



Beverly and Qamanirjuaq Caribou Management Board

9 December 2011

Nunavut Impact Review Board
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NIRB File No. 07EN047 – Uranium North “Amer Lake Project” Proposal Amendment

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), I am submitting comments on the proposal from Uranium North for an addition to their mineral exploration project in the Amer Lake area, approximately 150 km north-northwest of Baker Lake. This is in accordance with the mandate of the BQCMB, which is to advise governments and caribou range communities on ways to protect the Beverly and Qamanirjuaq caribou herds and their ranges.

The information that we have been provided with is that Uranium North is proposing to add the following component to its original project: “Preparation and use of a winter trail (approximately 150 kilometres) to bring in supplies from Baker Lake to Amer Lake using a cat train. Trail would be used March of each year for the life of the permit.”

The BQCMB believes that this new project component, which was not part of the original project proposal, will result in a change to the original scope of the project that is significant for a number of reasons. This activity:

- involves ground transportation of goods across a significant distance of land
- extends the time period of the project earlier in the year, into late winter
- is not addressed by the conditions recommended by the NIRB in the August 2007 Project Screening Decision Report or the terms and conditions issued by INAC in the September 2007 land use permit.

The BQCMB therefore recommends that: a) this proposal should not be exempt from screening by the NIRB and b) as part of the screening process, the NIRB should require Uranium North to describe their plan for the cat train operation that outlines measures they will take to ensure that impacts on vegetation and wildlife, including caribou and caribou habitat, are minimal. This plan should include consideration of terrain and snowpack conditions (which may vary annually) and anticipated caribou movement patterns (based on information from GN-Dept. Environment). It should also include procedures for operators to follow if caribou are encountered while the cat train operation is underway.

Should the NIRB decide that this project is exempt from screening, it should recommend to AANDC that additional conditions be attached to the new permit that address the potential impacts that preparation and use of the winter trail may have on vegetation and wildlife, including caribou and caribou habitat.

Please let me know if you require further information or have any questions about these comments from the BQCMB.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. Wakelyn", written in black ink on a white background.

Leslie Wakelyn
BQCMB Biologist

cc. Albert Thorassie, BQCMB Chair