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## **Beverly and Qamanirjuaq Caribou Management Board**

25 February 2013

Sophia Granchinho
Senior Technical Advisor
Nunavut Impact Review Board
Cambridge Bay NU X0B 0C0
By e-mail: sgranchinho@nirb.ca

Dear Ms. Granchinho:

## NIRB 09MN003: Scheduling the Technical Meeting and Pre-Hearing Conference for the Kiggavik Technical Review

According to the NIRB's letter of February 6, 2013 to the Kiggavik Distribution List, on February 27<sup>th</sup> the NIRB will be confirming dates for the Technical Meeting and the Pre-Hearing Conference (PHC). Now that we have had a chance to review AREVA's response to our Information Requests (IRs), the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) would like to provide input regarding the timeline for this portion of the Kiggavik technical review and the agenda for these meetings.

The tentative dates proposed by the NIRB are May 28-31<sup>st</sup> for the technical meeting and June 4-6<sup>th</sup> for the PHC. The NIRB also indicated in your February 6<sup>th</sup> letter that a Community Roundtable session in Baker Lake will be held in conjunction with the PHC "with representation from communities identified as potentially impacted by the proposed project in order to provide an opportunity for meaningful participation in the Board's Review."

The BQCMB is concerned about scheduling this portion of the Kiggavik review for late May and early June. As the Nunavummiut Makitagunarningit (Makita) outlined in their letter of December 3, 2012 to the NIRB, holding community meetings at that time would not only inconvenience hunters of Baker Lake but would prevent their full participation in an important part of this review process. We would also like to point out that a similar limitation would occur for representatives from other communities in Nunavut and elsewhere across the caribou ranges that would potentially be impacted by the proposed project. These community representatives may not be available to travel to Baker Lake at that time due to their participation in on-the-land activities such as camping, hunting, and fishing. As Makita stated in their December 3<sup>rd</sup> letter, if the Community Roundtable and PHC occur in early June, ". . .the perspective of hunters – the demographic that may have the most to lose from a uranium mine and that has much to offer in the way of land knowledge – will not be able to play its full role in community hearings." Therefore we would recommend delaying the technical meeting, PHC and Community Roundtable to a more appropriate time, to be determined by the NIRB in consultation with these communities.

We would also like to make some suggestions for the agenda of the technical meeting and PHC (whenever they are scheduled). As you know, many information requests were submitted to AREVA related to potential effects and cumulative effects of the proposed Kiggavik project on caribou and caribou harvesters. Our review of AREVA's response to the BQCMB's IRs shows that a substantial

BQCMB Secretariat: Box 629, Stonewall MB R0C 2Z0

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Phone: 204-467-2438 E-mail: rossthompson@mymts.net Website: www.arctic-caribou.com

number of the IRs were deferred by NIRB and AREVA to technical review, and a disappointingly small portion of our requests have been fully addressed. Therefore we expect that a sizeable number of outstanding caribou-related issues (including effects on caribou, habitat and harvesters), many of them complex, will remain for discussion during the technical meeting. We also expect that caribou-related issues that are unresolved and carried forward to the PHC will be of great interest and subject to much discussion and comment during the Community Roundtable and PHC.

Therefore we would like to recommend that caribou-related issues be scheduled during the second half of the technical meeting and early in the PHC, to maximize efficiencies and minimize travel costs for those attending both meetings. We also suggest that the Community Roundtable be scheduled early in the PHC period, to provide the greatest opportunity for members of the public who are available at that time to have meaningful participation in the Board's Review. However, as we stated previously, we believe that holding the PHC in early June will prevent this opportunity from being realized by a large portion of caribou harvesters from communities who will be potentially impacted by the proposed project.

If you have any questions about these suggestions, please contact BQCMB contract biologist Leslie Wakelyn (wakelyn@theedge.ca) or Executive Director Ross Thompson (rossthompson@mymts.net).

Sincerely,

Earl Evans

**BQCMB** Chairperson

cc. Nunavummiut Makitagunarningit

Baker Lake HTO