

COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: <u> Kiggavik Project </u>	
Proponent: <u> AREVA Resources Canada Inc. </u>	
Location: <u> Kivalliq Region </u>	
Comments Due By: <u> February 10, 2009 extension to </u>	NIRB #: <u> 09MN003 </u>
<u> 18th of February 2009 </u>	
Indicate your concerns about the project proposal below:	
<input type="checkbox"/> no concerns	x traditional uses of land
x water quality	x Inuit harvesting activities
x terrain	x community involvement and consultation
x air quality	x local development in the area
x wildlife and their habitat	x tourism in the area
x marine mammals and their habitat	x human health issues
x birds and their habitat	x other: _____
x fish and their habitat	_____
x heritage resources in area	_____
Please describe the concerns indicated above:	
<p>1) Caribou, Wildlife and their Habitat – with at least 30 uranium exploration companies exploring in the Kivalliq in 2007/08 the cumulative effects of these camps flying around are potentially disturbing the caribou behavior and health. http://www.miningnorth.com/docs/NU_ExMap2007_ENGLISH_nov2707.pdf. Caribou have been a staple food source for the Inuit and northerners of the Baker Lake region. Many Inuit and northerners prefer caribou meat to southern meats like beef or chicken. Caribou meat is much healthier to eat and Inuit from other regions ask for caribou meat from the Kivalliq. It is a much cheaper food source as well. Wildlife in the area must be considered as well, Muskox, wolves,, foxes as much as the caribou. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor the caribou and habitat including but not limited to hunters submitting caribou meat for analysis of toxins or basic continuous studies for generations. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.</p>	
<p>2) Permafrost – with temperatures predicted to rise in the future what are the plans for AREVA for remediation IF this project goes ahead? AREVA will have to monitor & maintain for many thousands of years the tailings and mine sites. Water and drainage patterns will change and these future considerations need to be addressed and monies and technologies of the future must be used not technologies of 2009 to monitor current mines and current exploration sites. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor the permafrost. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.</p>	
<p>3) Water Quality – a) Fresh water is a very rich resource itself and Baker Lake and surrounding area is rich in fresh water which is fairly uncontaminated except for possible long rang transport of pollutants from the south or internationally. We now have one lake that will act like a tailings pond for the Meadowbank project for which federal (Canadian government) laws were changed to accommodate this type of storage of tailings in Canada. This lake will be toxic forever. I learned</p>	

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about this lake on CBC's "the National". The potential for contaminating the fresh water and ecosystems is very high with the possibility of the permafrost melting. Many countries would love to have as much fresh water as we do and we must protect it to ensure it does not become polluted as other water bodies have in the country and worldwide. B) Marine ecosystems – depending on what methods of transport AREVA decides the marine ecosystems must be protected and monitored as well. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor Fresh water and marine ecosystems. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.

- 4) **Air Quality** – with tailings and AREVA's plans for storage of mine waste there is high potential of the wind carrying radioactive mine waste to the surrounding tundra landscape and having repercussion effects on wildlife, water and people not associated with the mine site. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 5) **IPG's** – NIRB, NPC & NWB must update their websites and some websites are none existent and others with pages still "under construction". NWMB is way more informative and has been for many years including having information in Inuktitut. The following is a link to the Mackenzie Valley Environmental Impact Review Board's website which has a more open and transparent way of informing the public of exploration/ mining activities in their region.
<http://www.mveirb.nt.ca/>. This website has regular updates and does not use an FTP site for the public to try and navigate through. This website is not perfect but it is a good start. NIRB would benefit greatly from learning from MVEIRB webmasters to help produce a website for 2009 technologies. Their site has web casts of live public hearing for all to listen to. NWMB has a database of past meetings, conference calls and is more transparent in their way of informing the public about business of the NWMB. NIRB and the other IPG websites have the potential to grow and keep getting better with new advancements in communication tools and technologies. This form is hard to find on the NIRB Website and FTP site. I found it by accident. A clearer way for the General Public to add comments would greatly help plus using maps and not lat/longs of the lease hold land where the interested party is looking to get approval for exploration/mining or other activities. A map is quick and clear and does not involve you having to go look on the map or Internet to look and see where the activity is happening.
 - NPC - When did the Keewatin Regional Land Use Plan (KRLUP) change? From the NPC meeting in June of 2006, held in Baker Lake where NPC said the purpose of the meeting was not to make a decision about the KRLUP regarding a moratorium on uranium mines in the region until there was public consultation. The definition of consultation can be broad or very narrow. I could not find any information on the Internet about this new decision. Appendix E of the KRLUP 3.5 ("Uranium development shall not take place until the NPC, NIRB, the NWB and the NWMB have reviewed all the relevant 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" and 3.6 "Any future proposal to mine uranium must be approved by the people of the region" and these two items specifically apply to Uranium. The KRLUP: Chapter Six addresses informing the residents of what is happening in the region, as well residents should have significant input into the regulations and management of these activities. Environmental protection and wildlife protection, with specific concerns addressed to the Thelon game sanctuary area and the numerous cultural heritage this area brings to the local residents and to the region, page 58 shows the numerous sites and this chapter explains the importance to the people of the region for future generations. Heritage resources should be protected and maintained.
 - Additional information like NTI, RIO's, Hamlets, CLARC's, and HTO's should be obligated to submit their minutes of meetings where major decisions are made on behalf of their group which effect many groups of people or individuals who may or may not support their decision. This would make them more accountable and transparent and people would then have more confidence in the system. NIRBs website maybe a potential place for this information to be kept to keep in it central and transparent.
 - NTI/RIO's and IOLs – where are the documents outlining the IOL parcels of land and

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their purpose for land selection. The NLCA was pushed ahead because the residents of Baker Lake were apposed to uranium development and this infringed on their rights as Inuit so then exploration companies could not seek approval from the Crown (Government of Canada) until the land claims were settled. The Inuit residents of Baker Lake selected many areas that were potentially uranium rich to prevent uranium development and more importantly they were selected for 17.1.2 a, c & d. Where are the documents outline why BL-## is selected? Many people who were on the land selection committees for the areas around Baker Lake have passed on and fought hard to have them protected under IOL status. Do IOL lands have to go through the NIRB process as well?

