



*Alternatives North*

## **TECHNICAL REPORT**

Giant Mine Remediation Project

EA0809-001 [2008]



**Submitted to the  
Mackenzie Valley Environmental Impact  
Review Board**

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## EXECUTIVE SUMMARY

Alternatives North was established 20 years ago and works on social justice issues. We are a non-profit society based in Yellowknife. We worked together with other parties during the Environmental Assessment, especially the Yellowknives Dene First Nation (YKDFN).

Our most important issues are making sure there is an independent watchdog for the Giant Mine and that we work together to properly plan to look after Giant Mine forever.

This is an unusual development as we are trying to fix a problem after it happened. The government owns the site, plans to freeze the underground arsenic at Giant Mine forever, but is also supposed to be the inspector. Many of the plans and designs are not finished.

Measures are required to avoid or reduce significant environmental impacts and to reduce significant public concern with the Giant Mine plan proposed by the governments.

We believe that the Review Board should recommend to the governments that they:

- make a formal apology and negotiate compensation for the YKDFN for the environmental and social problems caused by the Giant Mine;
- prove to the Water Board that treated water from Giant Mine will not thin ice on Back Bay;
- prove to the Water Board that the waters in Back and Yellowknife Bays will be safe for people and fish, and pay the City for any extra costs to make the water drinkable if the Giant Mine causes problems;
- submit designs and ways to measure whether the new covers on the tailings ponds will work;
- prepare an air quality monitoring program and take steps to control dust from the tailings;
- prepare environmental plans that set out how the success of the proposed plan for Giant Mine will be measured and the steps to be taken if things go wrong;
- prepared clear written instructions for their employees so as to avoid confusion over roles and responsibilities for the Giant Mine;
- set up an independent environmental watchdog group for the Giant Mine before the proposed plan for Giant Mine is started;
- develop a plan to search for a better way to deal with the underground arsenic than trying to freeze it forever;
- work together with interested parties to develop a proper plan to take care of the Giant Mine forever and to tell future generations what we have done; and
- negotiate an agreement with interested parties to cover setting up the watchdog group, the plan for a better solution for the underground arsenic and to prepare a long-term plan for the site.

**Alternatives North believes that the project should only go ahead if all the above measures are accepted and implemented as a package to prevent significant adverse environmental impacts and to reduce significant public concern.**

## **1.0 INTRODUCTION**

### **1.1 Organization of Technical Report and Preface**

This Technical Report is organized following the guidance provided by the Mackenzie Valley Environmental Impact Review Board (Review Board) as follows:

- Executive Summary is a one-page plain language overview of this submission;
- Section 1 provides background information on Alternatives North (AN), our interest in the Development, and our involvement to date in this Environmental Assessment;
- Section 2 is the list of general subjects we have raised during this process to date;
- Section 3 reviews the unusual aspects of this Environmental Assessment;
- Section 4 sets out the context for the Giant Mine Remediation Plan with a focus on the lack of a ‘social licence’ to carry out the Development and the need to prevent similar legacies in the future;
- Section 5 presents the issues Alternatives North considers unresolved with recommended measures and suggestions as appropriate; and
- Section 6 draws some overall conclusions and-summarizes our recommendations, missing information and some observations about the next steps.

Please note that there are many significant commitments to provide additional information that the Developers made at the June 27-28, 2012 technical meeting (summarized in section 6). AN reserves the right to change, modify and bring forward additional issues and concerns based on our review and analysis of this additional information.

References in this submission are to the documents filed on the Public Registry using the numbers assigned by the Review Board (e.g. [PR#116](#) Terms of Reference). Appendix 1 is the Public Registry listing but we note that the Review Board has not assigned numbers to documents filed after April 25, 2012 so we have assigned further numbers in chronological order according to the place in the listing. Where AN has used additional reference material, including documents obtained under the federal *Access to Information Act*, we have appended them to this submission so these documents will now form part of the public record for this proceeding.

### **1.2 Background on Alternatives North**

Alternatives North (AN) was established 20 years ago and functions as a social justice coalition and non-profit society, based in Yellowknife and operating in the Northwest Territories. Within our ranks are representatives of churches, labour unions, environmental organizations, women and family advocates, seniors, and anti-poverty groups. Alternatives North is a small volunteer organization with a well established history of its ability to constructively engage with other stakeholders and interests on issues. We have a proven track record of securing resources for research and bringing together people to work through issues and concerns.

We have no paid staff or office. Our participation in this Environmental Assessment was supported through the extensive volunteer efforts of our members and participant and special funding provided by the Aboriginal Affairs and Northern Development Canada, the Western

Mining Action Network, and the Abandoned Mines Program through Memorial University. We also acknowledge in-kind support by some of our contractors and experts who graciously reduced their rates in the interest of public service.

### **1.3 Alternatives North's Interest in the Giant Mine**

Many of our members, as individuals and organizations, have had an interest in the Giant Mine given its proximity to the community and its environmental and social legacy. Members of Alternatives North live and own property in the City of Yellowknife, near the Giant Mine, some for as long as 30 years. Several members have visited the mine site, including the underground operations. Alternatives North members have served in local governments with responsibilities for the Giant Mine and have directly participated in the water licensing for the Giant Mine, assessment of the air emissions, evaluation of remediation alternatives and the environmental assessment process to date. This record of direct involvement goes back at least 20 years.

Alternatives North's primary objective in the Giant Mine Remediation Environmental Assessment is to help with the development of a better understanding of perpetual care, in theory and practice, as it is related to this mine site. This will be the basis for building a set of goals and principles to help guide how the considerations of perpetual care should be incorporated into the Giant Mine Remediation Plan.

A good working relationship has been established amongst Kevin O'Reilly (a member of the Alternatives North), the Yellowknives Dene First Nation (YKDFN) and the City of Yellowknife. Mr. O'Reilly has worked before with the YKDFN and served as a Yellowknife City Councillor 1997-2006. Alternatives North has worked with the YKDFN on climate change and responsible mining practices for Canadian companies. Mr. O'Reilly has personally worked with the YKDFN in the past through his previous employment with the Dene Nation, Canadian Arctic Resources Committee and as a Yellowknife City Councillor.

The work we conducted during this Environmental Assessment was discussed and shared with the staff of the Yellowknives Dene First Nation and the City of Yellowknife. Efforts have been made to ensure there was no duplication or overlap. Alternatives North and the YKDFN worked together, especially on the workshop on perpetual care for the Giant Mine where the elders and other community members were active participants.

### **1.4 AN Involvement in the Environmental Assessment to Date**

- Kevin O'Reilly, has been a party since the beginning of the Environmental Assessment;
- Alternatives North filed a 'Request for Party Status' with the Mackenzie Valley Environmental Impact Review Board on December 6, 2010 and selects, Mr. O'Reilly to represent Alternatives North on this file;
- Review Board grants party status to AN on December 21, 2010.

AN (and before AN was a party, Kevin O'Reilly) has made over 70 submissions to the Review Board public registry. Our participation has included the following:

- Two Rounds of Information requests to the Developers on environmental and socio-economic matters, including water quality predictions, ice thinning, tailing cover design, access to information, perpetual care planning, independent oversight and other topics;
- Filing of evidence on perpetual care, long-term funding, independent oversight and other matters;
- Informal requests for information and procedural clarifications;
- Participation in the Technical Sessions held in October 2011 and the technical meeting held in June 2012;
- Co-sponsorship and organization of two workshop with the Yellowknives Dene First Nation (September 2011 on Perpetual Care at Dettah and March 2012 on Oversight at Yellowknife);
- Participation in two working groups (Environmental Management and Oversight) established as a result of our raising issues and suggesting a constructive dialogue; and
- Organization of public events on the Giant Mine regarding perpetual care and oversight.

## 2.0 LIST OF GENERAL SUBJECTS REVIEWED

AN's major focus was on the following two issues—oversight and perpetual care. We undertook a number of projects, in cooperation with other parties, especially the Yellowknives Dene First Nation. The related sections of the Terms of Reference are highlighted to show that this work is within the scope of the Environmental Assessment and brought added value to the process. Alternatives North has filed expert evidence on these two subjects for this Environmental Assessment.

1. Independent Oversight Studies that will provide information on other models and examples of best practices. This should prove helpful in designing approaches for ongoing and long-term community engagement in remediation of the Giant Mine. ([PR#116](#)--Terms of Reference, s. 3.2.6 Public Consultation, "public consultation and involvement during implementation of the project and afterwards, with particular regard to reporting monitoring results and adaptive management and a description of how public complaints will be addressed and the dispute resolution process").
2. Perpetual Care Management research will provide background on the theory and practice of perpetual care, and a participatory workshop involving community interests, all aimed at developing a set of goals and principles that should guide remediation at the Giant Mine. ([PR#116](#)--Terms of Reference, s. 3.3 Arsenic Containment, many of these points will be addressed by this work including "whether the frozen block method will protect the biophysical environment and the health and well-being of the human residents living nearby to the Giant Mine for as long as the contaminated materials persist at the site")

We have raised concerns on other issues including;

- Impacts on ice in Back Bay,
- Impacts on water quality in Back and Yellowknife bays,
- Impacts on air quality,
- Risk assessment and management, and
- Other issues as identified below, and as noted in s. 6.1 Outstanding Information Request Issues.



### 3.0 UNUSUAL ASPECTS OF THIS ENVIRONMENTAL ASSESSMENT

This section will attempt to capture the unusual nature of this Environmental Assessment. Most environmental reviews deal with a private sector party wishing to build, construct or carry out a project using or impacting public resources. Most environmental reviews are to assess a new or “Greenfield” development where the aim is to limit, mitigate or avoid environmental impacts.

This Environmental Assessment deals with a development initiated after-the-fact, a mine remediation attempting to reduce or eliminate risk and impacts. Here we are trying to minimize impacts that have already happened; are in the process of happening or may arise if not well managed. We are also dealing with a development proposal that at its core, require human intervention, care and maintenance forever. While the scoping of this Environmental Assessment has precluded consideration of alternatives, the effectiveness of the selected alternative is still matter of active debate. Does the Giant Mine Remediation Project (GMRP) meet public expectations? Does the frozen block method and other GMRP activities address the environmental, social and cultural legacies of the Giant Mine? We deal with the issue of public concern in section 4.0 below.

