

Before the Nunavut Water Board  
In the matter of:

an Application by  
CanZinco Ltd.  
for the approval of  
Part G, Sections 3-17  
Water Licence  
NWB1NAN0208  
(Nanisivik Mine)

Written Intervention

By

Indian and Northern Affairs Canada

May 28, 2004

## **Executive Summary**

### ***Introduction***

Indian and Northern Affairs Canada (INAC), with the assistance of EBA Engineering Consultants Limited, undertook a technical review of the Nanisivik Mine 2004 Reclamation and Closure Plan (RCP) submitted by CanZinco Limited (the Proponent) in accordance with Part G of Water Licence NWB1NAN0208 (the Current Licence), issued by the Nunavut Water Board (NWB). The following comments comprise a summary of INACs outstanding concerns (identified by Water Licence and report title) with the RCP, and takes into consideration all correspondence received by the NWB from the Proponent subsequent to the circulation of the RCP for review in March, 2004.

### ***Part G, Section 14 - Human Health and Ecological Risk Assessment (HHERA)***

The Government of Nunavut (GN) - Department of Environment has expressed concern with the HHERA, which received NWB approval in November, 2003. As a number of GN departments were involved in the development of the this HHERA, INAC recommends that the NWB seek clarification on the GN's position on the acceptability of the HHERA, and the Soil Quality Remediation Objectives (SQROs) contained therein. If the NWB determines that HHERA and associated SQROs are open for further discussion and/or modification, INAC recommends that the review and approval of the specific activities dependant on the currently approved SQRO values, such as the clean-up contaminated soils, cease until such time as these remediation objectives are no longer subject to change.

### ***Part G, Section 3 - Final Closure and Reclamation Plan***

The Proponent has committed to providing a Spring/Summer 2004 implementation plan at the Arctic Bay Public Hearings. Pending the submission and approval of the implementation plan, INAC recommends that the Proponent provide future proposed implementation plans for NWB review and approval. These could possibly be included as a component of the Quarterly Report Requirements issued during reclamation. INAC also recommends that new Water Licence Applications be required for any undertakings not identified under the Current Licence. Such undertakings should include any proposed reassignment of facilities or infrastructure identified under the Current Licence. INAC, in its written submission, also provides a listing of the six land leases and four quarry permits held by the Proponent, recommends that these leases and permits be kept up to date, and requests that the roads on these leases be re-contoured and returned to as close to the pre-mining condition as possible.

### ***Part G, Section 4 - Engineering Design of Surface Reclamation Covers***

The Proponent currently plans to leave the industrial complex and concentrate storage shed concrete foundations in place and cover with shale for reclamation. INAC has previously recommended that these foundations, and any associated contaminated soils, be removed and stored in the underground mine workings. The Proponent has committed to investigating the concrete foundation areas for potential contamination. INAC recommends that, given the uncertain state of these sites, NWB approval be conditional, with final approval granted upon receipt and review of these reports.

***Part G, Section 8 - Waste Rock Pile and Open Pit Closure Plan***

The Proponent has committed to providing additional geochemical characterization of the West Open Pit and West Open Pit access road. INAC recommends that the Waste Rock Piles and Open Pit Closures Plan receive conditional approval, with the pending geochemical inspection reports subject to a separate NWB review and approval process.

***Part G, Section 9 - Closure Monitoring Plan***

INAC supports the current identified monitoring regime, which covers the Reclamation period and the first 5 years of the Post-closure period. This support is conditional on the Proponent's identified commitment to modify the program, including lengthening of the monitoring period, to address any and all concerns and environmental impacts that may be identified. INAC recommends, however, that the Proponent also provide a plan to ensure that the residents of Arctic Bay are kept informed of the monitoring results and implications throughout the monitoring period.

***Part G, Section 13 - 2003 Phase III Environmental Site Assessment***

INAC recommends that the Proponent make a further clear commitment to the sampling for PCB's in the soils beneath and surrounding the PCB storage facility, including the slab. INAC further recommends that the results of the PCB and ANFO plant sampling, and any contingency plans developed, be submitted to the NWB for review and approval.

