



Environment Environnement  
Canada Canada

Environmental Protection Operations  
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Our File: 4704 004 021  
Your File: NIRB 08MN006

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**Re: NIRB 08MN006 - Comments on Draft Guidelines for Sabina Silver Corporation's Hackett River Project (Rev. 01)**

Environment Canada (EC) has reviewed the above noted draft guidelines and offers the following advice for your consideration. Environment Canada's contribution to your request for comments is based primarily on the mandated responsibilities arising from Section 36(3) of the *Fisheries Act*, the *Canadian Environmental Protection Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

Comments and Recommendations

**Section 6.16.2.8, Fish and other Aquatic Organisms**

Clarification is required throughout this section as to when the species being referred to in certain subsections include just fish or all aquatic organisms; specifically see subsections (b), (c), (f), (g), (h), (j), (k), and (l). Further rephrasing may be necessary for subsection (c) depending on which species population the subsection is referring to. If the species being referred to are just fish, the "estimated productive capacity of the water body" would be an appropriate measure, however if the species in question are all aquatic organisms, than using the term "tropic status" may be more appropriate.

**Section 6.17.5.8, Tailings Management Facility**

The first two items listed under "Typically, questions arise regarding:" (i.e., Current and predicted water quality and Discharge point for effluent) should be expanded to include questions regarding the extent of the zone of alteration for receiving water quality.

**Section 6.17.6.3, Air Quality**

The statement "Relevant indicators may include the *National Ambient Air Quality Objectives for Ground Level Ozone* (HC 1999), the *National Ambient Air Quality Objectives for Particulate Matter* (HC 1998), and the *Guidelines for Ambient Air Quality Standards in the Northwest Territories*" could be shortened to "Relevant indicators may include the *National Ambient Air Quality Objectives* and the *Guidelines for Ambient Air Quality Standards in the Northwest Territories*"

Please do not hesitate to contact me at (867) 669-4746 or [jane.fitzgerald@ec.gc.ca](mailto:jane.fitzgerald@ec.gc.ca) with any questions or comments.

Yours truly,

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