While it is not unique for government to be the proponent, it is certainly not the norm in the Mackenzie Valley. It is also unusual for the proponent or developer to have mixed roles and responsibilities. The roles for Aboriginal Affairs and Northern Development Canada include: project decision-maker, subsurface rights management, inspection and enforcement, promotion of economic development, broad environmental protection, and recipient of recommendations coming from this Environmental Assessment (further details in section 5.5 below on Independent Oversight).

Another unusual aspect of the GMRP is that the Review Board is being asked to review a concept as the specific design for the frozen block and many other aspects of the GMRP have yet to be completed, despite this four-year process. It is hard to believe that the GMRP would have been under construction now had an Environmental Assessment not been required by the City of Yellowknife.

Lastly, this may be the first time that a non-governmental organization has taken such an active role in an Environmental Assessment. This is in part due to the determination of our volunteers but the work was supported by participant funding from AANDC. Participant funding clearly brings additional information, perspectives and ideas to bear and undoubtedly leads to more informed decisions. The fact that participant funding has finally been made available for Environmental Assessment in the Mackenzie Valley is a very significant step forward in public participation and democratic decision-making. We ask the Review Board to explicitly acknowledge the value-added from participant funding and encourage AANDC to implement an ongoing program, not just a one-off for this Development.

If an ongoing program was developed, improvements to the administration of the funds are clearly needed (see Appendix 2). While we have suggested some ways to make for a more efficient and effective participant funding system, there would be additional value in bringing together the parties after this Environmental Assessment for a lessons learned exercise.

***Recommendation for the Review Board:***

**Suggestion 1**--AANDC should implement an ongoing participant funding program for all Environmental Assessments and Environmental Impact Reviews in the Mackenzie Valley. There should be a lessons learned meeting or workshop after the government response to this Report of Environmental Assessment with a view to improving the application, review and disbursement of participant funding.

## **4.0 PUBLIC CONCERN**

### **4.1 Issue**

#### **PR#116—Terms of Reference**

*s. 3.1.4 Key Lines of Inquiry--monitoring and maintenance activities at the Giant Mine after the active freezing stage*

*s. 3.2.6 Public Consultation*

*The purpose of public consultation is to provide those individuals who may be affected by the development an opportunity to effectively participate in the environmental assessment.*

*Describe any plans the developer has to continue public consultation and involvement during implementation of the project and afterwards, with particular regard to reporting monitoring results and adaptive management and a description of how public complaints will be addressed and the dispute resolution process.*

The issue is whether there is significant public concern with the GMRP and whether the Developers have taken any significant steps to better consult and involve the public during the course of the Environmental Assessment.

Have the Developers been responsive to public concerns? Have the Developers taken steps to build better relationships and trust to allow for the GMRP to proceed? Is there a ‘social licence’ (see Appendix 3) for the GMRP to move forward?

### **4.2 Developers’ Conclusion**

#### **PR#139—Developer’s Assessment Report**

*s. 15.1 Conclusion--The Project Team is of the opinion that the DAR has met the requirements of the Terms of Reference and that the DAR also reflects the principles and standard practices of environmental impact assessment, with the unique context of the Northwest Territories in mind. In preparing the DAR, the Project Team has...proposed a consultation and engagement strategy to respond to potential issues and concerns as the Project goes forward.*

### **4.3 Alternatives North’s Conclusion**

The Developers’ conclusion on significant public concern implies that the proposed consultation and engagement strategy is deemed to be sufficient to address public concern.

AN disagrees with the Developers’ apparent conclusion that there is no significant public concern. AN is of the view that the GMRP was originally referred for an Environmental Assessment at least partly based on public concern, and that although there has been some limited progress on building trust, there is still significant public concern with the GMRP as currently proposed.

#### 4.4 Rationale and Recommendations

It is necessary to go back in time and briefly review the approach to developing the GMRP to understand the deep public mistrust and sense of betrayal that pervades the Giant Mine (PR#171 pg. 23 for an outside evaluation of public participation in development of the GMRP; PR#356 pg. 95-108 for a detailed personal account).

Giant Mine became a public liability in 1999. There is a deep and pervasive resentment in the community over the mismanagement and lack of regulatory oversight of the Giant Mine and the resulting environmental, social and cultural legacy.

The GMRP was developed over the period from 1999 to 2003 with limited public involvement. No participant funding was made available, and there was no public involvement in developing or applying evaluative criteria for the alternatives or options for managing the underground arsenic at Giant Mine (PR#171 pg. 23; PR#352 pg. 97-107). It was only in October 2011 that AANDC finally provided funding directly to the YKDFN to become involved in the GMRP.

This lack of meaningful public or Aboriginal involvement in the GMRP stands in stark contrast to the collaborative and cooperative approach of AANDC on the remediation of the Port Radium where an Action Plan was developed with the community of Deline (PR#18) and over \$6 million was provided for joint studies, community development and healing. The Colomac Mine remediation was so successful that there was no higher level of environmental assessment or even a public hearing for the water licence due to the collaborative approach taken (PR#94)

The Technical Advisor to AANDC made the following recommendation following several years of study to develop the GRMP:

The in situ alternative recommended by the Technical Advisor, namely Alternative B3 – Ground Freezing as a Frozen Block, should be adopted as the preferred approach for managing the arsenic trioxide dust stored underground at Giant Mine. Elements of the alternative should be modified to take into account suggestions made by the general public, the Yellowknives Dene, and the GNWT. The modified alternative should be described within a Project Description that presents a complete plan for final closure and reclamation of the Giant Mine site, including surface works. **The Project Description should then be submitted for formal environmental review, licensing and subsequent implementation.** (PR#139, pg. 6-10, emphasis added)

Despite repeated requests about whether the Developers would voluntarily submit the GRMP for an Environmental Assessment, no definitive answer was ever provided and the Development was headed straight to the regulatory phase (i.e. water licensing) (PR#13, 14 and 15). For the very first time in the Mackenzie Valley, a municipal government exercised its authority under the *Mackenzie Valley Resource Management Act* and made a mandatory referral of the water licence application and the GMRP based on the potential for significant adverse environmental effects

and public concern ([PR#1](#); [PR#352](#) pg. 97-107). It is also our understanding that this was the first time that a Chief of the YKDFN has ever come to a Yellowknife City Council meeting.

While the above paragraphs describe the context and legacy of the Giant Mine and how we got to the Environmental Assessment, it is important to assess the commitment of the Developers' to meaningfully engage the public and address concerns during this Environmental Assessment. AN is pleased with the progress that has been made in the two Working Groups (Environmental Management and Oversight) but this came about through our determination and constructive approach, not from the Developers' own initiatives ([PR#411](#); [PR#354](#), pg. 200-208).

AN has the impression that the Developers<sup>2</sup> have resisted this Environmental Assessment from the very beginning and have questioned their commitment to complete it ([PR#417](#)). There have been several instances where engagement or information has been requested with mixed results. Some examples include:

- This Environmental Assessment is now more than two years behind the initial work plan schedule released in May 2008. The Developer has requested delays and extensions 8 times for a total of 191 days. The Developer's Assessment Report itself was submitted almost two years behind the original submission date and a year later than the amended work plan following the scoping determination by the Review Board.
- AN has requested that the Site Stabilization Plan be made public on several occasions informally and twice in writing (March 8, 2012 [PR#417-418](#); June 18, 2012 [PR#436](#)). This Plan was developed in secret as early as October 2011 (most likely before the Technical Sessions) and submitted for Ministerial approval without any public consultation ([PR#427](#)). It was approved by the AANDC Minister on November 2, 2011 and has still not been released (see Appendix 3 for documents obtained under Access to Information). This Plan appears to be the basis for the Developers' assuming emergency authority under the *MVRMA* s. 119 to exempt part or all of the GMRP from this Environmental Assessment or any further environmental review. The experience with the Conveyor Demolition where the Developers' had to be requested to provide a legal justification for the work and then invoked emergency authority ([PR#402,409-410,413](#)) did little to build public confidence in an open and transparent approach to required work at the site.
- Following a release of tailings into Baker Creek in May 2011, AANDC finally held a public meeting on July 19, 2011. Concerns were raised regarding lessons learned and remediation options, both at the meeting and reiterated in an e-mail dated August 5, 2011 ([PR#337](#)). AANDC has yet to respond.
- Recent public meetings in May 2012 for the Developers to provide updates were held with as little as three days notice ([PR#427](#)).
- AN requested another Technical Session on May 8, 2012 to discuss the responses to the Second Round of Information Requests given the failure to respond to many questions and new issues raised by some of the responses ([PR#417](#)). Despite repeated requests and

attempts to have such a meeting ([PR#426](#), [427](#), [437](#)) it was not held until June 27-28, 2012 only two weeks before the deadline for Technical Report submissions. No presentations were sent out ahead of time, no sound system was available and no transcripts were kept. AN could not determine ahead of time whether we should have our technical experts at the meeting or not, even if participant funding for the new year had been made available (see unfiled summary of this meeting when it is available).

While these recent examples may not appear important, they demonstrate a continuing secretive and uncooperative approach rather than working with the parties to develop collaborative and constructive processes and mechanisms to build trust and public confidence, especially given the lack of progress on oversight or a Giant Mine Environmental Agreement (see s. 5.6 and 5.8 below). We do not ascribe a cause or motivation which may be lack of capacity, poor advice, insensitivity to local concerns, or complex and inefficient decision-making but the outcome is clear--little if any progress in remedying public concern. We simply expect and demand more from our public governments.

There is still no public demonstration of consent, let alone support, for the GMRP or the frozen block method from either the City of Yellowknife or the YKDFN. Recent performance by the Developers' on public engagement and work with the parties to this Environmental Assessment does not bode well for the future. There is no 'social licence' for the GMRP to proceed and significant public concern lingers in the community. Additional information on what has become known as a 'social licence' is found in Appendix 3.

AN firmly believes that some of the public concern about the GMRP is related to the outstanding issues below such as lack of independent oversight, little perpetual care planning, potential ice thinning and water quality changes. However, at the core of public concern is a lack of trust ([PR#352](#) pg. 108-11; [PR#356](#) pg. 95-108). One of the recommendations coming from the September 27-28, 2012 Perpetual Care Workshop was for a formal apology as a prerequisite to trust ([PR#362](#), pg. 14, 21, 23 and 26).

