

February 5, 2016

Ms. Sachi De Souza Environmental Assessment Officer Mackenzie Valley Environmental Impact Review Board 5102 50<sup>th</sup> Avenue, Yellowknife, NT X1A 2N7

Dear Ms. De Souza

## RE: <u>Environmental Assessment EA1415-001, Prairie Creek Mine</u> <u>Independent Consultant for Risk Assessment</u>

We refer to the proposed Scope of Work for an independent risk assessment from the Review Board dated February 2, 2016. Firstly, Canadian Zinc Corporation (CZN) is not opposed to the appointment of Oboni Riskope for this work. They appear to be appropriately qualified.

CZN does not have concerns regarding the proposed scope of work, although we do have a recommendation regarding the approach. In Phase 2, the risk assessor will provide a technical report describing the findings of their risk assessment, and this will be made publically available prior to the submission of other parties' technical reports. We are concerned that the risk assessor may not be suitably familiar with the project terrain since they have not visited the area, and indeed it appears they have limited northern experience. Our recommendation is that the risk assessor be asked to provide a draft report to CZN for review prior to completion. The purpose of this is to allow CZN to confirm that all of the assumptions made are correct, and that the resulting risk assessment is then a true reflection of the project proposal. We believe this is a necessary step before other parties rely on the report for the preparation of their technical reports. CZN would not undertake technical comment on the draft report since this would take place after final report issue.

We would also like to point out entries in the scope of work document that perhaps could be written more appropriately:

On page 1, the third bullet reads "locations with sensitive habitat that would likely result in a high consequence event (this should include areas with karst topography)". We believe the whole road alignment can be considered 'habitat' in some form, and that 'sensitive' is highly subjective. In fact, karst topography might represent less sensitive habitat since the plateau area crossed by the road does not host fish-bearing streams. We suggest the bullet be reworded as follows: "locations that may be considered more sensitive, either in terms of habitat or the

potential for dispersal of a spill, where an accident might result in a high consequence event (this should include areas with karst topography)".

On page 1, the fourth bullet reads "where the road design increase the likelihood of an accident". As worded, this implies the road design might increase the potential for an accident, which we don't believe was intended. We suggest the following revised wording: "where an accident is more likely considering the terrain and proposed road design".

On page 3, 2<sup>nd</sup> paragraph, we suggest the following wording (changes in bold type): "Oboni Riskope will prepare a final written summary as its closing submission. The closing submission will describe Oboni Riskope's views on **any** significant adverse impacts that, **in their opinion**, have not been mitigated through the environmental assessment process and make related recommendations."

We appreciate your consideration of the above. If you have any questions, please contact us at 604 688 2001.

Yours truly, CANADIAN ZINC CORPORATION

David P. Harpley, P. Geo. VP, Environment and Permitting Affairs