

Environment Canada's Scoping Recommendations Gahcho Kue Project

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Environment Canada
Environnement Canada



Process Comments

- EC acknowledges that the Board is working to focus the scoping of the assessment for the Gahcho Kue project through emphasizing aspects which warrant the most attention.
- It is EC's opinion, however, that the environmental assessment must consider all aspects of the proposed project, and that we risk missing the sum total of effects, and leave the process open to challenge, if we do not include all issues in the review.

Process Comments

- EC chose to highlight the areas where higher levels of detail and scrutiny are warranted, rather than single out the 20 top issues and assign point values to them.
- This approach was in part necessitated by the lack of information available to us, for a number of issues, with which to base our assignment of priorities.

Process Comments

- All of the issues identified in the workshop need to be covered in the Developer's Assessment Report.
- EC agrees that the level of emphasis may vary for issues, depending on the potential for significant effects and the extent to which activities can be mitigated and/or routinely addressed through accepted management practices.

EC's Scoping Recommendations

- The topics which EC wishes to emphasize include:
 - migratory birds and species at risk
 - air quality
 - lake dewatering
 - contaminants
 - winter road
 - permafrost and groundwater/hydrogeology

EC's Scoping Recommendations

Migratory birds and Species at Risk:

➤ Issues include:

- disturbance to nesting, molting, and migrating birds
- contaminants exposure
- potential increases in predators
- habitat loss
- potential mortality due to project activities

EC's Scoping Recommendations

- The relative priority of these particular issues can not be properly assessed until we are provided with more information:
 - specific project details
 - baseline data on wildlife in area
 - wildlife composition at Gahcho Kue may differ compared to other mine sites

EC's Scoping Recommendations

Air issues:

- Project activities will emit large amounts of various pollutants (NO_x, SO₂, CO, etc.) and fugitive dust into the atmosphere.
- To understand potential impacts from these emissions a full air quality assessment must be completed.
- The assessment needs to be based on air quality model predictions of ambient concentrations of pollutants, acid deposition and dust deposition.
- Predictions need to be compared to applicable ambient air quality and deposition standards.

EC's Scoping Recommendations

- Incineration of waste will release persistent organic pollutants (POPs) and metals to the environment.
- The proponent needs to identify how they will achieve and demonstrate compliance with the Canada-wide Standards for dioxins and furans and CWS for mercury emissions.

EC's Scoping Recommendations

Lake dewatering:

- Further information is needed regarding the potential for dust from the de-watered lakebed for us to be able to evaluate this concern.
- Specifically, data on substrate characteristics, sediment particle size, sediment chemistry, and bench testing of drying behaviour would be helpful.
- An associated concern with lake dewatering and rewatering is the alteration to natural flow regimes, and the effects which may occur to biota (including waterfowl) and channel stability.

EC's Scoping Recommendations

Contaminants:

- There are a number of potential sources of contaminants, including mill effluent, lakebed sediments, backfilled pits, waste rock and processed kimberlite, and deep groundwater.
- A detailed evaluation will be needed for each source, and will have to include the characterization and extent of potential downstream receiving environment effects.

EC's Scoping Recommendations

Winter road:

- The spur road will have to be assessed.
- Monitoring of the road-related impacts should be considered, and the spatial extent of monitoring appropriately selected.

EC's Scoping Recommendations

Permafrost and Groundwater/Hydrogeology:

- Details are needed for groundwater and permafrost baseline conditions and predicted behaviour, with sufficient information for reviewers to evaluate impacts.
- EC will be focusing on: the impacts of pits on groundwater movement and water quality, long term groundwater flow implications, and details on how the proponent will be managing groundwater flows.
- For permafrost issues, long term modelling should be done using appropriate inputs, and a robust ongoing monitoring program designed to refine or verify model predictions.
- Effects of the pits on the thermal regime will need to be evaluated for operational and post-closure states.

Conclusion

- EC hopes that these comments prove to be constructive, and that they can be integrated into the development of the draft Terms of Reference.
- We look forward to providing input into the ToR when they are developed.



EC thanks the Board for this opportunity to present our scoping recommendations, and would be happy to take any questions.