An apology need not be an admission of guilt but a commitment to taking responsibility, to prevent this from happening again and moving forward in a collaborative and cooperative fashion. Apologies are not new to the federal government as they have been offered in a variety of situations such as to the High Arctic Exiles (relocated Inuit taken to Resolute and Grise Fiord), to Japanese internees during the Second World War, and for the damage done to Aboriginal peoples during the Residential School era (see Appendix 3 for further information). AN does not assert in any way that the damages from Giant Mine are comparable to these other situations, but simply notes that an apology is almost always seen as a start to reconciliation and a new and more constructive relationship.

Along with an apology, we recognize and support the need for compensation to the YKDFN for the damage caused to their land, citizens and culture by the Giant Mine. All of this is part of a healing journey that has yet to take place. AN believes that the recommendation 1, as well as all our recommendations, must be accepted by the Responsible Minister as a full package to reduce or avoid significant public concern or to avoid an Environmental Impact Review of the GMRP.

***Recommendation to the Review Board:***

**Measure 1**--To reduce significant public concern with the development and to build better working relationships, trust and public confidence, AANDC will work collaboratively with YKDFN and others in Yellowknife, to make a formal apology for the environmental and social legacy of the Giant Mine. A healing process and/or programs and a ceremony should be considered as part of an apology. There should be negotiated compensation to the YKDFN for the impacts of the Giant Mine on its citizens and traditional territory.

Whatever happens with the GMRP and this Environmental Assessment, AN believes that we must work together to ensure that another Giant Mine never happens again. If we fail in this respect, we have failed not just ourselves but those that come after us. There is nothing in law that would prevent another Giant Mine from happening in the NWT. The NWT still has a comparatively lax and uncoordinated closure and reclamation regime for mining compared to other jurisdiction in Canada and the US ([PR#28](#), [29](#)). There are still no mandatory requirements for closure plans or financial security. While there has been some improvement to policy and guidelines ([PR#19](#) and [27](#)), these are not binding in any way and there is still room for considerable discretion. We acknowledge that GNWT has learned some lessons from Giant Mine and amended its *Commissioner's Lands Act* to include a mandatory requirement for financial security for commercial and industrial land users. Despite what may seem to be imminent devolution of authority for lands and resources to GNWT, we believe a proper public review of the federal legislative and regulatory framework for mine closure and reclamation to demonstrate that lessons have been learned from Giant Mine.

***Recommendation to the Review Board:***

**Suggestion 2**--AANDC and/or GNWT (in the case of devolution) should conduct a public review of the legal framework for mine closure and reclamation with a view to strengthening the regulatory system and make mandatory requirements for closure plans and financial security to avoid further perpetual care mine sites.



## 5.0 UNRESOLVED ISSUES

### 5.1 Ice Thinning

#### 5.1.1 Issue

[PR#116](#)—Terms of Reference

##### s. 3.5.1 Water

*The Review Board has identified water as a key valued component for this environmental assessment. The contaminated water at the Giant Mine must be treated before discharge to the environment to ensure the health and safety of the ecosystem and the local residents who depend on that ecosystem.*

*While conducting an impact assessment based on identified valued components, specific consideration shall be given to the following:*

- 3. An examination of the potential effects of the proposed development on water quality, quantity and temperature throughout the potentially impacted area.*
- 5. **An analysis of the effect of all remediation activities on ice formation**, with particular attention to the impact of active freezing activities on normal seasonal freeze and thaw cycles in nearby water bodies. [emphasis added]*

The issue is whether the treated minewater discharged through the 81 m long diffuser in Back Bay will cause any ice thinning in winter, when and to what degree and whether this presents a public safety problem.

#### 5.1.2 Developers' Conclusion

[PR#139](#)—Developer's Assessment Report

Table 8.7.2, pg. 8-63 and 8-64 deals with discharge of treated minewater to Great Slave Lake but does not consider or mention any potential effects to ice cover.

Table 12.3.1, pg. 12-13 states:

*The discharge of treated minewater is not anticipated to pose either a safety risk to human well-being, or to impair the ecological function of Yellowknife Bay.*

*Depending on the selection of the final location, the diffuser will be placed between 8.5 m to 10 m below the surface of Yellowknife Bay. This distance from surface, as well as the relatively small volume of water discharged and the anticipated cold temperature of treated minewater suggests there will be no significant ecological or safety risks associated with the thermal discharge.*



*s. 15.1 Conclusion--The Project Team is of the opinion that the DAR has met the requirements of the Terms of Reference and that the DAR also reflects the principles and standard practices of environmental impact assessment, with the unique context of the Northwest Territories in mind.*

[PR#389](#), Response to YKDFN Round Two IR, pg. 2-3:

The preliminary design indicates that the diffuser will not significantly impact the ice thickness in the winter, however it is important to collect data on ice thickness in the bay in late fall and late spring in addition to the normal monitoring program performed by the City of Yellowknife before snow machines start to use the frozen bay for access across the bay or up the Yellowknife River.

The preliminary design for the diffuser indicates that based on the available data; there should be no measureable thinning of the ice above the diffuser in the winter.

Unfiled presentation from the June 27-28, 2012 technical meeting—Treated Water Outfall Diffuser, slide 11:

Local thinning of the ice cover may occur, and the potential for this will be further investigated during the diffuser detailed design phase. Thinning, if any, would be local and may be further minimized by adjusting the port angle.

#### 5.1.3 Alternatives North's Conclusion

The Back Bay area is heavily used by Yellowknifers in the winter and any ice thinning could have serious impacts on public safety. AN does not accept the inconsistent explanations and conclusions from the Developers or their consultants on the potential for ice thinning, its potential effects on public safety or its unsupported conclusion that there is no potential for significant adverse effects.

#### 5.1.4 Rationale and Recommendations

AN has consistently raised the issue of ice thinning and the related public safety issue for ice users on Back Bay. The issue was raised by Kevin O'Reilly in the July 2010 public meetings held by AANDC before the DAR was filed, and at the Technical Sessions in October 2011 ([PR#353](#) pg. 103-110).

In October 2011, ice thinning issue was identified by the Developers as:

This has been one of the number 1 issues that has been given to the design team; they're aware of it. And one of the things that we're proceeding on is we are doing further work to look at that quant -- quantitative nature of -- we do not believe it's going to be substantial, but that as part of the work that's going to be done this fall

into the winter is looking at those dynamics. So, this is on the books, this is an important concern, and we are -- we have proposed plans to provide more information to people ([PR#353](#), pg. 101).

Despite this stated priority for the issue, eight months later the Developers<sup>2</sup> have yet to conduct any thermal modelling of the potential diffuser discharges to determine the potential for ice thinning and what effect that may have on public safety for ice users, especially in the shoulder seasons when ice is forming or beginning to thin from melting (unfiled summary of the June 2012 technical meeting).

During the June 2012 technical meeting, the Developers<sup>2</sup> were asked to make a commitment to no ice thinning in Back Bay and would only commit that there would be no threat to public safety. The Developers<sup>2</sup> also could not define what “safe” really means and how much ice thinning and when it may occur, would be sage for various users (e.g. pedestrians, walkers, or skiers).

AN’s position is that this kind of commitment shifts the burden of proof or the burden of knowing whether it may be safe or not, to the public rather than the Developers assuming the risk and any further mitigation or changes in operation. If anyone goes through the ice above or near the diffuser, there will likely be a lawsuit and the Developers could be held legally liable. There is still significant public concern with the lack of progress on this issue and the possible severity of the consequences. The Developers<sup>2</sup> do not appear to be in a position to draw any clear and consistent conclusions regarding the significance of this impact or to make a commitment to no thinning. AN is of the view this is still a major unresolved issue, a significant adverse environmental effect and a significant cause of public concern.

***Recommendation to Review Board:***

**Measure 2**--To prevent significant adverse impacts on winter users of Back Bay as a result of ice thinning caused by diffuser effluent discharges, the Developers need to do the following before any approval or construction:

- Complete thermal modelling and field tests for the potential to cause ice thinning on Back Bay;
- Prove to the satisfaction of regulatory authorities that a diffuser can be designed in such a way as to not thin ice on Bay Bay; and
- Prepare an ice thickness monitoring program for the approval of regulatory authorities that includes public reporting of the results.

## 5.2 Water Quality In Back and Yellowknife Bays

### 5.2.1 Issue

[PR#116](#)—Terms of Reference

s. 3.5.1 Water

*The Review Board has identified water as a key valued component for this environmental assessment. The contaminated water at the Giant Mine must be treated before discharge to the environment to ensure the health and safety of the ecosystem and the local residents who depend on that ecosystem.*

*While conducting an impact assessment based on identified valued components, specific consideration shall be given to the following:*

3. *An examination of the potential effects of the proposed development on water quality, quantity and temperature throughout the potentially impacted area. Assessments of water quality should make use of applicable standards and guidelines. This analysis shall include, but not be limited to:*
  - a. *A prediction of water quality, with special attention on arsenic levels, and how these levels may change through the lifespan of the project, the assessment of which should cover both inflows to the treatment process from i) mine water and ii) contaminated surface runoff and outflows from the treatment plant to the environment*

The Developers have proposed a new water treatment plant as part of the GRMP which is a good and desirable initiative. The current system on site discharges treated effluent directly into Baker Creek on a seasonal basis. The GRMP proposes two very significant changes. Firstly, the effluent will be discharged through a diffuser at the bottom of Back Bay. Secondly, the discharge will occur year round, including periods of ice cover. It is important to understand how the discharge may affect water quality in this area given the potential to stir up contaminated sediments, temperature gradients, currents and the chemical and thermal composition of the effluent.

### 5.2.2 Developers' Conclusion

[PR#139](#)—Developer's Assessment Report

Table 12.3.1, pg. 12-12 and 12-13 states:

*The discharge of treated minewater is not expected to result in a significant adverse effect on the water quality of Yellowknife Bay, or other VCs. The diffuser will be designed to encourage rapid mixing of treated effluent with lake water and thus reduce the size of the mixing zone required to meet the CWQG-FAL guideline for arsenic. The activity will not result in an increase of human exposure to arsenic.*

*The discharge of treated minewater is not anticipated to pose either a safety risk to human well-being, or to impair the ecological function of Yellowknife Bay.*

### 5.2.3 Alternatives North's Conclusion

AN does not accept the Developers conclusion that there will be no significant adverse environmental effects. The Developers' conclusion of no significant adverse effects on water quality cannot be reached without having completed the far field modelling of effluent mixing and consequent water quality predictions for Back and Yellowknife bays. We are of the view that there is the potential for significant adverse environmental effects from the diffuser discharge into Back and Yellowknife bays.

