



COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: <u>Nunavut Uranium Project</u>			
Proponent: <u>Forum Energy Metals Corp.</u>			
Location: <u>Kivalliq Region</u>			
Comments Due By: <u>July 5, 2022</u>	NIRB #: <u>22EN032</u>		
<p>Indicate your concerns about the project proposal below:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> no concerns <input checked="" type="checkbox"/> water quality <input checked="" type="checkbox"/> terrain <input checked="" type="checkbox"/> air quality <input checked="" type="checkbox"/> wildlife and their habitat <input type="checkbox"/> marine mammals and their habitat <input checked="" type="checkbox"/> birds and their habitat <input checked="" type="checkbox"/> fish and their habitat <input checked="" type="checkbox"/> heritage resources in area </td> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> traditional uses of land <input checked="" type="checkbox"/> Inuit harvesting activities <input checked="" type="checkbox"/> community involvement and consultation <input checked="" type="checkbox"/> local development in the area <input checked="" type="checkbox"/> tourism in the area <input checked="" type="checkbox"/> human health issues <input checked="" type="checkbox"/> other: NPC conformity process for Uranium KRLUP term 3.5/3.6; not inclusive for public and communities directly affected by uranium resource exploration and extraction. December 2006 uranium conformity process from the KRLUP was initiated by at most 65 people who were to represent the public and Inuit with no consultation to learn if this activity was acceptable or not. Inuit who live or have ties to the land are not properly consulted plus IPGs, governments and Inuit orgs have not properly consulted or given the people a true voice to learn if we want this activity, only big corporations, business, lobbyist for economic side of resource extraction represented and not the public who live or are from the areas with no consultation to learn if this activity is what is wanted or not. Industry has been listened too hence the conformity by NPC. </td> </tr> </table> <p>Please describe the concerns indicated above:</p> <p>Kangirjuap Kuunga/Thelon River and Akulliqpaq Qamaniq/Aberdeen Lake and surrounding area is an important landscape to Inuit who not only consider the community as home (recent in the last 60 years) but the land surrounding (all Inuit lived on the landscape and still do to hunt, to rejuvenate their mind body and spirit, to connect with the land and all it gives; fresh air, clean water, fish, birds, wildlife and connection to spirit) – this is especially important to Inuit who have family ties to these landscapes, recreation travelers (paddlers or ecotourists) and wildlife/fish/birds who call this home and so much more.</p> <p>Uranium exploration/mining/milling/decommissioning leads to a domino effect for the whole region which will forever negatively be impacted by the uranium industry; piece by piece,</p>		<input type="checkbox"/> no concerns <input checked="" type="checkbox"/> water quality <input checked="" type="checkbox"/> terrain <input checked="" type="checkbox"/> air quality <input checked="" type="checkbox"/> wildlife and their habitat <input type="checkbox"/> marine mammals and their habitat <input checked="" type="checkbox"/> birds and their habitat <input checked="" type="checkbox"/> fish and their habitat <input checked="" type="checkbox"/> heritage resources in area	<input checked="" type="checkbox"/> traditional uses of land <input checked="" type="checkbox"/> Inuit harvesting activities <input checked="" type="checkbox"/> community involvement and consultation <input checked="" type="checkbox"/> local development in the area <input checked="" type="checkbox"/> tourism in the area <input checked="" type="checkbox"/> human health issues <input checked="" type="checkbox"/> other: NPC conformity process for Uranium KRLUP term 3.5/3.6; not inclusive for public and communities directly affected by uranium resource exploration and extraction. December 2006 uranium conformity process from the KRLUP was initiated by at most 65 people who were to represent the public and Inuit with no consultation to learn if this activity was acceptable or not. Inuit who live or have ties to the land are not properly consulted plus IPGs, governments and Inuit orgs have not properly consulted or given the people a true voice to learn if we want this activity, only big corporations, business, lobbyist for economic side of resource extraction represented and not the public who live or are from the areas with no consultation to learn if this activity is what is wanted or not. Industry has been listened too hence the conformity by NPC.
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permit by permit, lease by lease with uranium companies “owning” the land with permits that were not properly consulted with the people of the area with no regard to those who came before them; our ancestors and who we are today: Akillinirmiut, Qairnirmiut, Hauniqtuurmiut, Hanningayuqmiut, Ukkuhiksalingmiut, Harvaqtuurmiut and Paalirmiut to name a few.

