

October 15, 2002

Mr. Hugh R. Wilson
Manager, Environmental Affairs
MIRAMAR HOPE BAY LTD.
311 West First Street
North Vancouver, B.C.
V7M 1B5

via fax 604 980-0731

Dear Mr. Wilson:

Re: Final EIS Guidelines Doris Hinge (Doris) Gold Mine

Pursuant to section 12.5.2 of the Nunavut Land Claims Agreement (NLCA) we enclose for you the **final** EIS Guidelines. At this point, we expect you to complete the *Draft* Environmental Impact Statement, based upon these Final Guidelines.

Additionally, the Nunavut Impact Review Board (NLCA) would like you to document the following requirements in your forthcoming *draft* EIS:

1. Continue your consultations with locally affected persons; distribute any information that you collect, and resolve any disagreements especially with locally affected persons. Eventually, all comments from the public must be summarized, documented, and presented in the final EIS.
2. We are assuming you now have a proper definition of the project. If there are any connected projects to Doris (e.g. ice or other roads and mines), these should be discussed together in the EIS.
3. Include a statement of the need for, and the purpose of the project, based on the precautionary principle and sustainable development.
4. We expect your EIS to indicate a comprehensive impact assessment approach, including but not limited to discussing environmental effects that are likely to result from the project in combination with other projects or activities that have been or will be carried out. Following the broad parameters of NLCA section 12.5.2 (a) - (i), the EIS should eventually focus on adverse impacts or effects and their mitigation. By mitigation, we expect the analysis to include how the impact could be avoided, minimized, cured, eliminated, or even compensated. See e.g.,

NLCA section 12.5.2(f). By anticipated impacts (see NLCA sections 12.5.2 (b-c)) we mean short and long-term direct and indirect, positive and negative, and cumulative impacts as set out below. Socio-economic, archaeological and cultural impacts are included too.

5. Cumulative effects analysis (CEA). A project proposal causes a cumulative effect if, when added to other projects in the region, or projects reasonably foreseeable in the region, will cause an additive effect.
6. Significance effects analysis. Not all impacts are significant and do not have to be studied. Therefore, you should advise the Board which impacts are significant, based first from the project setting (how unique is the area of the project, for example), and second, based on how *severe* the impacts will be, taking into account public health, land use plans, protected areas, habitat, or species, public concern, etc. Ultimately, the Board will decide which effects are significant and report to the Minister accordingly.
7. Alternatives to the project. This ‘Alternatives assessment’ comes from numbers 2 and 3 above and must include listing the “no-go” alternative, as well as the proponent’s “preferred” alternative. This requirement goes well beyond a study of the alternative means of carrying out the project that might be economically and technically feasible and the environmental effects of those alternative means. The “no-go” alternative is not only a potentially stand-alone option (i.e. the no-build may be the best option), it also serves as a baseline for comparison with other development alternatives that might reasonably be proposed in the circumstances of the Doris mine.
8. The ability of renewable resources affected by the Doris project to sustain current and future generations in Nunavut and Canada.
9. A discussion of monitoring or post-project analysis (PPA). See NLCA section 12.7.2. The purposes of the PPA is:
 - (a) to measure the relevant effects of projects on the ecosystemic and socio-economic environments of the Nunavut Settlement Area;
 - (b) to determine whether and to what extent the land or resource use in question is carried out within the predetermined terms and conditions;
 - (c) to provide the information base necessary for agencies to enforce terms and conditions of land or resource use approvals; and
 - (d) to assess the accuracy of the predictions contained in the project impact statements.
10. An assessment of any significant adverse ecosystemic or socio-economic trans-boundary effects.

If you have any questions about these requirements, please do not hesitate to contact me. In the meantime, and subject to the NIRB review, you should be applying for all permits/authorizations, such as the Nunavut Water Board and Article 20 if it applies, DFO authorizations, and etc. Please ensure that you send a copy to NIRB of all project-related correspondence, as we will need to know that you have applied for permits/authorizations before moving to the next step of the process, which will be the review of your forthcoming *draft* EIS.

Sincerely,

Original signed by:

Stephanie Briscoe
Executive Director

Encl.:

Cc. Minister Nault, Distribution list