

Good morning.

My name is Earl Evans. I am presenting today for the Beverly and Qamanirjuaq Caribou Management Board, or BQCMB.

I am the Board's Chairperson.

Thank you

-to the Nunavut Impact Review Board for the opportunity to present to you today and

-to the people of Baker Lake for their hospitality.

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Presentation Outline

- Background on BQCMB
- Project features of primary concern
- Issues resolved through technical review
- Summary of unresolved issues
- AREVA responses
- Remaining concerns

An outline of our presentation is shown here.

I will present information on:

- The BQCMB, including its mandate and purpose
- Characteristics of the Kiggavik project that are of primary concern to the BQCMB
- A synopsis of significant issues that have been resolved through technical review
- A summary of the issues that were not resolved as described in our written submission
- AREVA responses to BQCMB recommendations
- The BQCMB's remaining concerns



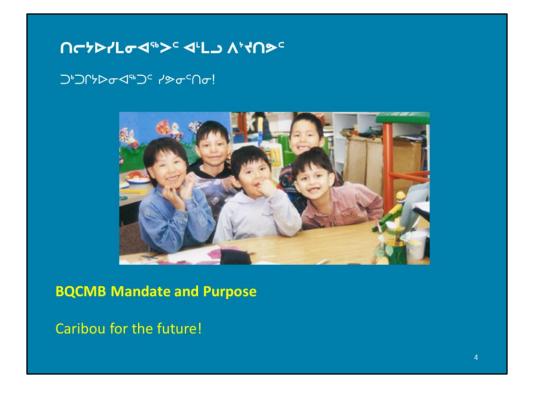
- The BQCMB was the first caribou co-management board established
 more than 30 years ago.
- The BQCMB is an advisory board it was not established through a land claim.
- The Board has **13 members**:

-8 from communities in Nunavut, Northwest Territories, Saskatchewan and Manitoba

-5 from governments of Canada, NU, NWT, SK, MB

• Our staff is a part-time Executive Director.

Contractors assist when funding is available.



• The BQCMB's **mandate** is provided by its management agreement for 2012-2022, signed by 5 governments (Canada, Nunavut, Northwest Territories, Manitoba, Saskatchewan).

Our responsibilities are outlined in the agreement and include making recommendations on "plans, processes and permit conditions for land use and human activities on the ranges".

- The Board's primary **purpose** is to help safeguard healthy caribou herds so they will be available to people who depend on caribou economically, culturally and spiritually.
- We provide information and make **recommendations** to assist communities, governments, regional organizations, and review boards like the NIRB.
- The Board is **not** responsible for caribou management that is the job of governments.

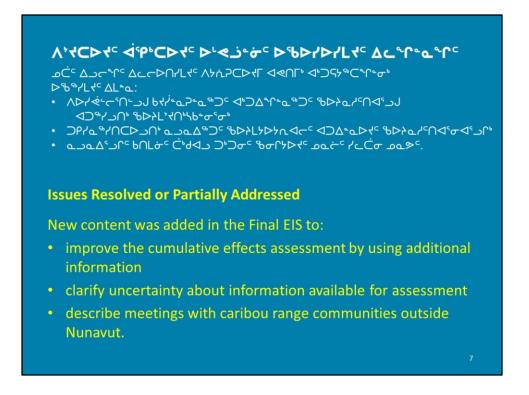


- The BQCMB is **not** against mining.
- The Board is concerned about the present and future amount of mineral exploration and development across the caribou ranges and the **cumulative effects** of those activities on caribou.
- The Board's involvement in environmental assessment is guided by its management plan and its co-management approach, which uses information and viewpoints from both community and scientific perspectives.



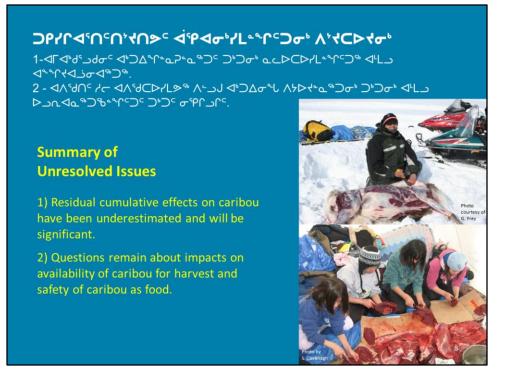
Features of the Kiggavik project of concern to the BQCMB include:

- its large size and complexity, with 5 mines, 3 roads and a large airstrip
- providing new access into a previously roadless area with a winter road and possibly an all-season road
- unknown mine construction start date to be determined by market conditions
- other exploration and development that will be attracted to the area and made more feasible, especially if an all-season road is developed
- first uranium project in Nunavut and in a tundra environment
- uranium and radio-activity



The BQCMB considers that **a few issues** raised in its technical comments **were resolved** through technical review.

- The main issue addressed by AREVA was the cumulative effects assessment, which they improved by reviewing and learning from assessments for other mines and by conducting an energetics model for assessing effects on caribou.
- They described the **uncertainty** that results from a lack of information and knowledge about the caribou herds and how their project will affect caribou.
- They met with caribou range **communities outside Nunavut** and added information in the Final EIS about these meetings.