### 5.2.4 Rationale and Recommendations

AN raised the issue of far field modelling at the October 2011 Technical Sessions ([PR#353](#), pg. 126-131). We were told that the 2006 risk assessment for arsenic loadings into Back Bay had already dealt with the issue of aquatic effects (see Supporting Document N1 Tier 2 Risk Assessment, Giant Mine Remediation Plan by SENES in 2006, could not be located on the public registry). Page 2-4 of this report deals with source characterization as follows:

## 2.2 SOURCE CHARACTERISTICS

### 2.2.1 Potential Future Releases Associated with Remediation Case

The modifications proposed in the Remediation Plan discussed in the main report are expected to decrease the arsenic discharges from surface sources within the mine area. After those measures are implemented, it is reasonable to expect that background and mine area arsenic releases will be reduced. In addition, some of the arsenic load from the mine site will go directly into Back Bay and some will still enter Baker Creek. The risk assessment examined one "Remediation Case" that was selected to cover these likely arsenic releases.

In the Remediation Case, 290 kg/yr from background sources (220 kg/yr upstream of the mine and 70 kg/yr from tributaries) and 190 kg/yr in surface runoff from the mine site is assumed to go directly into Baker Creek, for a total of 480 kg/yr. In addition, it was assumed that 140 kg/yr of arsenic from the treatment plant and 70 kg/yr from surface run-off would enter Back Bay. In total for the Remediation Case, it was assumed that 690 kg/yr arsenic was emitted to the aquatic environment. In addition, Baker Lake sediments will be removed and some sections of Baker Creek will be realigned; however, portions of Baker Creek will still have arsenic concentrations of up to 2,200 mg/kg. No surface ponds will be present on site with the exception of the treated water storage pond. The arsenic concentration in the pond is expected to average approximately 0.38 mg/L, but the pond will be fenced. Therefore, it will be inaccessible.

It is not clear whether this risk assessment considered the specific proposal for diffuser operation, whether sediment disturbance was considered, or currents and ice cover were factored in. It appears to be a loading analysis which is not the same as a far field model that should assess these factors and make predictions on water quality at various points and reflect any seasonal changes. It appears to AN that far field modelling should be done to feed into a proper risk assessment, rather than as a substitute for such work.

At the June 2012 technical meeting (report not yet filed with the Review Board), the consultants for the Developers indicated that the next step in modelling diffuser effluent and resulting water quality would be to include all of Back Bay and Yellowknife Bay up to School Draw. At the request of AN, the consultants agreed to consult with the City of Yellowknife and extend the boundary for modelling up to the proposed water intake (approximately at the bottom of 48<sup>th</sup> Street).

The Developers have yet to conduct far-field water quality modelling to predict how the diffuser discharge will affect water quality in Back and Yellowknife bays. This is especially important for two reasons. The City of Yellowknife is investigating moving its municipal potable water intake from the Yellowknife River to Yellowknife Bay and is thus very concerned about any potential changes in water quality ([PR#386](#)). The Developers<sup>2</sup> have also refused to commit to pay for any incremental costs for municipal water treatment should there be any accidents, malfunctions or other discharges that might affect water quality ([PR#394](#), Response to Second Round AN IR#08, pg. 2). AN does not accept this response as demonstrating a cooperative approach with the City (see [PR#417](#), Table pg. 2).

AN is of the view that the Developers are unable to properly assess the aquatic effects of the diffuser operation on Back and Yellowknife bays. There is still the potential for significant adverse environmental effects and thus a measure is necessary to prevent this from happening.

***Recommendation to Review Board:***

**Measure 3--**To prevent significant adverse impacts from Giant Mine water effluent, the Developers need to do the following before any approval or construction:

- Complete far field water quality modelling to properly assess the effects of the diffuser and minewater effluent on water quality in Back and Yellowknife bays;
- Commit to pay for any incremental costs for municipal water treatment costs caused by the Development;
- Prepare a comprehensive aquatic effects monitoring program for the approval of regulatory authorities. Such a program should include an adaptive management or response framework where thresholds are identified and tied to specific actions for key contaminants of concern including arsenic.

## 5.3 Cover Design and Performance

### 5.3.1 Issue

#### [PR#116](#)—Terms of Reference

#### 2.1 Scope of Development

*Under section 117(1) of the MVRMA, the Review Board determined that the scope of development will consist of all the physical works and activities required to remediate Giant Mine, an abandoned gold mine that houses approximately 237,000 tonnes of arsenic trioxide in underground chambers. Should the proposed development be altered by the developer at any point in the environmental assessment, the Review Board may adjust the scope of development. ... The development as described below is consistent with the development description found in the Giant Mine Remediation Plan, submitted by the developer to the MVLWB, unless otherwise specified in this document. The Review Board has determined that the following list of physical works or activities will occur during the remediation process:*

- *Capping of tailings areas*

#### 3.2.4 Development Description

*The developer will provide a description of the development as it is being proposed. This section should not make any predictions or provide mitigative strategies for potential impacts that may arise from the works or activities described here. The use of diagrams, maps and other visual aids is encouraged.*

*The development description will, at a minimum, include the following elements:*

8. *A detailed description of the proposed method(s) and location(s) of tailings disposal and/or containment, including a description of any technologies or materials that may be used, and any temporary or permanent measures to control fugitive dust from tailings disposal areas*

#### 3.3 Arsenic Containment

*The central issue of the development is the disposition of 237,000 tonnes of arsenic trioxide stored in underground chambers at the Giant Mine. Every party to the assessment brought this issue forward at the scoping hearing as their main concern. The developer should ensure that its responses are as complete and clearly understandable as possible. The use of alternative visual representations of information, such as diagrams, maps and illustrations, is encouraged. The description of potential impacts and proposed mitigation for this section should include the following elements at a minimum:*

11. *A description of potential effects of the frozen block on the additional remediation elements, including potential impacts on surface hydrology, tailings ponds consolidation and tailings covers*

### 5.3.2 Developers' Conclusion

#### PR#139—Developer's Assessment Report

Table 8.8.2 Assessment of Potentially Adverse Effects on the Terrestrial Environment, pg. 8-69

*While the contouring/capping of tailings areas and sludge ponds will reduce the potential for surface water and groundwater contamination, terrestrial habitat will be eliminated in the process. Due to the potential for chemical exposures (e.g., to arsenic) such habitat is considered substandard and elimination of tailings and sludge management ponds is desirable. In addition, there is an abundance of superior habitat within the LSA. On this basis, the elimination of standing water is viewed as having a net positive effect on terrestrial habitat.*

*Although disturbances to existing habitat are inevitable, the magnitude of adverse effects can be lessened through appropriate mitigation. Potential approaches include the following:*

- *New borrow sources will only be used in situations where insufficient material is available from previously disturbed areas;*
- *Any disturbed areas will be revegetated and/or offset by naturalization activities in other areas;*
- *The Project Team will secure the input of government wildlife regulators and traditional knowledge holders during work schedule planning to ensure that remediation activities consider the presence and key life stage of resident species (e.g., muskrats and shorebirds);*
- *Re-naturalizing areas using indigenous species to encourage re-colonization; and*
- *Detailed habitat surveys of any areas that are to be disturbed to confirm that habitat for certain life stages (e.g., nesting) or for rare or endangered species, if present, will not be affected.*

*Residual Effects--Yes. Earthwork activities will result in surface disturbances that will adversely affect terrestrial habitat.*

*Is Further Consideration Required? When? No.*

Table 12.3.1 Evaluation of Adverse Residual Effects—nothing about tailings in this Table.

### 5.3.3 Alternatives North's Conclusion

AN does not accept the Developers' conclusion that there will be no significant adverse environmental effects. The Developers' conclusion of no significant adverse effects on air quality, the aquatic environment or human health cannot be reached without having completed objectives or design of the tailings covers.



### 5.3.4 Rationale and Recommendations

The Developers submitted a Giant Mine Tailings Cover Trials 2010 Data Summary, December 2010 ([PR#370](#)) in response to an undertaking sought by AN during the October 2011 Technical Sessions. This study appears to be measuring settlement of cover into the tailings, ground temperature and moisture content in an effort to better design a cover.

The lack of information in this progress report prompted AN to file a Second Round IR#26 and the response ([PR#394](#)) identified a number of tasks and schedule as follows:

The remaining tasks to be completed related to the cover trials include:

- Test pitting /field investigations to evaluate the performance of the test pads, including investigation of potential separation or migration of material between layers, the performance of the geotextile, and the moisture condition of the layers.
- The surface of the test pads will be evaluated annually for the development and extent of surface cracks and for the extent or type of any vegetation.
- Re-commissioning the instrumentation each spring (instrumentation would be left in place, but data loggers are removed for the winter season).
- Monitoring the instrumentation and surveying the test pads. Monitoring and surveying will continue until final design is complete or until the test pad trials provide no new information for the design.
- Development of a Re-vegetation Plan.

In terms of the schedule for remaining tasks to be completed related to the cover trials:

- Test pitting/field investigations to be completed in the summer of 2012;
- Evaluation of the surface of the test pads would be completed annually in the spring and fall of each year until final design is complete, starting in 2012;
- Re-installing instrumentation on the test pads in early spring of each year until final design is complete, starting in 2012;
- Surveying of the test pads – survey the pads monthly from June to October of each year starting in 2012 until final design is complete; and
- Monitoring of instrumentation in the test pads – automated data collection from May to October beginning in 2012 until final design is complete.
- Development of re-vegetation plan starting spring 2012 – multi-year program including field trials anticipated.

During the June 2012 technical meeting (summary not yet filed with the Review Board), AN noted that two of the four test plots for cover testing were completely submerged in the Northwest Tailings Pond. The submerged plots for the study have limited if any value and it is unclear whether the remaining two plots are sufficient for the purposes of the study. The Developers have committed to submitting further information about the purpose, objectives and design of the cover including revegetation. It is uncertain whether this new information will be submitted with enough time for the parties to review it before the public hearing.



