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Mr. Philippe di Pizzo
Executive Director
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0E-1J0

Dear Mr. di Pizzo:

Re: Response to Government of Nunavut's comments (June 19, 2003) on Nanisivik ESA II and HHERA

On June 19, 2003, the Nunavut Water Board ("NWB") received comments from the Government of Nunavut ("GN") on: *Human Health and Ecological Risk Assessment Nanisivik Mine*. Subsequently, the NWB requested CanZinco provide a response by June 27, 2003. Please accept this letter as CanZinco's response.

Upon reviewing the attachments provided with the GN's submission, we were discouraged to see that the GN's consultant's review (Zelt/Toxcon) was limited to the original ESA and HHERA submissions by CanZinco dated January 2003. As part of the NWB's review process, CanZinco has made supplementary, and substantial, submissions since the original reports were filed, to clarify, correct and incorporate comments made by all reviewers and their technical advisors. Without the advantage of this supplementary information, the Zelt/Toxcon review is not current and, we believe, moves the well-advanced approval process several steps in retrograde. We would also add that this situation has occurred despite a reasonable request by CanZinco on May 22nd directly to the GN, to ensure that their consultants were circulated current information.

The Zelt/Toxcon document contains the following statement: "[We] recognize that the science of risk assessment is quite diverse. Thus, we acknowledge from the outset that the manner in which two risk assessors approach a contaminated site will vary." The NWB's approval process for the HHERA and ESA has included consideration of written submissions from several peer reviewers including: BC Research, EBA Engineering Consultants Limited, Dillon Consulting Limited, AMEC Earth & Environmental Limited and Acres International Limited. (These submissions were of course supplemental to submissions by the various stakeholder agencies: GN, INAC, NTI, and EC.) It has generally been acknowledged by the peer reviewers that the Nanisivik ESA and HHERA processes were conducted properly and in accordance with standard and accepted practices. Given the number of reviewers this process has had to date, we believe the inclusion of a review which has not had the benefit of participating in the iterative process or at least being current with modifications/improvements, brings little value to the process.

Respectfully then, we will not respond directly to the comments made in the Zelt/Toxcon report but will target our response to address the two issues raised by the GN in their covering letter of June 19th. The GN issues are presented below in *italics* and our comments follow.

1. *The HHERA, proposed SQRO's and relevant portions of the Phase 2 ESA should be treated as a first iteration only, requiring further dialogue and revision in accordance with the Review Report, before NWB approval is given.*

The GN has extrapolated this comment from statements made in the Zelt/Toxcon report. The report states: “A risk based assessment is an iterative process, whereby successive levels of data, analysis and risk characterization are applied. The CCME guidelines reflect this iterative approach.” We are in agreement with this statement and in following the CCME guidelines, which our consultants have done (and has been recognized by other reviewers), the Nanisivik risk assessment has appropriately adapted the iterative approach.

Without the benefit of having reviewed two supplementary submissions to the NWB by JWEL (May 16, 46 pp. and June 16, 33 pp.) on the HHERA, the GN's consultant would not be aware of several iterative steps which have occurred. In consideration of all developmental steps that the risk assessment has taken since September 2002, we are expecting that the NWB will recognize that the study has proceeded correctly.

2. *Wider soil sampling to establish reliable background data be ordered, and performed by the Mine as soon as feasible, and that upcoming Technical meetings or teleconferences should include the discussion in advance, of the proposed control site, included metals, and other aspects of sampling program that the Mine proposes to use to obtain this needed background data.*

Despite efforts in CanZinco's June 16th submission, it appears as though this issue was not addressed to the satisfaction of the GN. In that submission, GLL provided substantiating information to support the inclusion of the 1985 background data. Further, JWEL provided information to explain how the data does not detract from the determination of the SQRO's. Finally, CanZinco made a commitment to obtain “wider soil sampling” data and procedural information from the archives held by the former operator of the mine (Strathcona Mineral Services). We have obtained this information, and expect that it has arrived in the Gjoa Haven office this past week. The information includes soil sampling data from an area of 336 km² around the mine property. We are hopeful that this information will be sufficiently “wide” to address that aspect of the GN's comment. The data is also accompanied by a letter of affirmation from Mr. Doug Dumka (P. Geol.), who managed the 1985 soil sampling campaign and attests to the integrity of the reported data.

In closing, we would like to reiterate that we have considered all input brought forward by all reviewers as part of the approval process. We have attempted to address all comments, have directly incorporated many of these, and believe the reports have ultimately been improved. We look forward to receiving your approval on this stage of the reclamation process and to moving forward with the closure project. As always, should you or any of the reviewers wish to discuss this or other matters relating to the Nanisivik closure, please feel free to contact me directly at 416-363-4798.

Yours [sincerely](#),
Original signed by:

[Robert Carreau](#)
Corporate [Manager, Environmental Affairs](#)
[Breakwater Resources Ltd.](#)

cc. Bill Heath, Vice-President CanZinco Ltd.