

October 9, 2008

Ms. Leslie Payette Manager, Environmental Administration Nunavut Impact Review Board P.O. Box 2379 Cambridge Bay, Nunavut XOC 0C0

By e-mail: <a href="mailto:lpayette@nirb.ca">lpayette@nirb.ca</a>

Re: Draft Scope for the NIRB's Environmental Assessment – Hackett River Project Proposal

Dear Ms. Payette

KIA would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the *Draft Scope for the NIRB's Environmental Assessment of the Hackett River Project*.

The draft scope of the NIRB review is comprised of three parts:

- 1. Nunavut Land Claims Agreement Section 12.5. 2, (items a-j);
- 2. Hackett River Project Components; and
- 3. Scoping List

KIA has reviewed the Hackett River project proposal and the draft scope prepared by NIRB. The following comments are with reference to parts 2, and 3 of the draft scope:

## **Hackett River Project Components**

The Hackett River Project is still in the early stages of planning and development and therefore there are uncertainties regarding critical aspects of mine planning, operation and closure. Principally these include:

- The location of a deep sea port and consequent alignment of mine site access roads;
- The site of the tailings management facility and layout of mine site infrastructure; and
- The chemical characteristics of mine waste rock, specifically the metal leaching and acid rock drainage potential.

Due to the above uncertainties it is difficult to form a list of project components to be included in the scope of the project.

## **Scoping List**

The NIRB has compiled a list of environmental factors which may be impacted as a result of the construction, operation, modification, decommissioning, abandonment, and reclamation of project components. The list includes a broad range of biophysical and socio-economic environment components that may be impacted by the project.

It is KIA's view that with all of the unknowns surrounding this project at this time; it is difficult to pinpoint all issues to be considered in a review. KIA believes the draft scoping list provided by the NIRB can serve as a generic catch-all for the interim, and the Environmental Assessment process can move on to the development of project specific guidelines.

Please contact us if you have any questions.

Sincerely,

KTourdee

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