



NIRB File No.: 12MN001

January 18, 2017

To: Phase 2 Hope Bay Belt Distribution List

Sent via email

RE: Conformity Determination for TMAC Resources Inc.'s Draft Environmental Impact Statement Submission for the Phase 2 Hope Bay Belt Project and Commencement of the NIRB's Technical Review Period

Dear Parties:

On December 28, 2016 the Nunavut Impact Review Board (NIRB or Board) acknowledged receipt of TMAC Resources Inc.'s (TMAC; the Proponent) Draft Environmental Impact Statement (DEIS) submission for the Phase 2 Hope Bay Belt Project (the Project). The Board initiated an internal review of the DEIS to determine whether or not it conformed to the NIRB's EIS Guidelines issued to the Proponent on December 14, 2012¹ pursuant to Section 12.5.2 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in Right of Canada* (Nunavut Agreement). As TMAC also provided a copy of the DEIS on December 28, 2016 to the Nunavut Water Board (NWB) and requested that the NIRB and NWB implement their coordinated process for Reviews and Water Licensing, the NIRB has also consulted with the NWB regarding sections of the EIS Guidelines and the DEIS relating to the Draft Type "A" Water Licence Application.

The NIRB hereby accepts TMAC's submission as a DEIS and commences the technical review period. TMAC's Phase 2 Hope Bay Belt Project DEIS submission can be accessed from the NIRB's online public registry at www.nirb.ca by using any of the following search criteria:

- Project Name: Phase 2 Hope Bay Belt Project
- NIRB File No.: 12MN001
- Application No.: 124148

¹ NIRB Guidelines for the Preparation of an Environmental Impact Statement for Hope Bay Mining Ltd.'s Phase 2 Hope Bay Belt Project (NIRB File No. 12MN001).

The Technical Review Process

As part of the NIRB's Review of the Phase 2 Hope Bay Belt Project, the technical review process is meant to provide a detailed review of the DEIS document with the intent of analyzing the quality of the information presented by the Proponent. Parties will be invited to review the DEIS submission and develop technical review comments which address the following:

- Determination of whether Parties agree/disagree with the conclusions in the DEIS regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures – and reasons to support the determination;
- Determination of whether or not conclusions in the DEIS are supported by the analysis – and reasons to support the determination;
- Determination of whether appropriate methodology was utilized in the DEIS to develop conclusions – and reasons to support the determination, along with any proposed alternative methodologies which may be more appropriate (if applicable);
- Assessment of the quality and presentation of the information in the DEIS; and
- Any comments regarding additional information which would be useful in assessing impacts – and reasons to support any comments made.

Recognizing that the DEIS includes a draft application for a Type “A” Water Licence, the technical review process can include preliminary feedback on the draft document.

NIRB Call for Information Requests

To facilitate the development of technical review comments by parties, the NIRB is now inviting interested parties to provide the Board with Information Requests (IRs) directed to the Proponent and/or other parties involved in the assessment of the DEIS for the Phase 2 Hope Bay Belt Project. It should be noted that IRs are not meant to serve as technical review comments, but are to identify information gaps within the DEIS that need to be addressed so that parties can develop their respective technical review comments.

IRs to be submitted to the NIRB by interested parties must include the following:

- A clear reference to the volume, document, section, and/or page number in the DEIS where relevant information may be found, if applicable;
- To whom the IR is directed;
- Identification of the issue and the specific information being requested;
- The concern associated with the issue and need for information; and
- A clear rationale of the issue and information's importance to the impact assessment of the proposed project.

Should parties choose to submit information requests related to the completeness of the draft application for a Type “A” Water Licence, they may do so through the IR period or with the technical review comments following the IR period.

Please note that parties are also encouraged to review [Appendix A](#) which provides the NIRB's suggested format for the development of IRs and additional clarification regarding the information that must be included with submissions. By copy of this letter, the NIRB is requesting that responsible authorities, interested parties and those with specialist advice provide their information requests to the NIRB on or before **5:00 pm MST, Friday February 17, 2017**.

NIRB-NWB Coordination

The NIRB and the NWB will continue to coordinate the assessment and licensing aspects of the Phase 2 Hope Bay Belt project proposal during the NIRB's Review process and the NWB's consideration of the Type "A" Water Licence application.

Upon receipt of information requests or technical review comments, the NIRB will forward copies of any comment submissions received which pertain to the Draft Type "A" Water Licence Application, including comments on the completeness of the application, to the NWB for its consideration.