***Part G, Section 16 - Waste Disposal Plan***

The information provided by the Proponent was insufficient with regard to the Nanisivik Mine's long term stability and the potential for future surface subsidence. INAC requests that an updated and certified report be prepared by a Professional Engineer that reflects current mine conditions, and addresses the short and long-term stability issues associated with the closure of the Nanisivik Mine. The mine portal closure designs presented in this report were also inadequate. INAC requests that the Proponent provide, for subsequent NWB review and approval, detailed closure designs for the mine portals, ventilation raises, and all other mine openings to surface, that are certified by a Professional Engineer. The mine portal seal designs are also subject to the approval of the Mines Inspector, Workers Compensation Board.

***Part G, Section 17 - Landfill Closure Plan***

INAC recommends that the Proponent provide landfill contingency plans, and a framework under which these plans would be employed. These could be submitted to the NWB for review and approval at a date prior to the completion of the reclamation phase. INAC also recommends that the Proponent not be permitted to remove any monitoring parameters without the prior written approval of the NWB.

***Conclusion***

INAC has reviewed CanZinco's Nanisivik Mine 2004 Reclamation and Closure Plan (RCP), and is of the opinion that the Proponent has provided a sound framework through which reclamation and closure activities at the Nanisivik Mine site can be implemented. INAC is confident that the

RCP has been developed in accordance with NWB processes, good engineering practices, and government policies for mine abandonment and reclamation. INAC is satisfied with the reclamation measures proposed for lands held on leases from INAC. INAC therefore recommends that the 2004 Nanisivik Mine Final Closure and Reclamation Plan, to include information and commitments provided by the Proponent through NWB mediated correspondence, be granted conditional approval with the identified outstanding items subject to additional NWB review and approval processes.

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## **Introduction**

This intervention to the Nunavut Water Board (NWB) is made on behalf of Indian and Northern Affairs Canada (INAC) with respect to the submission of the Nanisivik 2004 Mine Final Reclamation and Closure Plan (RCP) by CanZinco Limited (the Proponent) in accordance with Part G of Water Licence NWB1NAN0208 (the Current Licence).

## **Background**

Water Licence NWB1NAN0208 was issued to CanZinco Ltd. in October, 2002 for the reclamation and closure of the Nanisivik Mine site. The Nanisivik Mine is a lead-zinc mine that began operation in 1976 under Strathcone Mineral Services Limited. In 1996 it was acquired by CanZinco Ltd., a subsidiary of Breakwater Resources Ltd.. The mine ceased operations prematurely in September, 2002, due to low base metal prices and the resulting economic infeasibility of continued mining operations at the Nanisivik Mine.

Nanisivik applied for a renewal of Water Licence NWB1NAN9702 in February, 2002. As the Nanisivik Mine was to cease active production shortly thereafter, the new Water Licence Application included the February 2002 Nanisivik Mine Closure and Reclamation Plan. The Water Licence Application underwent review by the Nunavut Impact Review Board, and the NWB. NWB Public Hearings were held in Arctic Bay in July, 2002. At this time, the February 2002 Closure and Reclamation Plan was recognized as lacking great deal of technical information and was considered to be a concept level plan. In October, 2002, CanZinco Ltd. was issued Water Licence NWB1NAN0208 (the Current Licence) for the reclamation and closure of the Nanisivik Mine site. In Part G of the Current Licence, the NWB advises the Proponent of the plans, and information contained therein, required for the approval of a reclamation and closure plan.

Following the issuance of the Current Licence, several technical meetings were held to define and agree upon the approach and content of the Part G reports required in the revised reclamation and closure plan. These meetings were held in Calgary (August, 2002), Iqaluit (March, 2003), and Ottawa (September, 2003). Following the Ottawa technical meeting, the revised Human Health and Ecological Risk Assessment (HHERA; Part G, Item 14 of the Current Licence) was submitted to the NWB in October, 2003. The HHERA set the Soil Quality Remediation Objectives (SQROs), and received NWB approval in November, 2004. In February/March, 2004, the Proponent submitted the 2004 Nanisivik Mine Reclamation and Closure Plan (RCP) to the NWB for review. This was circulated for review by the NWB in March, 2004. A final round of technical meetings to discuss the RCP, with the exception of the previously approved HHERA, were held in Yellowknife May 4-5, 2004, with the Public Hearing Pre-hearing held on May 6, 2004.

