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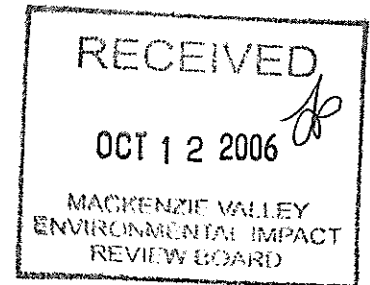
Yellowknife, NT X1A 2R3

Your file - Votre référence

Our file - Notre référence

October 6, 2006

Martin Haefele  
Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
Box 938  
YELLOWKNIFE, NT X1A 2N7



Dear Mr. Haefele,

**Re: Ur Energy Uranium Exploration Project Screech Lake ( MVEIRB EA #0607-003) Draft Work plan and Schedule**

Indian and Northern Affairs Canada (INAC) is pleased to submit the attached comments on the draft September 21, 2006 work plan and schedule for the above mentioned proposed development.

INAC supports efforts made by the Review Board to tailor assessments to the scope of development, and the potential impacts. Since the approach of this work plan is somewhat different from those used in previous assessments, it will be important for the Review Board to provide clear guidance on its expectations throughout the process. For example, the Review Board may wish to provide further guidance on " Post Hearing submissions," once that stage of the Environmental Assessment (EA) is reached.

Attached are additional comments pertaining to the draft work plan and schedule.

If you have any questions or concerns regarding our submission, please contact Lionel Marcinkoski at 669-2591 or [marcinkoskil@inac.gc.ca](mailto:marcinkoskil@inac.gc.ca).

Sincerely,

David Livingstone  
Director  
Renewable Resources and Environment

c.c. INAC EA Working Group

Canada

**INAC comments on the Draft Work plan and Schedule for the  
Environmental Assessment for Ur Energy Uranium Exploration Project  
Screch Lake (MVEIRB EA# 0607-003)**

**Comments on Specific Sections**

**Page 7 – Table 1- Constitutional issues**

INAC would like to address the second paragraph which states, “The decision whether to actually allow the development rests with the Minister of INAC. The Minister will determine if consultation and accommodation were adequate for the Minister’s purposes.”

INAC is concerned that these sentences may create the impression that the Minister of INAC is the sole decision-maker in the context of EA’s. Please note that s.130 of the MVRMA requires the Federal Minister and all of the Responsible Ministers (as defined in s. 111) to agree on a response to the Review Board’s Report of Environmental Assessment. The Minister of INAC, as the Federal Minister, transmits this response to the Review Board on behalf of all the Responsible Ministers.

In addition, the Minister of INAC is not necessarily the only Crown representative involved in a pending decision which may attract the Crown’s legal duty to consult.

This concern could be addressed by replacing “Minister of INAC” with “Responsible Ministers.”

**Page 7 – Table 1- Compliance with the *Species at Risk Act***

The last line in the last row is an incomplete sentence – some words may have been omitted.