AN remains concerned that there are no clear objectives for the cover design (e.g. water retention vs. water shedding, barrier vs. revegetation media). Without proper objectives or a design, it will not be possible to measure performance or determine the success of this mitigation measure. AN is of the view that a measure is necessary to prevent a potentially significant adverse environmental impact to the environment and human health from further wind-blown tailings and erosion into the aquatic environment.

***Recommendation to Review Board:***

**Measure 4--**To prevent significant adverse environmental effects related to exposure of wildlife or humans to arsenic in the tailings, the Developers submit the final cover design, objectives and performance criteria for approval by regulatory authorities prior to any construction of this part of the development.

**Measure 5--**To prevent significant adverse environmental effects related to exposure of wildlife or humans to arsenic in the tailings from wind-blown dust, the Developers prepare a comprehensive air quality monitoring program for the approval of regulatory authorities to test the performance of any tailings covers with regard to dust control. Such a program should include an adaptive management or response framework where thresholds are identified and tied to specific actions for key contaminants of concern including arsenic.

## 5.4 Environmental Management Plans

### 5.4.1 Issue

[PR#116](#)—Terms of Reference

### 3.6 Monitoring, Evaluation and Management

*The continued surveillance of the environment at and around the Giant Mine site was a source of interest for participants throughout the scoping phase of the environmental assessment. To address this concern the developer shall provide:*

- 1. A detailed description of the monitoring program proposed by the developer, including at a minimum a description of:*
  - a. A framework for effects monitoring, evaluation and management for all stages of the development*
  - b. Monitoring standards, methodologies and requirements for water quality, ground temperature, ecological effects and sediment contamination, and the effectiveness of mitigation and compensation measures*
  - c. Criteria for evaluating monitoring results, including triggers and thresholds for actions*
  - d. Internal management systems to ensure that results are properly assessed*
  - e. Plans for responding to unacceptable monitoring results through project management actions, and confidence in the adequacy of the management options available*
  - f. A description of any technology used in the implementation of the monitoring activities, and monitoring locations, frequency and duration*
  - g. A schedule of anticipated activities to implement the monitoring program*
  - h. Plans to periodically review of the efficacy of the proposed monitoring program and technologies used and a reevaluation of the goals and benchmarks of the monitoring program*
  - i. Plans to engage with local communities in the development, implementation and review of monitoring activities*
  - j. The anticipated lifespan of active monitoring activities*
  - k. Anticipated redundancies in the monitoring program*
- 2. An assessment of the ability of the monitoring program to adequately detect and identify small arsenic trioxide leakages from the frozen block*
- 3. An assessment of the ability of the monitoring program to adequately protect human health and safety and the integrity of the local ecosystem, with consideration given to the potential impact of a catastrophic malfunction*

#### 5.4.2 Developers' Conclusion

##### [PR#139](#)—Developer's Assessment Report

*s. 15.1 Conclusion-- The Project Team is of the opinion that the DAR has met the requirements of the Terms of Reference and that the DAR also reflects the principles and standard practices of environmental impact assessment, with the unique context of the Northwest Territories in mind.*

#### 5.4.3 Alternatives North's Conclusion

The DAR did not provide sufficient detail or a framework that laid out a clear path toward environmental management plans and monitoring programs that would satisfy AANDC's own Mine Site Reclamation Guidelines for the NWT ([PR#19](#)). Without proper environmental management systems based on sound environmental management plans and monitoring programs, there is no feedback loop to determine how to measure success, when to take further action and what that might be. Although progress has been made towards a proper set of environmental management plans through the ongoing work of the Environmental Management Working Group of which AN is a member, given our concerns raised above with regard to water quality and ice thinning in particular, we believe there is still potential for significant adverse environmental effects without appropriate measures made by the Review Board.

#### 5.4.4 Rationale and Recommendations

It has been a real struggle to have the Giant Mine Team recognize and at least for now, partially accept, AANDC's own mine closure and reclamation guidelines as the appropriate structure and organization for environmental management plans (see the discussion on environmental management that took place at the Technical Sessions, [PR#352](#) pg. 167-179; [PR#353](#) pg. 30-43 especially pg. 39-43).

Proper environmental management plans involve using mine components as the starting ~~to~~ point to develop closure objectives, measureable performance or closure criteria (measures of success), monitoring systems to track performance, triggers or thresholds for specific actions, and where there is uncertainty research and design work and a schedule to fill gaps. An Environmental Management Working Group has begun to develop a framework and identify priorities for environmental management plans.

For AN, the highest priority is a proper plan to measure the success, and develop triggers and action for contingencies for the frozen block storage of underground arsenic.

Without such environmental management plans, there is a very real potential for significant adverse environmental effects, particularly from accidents or malfunctions or simple poor performance of some parts of the GMRP that might go unmonitored or not acted upon. It is very important to AN that there be a collaborative process for developing thresholds and triggers or limits of acceptable change. We note that the Developers have committed to do so in the context of risk assessment ([PR#356](#) pg. 205-208) and wish that this be extended to environmental management plans.

***Recommendation to Review Board:***

**Measure 6--**To prevent significant adverse environmental effects related to accidents and malfunctions or non-performance of elements of the project resulting in arsenic releases to water or air, environmental management plans be approved by regulatory authorities prior to any construction of the project. Such plans to be developed based on mine components and contain the following elements:

- objectives;
- measureable performance or closure criteria (measures of success);
- monitoring systems to track performance;
- triggers or thresholds for specific actions; and
- research and design work and a schedule to fill gaps, where there is uncertainty.

The environmental management plans be developed collaboratively with interested parties as part of an overall Environmental Agreement (see Measure 11).

## 5.5 Independent Oversight

### 5.5.1 Issue

#### [PR#116](#)—Terms of Reference

#### 3.2.2 Developer

*Provide the following information:*

- 2. A discussion describing the relationship between the developer and its contractors and subcontractors with details as to how the developer will ensure that the contractors and subcontractors will be responsible for, and honour commitments made by, the developer*
- 4. A description of the relationship between the Government of the NWT and the developer as it pertains to the development, including a description of respective duties and obligations of the two organizations*

#### 3.2.6 Public Consultation

*The purpose of public consultation is to provide those individuals who may be affected by the development an opportunity to effectively participate in the environmental assessment. Although the developer in this case has held numerous public information sessions and workshops over the many years spent designing the development, one issue identified during the scoping phase of this environmental assessment was a lack of effective public consultation. This may be due to the complexity and volume of information presented by the developer, or the considerable length of time between the last concerted effort on consultation and the referral to environmental assessment. The Review Board needs a thorough understanding of the developer's efforts to consult with the public to consider whether potentially affected individuals have been able to participate in the process.*

*The following items are required for consideration of public consultation:*

- 2. Identify any plans, strategies or commitments that the developer is contemplating to ensure that individuals or groups that may be affected by the development will continue to be consulted over the term of this environmental assessment and over the life of the project.*
- 3. Describe the membership and activities of the Giant Mine Community Alliance.*
- 6. Describe any plans the developer has to continue public consultation and involvement during implementation of the project and afterwards, with particular regard to reporting monitoring results and adaptive management and a description of how public complaints will be addressed and the dispute resolution process.*

### 5.5.2 Developers' Conclusion

#### [PR#139](#)—Developer's Assessment Report

*s. 15.1 Conclusion-- The Project Team is of the opinion that the DAR has met the requirements of the Terms of Reference and that the DAR also reflects the principles and standard practices of environmental impact assessment, with the unique context of the Northwest Territories in mind. In preparing the DAR, the Project Team has...proposed a consultation and engagement strategy to respond to potential issues and concerns as the Project goes forward.*

### 5.5.3 Alternatives North’s Conclusion

AN recognizes that there has been considerable progress made in the Developers understanding of the concept of independent oversight and the positions of the parties in this regard. However, we remain very concerned that there will not be a firm commitment to achieve an acceptable form of oversight before the conclusion of the Environmental Assessment or perhaps even afterwards. We believe that the pressure for all parties to reach an agreement needs to continue, especially after the Environmental Assessment, as we view the Environmental Assessment as the primary reason there is any dialogue amongst the parties at all.

For AN, independent oversight is a critical and essential condition for the GRMP to move forward with any semblance of community acceptance. Without a suitable independent oversight body established through a legally binding Environmental Agreement (see s. 5.8 below), there is and will continue to be significant public concern with the GRMP.

### 5.5.4 Rationale and Recommendations

The DAR had this to say about AANDC’s roles and responsibilities with regard to the GMRP:

In addition to its role as Proponent, INAC [now known as AANDC] has a number of responsibilities that relate directly to the Giant Mine Remediation Project. These include:

- As the federal Minister responsible for the MVRMA, the Minister of INAC will consider the recommendation of the Review Board with the other responsible ministers concerning the EA for the Remediation Project. Further details on the process by which this will occur are provided in Section 2.6;
- Any “Type A” water licences required for the implementation of the Remediation Project will require the approval of the Minister of INAC; and
- Inspection and enforcement of any regulatory authorizations issued under the MVRMA (e.g., water licences) will be the responsibility of inspectors within INAC.

INAC has additional responsibilities that are indirectly relevant to the Remediation Project. For example, the Minister of INAC is responsible for the *Indian Act* and related requirements (e.g., Crown Consultation, land claim negotiation). The department also has responsibilities to promote Northern economic development and capacity building. ([PR#139](#), pg. 1-8 and 1-9)

Numerous IRs have been submitted about the conflicting roles and responsibilities of AANDC (see [PR#301](#) Response to Round One NSMA IR#01; [PR#309](#) Response to Round One AN IR#01; [not found on public registry] Response to YKDFN First Round IR#25; [PR#381](#) Second Round IR#21 and #22). This is evidence of persistent significant public concern with the multiple roles and responsibilities of the Developers.

The typical response from AANDC is shown below:

On an operational level, INAC employees are responsible for consulting with the INAC Minister on the Review Board's recommendations. This role is separated from the proponent role. INAC will document this process fully; and will be neutral in its approach so as not to fetter the INAC Minister's discretion. INAC will exercise its different roles in the Remediation Project in a manner that will meet the general principles of fairness, transparency and accountability.

