

BEVERLY AND QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

13 April 2006

James Eetoolook
First Vice-President
Nunavut Tunngavik Inc.
P.O. Box 1269
Cambridge Bay NU X0B 0C0

Dear Mr. Eetoolook:

Draft Consultation Document and Draft Uranium Policy

It has come to the attention of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB) that NTI has distributed the above-named documents for review and comment to a restricted group, and that NTI plans to develop a policy on uranium mining in Nunavut based on involvement of this same exclusive group.

We believe this consultation process is inadequate and needs to be expanded for reasons outlined below.

- Baker Lake and other communities should have been involved in discussions from the initial stages of policy development. By developing these draft documents with no substantial involvement by the communities most likely to be affected by this policy, NTI has not adequately respected their priorities. Baker Lake has a long and well-known concern with uranium mining.
- The documents appear one-sided and biased in favour of uranium mining, suggesting that adequate consideration was not given to the potential negative impacts. In fact, the documents clearly indicate that NTI supports uranium mining, and has taken this position before consultation. It appears that, to date, there has not been adequate opportunity for discussion among the Inuit you represent.
- Several stakeholders were excluded from your process, including the BQCMB, and others from outside of Nunavut - although notably the uranium industry was included. There are many others with a legitimate stake in this issue and in the consequences the policy could have for Nunavut and its environment, including wildlife resources that are shared with other jurisdictions (e.g., caribou). These stakeholders include several communities, such as Lutsel K'e and others in northern Saskatchewan and Manitoba. The BQCMB has had a long standing concern about uranium mining since

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the 1980s, as expressed by caribou-using communities like Baker Lake, Arviat and Black Lake, Saskatchewan.

- The consultation process is contrary to your own Mining Policy. Objective 5 (Improve Consultation and Clarify Decision-Making) states that: "*All stakeholders* should be given a meaningful opportunity to participate in decision-making. Processes should be *open, transparent, timely, and well-defined.*" (italics added). This objective is not being followed by your current process for developing a uranium policy for Nunavut.

We will be submitting substantive comments to you on these draft documents before the end of April 2006. We also request that the BQCMB be included in subsequent consultations during development of your policy on uranium mining. This issue will be an agenda item for our May 2006 board meeting.

Sincerely,

[original signed by Ross Thompson for Jerome Denechezhe]

Jerome Denechezhe
Chairperson

Cc: Daryll Hedman, Vice-Chair, BQCMB

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