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5510-5-11

Ms. Stephanie Briscoe
Executive Director
Nunavut Impact Review Board
PO Box 2379
Cambridge Bay, NU X0E 0C0

May 24, 2005

Dear Ms. Briscoe,

Re: Request for Comments on Proposed Guidelines and Timelines for Doris EIS

Indian and Northern Affairs Canada (INAC) would like to thank the Nunavut Impact Review Board (NIRB) for their invitation of May 11, 2005 to comment on Miramar Hope Bay Limited's May 9, 2005 proposed process for the environmental assessment of the Doris North Gold project.

The Proponent has proposed shorter timelines for review of the guidelines and the draft environmental impact statement (EIS), in light of the project's previous review. In considering the feasibility of these proposed revisions to the process, INAC considered a number of factors. Most importantly was the company's statement of March 7, 2005 in which it committed to the development of a "new, comprehensive" EIS, instead of focusing solely on key areas of concern. The Department considers this to be a positive move, in that it recognizes that a change in one aspect of the project will have a cascade effect on other systems and impacts. The Minister, in his letter of April 22, 2005 to NIRB, supported this commitment from the company.

Considering these factors, the Department, while supportive of reducing the period of the environmental assessment by shortening the guidelines review and eliminating the Pre-Hearing Conference, is not in support of reducing the length of time allocated to conformity, adequacy, and technical reviews.

The current preliminary project description (January 2005) lacks a level of detail whereby INAC is assured of the continuity of the original project's scope. Nevertheless, assuming that the project's scope, as proposed, does not vary significantly from the previous Doris North proposal, INAC feels that the Guidelines utilized for the previous Doris environmental assessment can be carried forward, with minor revisions and a very brief guidelines review period.

INAC proposes that upon receipt of the draft EIS, NIRB undertake the conformity and adequacy reviews as per normal procedures. As stated however, in light of the previous environmental assessment, the Department does not consider a Pre-Hearing Conference to be necessary. Following the adequacy review, and after appropriate changes have been incorporated into the final EIS by the Proponent, INAC requests that NIRB provide interveners with a minimum of 90 days to complete their technical review. Should there be deficiencies in the information submitted, and an information request for supplemental information be required, INAC suggests that the 90-day review period not start until those deficiencies have been addressed. The Department also suggests that the final public hearing occur a minimum of ten days after the submission of final comments.

For Miramar-Hope Bay Ltd. to move through the process in an expeditious manner, INAC believes that it remains incumbent upon the Proponent to provide complete data within NIRB's defined timeframes. INAC will make every effort to review the information in a timely fashion; however, the timing of the Department's review is predicated on the quality of the data submitted. Also NIRB, as leaders of this environmental assessment, need to ensure that each step in the process moves forward only once the concerns at that stage of the assessment have been fully addressed.

Please contact me at (867) 975-4549, or Peter Scholz, Environmental Assessment Coordinator for this project, at (867) 975-4567, if you have questions or comments.

Yours truly,

Original Signed By

Glen Stephens
Manager Environment