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Dec 15<sup>th</sup>, 2011

Honourable John Duncan  
600 Confederation Building  
House of Commons  
Ottawa ON  
K1A 0A6

*E-mail: john.duncan@parl.gc.ca*

Dear Minister Duncan:

**RE: Mackenzie Valley Environmental Impact Review Board EA0809-002: Canadian Zinc Corporation, Prairie Creek Mine**

The Northwest Territories Chapter of the Canadian Parks and Wilderness Society (CPAWS-NWT) is part of a national non-profit conservation organization dedicated to protecting Canada's wilderness. CPAWS-NWT has invested two decades in ensuring the protection of the South Nahanni River Watershed. As you are aware, the Nahanni region has local, regional, national, and international conservation significance, most recently recognized by your government's expansion of Nahanni National Park Reserve in 2009 to protect the ecological integrity of the South Nahanni Watershed.

On December 8<sup>th</sup>, MVEIRB released their 'Report of Environmental Assessment and Reasons for Decision', which concluded that "the proposed Prairie Creek Mine development is not likely to cause significant adverse effects on the environment". CPAWS-NWT urges you to consider that this decision is inadequate for an environmental review board responsible for protecting the environment.

We have specific concerns about the following elements of MVEIRB's decision:

- The Board has avoided its own responsibility, which is to provide a clear mitigative framework for the safe development, operation, and closure of the proposed Prairie Creek Mine.

- The reasons for decision do not provide the regulatory agencies with enforceable measures to fulfill commitments that will prevent environmental impacts, during the lifespan of the development
- The responsible federal authorities' recommendations have not been adequately reflected in the report, including for water quality
- MVEIRB has based its decision on the 'assumption' that Canadian Zinc will fulfill a 25-page list of commitments made during the EA.
- MVEIRB does not make any firm mitigation recommendations and only provides three 'suggestions' as to how the project should be managed from an environmental perspective.

Until a full set of mitigative measures are clearly identified, articulated, and rendered enforceable by the MVEIRB, it remains unclear as to whether any of the proponent's commitments will be upheld. As a result, CPAWS-NWT believes that the ecological integrity of Nahanni National Park Reserve, a UNESCO world heritage site, and the South Nahanni Watershed in general will be compromised as a result of the proposed Prairie Creek Mine.

We ask that you return EA0809-002 to the MVEIRB for a re-examination of the public record and request of the Board that they establish measures that provide clear regulatory direction to ensure that Canadian Zinc Corporation's (or its successors) commitments to mitigate the impacts of their proposed mine are implemented and enforceable. Until mandatory mitigative measures are in place, this project should not proceed to regulatory permitting and licensing.  
Sincerely,



Kris Brekke  
Executive Director  
Canadian Parks and Wilderness Society  
Northwest Territories Chapter

Cc.

Hon. Peter Kent Minister, Environment Canada  
Hon. Joe Oliver Minister, Natural Resources Canada  
Hon. Denis Lebel, Minister, Transport Canada  
Hon. Keith Ashfield, Minister, Fisheries and Oceans Canada  
Richard Edjericon, Chair, Mackenzie Valley Environmental Impact Review Board  
Theresa Joudrie, AANDC