- CEAA/INAC/NIRB - The minister from INAC announced in May or June of 2008 that he was pleased to announce that CEAA will no longer apply in Nunavut and was confident that NIRB was capable to fill this role. I looked at the CEAA website and this site is more open and transparent compared to the NIRB site. CEAA should still apply when it comes to Uranium because Uranium exploration, uranium mining and nuclear power generation is at a different level of danger and health risks associated with the whole process from start to finish. From exploration, closing drill caps and ensuring they are properly sealed, mining and yellowcake transportation, to power generation with cooling water contamination deemed safe after seven years and spent uranium waste disposal for which there is still no safe way to dispose of it. This waste lasts tens of thousands of years. I cannot find this announcement on the CEAA, INAC or NIRB websites, if it is there my apologies but the search engines are not showing it.

- 6) **Human Health** – with many different types of exploration coming in the region baseline studies should be conducted to monitor different toxins that may be increasing, stabilizing or decreasing. Blood tests or other types of tests could be monitored to provide information about a population that lives close to exploration. There is an increase in cancer, which may or may not be attributed to exploration activity but cannot be ruled out unless studies are carried out before exploration turns to a potential mine. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor human health. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 7) **Fish and their Habitat** – fish are an important resource and essential part of the diet of the residents of Baker Lake. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor fish and their habitat. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 8) **Tourism** – there is a great opportunity for tourism in this region as it is the only inland community in Nunavut and therefore offers great potential for unique tourism opportunities from sport fishing, hunting, wildlife viewing to traditional activities such as camping in iglus, traveling by dog team, traveling by kayak or motorized trips to name a few. There was once a small but growing traditional camp in Baker Lake and offered tourists opportunities to participate in activities. Promotion of the region as a destination to travel as it is a renewable resource and keeps traditions alive for future generations. The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor heritage activities to ensure they do not slip away. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.
- 9) **Socio-economic effects** – the effects of a new lifestyle and way of living need to be monitored and well documented from a variety of levels of governments and agencies. The information should be honest and transparent. IF the data shows there is an increase in violence it should not be covered up or if there is an increase in substance abuse this should not be covered up, or if there is an increase of self confidence this should be explained thoroughly and how the positive and negative impacts can be addressed. . The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor peoples mental and physical health. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.

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10) What is the rush to mine uranium or resources that may harm people, environment, cultural heritage, air quality and the economy of people who may in the future have effects from the mine ranging in health effects, animal health effects, to name a few. The uranium is not going anywhere and it might be prudent to be very cautious about this new endeavor to mine uranium. A uranium mine has never been started in permafrost in Canada. IF a mine did go ahead in the future, then the all the uranium and waste rock should be shipped out as well to reduce the effects of toxic radioactive waste from entering the disturbed local regional environment.

Do you have any suggestions or recommendations for this application?

- More non-industry technical and non-technical information available to the residents of the region and the residents of Baker Lake.
- A more detailed plan as to how much money will be allocated to clean up the site when it is closed and the remediation and monitoring of the site for thousands of years, because that is how many years the toxic waste takes to get to safe levels.
- IPG's, GN, Government of Canada, Hamlet Councils, HTO's, CLARC's to name a few need to communicate and place information accessible to all, must be transparent and honest with both positive and negative information.
- Secondary organizations affected by this new industry need to be involved and provide data and information about the effect both positive and negative in a way that is transparent and honest.
- The NLCA is only 10 years old and we should take a precautionary route to ensure this does not set a precedent.
- The IPGs have an important role and setting the bar high is not a bad idea since uranium mining in permafrost regions have never been done in Canada.
- The Government of Canada, Nunavut Government, NTI, RIOs, exploration/mining Industry and most importantly Independent Non-Industry studies should be carried out to provide baseline information to monitor activities, to ensure the health of the land, animals and people are safe. All tests or monitoring must be detailed enough to detect change and parameters cannot be so broad that the tests or monitoring show no change or minor.

Do you support the project proposal? Yes No Any additional comments?

UNDECIDED. More transparent information from all parties needs to be available to understand to enormity of the issue. Parties include, Government of Canada (Health Canada, INAC, DFO, TC, EC to name a few) Nunavut Government (Environment, ED&T, CG&T, Health & Social Services to name a few), NTI, KIA, IPGs, CLARC's, Hamlet Councils, HTO's, industry, non-industry organizations and residents and beneficiaries of KIA and NLCA and Canadians since the uranium is to be used for peaceful purposes. The whole uranium cycle needs to be addressed and assessed not pieces or parts of the cycle.

Name of person commenting: Paula Kigjugalik Hughson **of** The General Public

Position: Nunavut Beneficiary **Organization:** NLCA

Signature: Paula Kigjugalik Hughson **Date:** February 18, 2009