



NIRB File No.: 09MN003
AANDC File No.: 5510-5-25-3
DFO File No.: 08-HCAA-CA7-00002
NRCan File No.: NT-070
EC File No.: 4703 001 006

October 16, 2014

Diane Martens
Regulatory Process Manager
AREVA Resources Canada Inc.
817 – 45th Street West
Saskatoon, SK S7K 3X5

Sent via email: diane.martens@areva.ca

Re: Acceptance of the FEIS and Commencement of Technical Review Period for the NIRB's Review of AREVA Resources Canada Ltd.'s Kiggavik Gold Project

Dear Ms. Martens:

On October 1, 2014 the Nunavut Impact Review Board (NIRB or Board) initiated an internal review of AREVA Resources Canada Inc.'s (AREVA or the Proponent) Final Environmental Impact Statement (FEIS) submission for the Kiggavik Project (the Project) to determine compliance with the NIRB's previously issued EIS Guidelines¹, and Preliminary Hearing Conference Decision² (PHC Decision). The PHC Decision includes commitments made by AREVA prior to, and during, the Technical Meeting.

COMPLIANCE REVIEW

The NIRB has now completed its compliance review of AREVA's FEIS submission and has determined that it generally complies with both the NIRB's EIS Guidelines and the Board's PHC Decision.

AREVA's FEIS for the Kiggavik Project can be accessed from the NIRB's online public registry at the following location:

¹ NIRB Guidelines for the Preparation of an Environmental Impact Statement for AREVA Resources Canada Inc.'s Kiggavik Project (NIRB File No. 09MN003), issued May 3, 2011.

² NIRB Preliminary Hearing Conference Decision Concerning the Kiggavik Project (NIRB File No. 09MN003) Proposed by AREVA Resources Canada Inc., issued July 5, 2013.

<http://ftp.nirb.ca/02-REVIEWS/ACTIVE%20REVIEWS/09MN003-AREVA%20KIGGAVIK/2-REVIEW/09-FINAL%20EIS/>.

As the Board has accepted AREVA's FEIS submission for the Project, the Board requests that the Proponent provide nine (9) hard copies of the FEIS Main Document (Volume 1) and nine (9) electronic copies of all remaining volumes (Volumes 2-11) to the NIRB office in Cambridge Bay.

OBJECTIVE OF THE NIRB'S REVIEW & NEXT STEPS

With the acceptance of the Proponent's October 1, 2014 submission, the Board now commences the technical review of AREVA's FEIS for the Kiggavik Project. By copy of this letter, the Board invites interested parties to submit final written submissions to the NIRB; submissions will be accepted until **5:00 pm MT Friday January 16, 2015**. Please note that the NIRB has provided direction on the recommended format for final written submissions as Appendix A, and AREVA is responsible to supply parties with the requested copies of the FEIS as outlined in Appendix B of this letter.

Similar to the technical review of the Draft EIS, the technical review of the FEIS is a detailed analysis of the EIS documentation, with the objective of assessing the quality of the supplemental and/or revised information that has been addressed following the PHC and reconsidering the conclusions of the impact predictions presented by the Proponent. During this final phase of the NIRB's Review, the technical review period for the FEIS is meant to facilitate parties' determination of whether or not they agree with the Proponent's conclusions regarding the Project's potential ecosystemic and socio-economic impacts, the adequacy of proposed mitigation and monitoring measures and, ultimately whether parties support the approval of the Project as currently proposed.

The NIRB's Review is structured with both Draft EIS and FEIS stages in order to allow for a more iterative process in which environmental assessment serves to support the Proponent to plan the best possible project, with input from the public, government, Inuit organizations and other interested parties while also providing a foundation for the subsequent permitting and licensing work of authorizing agencies. The participation by these parties in the Review process also serves to provide the NIRB with important advice for its consideration in developing the Final Hearing Report on the Project, which will determine whether the impacts from the Project can be managed appropriately and ultimately, whether the Project should be allowed to proceed and, if so, under what terms and conditions.

As noted within the NIRB's PHC Decision, the Board anticipated that the technical review period would include a minimum 80 day period for the preparation and provision of final written submissions by parties, and a 15 day period for AREVA to file a written response to the final submissions of the parties prior to the Final Hearing. The Board also notes for the information of all parties that even with the Proponent's response to submissions, it is expected that there will be issues which are unresolved prior to the Final Hearing and which will necessarily remain to be addressed at the Final Hearing itself. The Final Hearing is the appropriate venue for the Proponent to provide its final response for consideration by the Board and all parties, as the

Board and all parties, including their respective technical experts, benefit from a full and fair discussion of all respective positions.

