Environmental Protection Branch Qimugjuk Building 969 P.O. Box 1870 Iqaluit, NU X0A 0H0

Tel: (867) 975-4639 Fax: (867) 975-4645

May 24, 2005

Gladys Joudrey Manager of Administration Nunavut Impact Review Board P.O. Box 1360 Cambridge Bay, NU X0B 0C0

Tel: (867) 983-4616 Fax: (867) 983-2594

Via Email at gjoudrey @nirb.nunavut.ca

Our file: 4703 003 013

Dear Ms. Joudrey

## **RE**: Miramar Hope Bay Ltd.'s Response to the Minister's Decision

Thank-you for the opportunity to comment on the May 9/05 letter from Miramar Hope Bay Ltd. (MHBL) regarding the proposed process for the review of the Doris North Project. In this letter, MHBL outlines their preferred approach for the review of the proposed Doris North Gold Project, taking into consideration the direction given in the Minister's letter dated April 22, 2005

MHBL is proposing to use the existing Environmental Impact Statement (EIS) Guidelines, issued by the Nunavut Impact Review Board (NIRB) on October 15, 2002, for the development of the new EIS. The preliminary project description submitted in January 2005 lacks a considerable amount of detail, making it difficult to determine if the current guidelines are appropriate for the project. However, Environment Canada (EC) feels that the current guidelines will likely still be applicable to the project contingent on two factors. First, in order for the existing guidelines to be adopted, the scope of the new EIS must not have changed substantially from the previous EIS, especially in regards to the mineral deposits included as components of the project. If the scope of the project differs from the original EIS, the existing guidelines will have to be amended or new guidelines developed. Secondly, the new EIS must also include the information identified by the NIRB as being deficient during the previous public hearings.

In regards to timelines for the process, EC recommends that the NIRB not establish timelines until the draft EIS has been received and a preliminary review of the document completed, as per normal adequacy and conformity review procedures. The revised EIS is going to be a comprehensive and cohesive document that incorporates the deficiencies identified by the NIRB into the other aspects of the project. Therefore, the entire EIS will have to be reviewed, which will not provide for any allowances to be made in terms of timelines, despite familiarity with the project in general. Environment Canada does not feel that it is prudent to set the timelines without having an opportunity to review the material that is actually submitted. Similarly, the dates for the final hearing should not be established until after the final EIS has been submitted. MHBL states that they are optimistic that the content and detail of the EIS will be adequate, allowing for the final EIS will be distributed expeditiously. In order to help achieve this goal, EC encourages MHBL to ensure that any outstanding issues from the previous EIS are addressed and incorporated into the revised EIS and that the information submitted is of sufficient quality to allow for a thorough assessment of potential impacts.



Environment Canada looks forward to working with MHBL and the NIRB to ensure that the Doris North Project proceeds in an environmentally-acceptable manner. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at <a href="mailto:colette.spagnuolo@ec.gc.ca">colette.spagnuolo@ec.gc.ca</a>.

Yours truly,

## Original signed by

Colette Spagnuolo Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife) (Stephen Lines, Technical Advisor, Nunavut Impact Review Board, Cambridge Bay)

