee shall not, between May 15 and September 1, conduct any diamond drilling operation within 5km of any "Designated Crossing" as outlined on the map certified by the Engineer as the "Caribou Protection map" and annexed to this land Use Permit.

NOTE

1. The Land Use Inspector's decision will be based on the existing caribou information.
2. Concentrations of caribou should be avoided by low-level aircraft at all times.

4. Carnivores

The GN is concerned that there may be possible attraction of Carnivores (Grizzly Bears, Wolves, Foxes). The proponent is advised to minimize odors that potentially attract carnivores through timely camp housekeeping. Should the proponent experience any interaction with carnivores, they are advised they should contact the local wildlife officer.

5. Bear-People Conflicts

The operation is in an area where bears may be encountered. Proper food handling and garbage disposal procedures should be followed to reduce the likelihood that bears will be attracted to the operation. Careful planning and attention to details of camp design and maintenance will decrease the attraction of bears to camp.

The applicant should follow procedures outlined in the "Safety in Bear Country Manual", and should contact the Regional/Area Biologist or the Wildlife manager indicated below for information and advice on measures which should be taken to minimize the possibility of bear-people conflicts.

DoE Contacts

Manager, Wildlife

-Dan Shewchuk, (867) 857-2828

Biologist, Kivalliq Region, Arviat

- Mitch Campbell, (867) 857-2828

Once again the Department of Environment thanks NIRBNunavut Water Board for the opportunity to comment on this project proposal.

Sincerely,

Michael Mifflin

Coordinator Land Use Planning

Department of Environment