When assessing how much information and what level of detail or confidence is adequate to allow for development of final written submissions, all parties are reminded that the focus of these submissions is expected to include the following:

- Determination of whether Parties agree/disagree with the conclusions presented in the FEIS regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures – and all evidence supporting the parties' position;
- Determination of whether or not conclusions presented in the FEIS are supported by the analysis – and all evidence supporting the parties' position;
- Determination of whether appropriate methodology was utilized in the FEIS to develop conclusions – and all evidence supporting the parties' position;
- An assessment of the quality of the information presented in the FEIS; and
- Determination regarding the appropriateness of proposed monitoring measures – and evidence to support the determination, along with any proposed alternative monitoring measures which may be more appropriate (if applicable).

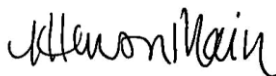
SUMMARY

In closing, please be advised that the NIRB staff will continue discussions with the host community of Baker Lake to determine acceptable dates and logistics for the Final Hearing. We will be in a position to provide further details and confirmation of dates to all parties by way of a Notice of Public Hearing to be released in the coming weeks.

Once again the NIRB reminds all parties that the deadline for final written submissions is **5:00 pm MT Friday January 16, 2015**. Submissions may be provided by email to info@nirb.ca or by fax to **(867) 983-2594**.

Should you have any questions or require clarification regarding the results of the NIRB's compliance review or the next steps in the Board's Review of the Kiggavik Project, please contact Tara Arko, Technical Advisor, by telephone at (867) 983-4611 or tarko@nirb.ca.

Sincerely,



Amanda Hanson Main
Director, Technical Services
Nunavut Impact Review Board

Attached: Appendix A – Format for Parties’ Written Submissions
Appendix B – Parties’ Requests for Copies of Kiggavik FEIS

cc: Kiggavik Distribution List
Barry McCallum, AREVA Resources Canada Inc.
Tammy Van Lambalgen, AREVA Resources Canada Inc.
Luis Manzo, Kivalliq Inuit Association
Agnes Simonfalvy, Government of Nunavut
Karen Costello, Aboriginal Affairs and Northern Development Canada
Tineka Simmons, Canadian Northern Economic Development Agency
Michael Mohammed, Environment Canada
Kelli Eggers, Fisheries and Oceans Canada
Rob Johnstone, Natural Resources Canada
Meighan Andrews, Transport Canada

Written submissions must contain the following:

1. Executive Summary

Submissions must contain a non-technical executive summary of the major issues identified during the review of the Final Environmental Impact Statement (FEIS). The summary should not exceed two pages, and is to be provided in English, Inuktitut, and French.

2. Table of Contents

Submissions must contain a table of contents with sections related to the main headings of the NIRB’s EIS Guidelines for the Project and which identify the major issues under those headings the party intends to address at the Final Hearing. In addition to addressing the major issues they have identified for the Final Hearing, submissions may also address any other matter the party considers relevant to the NIRB’s review of the FEIS and the Project.

3. Introduction

All submissions should contain a statement of the party’s mandate and relationship to the Project, and for parties with regulatory jurisdiction over the Kiggavik Project, a description of the jurisdiction of that party and a list of the legislation, regulations, policies and guidelines administered by the party that are applicable to the Project.

4. Specific Comments

For each issue included in the submissions, parties should provide the following:

- a) Issue & Reference: A detailed description of the issue and, where appropriate, a reference to where within the FEIS (document, section and page number) that issue is discussed;
- b) Discussion: A brief discussion of the issue’s importance to the impact assessment process and which includes the following:
 - i. Whether the Party agrees/disagrees with the conclusions relevant to the issue as presented in the FEIS regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures. Parties are asked to provide any evidence used to support these positions;
 - ii. Whether or not conclusions relevant to the issue as presented in the FEIS are supported by the analysis. Parties are asked to provide any evidence used to support these positions;
 - iii. Whether appropriate methodology was utilized in the FEIS to develop conclusions relevant to the issue. Parties are asked to provide any evidence used to support these positions;
 - iv. An assessment of the quality of the information presented in the FEIS as related to the issue; and
 - v. An assessment of the appropriateness of proposed monitoring measures relevant to the issue. Parties are asked to provide any evidence used to support these

determinations, along with any proposed alternative monitoring measures which may be more appropriate (if applicable).