NWB correspondence of May 10, 2004, identified the final Public Hearing dates and location, and provided the intervention focus as Part G of the Current Licence, and any issue pertaining to the closure and reclamation of the Nanisivik Mine site. The documents reviewed in the

preparation of INAC's intervention included:

- G-3 Final Closure and Reclamation Plan
- G-4 Engineering Design of Surface Reclamation Covers
- G-5 Assessment of Surface Cell and Test Cell Taliks
- G-6 Quarry Development and Reclamation Plan
- G-7 Detailed Design of the West Twin Dyke Spillway
- G-8 Rock Piles and Open Pit Closures
- G-9 Closure Monitoring Plan
- G-13 2003 Phase 3 ESA
- G-14 Human Health and Ecological Risk Assessment
- G-15 West Twin Disposal Area Closure Plan
- G-16 Waste Disposal Plan
- G-17 Landfill Closure Plan

The plans pertaining to Part 5, Sections 5,6,7, and 15 of the Current Licence were reviewed, but are not specifically addressed in this written intervention as INAC was either in agreement with these documents as initially presented, or is satisfied with the supplementary information and/or additional commitments provided by the Proponent in their correspondence of May 3, 2004, (R.Carreau, Breakwater Resources to S. Traynor, INAC) and May 14, 2004 (R. Carreau, Breakwater Resources, to P. di Pizzo, NWB). This intervention provides a synopsis of our understanding of the various focus sections and recommended terms and conditions for RCP implementation. The comments addressing Part G, Section 14 of the Current Licence, the HHERA, are presented first in response to the NWB's request of April 20, 2004, for parties to address the HHERA comments and concerns raised by the Government of Nunavut, Department of Environment, in their April 29, 2004 letter to the NWB.

## **Part G, Section 14 - Human Health and Ecological Risk Assessment**

In 2002, the decision was made to undertake a site specific risk assessment procedure to determine the Soil Quality Remediation Objectives (SQROs), rather than to apply generic Canadian soil quality guidelines. The resulting Human Health and Ecological Risk Assessment (HHERA) identifies an “acceptable” level of risk to humans and representative ecological receptors. This is accomplished by quantifying receptor exposure to a respective contaminant, via all of the identified potential exposure pathways, and then using an iterative process to determine the acceptable degree of hazard (where hazard is a function of contaminant concentration). The concentration at which the contaminant meets the established level of “acceptable” risk becomes the SQRO.

The HHERA underwent two rounds of technical review, which included rigorous discussion at the September, 2003, HHERA technical meetings in Ottawa. At the end of the September, 2003 meetings the participants, including the GN departments involved, agreed upon the outstanding changes to be made to the HHERA prior to its final submission to the NWB for approval. The identified changes were made, and the HHERA was approved by the NWB in November, 2003. On April 29, 2004, the Government of Nunavut (GN), Department of Environment (DE), submitted a list of concerns with respect to the Human Health and Ecological Risk Assessment (HHERA) to the NWB (G. Lemus, GN-DE, to P. di Pizzo, NWB). Dillon Consulting, on behalf of the NWB, reviewed the HHERA with respect to the GN-DE’s concerns, and concluded that “[the GN-DE’s] review does not raise any issues that have not been previously addressed in other reviews”, and continues that “the major issues raised in previous reviews have been adequately addressed and that the overall conclusions presented in the report are reasonable” (May 13, 2004 letter from B. Leece, Dillon Consulting, to D. Filiatrault, NWB).

Many activities identified in the reclamation and closure plan (RCP) are based on the SQROs derived from the HHERA. It is therefore inappropriate to proceed with any reclamation activities affected by HHERA outcomes until such time as the remediation objectives are no longer subject to change; to proceed in the absence of such clarity would add unacceptable level of uncertainty to reclamation undertakings and outcome for the community, the regulators, and the Proponent.

INAC has the following comments with respect to the HHERA:

1. INAC recommends that the NWB encourage the GN to provide an unambiguous opinion on its position with respect to re-opening the SQROs and the HHERA process.
2. INAC has been involved throughout the NWB’s HHERA review process, and supports the NWB approved HHERA and the SQROs contained therein. However, if the NWB determines that additional HHERA review is required, INAC will participate in the process as determined by the NWB.
3. If the NWB determines that the HHERA and the SQROs may be altered, INAC



recommends that the review and approval of specific activities dependant on the current SQROs, such as the clean-up contaminated soils, be deferred until such time as the remediation objectives are no longer subject to change.