I will now outline the **10 key issues remaining unresolved in AREVA's Final EIS** that were raised in the BQCMB's final written submission to the NIRB.

I will review them in the order in which we presented them in our Executive Summary.

Issue 1: BQCMB concludes **residual cumulative effects on caribou will be significant** and will likely result in:

- reduced sustainability of one or more caribou herds and

- **transboundary effects** on Qamanirjuaq caribou harvesters outside Nunavut

<u>Issue 2</u>: Views and values of traditional caribou-using peoples have not been given enough weight when assessing **significance of effects** on caribou and traditional cultures.

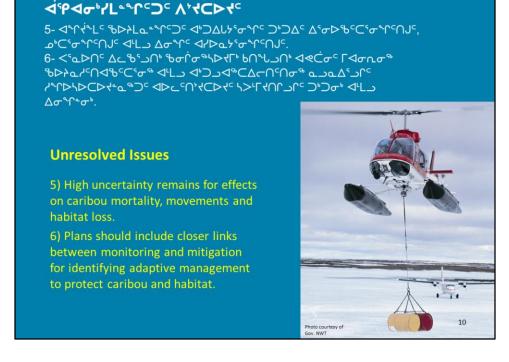
There are **no clear answers** to questions about impacts on availability of caribou for harvest and safety of caribou as food.



<u>Issue 3</u>: Additional collaborative planning will be needed for monitoring and mitigation of cumulative effects from induced development with several agencies, AREVA and other stakeholders.

We recommend a **regional terrestrial cumulative effects framework** be established through the federal government's Nunavut General Monitoring Plan.

<u>Issue 4</u>: There is not enough **transfer of experience** with monitoring and mitigation from uranium mines in Saskatchewan, particularly for dust control and use of Aboriginal knowledge.



<u>Issue 5:</u> There is a high degree of uncertainty in assessment of incremental effects for caribou mortality, habitat loss and caribou movements as a result of:

- reliance on information from collared caribou and
- natural variability in caribou mortality and movements.

Issue 6: A more strongly **precautionary** approach is needed for **adaptive management** that includes:

- adjustments to mitigation made over time to protect caribou and habitat
- closer links between monitoring and mitigation



<u>Issue 7:</u> Stronger ongoing cooperation will be needed during monitoring and mitigation between AREVA, wildlife agencies and traditional caribouusing peoples from within and outside Nunavut.

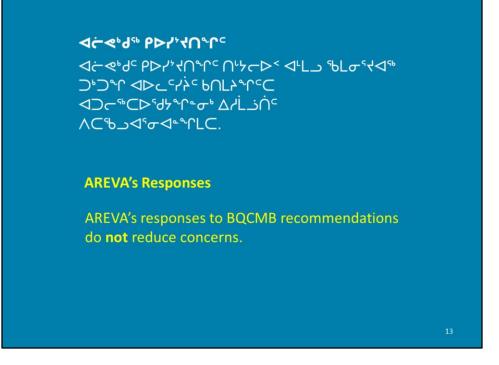
We recommend an **independent advisory committee or technical** working group.

Issue 8: The all-season road is an unacceptable option because of the effects and cumulative effects on caribou associated with it.



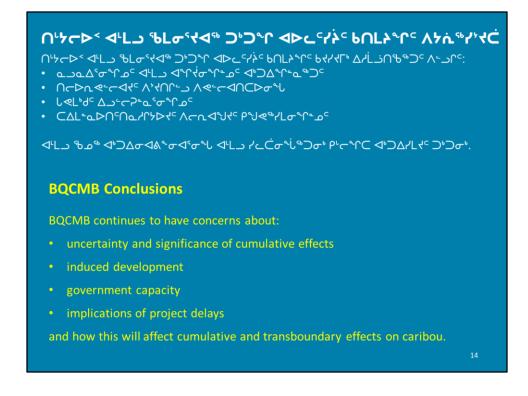
Issue 9: An access management plan for Project roads has not been developed and the assumption that winter access roads will not increase caribou harvest has not been assessed.

<u>Issue 10:</u> An extended delay in project start-up that may result from waiting for favourable market conditions will require a **new assessment** to incorporate updated information about caribou, harvest rates and ongoing and planned exploration and development projects.



- **BQCMB remains concerned** that AREVA's responses to our recommendations do not reduce fears about:
 - cumulative and transboundary effects,
 - sustainability of caribou harvesting, and
 - an all-season road.
- AREVA's responses were generally that their commitments made either in the Final EIS or in response to GN recommendations address all BQCMB recommendations.

AREVA suggested only one term and condition in response to BQCMB's 43 recommendations.



BQCMB continues to have concerns about:

- Uncertainty in conclusions
- Assessment of significance
- Cumulative effects on caribou
- Transboundary effects for caribou and caribou harvesters
- Capacity of governments to deal with demands for monitoring and mitigation resulting from induced development
- Uncertain project start date and waiting for favorable market conditions



Thank-you to the NIRB for the opportunity to present these concerns on behalf of the BQCMB.