These roles within INAC are structured to avoid conflict of interest, bias or apprehension of bias. This will be ensured by each branch of INAC fulfilling its legislative roles and acting in a transparent manner. As discussed in Chapter 13 of the DAR, The Project Team is committed to engaging the public and interested parties to explain INAC's roles and responsibilities, and how INAC will ensure fairness, transparency and accountability. ([PR#301](#), pg. 3)

When specifically asked by AN for any "written policies, directives or other guidance that has been provided to AANDC staff and managers regarding any separation of function and communications within the Department with regard to Giant Mine", AANDC responded as follows:

AANDC does not have any formal written policies or directives with regards to the separation of function and communications within the Department related to the Remediation Project. ([PR#394](#), Round Two IRs AN#21, pg. 2)

When there were delays in reporting an arsenic spill during the Freeze Optimization Study in October 2009 ([PR#120](#)), Kevin O'Reilly submitted a federal Access to Information request to try to determine what happened.

It took about 17 months to have the records disclosed but a sample is found in Appendix 3. The documents show a confused response and may reflect poor internal communications and coordination. More importantly, when the drilling operation to implement the Freeze Optimization Study was halted by an AANDC land use inspector until a full clean-up was conducted, the Giant Mine Remediation Team (including AANDC and Public Works and Government Services staff) became very concerned about having idle equipment at site at a cost of \$10,000 a day. The Giant Mine Remediation Team went above the AANDC land use inspector to the Regional Director General for AANDC in Yellowknife who then approved recommencement of the drilling before the AANDC land use inspector's order had been carried out.

We do not raise this example lightly and there is no intention to embarrass any of the individuals involved but there are clearly no internal checks on conflicting roles and responsibilities. This is a very troubling concrete example of how decisions may be made in the future, where project staff may go above or around inspection staff. To avoid further examples of this kind of decision-making and to reduce significant public concern, AN believes that the Review Board

should make a measure requiring clearer separation of roles and responsibilities within AANDC for the GMRP.

***Recommendation to Review Board:***

**Measure 7--**To reduce and avoid significant public concern, AANDC develop clear written guidelines for its employees who perform various functions with regard to Giant Mine including project management, inspections and technical advice, so as to avoid real and perceived conflicts of interest. The guidelines should be publicly available within six months of the government response to this Report of Environmental Assessment.

AN notes that several long-term employees with the Giant Mine Remediation Team have left the project in the last several months. We are also aware that the Giant Mine Remediation office within AANDC is short-staffed. Given the above and the numerous delays in this ongoing Environmental Assessment caused by the Developers, we question if there is a lack of capacity to properly engage in this Environmental Assessment and with the community.

At the recent June 2012 technical meeting, along with the YKDFN, we requested an organizational chart be filed before the public hearing for the Giant Mine Remediation Team both now and for the perpetual care phase of the GMRP (unfiled summary of the June 2012 technical meeting). We have the strong impression that authority and capacity for implementation of the GMRP have shifted dramatically from Yellowknife to Ottawa over the last year.

AN is concerned that a shift of authority and capacity away from Yellowknife will lead to an even less responsive approach to the GMRP (see s. 4.0 Public Concern above). We do not think it appropriate that a measure be required for a structure or organization to be based in Yellowknife, a suggestion by the Review Board on this matter has been recommended below.

***Recommendation to Review Board:***

**Suggestion 3--**AANDC should develop a management team and structure for implementation of the Giant Mine Remediation Plan with authority and technical support located in Yellowknife so as to increase accountability, transparency, responsiveness and build local confidence.

Rather than attempt to repeat the arguments in favour of oversight, the independent report by Dr. Natasha Affolder of the Faculty of Law, University of British Columbia provides an excellent overview and comparison of numerous environmental oversight bodies and the legal framework for same ([PR#185](#)). A short quote provides a helpful overview and rationale as to why independent oversight is needed for Giant Mine:

A key theme to emerge from this study is that independent oversight bodies fulfill multiple roles. The oversight bodies discussed in this report reveal a tension between two of these key roles: 1) serving as a conduit for communication between the



public, project proponent and regulators, and 2) providing rigorous technical oversight of the monitoring process. The ability of an oversight agency to discharge these mandates will depend on a number of factors including its legal basis, the security of its tenure, the adequacy of its funding, its access to information, obligations on the regulator to respond to its recommendations, and the calibre of respect between regulator and oversight body. A further tension to be balanced is between securing independence of overseers, while ensuring that these “eyes and ears” have sufficient knowledge of the project and the community.

Given the strong concerns with conflicting roles and responsibilities for the Developers on the part of the Aboriginal and non-governmental parties, independent oversight appears to be a logical approach.

The March 2012 workshop organized by AN with the support of YKDFN and the Developers provides further rationale for independent oversight for the GMRP ([PR#411](#)). The fact that all the parties got together to discuss the concept and then continue to work together is quite remarkable ([PR#434](#)) and one of the collateral benefits of this Environmental Assessment.

The NWT has some successful examples and experiences with independent oversight based on the diamond mines. This has certainly raised the bar for both the private sector and government. What the governments decided was necessary for the diamond mines provides a perfect match for the GMRP. Uncertainty over commitments, public concern, need for better coordination and a lack of confidence in public government’s capacity and willingness to regulate, all led to legally binding Environmental Agreements for the diamond mines. AN is of the view that the same sort of rationale exists for the GMRP and that as part of the measures to reduce significant public concern, independent oversight is crucial requirement for the Development to move ahead.

***Recommendation to Review Board:***

**Measure 8--**To reduce and avoid significant public concern, a mutually agreeable public oversight body for the Giant Mine be established before the project proceeds (see Measure 11).

## 5.6 Need for On-going Research and Development into a Permanent Solution

### 5.6.1 Issue

[PR#116](#)—Terms of Reference

#### 3.2.2 Developer

*Provide the following information:*

5. *A description of project feasibility including financial feasibility. Include discussion of funding certainty for the development and related monitoring*

#### 3.3 Arsenic Containment

*The description of potential impacts and proposed mitigation for this section should include the following elements at a minimum:*

3. *A discussion of whether the frozen block method will protect the biophysical environment and the health and well-being of the human residents living nearby to the Giant Mine for as long as the contaminated materials persist at the site*
4. *A discussion of whether the developer contemplated a reconsideration of the frozen block method should a technological advance or change in the environment make it either necessary or advantageous to do so*
5. *A discussion whether the developer contemplated assigning resources to make it possible to periodically review the questions posed above (s. 3.3 #5)*

#### 3.6 Monitoring, Evaluation and Management

*The continued surveillance of the environment at and around the Giant Mine site was a source of interest for participants throughout the scoping phase of the environmental assessment. To address this concern the developer shall provide:*

- h. *Plans to periodically review of the efficacy of the proposed monitoring program and technologies used and a reevaluation of the goals and benchmarks of the monitoring program*

### 5.6.2 Developers' Conclusion

[PR#139](#)—Developer's Assessment Report

#### s.6.2.2 Future Re-Consideration of Alternatives

***The question of future re-consideration of alternatives for managing the arsenic trioxide dust was raised many times during the initial review process.***

*In theory, more attractive alternatives could present themselves in the future. However, INAC and the GNWT believe that the assessment of currently available alternatives has been exhaustive, and that the patterns that became apparent from that work show that it is unlikely that markedly superior alternatives will be identified. Specifically, the assessment included all currently available methods, even those in the early stages of research, and found nothing that had future promise. Furthermore, the assessed alternatives included examples of all conceivable*

*classes of options. Where entire classes of options have been shown to be deficient, the conclusion will hold even if the future brings improvements in particular methods.*

*It should also be recognized that, once the proposed alternative is implemented, long-term risks will be reduced to levels such that it will be difficult to justify the costs and increased short-term risks associated with implementing a completely different alternative. In other words, the successful implementation of the frozen block method will significantly raise the thresholds by which any other alternative will be assessed.*

***For all of these reasons, INAC and GNWT view the frozen block method as the long-term solution for Giant Mine arsenic trioxide, rather than as a temporary measure. The Project Team remains open to improvements in the frozen block method, and will re-evaluate alternatives if technologies advance or if monitoring data indicate unforeseen emerging risks to the environment and/or humans. However, there is no intention of turning the proposed remediation into a long-term search for “something better.” [emphasis added]***

*s. 15.1 Conclusion-- The Project Team is of the opinion that the DAR has met the requirements of the Terms of Reference and that the DAR also reflects the principles and standard practices of environmental impact assessment, with the unique context of the Northwest Territories in mind.*

### 5.6.3 Alternatives North’s Conclusion

AN has already discussed the public concern surrounding the perpetual care nature of the frozen block method for the GMRP in s. 4.0 above. Although we have noted a small shift in the Developers’ position to a ten-year review of new technologies or alternatives, this does not indicate that there will be any active research and development into more permanent solutions. Clearly this is simply pushing off responsibility to future generations and is not consistent with sustainable development or the polluter pay principle. The onus is shifted from the Developers to the community over the long-term, essentially forever.

AN is of the view that significant public concern with and doubts about the GMRP will remain without a clear plan and financial commitment aimed at finding a better solution that minimizes perpetual care requirements.

### 5.6.4 Rationale and Recommendations

As the Developers<sup>2</sup> themselves acknowledge, the issue of the need to periodically reconsider or research alternatives has been raised for years as part of the planning for remediation of the Giant Mine. When AN raised the issue of whether there was any intention to initiate or fund active research and development in the First Round of IRs ([PR#219](#)), the Developers responded as follows:

The DAR also notes (Section 6.2.2.4) that INAC and the GNWT remain open to considering alternative emerging technologies in the future. The intention is to review advances in technologies rather than fund active research through the remediation project. Technology reviews and evaluations will be conducted as an

element of the Giant Mine Remediation Project Adaptive Management Plan (AMP) which is currently under development.

When the Review Board basically asked the same question ([PR#210](#)), the response was as follows:

The Project Team is proposing that a review of emergent technologies be conducted every 10 years following full implementation of the Frozen Block Method, and that the result of the reviews be reported in the State of the Environment Report for that year.

How the 10-year review might be conducted and whether it would be done now that the initial evaluation of alternatives took place almost ten years ago, was the subject of some discussion at the October 2011 Technical Sessions ([PR#352](#) pg. 241-245). The Developers indicated that clock only starts ticking for a 10-year review after the GMRP is approved. AN is also seeking a firm commitment for a more collaborative approach to a technology review or re-consideration of alternatives in contrast to the approach taken during the development of the original Remediation Plan (see s. 4.0 on Public Concern above).

