

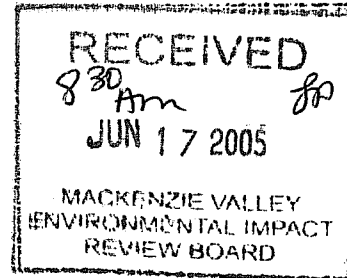
via – fax (867-766-7074)

9 Woodthrush Green
Ottawa, ON
June 16, 2005

Mr. Martin Haefele
Environmental Assessment Officer
MVEIRB
Yellowknife, NT X1A 2N7

Re: EA0506-003 Ur Energy
Uranium Exploration Screech Lake

Dear Mr. Haefele,



Thank you for the opportunity of making this submission.

The perspective I would like to bring to the discussion is that the main issue isn't development versus no development but rather development only within the context of an established comprehensive and extensive (in terms of impacted area), long-term plan. Such a plan must take into account all the competing uses of the land in a way that preserves the character of nature (in the most complete sense including all aspects of the people of first nations, water, air, fauna, wildlife, etc) in the territory. Beginning development in an ad hoc way will serve as an example to be repeated on the premise the next one isn't doing anything different than the previous. This has a high risk of failure regarding the preservation of irreplaceable natural habitat/resources and history shows this will lead to a mess on all fronts in spite of all the platitudes of the developing parties they will be better than those before. By their very nature developers don't look at the big picture and thus the regulators bear this huge responsibility and must fulfill this role. The regulators' job really isn't to approve or reject a project, it is to make "The Plan" and then it becomes a simple task to check if a given project fits "The Plan". For this reason it is critical not to start without "The Plan". I am not aware that any such plan exists for the Thelon basin as a whole and thus logic says to proceed with the approval of the project being investigated under the terms of EA0506-003 Ur Energy is back to front and therefore wrong by any argument.

"The Plan" to be effective must first be a long term, rather than a short term, vision of what is desired to be maintained and what development is possible without destroying or significantly disturbing what is to be preserved. Long term I think is at least several tens of years rather than several years. Preservation and development implies a balance between moving ahead and doing nothing but in my opinion it isn't "balance" in the simple sense of the word because if one gets it wrong from the start it is likely impossible to make it right again. Man can't recreate a caribou herd we can only allow it to maintain itself. Moving forward cautiously and measuring the impact of each step before the next and checking if the assumptions in "The Plan" are in fact valid is necessary. Depending on findings it may be appropriate to modify "The Plan" either way, ie less or more development.

Assuming agreement on "The Plan" being long term the next major step is to agree on what is to be preserved and/or maintained. This is a critical point because if there is no agreement on identifying the key concepts there can be little expectation of achieving a presumed outcome. That is to say, if one doesn't get the philosophy right it will be impossible to get the details right. I don't intend to speak to all the issues or the detailed implementation requirements but would suggest the following should be considered key concepts for "The Plan" to preserve/address.

- First Nation land claims, specifically the Lutsel K'e Dene, and their rights to have a say in the development of this land and, if given their rights, what do they want preserved.
- The very long term (ie forever) survival and well being of the Beverly-Qamanirjuaq caribou herd and the requirement, if any, for a continuous undisturbed migration corridor with calving, post calving and wintering areas at either end.
- A statement to the effect that there can be no compromise in the first instance, to employ processes and procedures to avoid or minimize the creation of air or water pollution and in the second instance that stringent state of the art low limits be set for the maximum allowable emissions that may occur.
- A statement to the effect that the user pays with respect to correcting any and all environmental contamination. By this I mean any developer (his heirs, successors and assigns) is totally and forever responsible for all the costs to remediate any contamination they cause. And here I will go into a detail because the developer will be a corporation and since they can hide behind the veil of bankruptcy (after all the profitable mining has been done), the best approach will be to require an up front trust fund be established by any developer prior to work beginning with additional contributions to be made during the life of any project. The amount of funds should be significant and conservative with respect to the potential clean up costs to be covered. Custody of the fund will be with the regulator. Thus the money will be there if required and if at the end of the project it is not required it will be refunded to the developer, with interest. This is fair since if the developer does not pollute he gets the money back in the end. If a developer objects to the concept of an up front trust fund one has to wonder about their integrity with respect to achieving a non polluting development.
- Assuming there will be development, "The Plan" should predetermine designated transportation corridors to export mined product to market. Obviously these transportation corridors must not conflict with any of the long-term objectives for the area and be routed through the least sensitive areas.
- What are likely and/or logical expansions of the existing Thelon Wildlife Sanctuary and what other future adjacent protected areas can be anticipated that should be provided for in the beginning?
- If development generally is deemed good, what are competing options (besides mining), what are the respective benefits re income/services to those living in the area and by what criteria should it be decided which to chose and in what priority? For example could tourism provide a higher net benefit to the local community than mining?

The final step is to establish the specific details, action items and a practical schedule for "The Plan" that flow from the main concepts such as indicated above

Overall, we need to guard against the myth that a single project cannot impact such a vast region. If a project is looked at in isolation, indeed it may be difficult to imagine any harm even if it goes wrong. However, to the contrary a single project could create all kinds of problems if for example to get the ore to market, a road is built that disrupts the caribou migration. Also, water and/or air pollution can travel hundreds or thousands of kilometers affecting plant and animal life, contaminate the food chain and cause irreversible ecological impact. There is no end of examples of this being the norm in the past and it is dangerous to assume it won't happen again.


More importantly, the precedent will be set and it will be difficult to resist the pressure that will be exerted on politicians and regulators by a company that has invested significant sums of capital and promises regional economic benefits for allowing this and other projects to go ahead.

One might ask what is a southern Canadian like me doing bothering about development in the north? I might ask where are the developers from and what is their allegiance? Is it to their shareholders and/or their own potential personal gain? Nothing wrong with that as long as it isn't at the expense of the environment or the people of the north. My own motivation is for any development, wherever it occurs in our country, or the world for that matter, to be done in a way that avoids irreversible loss to those who follow. Since the natural restorative processes are so slow in the northern climate, extra measures and caution are warranted. A very applicable statement: (author unknown to me) to keep in mind is: "We do not inherit the earth from our parents, we borrow it from our children".

As mentioned previously, the responsibility for developing a proper plan falls to the regulators and the politicians. This is not a small responsibility and should not be taken lightly as you are entrusted to do "the right thing" on behalf of all of us. Of course this can take time to do properly but please remember the ore won't go anywhere and it will still be there to mine in the future. On the other hand, ecological damage in the north could take hundreds of years, if ever, to be corrected. There is no incentive to rush and the impatience of potential developers is the least valid reason to approve anything before making "The Plan". Please take the time to approach this properly and understand the easy route is to make approvals quickly but it will take strength to go slowly and do it properly. For our children's sake be confident you have the strength and courage for the proper approach.

Thank you for your attention and consideration of these comments. I trust they will be of interest and value to you in your hearing and deliberations.

Yours truly



John Groves