- c) Proponent's Conclusion: If provided by the Proponent, identify the Proponent's conclusion(s) related to the issue;
- d) Party's Conclusion: A statement summarizing the conclusion(s) of the commenting party related to the issue, including reference to the justification/data/rationale supporting that conclusion as presented in (b) above; and,
- e) Recommendation(s): Any recommendation(s) to the Board with respect to the disposition of the issue.

5. Summary of Recommendations

Finally, submissions should contain a table which summarizes all recommendations provided to the Board with respect to issues as presented in item 4 above.

Translation/Interpretation Requirements

The NIRB requires final written submissions to be provided in English with executive summaries in English, Inuktitut and French. The Board further encourages all parties to translate the remaining content of their written submissions into Inuktitut and French to the extent possible. Please note that parties are responsible for sourcing this translation.

The Final Hearing will be conducted in Inuktitut and English, using simultaneous interpretation. The NIRB will also endeavour to provide simultaneous interpretation in French upon request. Please notify the NIRB should you require French interpretation to be made available for the Final Hearing.

Additionally, those who require special audio-visual equipment or other accommodations at the Final Hearing are requested to inform the NIRB in order that adequate arrangements can be made.

Format, File Size and Deadline for filing submissions

Parties must provide submissions in a fully functional, electronically searchable Word, Excel or PDF file. Noting the current constraints with respect to internet bandwidth and speed, the NIRB requests that all documents be submitted via email with attachments no larger than 5 MB.

The NIRB reminds parties that the deadline for final written submissions is **5:00 pm MT Friday January 16, 2015**.

APPENDIX B – PARTIES’ REQUESTS FOR KIGGAVIK FEIS

Agency	No. Copies	Mailing Address
NIRB	9 print copies of the main document, each including a digital copy of entire FEIS document, to: Nunavut Impact Review Board, P.O. Box 1360, Cambridge Bay, NU X0B 0C0	
KIA	5 electronic	(4 electronic) Kivalliq Inuit Association, P.O. Box 340, Rankin Inlet, NU X0C 0G0 (1 electronic) Alan Sexton, GeoVector Management Inc., 10 Green Street Suite 312, Nepean, ON K2J 3Z6
NTI	1 print; 1 electronic	Carson Gillis, Director, Department of Lands and Resources Nunavut Tunngavik Inc., P.O. Box 1269, Cambridge Bay, NU, X0B 0C0
GN	16 electronic; 2 print	Agnes Simonfalvy, Government of Nunavut P.O Box 1000-Station 1500, Iqaluit, NU X0A 0H0
AANDC	8 electronic	(3 Electronic) Rachel Theoret-Gosselin, Environmental Assessment Coordinator Aboriginal Affairs and Northern Development Canada, Nunavut Regional Office, Building 918, PO Box 100, Iqaluit, NU X0A 0H0 (1 electronic copy each) Sara MacMillan, SNC-Lavalin Inc., 1075 West Georgia St, Suite 1200, Vancouver, BC. V6E 3C9 Tracy Earle, SNC-Lavalin Inc. 202-10012 97th Avenue, Fort St. John, BC. V1J 5P3 Mart Lupp, SNC-Lavalin Inc. 195 The West Mall, Toronto, ON. M9C 5K1 Jennifer Walsh, Environmental Policy Analyst, Aboriginal Affairs and Northern Development Canada 15/25 Eddy Street, Gatineau, Quebec K1A 0H4 Tamara Hamilton, A/Senior Analyst, EA, Environment and Renewable Resources, Aboriginal Affairs and Northern Development Canada 10th Floor, 25 Eddy St., Gatineau, Quebec, K1A 0H4
CNSC	3 print	(2 print copies) Heather Harpell, Environmental Assessment Division, Headquarters Canadian Nuclear Safety Commission P.O. Box 1046, Station B, 280 Slater St., Ottawa ON K1P 5S9 (1 print copy) Denis Schryer, Uranium Mines and Mills Division, Canadian Nuclear Safety Commission 101 22nd Street E., Suite 520, Saskatoon, SK S7K 0E1
DFO	1 electronic	Fisheries and Oceans Canada, Attn: Kelly Eggers, 301-5204 50th Ave, Yellowknife, NT, X1A 1E2

