

Bathurst Inlet Road and Port Committee

BRPC

**c/o P.O. Box 820
Yellowknife, NT
X1A 2N6**

August 8, 2008

Nunavut Impact Review Board
PO Box 2379
Cambridge Bay, NU
X0B 0C0

Attn: Leslie Payette
Manager, Environmental Administration

Re: Commencement of the NIRB's Part 5 Review of Sabina Silver Corporation's Hackett River Project

Dear Ms. Payette:

The Bathurst Road and Port Committee (BRPC) would like to thank the Nunavut Impact Review Board (NIRB) for providing us with your correspondence of September 18 and October 8, 2008 (via e-mail) regarding the above noted project and associated review process activities. The BRPC is very interested in maintaining its involvement in the various development projects in the Kitikmeot Region of Nunavut, which have the potential to both positively and negatively impact the people of Bathurst Inlet and Umingmaktok and the Inuit Owned Lands (IOL) that are designated to these communities. The Hackett River Project, which is located on both crown land and IOL designated as Bathurst/BayChimo (BB), has identified the Bathurst Inlet Port and Road (BIPAR) as a key component of their project description which is of special interest to our committee.

By way of this letter, and presented in bullet format below, the BRPC would like to provide NIRB with our comments associated the *Draft* Scope for the Environmental Assessment of the Hackett River Project (Appendix B of NIRB's September 18, 2008 correspondence).

Section 2 – Hackett River Project Components

Part a) BIPAR

- Will the assessment of the BIPAR project that is currently on going be incorporated into this review at some level?
- Will the current assessment address all the requirements that the Hackett River project has proposed?
- Does the review of the Hackett River Project require some duplication of review completed for BIPAR?

Part b) BIPAR Sabina Infrastructure

- There will need to be a definite distinction made between current BIPAR infrastructure and proposed infrastructure to be constructed by Sabina to support their operations. BIPAR, under their cumulative effects assessment, identifies an Expansion of the Port

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site as a future development. Would the proposed Sabina infrastructure be the limit of future development at the port site?

- Detailed site plans will be required and the coordination of responsibilities between BIPAR and Sabina for the integration of this infrastructure and its operation will need to be assessed. Is this a review of the BIPAR project or the Hackett River Project?
- There is no specific mention of a concentrate storage facility for the port site however hauling is to be completed during the winter. What is proposed for storage?

Part b) Mobilization and Shipping

- Is Sabina looking at a separate assessment of different alternatives for mobilization and shipping than that of the BIPAR project?
- The BIPAR project has specifically been assessed recognizing that there will not be ice breaking, however it is noted in this Draft Scoping document that there may be possible ice-breaking activities. Where is the cross over between projects? And can one project be permitted for no breaking of ice while the other will be permitted to break ice?
- Would the vessel and routing options not conform to the BIPAR project, which is currently under review?

Part c) BIPAR Winter road from the Port to the Hackett Spur road

- Is this not a component of the BIPAR project and thus currently under review?

Part d) All-weather Access (Spur) Road

- Why an all-weather road when the connecting transportation corridor is winter only?

Section 3 – Scoping List

- There needs to be a “Project Alternatives” assessment completed – on page 2 of 9 (September 18, 2008 NIRB correspondence) it states “should the BIPAR project not proceed in a manner allowing for the proposed coordination and sharing of infrastructure, Sabina proposes to construct a similar all-weather access road and deep water port to connect the mine to Bathurst Inlet”.
- How will NIRB deal with this aspect of the project at this time?
- Appendix B, under Hackett River Project Components, does not mention a concentrate storage facility (450000 tonne capacity) as presented on page 2 of 9.
- How much overlap will there be in the assessments with the BIPAR project?
- What about a feasibility assessment and study?
- What about heritage resources?
- With the GBPR project being incorporated into the IZOK, High Lake and Ulu projects of Zinifex is an assessment of BIPAR’s feasibility to support Hackett River needed?

The BRPC feels that community consultation is a very important component of any project but not just to the level of community information meetings. Some of the most qualified people to provide information into an assessment of this nature are those people who live on the land and use the waters of the area(s) proposed for development. We encourage NIRB to communicate

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this to the proponent to ensure that the best information to assess impacts can be presented and reviewed by interested parties and interveners.

The BRPC would like to thank NIRB for providing our committee with the opportunity to provide comment. We also look forward to participating in NIRB consultation meetings in either Cambridge Bay or Umingmaktok later this month. Should you have any questions please do not hesitate to contact me at (867) 445-8175

Yours truly,

Craig J. Thomas
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