Land management regulatory system in Nunavut is not inclusive for the general public and most Inuit as they are not aware of the colonial Fee Simple land distribution system that is in place in Nunavut to hand out land that Inuit have occupied and have long connections, bonds, associations and share with wildlife/fish/birds and habitat. Land managers for: NPC, Government of Canada/Government of Nunavut, NTI and KIA do not disseminate or consult with the communities in person to learn if these activities are wanted or not in their backyard, it is left to the regulatory system which is very colonial and foreign to most people in the communities. It is more invisible with online staking and such for land resource extraction. Input from mining industry, mining industry lobbyists or business – economic aspect/mining on the other hand to the land in question have more say than those who live here all year round because industry knows this colonial system which is skewed to their terms from the start of the regulatory process. The general public and Inuit are left on the side lines and left to catch up but lose in the end because major decisions are made on their behalf without meaningful and proper consolation or discussions regarding these contentious issues.

Staking claims by industry is part of the fee entry system and applies to all land in Nunavut where applicable and eventually exploration for minerals, bulk sampling/advanced exploration, feasibility studies, environmental assessments, permitting, mine construction, mine operation, tailings, smelting, decommissioning: regulatory system. This system is not in sync with Inuit worldview or at the community level where industry can change “land” staked by different companies without consulting the people who are most impacted at the landscape level not the shareholders who live the majority live outside of Nunavut and even outside the country of Canada. Most times Inuit who live and use the area in question learn about the activity long after the permits have been long approved with aircraft or machinery suddenly in their hunting or camping grounds. Land resource managers for Nunavut are part of this issue too as they do not come to the communities to properly consult and learn what the community wants. A minimum threshold must be established where there is community support at least 85% for uranium activity for example. Article 32 has not been implemented for Inuit societal worldview for mineral industry. It is not only the economic “benefit” that will benefit the majority outside Nunavut but leave us with the mess as money will not buy back clean air, water, habitat for caribou or other wildlife, fish or birds.

The NPC 2021 Draft Nunavut Land Use Plan gives EXISTING RIGHTS to mineral/exploration/mining companies who stake claims. In this draft plan NPC are giving land to outsiders and they have more rights than Inuit who have lived and occupied these lands for generations and generations; Inuit rights to say yes or no to mineral extraction companies holding permits/leases to lands Inuit have rights to are not true because NTI,



KIA, NPC and other Land resource managers have not properly consulted Inuit and communities regarding these activities or resource extraction.

Investment in our people through education from K to 12 and college and university where Inuit are the majority employed at all levels of jobs/careers in the mining industry. This could be engineers, chemistry technicians, biologists, nurses, doctors, tailings pit engineers, geologists and the list goes on. This will not happen right away and will likely take at least 50 to 100 years and that is ok because the minerals are not going anywhere. We as Inuit will be in a much better position to negotiate our precious land resources and be more equal at the negotiating table.

Water Quality: Kangirjuap Kuunga/Thelon River and Akulliqpaaq Qamaniq/Aberdeen Lake and the whole water system/drainage basin draining into Baker Lake is an important drinking water source for the community of Baker Lake.

Terrain: the habitat is important to wildlife especially the Beverly/Qamanirjuaq Caribou herd. Waste from uranium exploration, bore holes, radiation equipment, radiative wastewater and other waste from exploration all contribute negatively to the landscape, people, wildlife and environment.

Air Quality: Radon gas from bore holes is a major concern over time especially when sites are left because the site are not “productive” enough for the company.