### **Part G, Section 3 - Final Closure and Reclamation Plan**

The plan submitted under Part G, Section 3 of the Current Water Licence is comprised of the summaries of all reclamation activities included in the RCP, and also includes broader Reclamation and Closure information not readily captured in any other RCP documentation. INAC's comments on broad reclamation and closure issues are presented below:

4. In their response to the NWB information request of May 7, 2004, the Proponent committed to providing an implementation plan for spring/summer 2004 reclamation activities, at the June, 2004, NWB Public Hearings held in Arctic Bay. INAC recommends that no reclamation work proceed prior to NWB receipt and approval of this implementation plan. INAC also recommends that the Proponent provide future implementation plans for NWB review and approval. These could possibly be included as a component of the Quarterly Report requirements issued during reclamation.
5. Water Licence NWB1NAN0208 (the Current Water Licence) was issued for the closure and reclamation of the Nanisivik Mine site. The Final Closure and Reclamation Plan (submitted under Part G, Section 3 of the Current Water Licence) provides for the decommissioning of all facilities and infrastructure identified under the Current Water Licence. INAC recommends that after such time as the RCP receives NWB approval, all subsequent alterations in the RCP (including changes in the fate of materials, facilities, or infrastructure contained within the RCP) become subject to NWB approval.
6. If the reassignment of any materials, facilities, or infrastructure creates a situation in which an associated Water Licence requirement emerged, INAC recommends that an application for such Licence be required as for any new appurtenant undertaking. INAC further recommends that an approved Water Licence for any reassigned facilities and/or infrastructure exist prior to the release of these entities from Water Licence NWB1NAN0208.
7. To assist in clarifying the current regulatory state of the Nanisivik site (as per Item 9, NWB information requests of May 7, 2004), a list of the Land Leases and Quarry Permits issued by INAC lands to the Proponent are listed below:

#### **Leases:**

- |           |   |
|-----------|---|
| 48C/1-7-2 | Parcel A (27.9 ha), Parcel B (13.5) Development of underground and open pit mine purposes only, waste rock dumps also on this site.<br><b>Expiry Date: October 31, 2006</b> |
|-----------|---|

- 48C/1-5-2      12 ha, Underground Mine Portal, Open Pit Mining, Waste Rock Dumps  
**Expiry Date: May 31, 2004 (Expired)**
- 48C/1-6-2      3 ha, Ventilation Shaft  
**Expiry Date: October 31, 2006**
- 48C/1-8-3      5 ha, Minesite, Oceanview.  
**Expiry Date: This lease is presently in overholding tenancy (Expired December 31, 1999)**
- 48C/1-10-2     12.6 ha, Open Pit Mine and Access Road  
**Expiry Date: December 31, 2004**
- 48C/1-9-3      50 ha, Beds of Body of Water West Twin Lake (Kuviku), Tailings Disposal Area  
**Expiry Date: This lease is presently in overholding tenancy (Expired December 31, 1999)**

Quarries:

- N2003QP0087      Shale Hill, 1000 cubic meters of Shale  
**Expiry Date: September 15, 2004 or when the authorized quantity of material has been quarried or removed, whichever is the sooner**
- N2003QP0088      Road Quarry, 500 cubic meters of Shale  
**Expiry Date: September 15, 2004 or when the authorized quantity of material has been quarried or removed, whichever is the sooner**
- N2003QP0089      Area 14, 500 cubic meters of Shale  
**Expiry Date: September 15, 2004 or when the authorized quantity of material has been quarried or removed, whichever is the sooner**
- N2003QP0090      East Twin Quarry, cubic meters of Shale  
**Expiry Date: September 15, 2004 or when the authorized quantity of material has been quarried or removed, whichever is the sooner**

Note also:

- a.      The leases that are in overholding tenancy and expired will have to be renewed.

INAC plans to renew the crown land leases for a term that is acceptable to complete the monitoring phase of the reclamation and closure of the mine. INAC's recommendation would be to December 31, 2012 with an option to extend if monitoring identifies a requirement for a longer term.

- b. The quarry permits on crown land will have to be renewed if needed by the Proponent to conclude their reclamation plans. In the technical review, the East Twin Quarry was identified as being used for a shale quarry. This quarry permit will need to be amended to meet the needs of the project, that being the length of the permit and/or the quantity of shale being removed.
  - c. INAC Lands would also remind the proponent the roads on crown lands going to these lease and permit areas will have to be re-contoured and proper drainage restored as part of the reclamation plan.
8. INAC will not entertain any proposals for underground waste disposal following closure of the mine portals.

