

November 18, 2020

Mavis Cli-Michaud, Chair
Mackenzie Valley Land and Water Board
7th Floor - 4922 48th Street
PO Box 2130, Yellowknife NT X1A 2P6

Re: Closing Argument for Canadian Zinc Corp – Prairie Creek Mine Type A Mining and Milling Renewal Applications - Land Use Permit MV2020D0007, Water Licence V2020L2-0003

Dear Ms. Cli-Michaud,

The proposed Prairie Creek Mine and All Season Road fall within Łíídlíí Kúé (LK) First Nation’s traditional territory. Our community has been engaged on this file for numerous years and is committed to advancing socially and environmentally responsible development projects that increase the prosperity of our Region.

NorZinc is requesting a renewal of water licence MV2008L2-0002 for a 3-year term and a replacement of land use permit MV2008D0014 for a 5-year term. We understand that NorZinc is making these requests to ensure their mining authorizations remain valid while they complete their plans for mine expansion.

LK has participated fully in the review of the Prairie Creek Mine Type A Mining and Milling Renewal Applications. As a closing argument on these applications, LK provides the following comments to the Mackenzie Valley Land and Water Board (the Board):

Throughout the review process, the reviewers and the proponent provided numerous comments focused on submission timelines, including those related to the Aquatic Effects Monitoring Program (AEMP) Design Plan, the AEMP Annual Report, and the Failure Modes and Effects Analysis.

Given that NorZinc is planning to substantially revise their project in a new application to the Board, we believe that submission timelines should be triggered by physical construction activities wherever possible (e.g., “plan X must be approved Y months before activity Z can commence”) rather than arbitrary administrative deadlines (e.g., “plan X must be submitted Y months after



licence issuance”). Aligning timelines with physical construction will prevent reviewers from expending time and effort on plans which are unlikely to be put into actual use and therefore unlikely to provide any environmental benefit.

Recommendation: The timeline for submission and approval of management plans should be connected to physical construction activities wherever possible.

LKFN believes these applications should be approved expeditiously, such that we may focus our attention on a thorough review of NorZinc’s future application for the Prairie Creek Mine expansion.

Mahsi,

A handwritten signature in black ink, appearing to read 'Kele Antoine', is written over the typed name.

Sub-Chief Kele Antoine
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