NEXT STEPS

The NIRB and NWB note that information available from the recent coordinated amendment (Project Certificate No. 003 and Water Licence No. 2AM-DOH1323) and ongoing monitoring of the Doris North Project may inform the Review of the proposed Phase 2 Hope Bay Belt Project. Considering TMAC's current request for the NIRB and NWB to conduct a coordinated assessment process, and noting that components of the Phase 2 Hope Bay Belt Project would rely on the use of existing infrastructure at the Doris North Gold Mine Project, which may necessitate another reconsideration of the terms and conditions of the Doris North Project Certificate No. 003, the NIRB and NWB are requesting that TMAC provide clarification on the level of coordination it is seeking in this Review on or before **February 17, 2017**.

Once the Proponent has had the opportunity to provide any additional detail on its request for a coordinated process, the NIRB and the NWB will work together to develop a detailed description of the proposed file-specific coordination between the Boards for the Project and will distribute this to parties once complete.

The next steps in the NIRB's Review of the proposed Phase 2 Hope Bay Belt Project have been outlined as follows for the information of parties:

- Submission of Information Requests (IRs) directly to the NIRB by interested parties on or before **5:00 pm MST, Friday February 17, 2017**.
- After considering all IRs and making decisions regarding their suitability, the NIRB will forward all appropriate requests to the Proponent (and other parties if applicable) on or before **Wednesday February 22, 2017**.
- Upon forwarding IRs to the appropriate parties, the NIRB may set a timeframe for the Proponent and other parties if applicable, to respond with an IR response package.
- Upon receipt of the IR response package(s), all parties will be given **sixty (60) days** for submission of technical review comments.

- The NIRB may schedule community information session meetings in communities potentially affected by the proposed Phase 2 Hope Bay Belt Project, and will provide a minimum of **twenty five (25) days'** notice for these events.

Once again, the NIRB requests that all interested parties submit their Information Requests to the NIRB at info@nirb.ca or by fax to (867) 983-2594 on or before **5:00 pm MST, Friday February 17, 2017.**

If you have any questions or require further clarification regarding the NIRB's Review of the Phase 2 Hope Bay Belt Project, please contact Kofi Boa-Antwi, Technical Advisor, at (867) 983-4616 or via email at kboaantwi@nirb.ca. Questions regarding Water Licensing for the Project can be directed to the NWB's Technical Advisor, Sonia Aredes, at sonia.aredes@nwb-oen.ca.

Sincerely,



Tara Arko
Director, Technical Services
Nunavut Impact Review Board

cc: John Roberts, TMAC Resources Inc.
Oliver Curran, TMAC Resources Inc.
Shelley Potter, TMAC Resources Inc.
David Hohnstein, Nunavut Water Board
Sonia Aredes, Nunavut Water Board
Karén Kharatyan, Nunavut Water Board

Attached: Appendix A – Suggested Format for Information Requests

APPENDIX A: SUGGESTED FORMAT FOR INFORMATION REQUESTS

Format and File Size

Parties must provide submissions in a fully functional, electronically searchable Word or PDF file, no larger than 5 MB.

Information Requests

The purpose of Information Requests is to identify information gaps or areas of uncertainty within the DEIS that need to be addressed so that parties can develop their respective technical review comments. Information requests can originate from, and be directed to, any of the parties involved in the assessment. Submissions must identify what specific information is required, and outline why the information required is necessary to facilitate the party's technical analysis of the DEIS or the potential impacts of the project. Upon receiving the Information Requests, the NIRB will consider each request, decide on its suitability, and then forward all appropriate requests to the Proponent and other parties as applicable. The NIRB will assess the suitability of each request in terms of what requirements are appropriate at this stage of the review process, and must balance these requirements with information that may be requested or issues that may be raised as part of technical review comments or at a more advanced stage of the Review.

Parties are asked to ensure that Information Requests address the following points:

IR Source:	Identify the organization/department/intervenor proposing the request.
IR Number:	Each specific Information Request must be numbered to allow for effective cross-referencing of the submission.
IR Directed To:	Clearly identify the organizations/departments/agencies to which the IR is directed (e.g., the Proponent and/or specific organization(s) of whom the information is requested).
Subject:	Identify the issue; list the general subject or topic associated with the request (e.g., monitoring of sediment quality).
Reference:	Provide a clear reference to any applicable volume, document, section, and/or page number in the Draft EIS where information relevant to the request may be found.
Issue/Concern:	Provide background information and justification for the request. The issue/concern should identify any shortcomings of available information, concerns associated with the issue and how the requested information is relevant to the technical analysis of information within the DEIS. A clear rationale of the issue's importance to the formulation of technical review comments and the overall impact assessment of the proposed project is required.
Information Request:	State the question and/or outline the specific information being requested of the Proponent or organization. Separate items requested should be appropriately numbered in order to track the provision of responses.