



January 20, 2003

**Mr. Philippe di Pizzo**

Executive Director

Nunavut Water Board

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RE: Water Licence No.: NWB1NAN0208, Nanisivik Mine

Dear Mr. di Pizzo:

In response to the NWB request for comments on the CanZinco Ltd letter (dated Dec 18, 2002) concerning its schedule of submissions. Nunavut Tunngavik Incorporated would like to submit the following to guide the NWB decision in reviewing this timetable in accordance with Part G, Item 2 of the water licence.

To begin with NTI has expressed its concerns with the various aspects of the Nanisivik Mine closure process and the serious socio-economic impacts that the residents of Arctic Bay have and will suffer due to the closure of operations and the environmental legacy of the mine site.

It has always been the contention of NTI that what is required in a comprehensive reclamation plan for the Nanisivik site as a whole, with due consideration to lessen the impacts on the residents of Arctic Bay.

The proposed timetable did come as a bit of a surprise, due to the length of delay in completing a final reclamation plan for the Mine site. Mr. Carreau's brief comments on the reasons for these delays in reports and studies, largely due to field work scheduled during the summer months, does not provide much information as to the nature of the work and the reports & studies effected. Despite this lack of clarity, from a technical point of view the fieldwork component of studies aimed at improving the effectiveness of the reclamation procedure does explain the delay in producing the final reports. As such, we will not take great issue with the delays. We would like to express the need for certainty with these timelines, as the reclamation process cannot continue to be delayed.

The residents of Arctic Bay, who have expressed concern with the slow pace of the process thus far, need to be consulted and advised of the details of the delays and the impact on the reclamation schedule, its effect on the suggested benefits to be provided to Arctic Bay (housing, equipment, etc.), as well as assurances of site stability during the delay period.

Of greater concern is the point made by NTI at the July 2002 hearing in Arctic Bay. At that time we stated that we wished to see a comprehensive reclamation plan for the entire area effected by the Nanisivik operations, that would address all reclamation issues regardless of ownership or responsibility. There is no indication that the proposed delay, in developing the final reclamation plan, will allow this issue to be addressed. It is the contention of NTI, that only through addressing all aspects of the Nanisivik site with a comprehensive reclamation plan will the Nanisivik reclamation be effective.

From the point of view of the impacts of this mine closure on the residents of Arctic Bay, we view this delay as an opportunity to provide additional benefits to the residents at least in a small way. It is clear from all discussions that the reclamation and monitoring of the Nanisivik site will be a multi year activity, which could provide employment opportunity for some Arctic Bay residents. It would be fruitful for CanZinco at this time to undertake training of Arctic Bay residents to fully participate in the reclamation and monitoring operations that will be initiated in 2004. The delay can provide the opportune time for such training to take place, with opportunity to provide field training during the summer field activities. In this way it is possible that some benefits can be provided to Arctic Bay residents in this capacity.

As a final point, it is NTI's intention to carry out a review of the various reports and final reclamation plan as they become available. We would request that digital copies be made available to all interveners, on a timely basis and in accordance with the timetable, so that the review of reports and studies can be carried out efficiently and with minimal delay.

Nunavut Tunngavik Inc. thanks the Nunavut Water Board for the opportunity to comment on the issues surrounding this important process and we look forward to the NWB wise consideration of these comments.

Sincerely

***(Originally signed)***

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