

Mackenzie Valley Environmental Impact Review Board

Our file: EA 0506-006
By Fax: (425) 335-1367; (604) 689-7179

Mr. Kamal Alouras, President
Sidon International Resources Corp.
Suite 1610 – 470 Granville St.
Vancouver, British Columbia
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Thursday, February 9th, 2006

RE: Sidon International Resources Corp.'s resubmission of Information Requests to MVEIRB

Dear Mr. Alouras,

On February 1st, 2006, the Mackenzie Valley Environmental Impact Review Board (Review Board) received by courier, Sidon International Resources Corp's (Sidon) resubmitted responses, dated December 14, 2005, to Information Requests (IRs). The IRs were issued by the Review Board as part of the environmental assessment of Sidon's proposed mineral exploration operations in the Drybones Bay area of the Northwest Territories.

It is probably useful to recount some of the main events that have lead to the current situation with this environmental assessment. The Review Board, in its Workplan, dated September 8, 2005, decided that in lieu of requiring a formal Developer's Assessment Report from Sidon, a single round of IRs by all parties should take place. The Review Board intended, upon receipt of the IR responses, to hold a public hearing on December 6th, 2005. The Review Board received IR responses on October 31, 2005, from Sidon. The Review Board in its *Reasons for Decision*, published on November 9th, 2005, determined that the IR responses it received from Sidon did not "adequately answer most of the questions posed by the Board and parties", and furthermore they were, "disappointing in terms of both content and tone." As a result, the Review Board decided to postpone its hearing until adequate answers to each IR were provided by Sidon.

The IR responses received on February 1st, 2006, were purportedly re-submitted to answer the concerns raised by the Review Board and the parties. Unfortunately, the resubmitted IR responses do not seem to have provided adequate answers. Instead, the re-submitted responses appear to largely be a reiteration of the original October 31, 2005 submission with two main modifications; the first being the removal of objectionable commentary which had coloured the original document with a regrettable tone.

However it is the second modification wherein the main problem lies. Instead of substantively expanding upon the information that had previously been presented in the original October 31 IR response to IRs, Sidon has instead, for the most part, opted to refer to two documents; the first being the Adapted Submission, which is part of Sidon's original application to the Mackenzie Land and Water Board, entitled, *Modified Development Assessment Report: For Sidon International Resources Corp. Preliminary Exploration Report*. The other reference is the Review Board's *New Shoshoni*

Corp. *Preliminary Exploration Report*. The other reference is the Review Board's *New Shoshoni Ventures Report of Environmental Assessment*, which is referred to as the "Final report" in the covering letter accompanying February 1st IR responses.

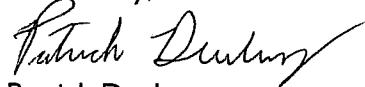
It should be somewhat self-evident why providing a line reference to the Adapted Submission is insufficient in itself to address an IR response. The Adapted Submission has been available since before the commencement of this EA; the Review Board is quite familiar with its content and presumably, so are the parties. The point to be made here is that the IRs issued by the Review Board represents a requirement for information that goes above and beyond, both in terms of specificity and depth, than that which is provided in the Adapted Submission. If all the information required by the Review Board and its parties had been provided in the Adapted Submission, there would have been no need to issue IRs in the first place. However, if Sidon truly believes that the answers to the IRs lie, at least in part, in the Adapted Submission, it must make a better effort to synthesize and present the information therein when responding to the specific IRs. A cursory reference is not sufficient for the Review Board's purposes or intent.

Sidon's attempt to address IR responses with references from the *New Shoshoni Ventures Report of Environmental Assessment* is also curious, partly because of the fact that it is for a separate undertaking in another area. While it is acknowledge that the *New Shoshoni Ventures Report of Environmental Assessment* may be considered a source of some pertinent information, references to it, as cited in the re-submitted IR responses, do not, by any means, constitute a sufficient response to the Review Board's concerns and questions. IR responses need to be site- and context-specific. If Sidon wishes to draw on existing documentation, such as the *New Shoshoni Ventures Report of Environmental Assessment*, in its IR responses, it must synthesize and interpret such information to address the undertaking at hand.

It is for these above-cited reasons that the re-submitted IR responses still remain unsatisfactory. As such, they will not be evaluated by the Board until they have been further reconsidered by Sidon. As a further note, it is requested that, in the future, Sidon attempt to ensure that its documentation and correspondence to the Review Board is submitted separately from that of Consolidated GoldWin Ventures or any other company.

Should you have any questions or concerns with matters covered in this letter, do not hesitate to contact me at your earliest convenience. Alan Ehrlich, who is normally responsible for this environmental assessment will be available to discuss these matters when he returns to the Review Board office on February 22, 2006.

Yours truly,



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cc'd Sidon EA distribution list