#### **Part G, Section 4 - Engineering Design of Surface Reclamation Covers**

At present, the surface reclamation cover plan provides for the concrete foundations of the industrial complex and concentrate storage shed to be buried under 2.2 and 0.5 m of cover, respectively. In a letter of April 26, 2004 (S. Traynor, INAC, to P. di Pizzo, NWB), INAC identified that the preferred reclamation approach for these concrete slabs was their removal from the surface and placement underground. Following discussion at the NWB May 4-5, 2004 technical meetings in Yellowknife, NWT, the Proponent committed to performing visual inspections of the concrete foundations (May 14, 2004, letter of R. Carreau, Breakwater Resources Ltd., to P. di Pizzo, NWB). If the concrete foundations were found to have been compromised, the Proponent further committed to undertake contaminant testing in the soils below the concrete (Letter of May 14, 2004, as above).

As additional testing, reporting, and contingency plan alternatives are dependant on the results of the pending inspections, the following comments are provided:

- 9. INAC recommends that the report provided by the Proponent to the NWB on the state of the concrete foundations include a photographic record as well as a description of the extent, timing, and method of inspection.
- 10. If significant contamination is detected within or below the concrete foundations, in particular hydrocarbon contamination, INAC recommends that the concrete foundations and all associated contaminated soil be removed and stored underground. This material should be accounted for in the Waste Disposal Plan (Part G, Item 16 of the Current Water Licence) as required.

11. INAC recommends that, given the uncertain state of the concrete foundations, that NWB approval of the Part G, Section 4 plan be conditional, with final approval granted upon receipt and review of the concrete foundation inspection reports.

### **Part G, Section 8 - Waste Rock Piles and Open Pit Closures**

At present, the Proponent has not yet collected all of the data required to provide a complete plan that identifies and addresses all areas of potential geochemical concern within the West Open Pit and West Open Pit Access Road.

12. INAC recommends that the Proponent receive conditional approval of the Waste Rock Piles and Open Pits Closure Plan (Part G, Section 8 under the Current Water Licence), with final approval contingent on the NWB review and acceptance of the geochemical inspection report and reclamation plans for the West Open Pit and West Open Pit access road. The Proponent has committed to providing this information to the NWB by October 31, 2004 (Letter of May 14, 2004, from R. Carreau, Breakwater Resources Ltd., to P. di Pizzo, NWB).

### **Part G, Section 9 - Closure Monitoring Plan**

The Monitoring Plan provided under Part G, Section 9 of the Current Water Licence provides for two periods of monitoring: 1) the Reclamation Period (2 years) and, 2) the Post-Closure Period (5 years). The Reclamation Period encompasses that period of time during which reclamation is ongoing. The Post-Closure Period begins once reclamation activities have been concluded at the site and extends for a minimum of 5 years. INAC is of the opinion that the monitoring program provided in this document, to include Kuhulu Lake (as per the May 14, 2004, letter of R. Carreau, Breakwater Resources Ltd., to P. di Pizzo, NWB), is currently sufficient.

It is important to reiterate, however, that the Proponent has committed to continue monitoring until such time as sufficient strength of evidence exists to conclude that the Nanisivik site is stable and that no possibility for future negative effects exists. It is important to note that the absence of negative effects in the first seven years of monitoring may not alone constitute such strength of evidence.

Two important benchmarks in the Nanisivik monitoring process will be the Terms for a Comprehensive Performance Review, and the Comprehensive Assessment Report, to be submitted by the Proponent in 2007 and 2010, respectively. The Closure Monitoring Plan commits the Proponent to continuing any additional monitoring as required subsequent to the identified 7-year monitoring plan. The Closure Monitoring Report also indicates, however, that the Proponent may expect a release from future monitoring requirements based on the results presented in the 2010 Comprehensive Assessment Report. The development of the Terms for a Comprehensive Performance Review in 2007 (as per Part G, Section 22 of the Current Licence) will, therefore, represent an important opportunity for preliminary objective criteria to be

developed that will be used to determine if and when the Proponent may be released from future monitoring responsibilities.

The Quarterly and Annual reports provided to the NWB constitute a mechanism through which regulators will obtain the results of the Nanisivik monitoring programs. No clear communication mechanism has been identified to ensure that the residents of Arctic Bay are also kept informed of these findings.

