

Dec 19<sup>th</sup>, 2011

Honourable John Duncan  
Minister of Aboriginal Affairs and Northern Development  
House of Commons  
Ottawa ON  
K1A 0A6

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

**RE: EA0809-002 --Canadian Zinc Corporation, Prairie Creek Mine  
Mackenzie Valley Environmental Impact Review Board (MVEIRB) Report of Environmental  
Assessment and Reasons for Decision**

Dear Minister Duncan:

We are writing to express our deep concern that the potentially significant environmental impacts of the proposed Prairie Creek Mine on the Nahanni National Park Reserve and World Heritage Site, an area of local, regional, national, and international significance, have not been adequately addressed by the Mackenzie Valley Environmental Impact Review Board 's December 8<sup>th</sup> decision.

We request that you send EA0809-002 back to the MVEIRB to further address the significant issues raised during the EA process, including by Aboriginal Affairs and Northern Development Canada (AANDC).

The Canadian Parks and Wilderness Society is a national non-profit conservation organization dedicated to protecting Canada's wilderness. CPAWS has had a long-standing interest in ensuring the protection of the South Nahanni River Watershed, having worked to secure its protection since the early 1970s.

On Thursday, December 8<sup>th</sup>, the 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 or be a cause for significant public concern".

We note that CPAWS NWT Chapter is a party to this environmental assessment and that they wrote to you on December 15<sup>th</sup> to highlight their concerns with this decision. We share their concerns and would like to reinforce the national and international significance of the Nahanni region and the significant public concern that has been expressed about the future of this region over many years.

Significant environmental issues were raised during the EA process by the responsible federal authorities, including by AANDC and Parks Canada, as well as by Dehcho First Nations (DFN) and Nahanni Butte Dene Band that have not been adequately addressed in the Board's decision. It is critically important that these recommendations be addressed in the EA report and that recommendations are included for enforceable mitigation measures to ensure water quality, the well-being of downstream communities, and the ecological integrity of Nahanni National Park Reserve and World Heritage Site.

We also note that there dissenting views filed by two board members that highlighted the potential significance of the impacts of the project, the inadequacy of the recommended measures, and the gaps in the evidence that should have been provided by the developer.

The proposed Prairie Creek Mine's location in the South Nahanni Watershed, upstream from the Nahanni World Heritage Site, means it is critically important that the environmental assessment and management regime of this proposal be held to the highest standard. UNESCO has already noted its concern about mining in the Nahanni watershed and recommended that Canada protect the entire South Nahanni Watershed. There has been significant public concern expressed over the past decade about the impact of this project on this globally significant ecosystem.

It is the responsibility of the MVEIRB to provide clear, enforceable mitigation measures for the safe development, operation, and closure of the proposed Prairie Creek Mine.

Until enforceable mitigation measures are clearly embedded in the MVEIRB's decision that address the concerns and recommendations of the Parties to the Environmental Assessment, including AANDC, Parks Canada, DFN, NBDB and others, this project is not ready to proceed to the permitting stage. If the current report is adopted, there is a significant chance that water quality, downstream communities, and the ecological integrity of Nahanni National Park Reserve and UNESCO World Heritage Site will be put at significant risk as a result of the proposed Prairie Creek Mine.

We request that you reject the EA0809-002 decision, and return it to the MVEIRB for a re-examination of the potential environmental impacts of the proposed Prairie Creek Mine. We believe that an Environmental Impact Review of this project would be appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Hébert-Daly', written in a cursive style.

Éric Hébert-Daly  
National Executive Director  
Canadian Parks and Wilderness Society

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

Mr. Richard Edjericon, Chair, Mackenzie Valley Environmental Impact Review Board

Mr. Sam Gargan, Grand Chief Dehcho First Nations

Mr. Alan Latourelle, CEO, Parks Canada Agency