AN is of the strong view that the Developers need to begin to characterize the GMRP as an interim solution. As the proposed alternative for managing the underground arsenic requires perpetual care, this needs to go hand-in-hand with a firm commit to an active, funded and ongoing research and development program. Without an adequate plan for perpetual care and management, including active research and development into a more permanent solution, the GMRP is simply unacceptable to the community. Significant public concern remains over the lack of a commitment by the Developers to an active, funded and collaborative research and development program into more permanent solutions that minimize perpetual care requirements. In our view the best way to ensure that a research plan is developed and funded is to make it, part of a legally binding Giant Mine Environmental Agreement (see s. 5.8).

***Recommendation to Review Board:***

**Measure 9--**To prevent significant adverse environmental effects related to accidents or malfunctions and resulting emissions of arsenic to the environment, and to reduce and avoid significant public concern, a research and development plan be developed collaboratively amongst the parties to investigate a more permanent solution (one that minimizes perpetual requirements for Giant Mine) for the underground arsenic within a year of the government response to this Report of Environmental Assessment. AANDC and GNWT shall fund the tasks and activities to carry out the plan. This plan will be part of an Environmental Agreement for Giant Mine (see Measure 11), and subject to regular review and public reporting.

## 5.7 Perpetual Care Planning and Management

### 5.7.1 Issue

#### [PR#116](#)—Terms of Reference

##### 3.1.4 Key Lines of Inquiry

*Key lines of inquiry are the subjects that require the most attention during the environmental assessment and the most rigorous analysis and detail in the DAR. Key lines of inquiry are identified by the Board to ensure a comprehensive, detailed analysis of the issues that resulted in public concern about the proposed development during the scoping phase.*

*The Key lines of inquiry for this environmental assessment are:*

- *Any issues related to arsenic trioxide (including its containment for an indefinite period underground and its contamination of the receiving environment)*
- ***Questions related to monitoring and maintenance activities at the Giant Mine after the active freezing stage***

##### 3.2.2 Developer

*Provide the following information:*

5. ***A description of project feasibility including financial feasibility. Include discussion of funding certainty for the development and related monitoring***

##### 3.2.4 Development Description

*The development description will, at a minimum, include the following elements:*

14. ***Estimated capital, operating, monitoring and maintenance costs (the latter presented by year for the life of the development)***
15. *The estimated lifespan of the development broken down into construction, active operations and ongoing maintenance; and monitoring*
16. ***The number of person years of work associated with the development, broken down by life cycle stage***

##### 3.3 Arsenic Containment

*The description of potential impacts and proposed mitigation for this section should include the following elements at a minimum:*

3. *A discussion of whether the frozen block method will protect the biophysical environment and the health and well-being of the human residents living nearby to the Giant Mine **for as long as the contaminated materials persist at the site** [emphasis added]*

### 5.7.2 Developers' Conclusion

#### [PR#139](#)—Developer's Assessment Report

##### s. 14.2 Long-term Environmental Monitoring

*The Giant Mine Remediation Project has been designed to minimize the potential for environmental impacts associated with current site risks. While some risks can be eliminated,*

*others will remain on site indefinitely and will require long-term management (e.g., arsenic trioxide stored in underground chambers). To ensure the effectiveness of efforts to manage these risks, and to ensure that the Remediation Project does not contribute additional significant environmental effects, a long-term monitoring program will be required. Such a program will evaluate both the physical performance of remediation infrastructure (e.g., tailings covers) and environmental quality (e.g. surface water quality) in the Site and Local Study Areas.*

...

*While the requirements of and reporting for many parameters of long-term monitoring will be governed by the water licence, the following two levels of reporting are proposed for data collected throughout the Long-term Environmental Monitoring Program. Ultimately, monitoring and reporting will be adjusted to meet the requirements of the water licence:*

- Annual Report(s) - prepared annually to summarize and review all operational and environmental data collected in the 1-year reporting period; and,*
- Status of the Environment (SOE) Reports - prepared every three years during the initial 15-year remediation period and every five years thereafter, to summarize, review and interpret the operational and environmental data collected in the reporting period and to provide recommendations for modifications to the monitoring program or site operations that may be affecting environmental quality.*

*s. 15.1 Conclusion-- The Project Team is of the opinion that the DAR has met the requirements of the Terms of Reference and that the DAR also reflects the principles and standard practices of environmental impact assessment, with the unique context of the Northwest Territories in mind.*

### 5.7.3 Alternatives North's Conclusion

AN recognizes that perpetual care will be required at Giant Mine regardless of the remediation options or alternatives selected and implemented. For example, water treatment will be required for many, many years. While we disagree with the Developer's<sup>2</sup> assessment of whether all reasonable means have been taken to minimize perpetual care requirements, we do not agree that the GMRP should proceed without a comprehensive perpetual care plan. Although we have consistently raised the issue of perpetual care, little progress has been made and significant public concern remains very strong. While extraordinary engineering and design work has been invested in building technological redundancies and contingencies, little has been done on developing social and institutional mechanisms and plans for perpetual care and management of the site. Given the perpetual care requirements of the GMRP, it is unacceptable for it to proceed without a binding measure for a comprehensive perpetual care plan

### 5.7.4 Rationale and Recommendations

Given the Terms of Reference for this Environmental Assessment, perpetual care is a central theme and one of the most important issues for AN and many residents of the community. The issue was raised during the Preliminary Screening ([PR#29](#)) in February 2008 by Kevin O'Reilly:

**1. The Plan does not adequately reflect the need to minimize perpetual care requirements.**



In my view, the driving principle in developing the Remediation Plan was to minimize costs with some balancing of environmental and human health costs. There was little effort to ensure that the knowledge, technology and capacity exists far into the future, in theory forever, to adequately contain the arsenic trioxide.

To improve our collective understanding of perpetual care, as its first piece of substantive work using AANDC participant funding, AN commissioned Joan Kuyek to conduct a review of case studies and lessons learned from perpetual care situations and sites around the world ([PR# 333](#)). This important contribution culminated in a joint workshop sponsored and organized by AN and the YKDFN held in September 2011 (the workshop report is found at [PR#362](#)). It would be fair to say that this workshop was a turning point in beginning to build better working relationships amongst the parties.

AN also commissioned a report on the principles of perpetual care by Carolyn Raffensperger with the Science and Environmental Health Network ([PR#395](#)). She proposed five principles that can serve as an evaluative framework for the currently proposed approaches and commitments made for perpetual care for the GMRP. Each principle is listed below followed by brief comments from AN:

#### *1. Responsibility to Future Generations*

AN does not believe that the current efforts towards perpetual care planning for the GMRP demonstrate a responsibility to future generations as they fall far short of best practices (see the discussion below for our analysis).

#### *2. Protection of “the Commons”*

Our preventative framework for mining closure and reclamation is still inadequate and ranks low compared to most other jurisdictions (see s. 4.4 and Suggestion 1).

#### *3. Free, Prior, and Informed Participation and Consent*

There is no clear indication of free, prior and informed participation and consent for the GMRP (see s. 4 above for our analysis).

#### *4. Precautionary Principle*

AN is of the view that much more work is needed, including a measure, on environmental management plans (see s. 5.4 above).

#### *5. Nature as Guide*

AN believes that much more can and should be done to properly consider the long-term remediation options for various mine components to reduce or eliminate perpetual care requirements and to work with natural processes rather than rely on engineered structures and solutions. Some initial thoughts on this are shown in Table 1. We compare the general

remediation options selected for Giant Mine and what remediation might start to look like over the long-term, once immediate priorities are dealt with and assuming efforts are directed at minimizing perpetual care requirements for future generations.

**Table 1. Giant Mine Remediation vs. Long-Term Remediation to Minimize Perpetual Care**

<b>Mine Component or Feature</b>	<b>GMRP Remediation</b>	<b>Long-Term Remediation to Minimize Perpetual Care</b>
Arsenic Storage Chamber Underground	Freeze in place forever	No need for permanent containment--removal and reprocess into a less toxic form or in-situ treatment
Tailings Areas	Drain, grade and engineered cover	No need for cover (no inspection and maintenance), removal and use as backfill
Baker Creek	Temporary measures to prevent overtop during frozen block implementation	Remove long-term risk of arsenic chambers being flooded or eroded if there is uncontrolled thawing, permanent North Diversion by rerouting drainage away from the site (no need for continued monitoring of Baker Creek, sediment transport reduced or eliminated)
Open Pits	Fencing and berms	Backfill, sloping of edges and reflooding (no need for fencing and maintenance)
Water Treatment	New water treatment plant and diffuser into Back Bay	Reduce treatment requirements Source removal? Biological or in-situ treatment? Stop or reduce infiltration (North Diversion)?
Buildings and Infrastructure	Demolition, toxic goes to frozen block or as frozen backfill, hazardous and non-hazardous landfilled on site	Recycling and reprocessing of all toxic, hazardous and non-hazardous material—nothing left on site
Contaminated Soils	Excavate and landfill or barrier containment	Removal and treatment to reduce or eliminate maintenance and monitoring

Proper perpetual care planning and management generally should include the following:

- proper record management and preservation;
- site designation and land use controls;
- long-term funding;
- communicating with future generations;
- transitioning of site from active remediation to perpetual care;
- scenario-building and planning; and
- a comprehensive perpetual care plan.



Table 2 provides a review of the perpetual care approaches and commitments made by the Developers during the course of this Environmental Assessment versus the best practices and lessons learned as revised by Joan Kuyek ([PR#333](#)) and from AN's own research. It is obvious that the current approaches and commitments made by the Developers fall far short.

AN does not blame the Developers for this deficiency as there is a lack of a policy framework at the national level as referenced in the Pembina Institute report on long-term funding options for perpetual care ([PR#421](#) pg. 15). The next stage, Phase 3, of the Federal Contaminated Sites Action Plan is apparently is to focus on long-term monitoring and care of remediated sites. The lack of a policy framework for perpetual care of federal contaminated sites in Canada was drawn to the attention of Canada's Commissioner of the Environment and Sustainable Development by AN ([PR#433](#)). Giant Mine could serve as a model of how to do perpetual care planning and management if we can get it right and work together.