13. INAC supports the current proposed closure and monitoring plan, however this support is conditional on the Proponent's identified commitment to modify the program, including lengthening of the monitoring period, to address any and all concerns and environmental impacts that may be identified.
14. INAC recommends that the Proponent clearly identify the frequency and mechanism by which the results, and any practical implications thereof, obtained from the Reclamation and Post-closure Monitoring Program will be communicated to the residents of Arctic Bay.

### **Part G, Section 13 - 2003 Phase 3 ESA**

In addition to the sampling for contaminants reported in the Phase III Environmental Site Assessment (ESA), the Proponent has committed to some sampling for polychlorinated biphenyls (PCBs) at the PCB storage facility, and in the materials used for building construction and maintenance (Item 3, May 14, 2004, letter from R. Carreau, Breakwater Resources Ltd., to P. di Pizzo, NWB). The Proponent has further committed to sample soils surrounding the ANFO Plant for total nitrogen, nitrate, and nitrite concentrations (Item 5, May 14, 2004 letter as above).

15. INAC recommends that the Proponent make a further clear commitment to the sampling for PCB's in the soils beneath and surrounding the PCB storage facility, including the slab. INAC further recommends that the results of the PCB and ANFO plant sampling, and any contingency plans developed, be submitted to the NWB for review and approval.

### **Part G, Section 16 - Waste Disposal Plan**

INAC is still waiting for a response from the engineers' discussion that was to take place after the technical hearings in Yellowknife regarding the issue of subsidence. To date, our technical engineers haven't had a meeting. When INAC receives this additional information, we will be reviewing the study and will be able to take the appropriate steps to address, if any, outstanding issues with the crown pillars and subsidence issue.

16. INAC requests the Proponent provide a validation of NRCan analysis using current mine conditions, and provide a certified opinion of a Professional Engineer on the future risks associated with mine stability issues

After reviewing the map that was provided by the Proponent in their Executive Summary and INAC's own maps, it should be noted that the following portals are on crown land: 09 south, 17N, 39, 88, K-Baseline, Oceanview and Area 14.

17. INAC requests an explanation why Portals 88, Oceanview and Area 14 three portals were excluded from the closure design and not included in the proponents letter to NWB on May 14, 2004.
18. INAC requests a commitment to provide detailed design closure and monitoring plans for the mine portals, ventilation raises, and all other mine openings to surface, that are certified by a P. Eng.. These plans are also subject to the Mine's Inspector, Worker's Compensation Board.

### **Part G, Section 17 - Landfill Closure Plan**

The Proponent has agreed to include BTEX in the parameters sampled in landfill leachate, and stated that "At the end of the reclamation period, the needs for the inclusion of all of these parameters will be re-assessed to ensure that analyses are appropriate to the needs of the site." (Item 4b, May 14, 2004, letter from R. Carreau, Breakwater Resources Ltd., to P. di Pizzo, NWB).

19. INAC recommends that no parameters be removed from the landfill leachate, or any other monitoring regimen, without prior approval from the NWB.

Item 44 of INAC's letter of April 26, 2004 (S. Traynor, INAC, to R. Carreau, Breakwater Resources Ltd., and P. di Pizzo, NWB), requested that the Proponent "identify the existence and/or detail of contingency plans in place, in the event that poor performance is detected in the closure/post-closure monitoring period" and to "provide a frame work, identifying in what order, and under what circumstances, these contingencies will be employed". In their response (Letter of May 3, 2004, R. Carreau, Breakwater Resources Ltd. to S. Traynor, INAC) the Proponent indicated that a response was being developed for this request. INAC has not yet been provided this response.

20. INAC recommends that the Landfill Closure Plan receive conditional approval, with landfill contingency plans be subsequently provided to the NWB for review and approval.

### **Conclusion**

INAC has reviewed CanZinco's Nanisivik Mine 2004 Reclamation and Closure Plan (RCP), and is of the opinion that the Proponent has provided a sound framework through which reclamation and closure activities at the Nanisivik Mine site can be implemented. INAC is confident that the RCP has been developed in accordance with NWB processes, good engineering practices, and

government policies for mine abandonment and reclamation. INAC is satisfied with the reclamation measures proposed for lands held on leases from INAC. INAC therefore recommends that the 2004 Nanisivik Mine Final Closure and Reclamation Plan, to include information and commitments provided by the Proponent through NWB mediated correspondence, be granted conditional approval with the identified outstanding items subject to additional NWB review and approval processes.