EC	2 print; 11 electronic	<p>(1 print copy) Dave Fox, Environment Canada Nova Plaza, 5019 52nd St, P.O. Box 2310, Yellowknife, NT X1A 2P7</p> <p>(1 print and 1 electronic copy) Kelly-Anne Fagan, Nuclear Program Officer, Environment Canada #2S518, 2nd Floor, Environment Canada Building 4905 Dufferin St, Toronto, Ontario M3H 5T4</p> <p>(1 electronic copy each) John Price, Environment Canada Qimugjuk Building P.O. Box 1870, Iqaluit, Nunavut X0A 0H0</p> <p>Michael Mohammed, Environment Canada Qimugjuk Building P.O. Box 1870, Iqaluit, Nunavut X0A 0H0</p> <p>Jean-François Dufour, Environment Canada Nova Plaza, 5019 52nd St, P.O. Box 2310, Yellowknife, NT X1A 2P7</p> <p>Loretta E. Ransom, Environment Canada Nova Plaza, 5019 52nd St, P.O. Box 2310, Yellowknife, NT X1A 2P7</p> <p>Tanmay Praharaj, Environment Canada Place Vincent Massey - Floor: 18th - Room: 18073 351, boul. Saint-Joseph, Gatineau, Quebec K1A 0H3</p> <p>Reg Ejeckam, Environment Canada Via Rail Station 123 Main St, room 150, Winnipeg, Manitoba R3C 4W2</p> <p>Duck Y. Kim, Environment Canada Environment Canada Building; #2S516, 2nd Floor 4905 Dufferin St, Toronto, Ontario M3H 5T4</p> <p>Raymond Kotchorek, Environment Canada Place Vincent Massey - Floor: 16th 351, boul. Saint-Joseph, Gatineau, Quebec K1A 0H3</p> <p>(2 electronic copies) Anne Wilson, Environment Canada 9250 - 49 St. NW, Edmonton, Alberta T6B 1K5</p>
HC	1 electronic	<p>Wendy Wilson, Health Canada 269 Laurier Ave W, room 5-077, Mail stop: 4905A, Ottawa, ON K1A 0K9</p>
NRCan	1 print, 2 electronic	<p>Kathleen Cavallaro, Natural Resources Canada 580 Booth St, 11th floor, Ottawa, ON K1A 0E4</p>
TC	3 electronic	<p>Kim Pawley, Manager, Environmental Assessment, Transport Canada Tower C, 330 Sparks Street, Floor: 18, Ottawa, ON K1A 0N5</p>

		<p>Jeffrey Tindall, Senior Environmental Assessment Advisor, Environmental Assessment, Transport Canada Tower C, 330 Sparks Street , Floor: 18, Ottawa, ON K1A 0N5</p> <p>Christopher Aguirre, Environmental Officer, Environmental Affairs, Transport Canada 3rd Floor - 344 Edmonton Street, P.O. Box 8550, Winnipeg, MB R3C 0P6</p>
CARC	2 electronic	David Gladders , Canadian Arctic Resources Committee, Box 371 Station A, Ottawa, Ontario, Canada, K1N 8V4
BQCMB	8 electronic	<p>(1 electronic copy each)</p> <p>Earl Evans, BQCMB Chair P.O. Box 262, Fort Smith, NT X0E 0P0</p> <p>Tim Trottier, Saskatchewan Environment P.O. Box 5000, La Ronge, SK S0J 1L0</p> <p>Daryll Hedman, Wildlife Manager, Manitoba Conservation P.O. Box 28, Thompson, MB R8N 1X4</p> <p>Ross Thompson, BQCMB Executive Director P.O. Box 629, Stonewall, MB R0C 2Z0</p> <p>Anne Gunn, 368 Roland Rd., Salt Spring Island, BC V8K 1V1</p> <p>(3 electronic copies)</p> <p>Leslie Wakelyn, 11 Taylor Rd., Yellowknife, NT X1A 2K8</p>
NM	2 print	<p>Nunavummiut Makitagunarningit Jack Hicks, 32 Ch. Stanyar, Val-des-Monts, QC J8N 7B6</p>
LKDFN	1 electronic	<p>Mike Tollis, Wildlife, Lands, and Environment Manager Lutsel K'e Dene First Nation, P.O. Box 28, Lutsel K'e, NT X0E 1A0</p>
LGL	3 print; 3 electronic	<p>Ted Elliott, Senior Marine Biologist and Spatial Ecologist LGL Limited, environmental research associates 22 Fisher Street, P.O. Box 280, King City, ON, L7B 1A6</p>