



Nunavut Water Board

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Public Registry

June 23, 2003

Philippe di Pizzo, NWB Executive Director,
 NUNAVUT WATER BOARD
 P.O. BOX 119
 GJOA HAVEN, NU X0B 1J0
 TEL: (867) 360-6338
 FAX: (867) 360-6369
 e-mail: nwbexec@polarnet.ca

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RE: Licence NWB1NAN0208 – Request for interim decommissioning and reclamation activities

Dear Mr. di Pizzo:

In reviewing the proposed reclamation activity for the 2003 summer season, as set out by CanZinco in the June 13, 2003 letter to the NWB, NTI is submitting the following comments.

In general, NTI is pleased to see CanZinco take the initiative to commence reclamation activities and to hire local residents for these summer activities. Based on recent discussions with CanZinco it is clear that we are in agreement that we should be striving for the highest Inuit employment rates possible throughout the reclamation process. To this end, we recommend the following steps be taken to ensure maximum Inuit employment during the summer activities:

- As soon as possible, CanZinco make available to the Hamlet of Arctic Bay, Qikiqtani Inuit Association and NTI estimates of the number of positions that will be required to conduct the summer work in person-days. In addition the estimates should indicate the type of work and level of positions required.
- Within 10 days of the receipt of the information, the Hamlet of Arctic Bay in consultation with other Inuit organizations shall provide CanZinco with the number of people available to fill the positions.
- At this time a meeting of CanZinco, the Hamlet of Arctic Bay and other interested parties can take place to finalize the employment plan for the summer activities.

In regard to the planned activities we provide the following:

1. Quarrying and stockpiling material for closure covers:

NTI does not have any concerns with the proposed quarrying activity

2. Contouring of the tailings surface in preparation for application of the closure cover:

As there is not yet full agreement on the method for dealing with the tailings, NTI proposes that some steps be taken to monitor this activity during the summer period. The community of Arctic Bay has particularly expressed a number of concerns with this activity to NTI. As such, we recommend that a community monitor be hired throughout the summer work period to be on site and given the task of providing information to the community of Arctic Bay on the summer operations. This would give an opportunity for CanZinco to communicate to the community of Arctic Bay what work is being conducted and to answer any community questions. We believe implementing this measure is an important step in maintaining a positive working relationship between CanZinco and the community of Arctic Bay.

3. Disposal of non-hazardous material underground, in the Open Pits or at the landfill site:

Two issues arise from this activity:

Firstly, NTI would like to seek assurances that the materials, to be disposed of underground or in open pits, are prepared for disposal to ensure that no hazardous materials are incorporated in the disposal.

Secondly, as per verbal agreement with the Arctic Bay community, CanZinco should assure that the materials to be disposed of have no value or use for the community. The community should be given an inventory of the materials slated to be disposed and an opportunity to evaluate the materials to determine if any items would be of use.

4. Waste rock recovery and disposal in the Open Pits or underground:

NTI does not have any concerns with the proposed recovery and disposal of Waste Rock.

5. Dismantling the industrial complex ("mill building") for shipment off-site:

NTI has several concerns with this activity:

Firstly, the shipping of the industrial complex off site is a loss of value to the property. We have not received confirmation that CanZinco has met its license obligation of depositing, with the federal government, the security deposit required by the NWB license. The removal of value from the property should be reviewed in context of CanZinco's obligations to post security for reclamation. The removal of this value from the property could put it out of the reach of regulators to cover a portion of the required security.

Secondly, in the process of dismantling the industrial complex, any materials that are considered of no value to the company should be evaluated by the Hamlet of Arctic Bay to determine if there may be some value for the community. Again, we propose that an inventory of these materials be prepared for the review of the Hamlet.

Beyond the above raised issues, NTI would like to impress upon the company that every effort should be made to involve the Arctic Bay community members, through employment and consultation, in this phase of the reclamation process.

NTI appreciates the opportunity to provide input into the proposed program, and is hopeful that the Board will consider the concerns raised, both with respect of the activities and of the need to involve the community in the reclamation activities.

Sincerely,



Stefan B. Lopatka

Senior Advisor:

Environmental, Water And Marine Management,
NUNAVUT TUNNGAVIK INC.