



## Beverly and Qamanirjuaq Caribou Management Board

1 February 2011

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Nunavut Impact Review Board  
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Dear Ms. Granchinho:

### **NIRB 09MN003: Comments on the Kiggavik Review Process**

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) would like to provide input at this time on two aspects of the Kiggavik review process that are unrelated to the scoping and EIS guidelines. Our comments on those two items were provided to the NIRB separately in our 24<sup>th</sup> January submission.

Our comments on three aspects of the Kiggavik review process are outlined below.

- 1) The BQCMB is concerned about the timeframe for Phase 2 of the Kiggavik review. Our understanding, based on the review timeline provided in the letter from the NIRB to INAC on 15 October 2010, is that 30 days have been allocated for submission of information requests once the NIRB accepts the draft EIS (i.e., following completion of the conformity review), and that this period will include the time it takes for the Proponent to provide review participants with digital copies of the draft EIS.

The BQCMB believes that this period will be insufficient for a thorough review of what will presumably be a very lengthy draft EIS<sup>1</sup>. We expect that this inadequate review period will compromise the ability of participants, including the BQCMB, to develop information requests that are constructive and well thought-out. It will not provide enough time for the BQCMB to hold the community meetings for which we have received participant funding and subsequently use the input received for developing information requests.

Furthermore, allowing 70 days for review of the draft EIS guidelines (85-pages) but only 30 days for review of the draft EIS and submission of information requests is not consistent. This timeline is particularly inadequate given the fact that the Proponent will develop a draft EIS according to its

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<sup>1</sup> For comparison, the EIS recently submitted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) by De Beers Canada Inc. for the Gahcho Kue Project (a proposed diamond mine in the NWT) is 19 volumes in size, including a section on caribou that is 320 pages long. The proposed Kiggavik Project is a much larger and more controversial development, and the Kiggavik EIS will need to address other issues in addition to those dealt with in the Gahcho Kue EIS.

own timetable, and therefore review participants will not have much advance notice regarding when they will need to resume their work on the Kiggavik review.

We therefore request that you increase the time allocated for this stage of the review process to at least 60 days.

- 2) We would like to clarify the role of the BQCMB in the ongoing Kiggavik review, to ensure that the NIRB, Indian and Northern Affairs Canada, and others do not have unrealistic expectations.
  - a) We are concerned that certain comments made in the “Final Report on Recommendations of the Participant Funding Review Committee for the Proposed Kiggavik Uranium Mine” may be misleading.

- Under item #5 of their report, the Committee states that “there is significant overlap” between the proposed contributions of the BQCMB and the Canadian Arctic Resources Committee (CARC). The focus of CARC’s proposed work was on “Caribou Landscape Vulnerability mapping” and a community mapping workshop in Baker Lake, at which the maps would be reviewed and recommendations sought from community members.

This is a highly specialized GIS-based analysis. The BQCMB will not be conducting an analysis of this type.

- The Committee’s report stated under item #6: “The committee also recognized that the Athabasca Denesuline are represented on the BQCMB and finds that available funding may be used more efficiently by funding the BQCMB, who represent several interests”. We are unsure what this implies about the BQCMB’s role, so would like to clarify what is planned and feasible.

The BQCMB’s application for participant funding included travel expenses for “participation in PAGC workshops in Saskatchewan communities”, to allow for BQCMB attendance at one of four sets of community workshops planned by the Prince Albert Grand Council (PAGC). However, the Athabasca Denesuline (PAGC) did not receive participant funding for the regional workshops they proposed, as they were awarded only a small amount of funding for travel expenses for the review hearing. If the PAGC is not able to hold these workshops, it is unlikely that the BQCMB will be able to meet with the northern Saskatchewan communities that were to be involved in these meetings.

The BQCMB will incorporate input from board members who represent northern Saskatchewan communities into our submissions, as originally planned. However, acquiring comments from these two individuals will not provide the same extent of input as obtaining recommendations from community gatherings. Therefore the contribution the BQCMB will be able to make to the review will be less than it would have been based on participation in PAGC’s workshops.

There are at least three other reasons that input from the BQCMB will differ from that potentially provided by the PAGC:

- BQCMB board members represent only one of the three Denesuline nations and two of the seven communities in northern Saskatchewan.
- The PAGC’s participation in the review will be based on their long-term working relationships with residents of these communities, as well as any meetings they are able to hold specifically related to this Project, and therefore their input will have greater depth and scope.

- The PAGC has a broader mandate than the BQCMB, and therefore they could provide input on a greater variety of topics, including socio-economic issues.
  
- b) We would also like to clarify the following statement in the BQCMB application for participant funding: “Provide scientific, traditional knowledge and community-based information on ecosystemic and socio-economic effects of the AREVA-Kiggavik project”. This is the first of five objectives for the BQCMB’s proposed contribution to the review (see “Step 2: Description of Proposed Activities”, p. 2).

This objective is intended to relate to effects of the Kiggavik project that are specifically related to caribou, caribou habitat, and caribou harvesters, as per the mandate of the BQCMB. The BQCMB will not be able to provide comments on the ecosystemic and socio-economic effects of this Project beyond this limited scope.

If you have any questions about this letter, please contact BQCMB contract biologist Leslie Wakelyn ([wakelyn@theedge.ca](mailto:wakelyn@theedge.ca)) or Secretary-Treasurer Ross Thompson ([rossthompson@mymts.net](mailto:rossthompson@mymts.net)).

Sincerely,



Albert Thorassie  
BQCMB Chairperson

cc. David Gladders, CARC  
Tina Giroux, PAGC