Noise Disturbance: Air traffic from helicopters, airplanes transporting drill rigs or crew or supplies and grid work to learn what the earth material composition. To winter transport of materials that can disturb wildlife and with pockets of activity taking place over time and with other projects ongoing, the cumulative effects can be detrimental to wildlife and Inuit who rely on this wildlife.

Caribou: the Beverly/Qamanirjuaq Caribou herd is our last precious resource that must be held in the upmost regard in terms of protecting habitat, lifecycle of caribou use of the landscape, protecting water crossings and ensure more are protected as they change due to outside influence especially increased activity from aircraft or ships. Caribou are increasingly more and more important as food insecurity is very prevalent in Nunavut. Qamani'tuaq is the only inland Inuit community and caribou is a very important food source which also provides clothing and warmth during the harsh winter months.

Fish: fish is an important food source for Qamani'tuaq as it is the only inland Inuit community in Nunavut. The people rely on fish as a food source. Fresh water, habitat and environment are required to keep this important food source available.

Uranium: the whole start to finish of this mineral; from exploration, to mining, milling, mine operation, tailings, decommissioning, transportation and all aspects needs proper inclusion



community level input and consultation with an Inuit worldview input. The footprint of this activity is large and not just the permit or lease site; its from site to shipping and beyond.

NIRB Areva Hearing: I asked NTI/KIA at the hearing for information regarding IOLs pertaining to BL parcels and surrounding areas as I wanted to know why they were selected as per the Nunavut Land Claims Agreement article 17.1.2. (a), (b), (c) and (d). I received information from NTI about CH which is Coral Harbour, but that was all. I wanted to see the documents as they are part of our living history. These organizations represent me as an Inuk and I want to know what they are saying and negotiating on my behalf and if it is best for us or not. I have yet to hear from NTI or KIA regarding this question and try to find on their website what decisions have been made on my behalf. Communication at the community level is nonexistent and use the regulatory process to promote their initiatives without properly consulting their electorate is what I see at the community level.

Waste Management: waste management permits are issued for disposal at local landfills. Where are the supporting documents that the local landfill will accept the waste from the project; combustible waste, grey water, no-combustibles, sewage and hazardous wastes. Hazardous waste is to be disposed of a facility that is capable of this, but it is not outlined where, by what method, how it will be stored and timeline to leave the community landfill for further storage south.

Do you have any suggestions or recommendations for this application?

Do not permit this project as uranium is still a very contentious issue in Nunavut that has not been properly consulted with Inuit at the community level by all land resource managers (NTI, KIA, Government of Canada, Government of Nunavut, NPC) who use the fee simple nonrenewable resource system to communicate this nonrenewable resource in which the general public is not familiar with or aware of at the community level. Meetings and decisions are made on their behalf without meaningful and proper consolation.

Article 32 of the NLCA has not been properly adhered to by all parties of land management in Nunavut as social issues are very integral to this issue.



Do you support the project proposal? Yes No Any additional comments?

This project and all uranium projects should NOT proceed.

Uranium mineral exploration and/or extraction and/or processing have not properly informed Inuit at the community level by land managers (NPC, government of Canada, /Government of Nunavut, NTI, KIA) or consulted Inuit or communities and the regulatory system has been manipulated to have this activity proceed and have a positive conformity in Nunavut without true Inuit community level participation or understanding of the issue.

Land permits/leases should not have been permitted by regulatory system by all permit/lease issuers without properly consulting the communities with a majority being Inuit and Inuit who have ties to areas of exploration, and not big business or lobbyists of this industry. Money and promises of jobs will not buy back our habitat for wildlife or landscapes that are not only for minerals but everything else we cherish.

Name of person commenting:	<u>Paula Kigjugalik Hughson</u>	of	<u>Baker Lake</u>
Position:	<u>Qairnirmiut and Harvarqtuurmiut Inuit decent</u>	Organization:	<u>Nunavut Land Claims Beneficiary</u>
Signature:	<u><i>Paula K. Hughson</i></u>	Date:	<u>July 5, 2022</u>