



October 14, 2013

Joanne Weiss Reid
Project Manager – Sisson Project, CEAR #11-03-63169
Canadian Environmental Assessment Agency
1801 Hollis St., Suite 200
Halifax, NS B3J 3N4

Re: Public Comment on the Environmental Impact Assessment Report for the Sisson Project (Tungsten and Molybdenum Mine), New Brunswick, CEAR #11-03-63169

Dear Ms. Weiss Reid:

Please find attached (via email) CCNB Action Inc.'s report on the EIA report for the Sisson Project. As you will recall, CCNB Action received Participant Funding from the Canadian Environmental Assessment Agency to participate in the review of the EIA report for this project. CCNB Action used most of this funding to hire experts to review and provide comments on sections of the EIA report and various technical reports prepared for the proponent to support the EIA report. The reviews and comments of CCNB Action's experts are contained in the attached report.

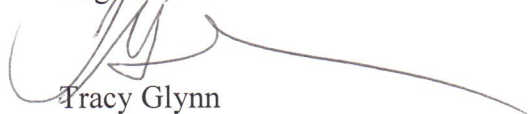
In brief, CCNB Action's report shows that the need for the proposed tungsten and molybdenum mine has not been proven adequately. In addition, CCNB Action's expert reviewers collectively are of the opinion that because of missing vital data or data of poor quality, and inadequate sampling, methodology, and modeling done by the proponent, a large number of the Sisson Project's environmental effects cannot actually be determined. As a result, the EIA report does not fulfill the requirements for the conducting and reporting of the environmental assessment for the project as set out in the project's EIA terms of reference. CCNB Action experts are also of the opinion that based on the data that is available in the EIA report, in many instances the proponent has under-estimated the environmental effects of the project and mischaracterized the significance of these impacts, i.e., CCNB Action experts believe these adverse environmental effects of the project should be rated as significant.

As a result of our review, it has become evident the presently inadequate and incomplete EIA report for the project must be redone so that fundamental questions about the project can be answered, such as what is the actual trace mineral content of the ore, what is the acid generating potential of the mined rock, and what are the true economic benefits of the project? Based on the fact the EIA report is incomplete, our experts' findings that many of the project's adverse environmental effects are significant, and the application of the precautionary principle, the adverse environmental effects of the project must be accepted as being significant. Given all of this, it is clear that at present the obvious risks posed to the environment by the proposed mine, such as the release of air contaminants, the physical destruction of valuable fish habitat, and metal leaching and acid rock drainage, substantially outweigh the unsubstantiated need for or benefits of the project. For this reason, it is the position of CCNB Action the project should not receive the approval of decision-makers until such time as fundamental errors and oversights in the EIA report are adequately addressed. It is only after the EIA report is properly completed that the public and regulators can return to the question of whether the project should receive approval.

Following from the above, we request the Minister use her authority under s. 23(2) of the old *CEAA* and/or the CEA Agency use its authority under s. 23(2) of *CEAA 2012* to require the proponent, Northcliff Resources Inc., to redo and revise the EIA report so that the information gaps in it identified by CCNB Action's experts are filled. We also ask that the current public comment period not be ended and that it be extended for 45 days following the submission of a revised EIA report by the proponent. If these revisions are not made, then CCNB Action stands by its position that the adverse environmental effects of the Sisson Project must be deemed to be significant and because of the unsubstantiated need for the project, that these effects cannot be justified. As such, we ask the Agency to conclude in its comprehensive study report (CSR) for the project, "That even with the implementation of mitigation measures, the Sisson Project is likely to cause significant adverse environmental effects and that these effects cannot be justified."

Thank you for your assistance throughout our participation in this review. If the Agency or other government departments have questions regarding CCNB Action's report, please do not hesitate to contact the writer. Finally, we note there continues to be an unnecessary delay in the supply of the geo-referenced coordinates of drill core assays from the proponent to Mr. Scott Kidd, CCNB Action's coordinator for our review in the EIA for the Sisson Project, who requested this information on September 23, 2013. Therefore, please be advised that CCNB Action may file an addendum to our report after Mr. Kidd receives the requested geo-coordinates and our experts have analyzed them.

Regards,



Tracy Glynn