***Recommendation to Review Board:***

**Suggestion 4**—Environment Canada as the lead agency on the Federal Contaminated Sites Action Program should develop a policy framework and guidance for the perpetual care and management of remediated contaminated sites. Giant Mine should serve as a case study and model of how proper perpetual care planning can be conducted with community involvement and the full implementation of the measures recommended from this Environmental Assessment.

To conclude, AN believes there has been insufficient progress on perpetual care planning for the Giant Mine. We recognize that perpetual care is inevitable but remain very concerned that there is little evidence of any clear ideas or commitments from the Developers for such long-term stewardship. In the absence of a perpetual care plan or even a commitment to prepare one, it would be unwise to proceed with the GMRP. This is a source of significant public concern and a strong measure from the Review Board is required to begin to reduce public concern and prevent adverse environmental effects from accidents, malfunctions and the tendency for human societies to forget over long periods of time.

**Table 2. Comparison of Giant Mine Perpetual Care Approaches and Commitments vs. Best Practices and Lessons Learned**

<b>Perpetual Care Plan Component</b>	<b>Giant Mine--Based on DAR, IR responses, Technical Session (Oct. 2011), technical meeting (June 2012)</b>	<b>Best Practices and Lessons Learned</b>
Records Management and Preservation	<ul style="list-style-type: none"> <li>• Internal database system, not disclosed</li> <li>• No detailed overall inventory of records (one page summary provided) (PR#217 attachment [not on the PR])</li> <li>• No commitment to prepare and make publicly available a detailed inventory or actual records other than through Access to Information and Privacy legislation (PR#316)</li> <li>• Some sort of digitization of records underway but scope and schedule not disclosed (PR#352 pg. 167-175)</li> <li>• Commitment to deposit project records with the Library and Archives Canada (Ottawa) but not discussed with institution (PR#309, Round Two Review Board IR#07, pg. 2; and discussion at the June 2012 technical meeting as yet unfiled with the Review board)</li> <li>• No long-term plan for records preservation or public access</li> <li>• Could be covered in an Environmental Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 43-44) on Hanford where extensive efforts made in light of a 'cover-up', virtually all records disclosed and now available on-line</li> <li>• France had decided to make two complete sets of records on acid-free paper to be kept at site and at the National Archives, detailed summary report distributed throughout France (<a href="#">PR#451</a>)</li> </ul>
Site Designation and Land Use Controls	<ul style="list-style-type: none"> <li>• No plan, commitment to discuss with the City (PR#394, Round Two AN IR#11)</li> <li>• No analysis of various tools or options for site designation or land use controls (PR#394, Round Two AN IR#11)</li> <li>• Could be covered in an Environmental Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 45) on Hanford where interpretive centres have been established</li> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 27) Superfund sites have well developed institutional control programs</li> <li>• Avens Associates report on site designation options for Giant (<a href="#">PR#415</a>)</li> </ul>

Perpetual Care Plan Component	Giant Mine--Based on DAR, IR responses, Technical Session (Oct. 2011), technical meeting (June 2012)	Best Practices and Lessons Learned
Long-Term Funding	<ul style="list-style-type: none"> <li>• Vague commitment to possibly review before perpetual care phase (PR#434, Review Board IR#3)</li> <li>• Regular federal funding system is reliable and has a proven track record (PR#434, Review Board IR#3)</li> <li>• Did not acknowledge the Pembina Institute report on long-term funding options for perpetual care (PR#436)</li> <li>• Could be covered in an Environmental Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 38-40) on Hanford where work has been done on long-term funding option including trusts</li> <li>• Pembina Institute report on long-term funding options for perpetual care outlines some current examples of such arrangements within the federal system (<a href="#">PR#421</a>)</li> <li>• Other examples of frameworks or examples of long-term funding for nuclear waste management sites (<a href="#">PR#443</a>, <a href="#">449</a>, <a href="#">450</a>, <a href="#">454</a>)</li> </ul>
Communicating with Future Generations	<ul style="list-style-type: none"> <li>• No plans for signage, monuments or symbols at site (nothing in DAR or on public registry)</li> <li>• Could be covered in an Environmental Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 45) on Hanford where interpretive centres have been established</li> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 101-107) on Western Isolation Pilot Plant where extensive research and planning has been done in terms of site markers and symbols</li> <li>• The film “Into Eternity” shows how Finland is struggling with how to communicate with future generations around nuclear waste management (<a href="#">PR#420</a>).</li> </ul>
Transition Plan	<ul style="list-style-type: none"> <li>• No transition plan prepared and no commitment to prepare one (nothing in DAR or on public registry)</li> <li>• Could be covered in an Environmental Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 25-28) on Superfund sites where extensive planning is done including transfer and transition of sites to other owners</li> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 35-36) on Hanford where extensive planning has been done to transition the site from active remediation to long-term stewardship</li> <li>• Hanford Long-Term Stewardship Plan (<a href="#">PR#428</a>)</li> </ul>

Perpetual Care Plan Component	Giant Mine--Based on DAR, IR responses, Technical Session (Oct. 2011), technical meeting (June 2012)	Best Practices and Lessons Learned
Scenario Building and Planning	<ul style="list-style-type: none"> <li>• FMECA (Failure Modes Effects Criticality Analysis) limited to a 100-year timeframe (PR#372)</li> <li>• No development or analysis of long-term events such as glaciations, shoreline change, collapse of central government (discussion at the June 2012 technical meeting as yet unfiled with the Review board)</li> <li>• Could be covered in an Environmental Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Kuyek Report (<a href="#">PR#333</a>, pg. 104-107) on Waste Isolation Pilot Project where a multi-stakeholder and expert Futures Panel has developed comprehensive scenarios and modelling</li> <li>• France went through a national debate on nuclear waste disposal where reversibility emerged as the priority and this has been institutionalized in legislation where a minimum 100-year reversibility is a mandatory design criterion (<a href="#">PR#449</a>, <a href="#">450</a>, <a href="#">452</a>)</li> <li>• UK nuclear waste management planning has involved extensive modelling and scenario analysis (<a href="#">PR#444</a> and <a href="#">445</a>)</li> <li>• The Deep Geological Repository Panel (for a site at Kincardine, Ontario) has required the consideration of glaciation and shoreline change (<a href="#">PR#441</a> and <a href="#">442</a>)</li> </ul>

Perpetual Care Plan Component	Giant Mine--Based on DAR, IR responses, Technical Session (Oct. 2011), technical meeting (June 2012)	Best Practices and Lessons Learned
Comprehensive Perpetual Care Plan	<ul style="list-style-type: none"> <li>• No outline or plan</li> <li>• Vague commitment to examine lessons learned from nuclear waste management, but no commitment to prepare such a plan or a timeline for one (PR#309, Round Two Review Board IR#07, pg. 3)</li> <li>• Could be covered in an Environmental Agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Best examples and practices appear to be from nuclear waste management and nuclear waste site remediation</li> <li>• Hanford Long-Term Stewardship Plan (<a href="#">PR#428</a>)</li> <li>• France went through a national debate on nuclear waste disposal where reversibility emerged as the priority and this has been institutionalized in legislation where a minimum 100-year reversibility is a mandatory design criterion (<a href="#">PR#449</a>, <a href="#">450</a>, <a href="#">452</a>)</li> <li>• UK nuclear waste management planning has involved extensive modelling and scenario analysis (<a href="#">PR#444</a> and <a href="#">445</a>)</li> <li>• The Deep Geological Repository Panel (for a site at Kincardine, Ontario) has required the consideration of glaciation and shoreline change (<a href="#">PR#441</a> and <a href="#">442</a>)</li> </ul>

***Recommendation to Review Board:***

**Measure 10--**To prevent significant adverse environmental effects related to accidents or malfunctions and resulting emissions of arsenic to the environment, and to reduce and avoid significant public concern, a perpetual care plan be developed collaboratively amongst the parties in the Oversight Working Group within a year of the government response to the Review Board EA report. This plan will be part of an Environmental Agreement for Giant Mine (see Measure 11). The Plan will build on lessons learned from waste management in other locations and apply best practices. The Plan shall contain provisions for the following:

- A comprehensive inventory of historical and project related records and a records management and preservation system including full public disclosure;
- An assessment and selection of appropriate land use controls and site designations;
- Long-term funding options for perpetual care of the site;
- Communicating with future generations including signage, monuments, symbols or other culturally-appropriate means of communications suggested by the YKDFN;
- Building possible future scenarios that include;
  - o inadvertent or purposeful human intrusion into the underground workings and arsenic storage chambers,
  - o collapse or transition of central government authority, and
  - o long-term but high consequence events such as glaciations or shoreline change;
- Transition planning for the change of the site from active remediation to passive care and maintenance.

## 5.8 A Giant Mine Environmental Agreement

### 5.8.1 Issue

[PR#116](#)—*Terms of Reference*

#### 3.2.6 Public Consultation

*The purpose of public consultation is to provide those individuals who may be affected by the development an opportunity to effectively participate in the environmental assessment.*

*The following items are required for consideration of public consultation:*

- 2. Identify any plans, strategies or commitments that the developer is contemplating to ensure that individuals or groups that may be affected by the development will continue to be consulted over the term of this environmental assessment and over the life of the project.*
- 6. Describe any plans the developer has to continue public consultation and involvement during implementation of the project and afterwards, with particular regard to reporting monitoring results and adaptive management and a description of how public complaints will be addressed and the dispute resolution process.*

### 5.8.2 Developers' Conclusion

[PR#139](#)—*Developer's Assessment Report*

*s. 15.1 Conclusion--The Project Team is of the opinion that the DAR has met the requirements of the Terms of Reference and that the DAR also reflects the principles and standard practices of environmental impact assessment, with the unique context of the Northwest Territories in mind. In preparing the DAR, the Project Team has...proposed a consultation and engagement strategy to respond to potential issues and concerns as the Project goes forward.*

### 5.8.3 Alternatives North's Conclusion

The Oversight Working Group has made significant progress towards an understanding of what may be required to form and implement an agreement for oversight and many other features such as public reporting, further research, access to information and more. While we are very pleased that this important work is finally underway, we remain very concerned that an agreement will not be reached without further guidance and pressure from the Review Board.

### 5.8.4 Rationale and Recommendations

In our view, an Environmental Agreement can be the mechanism to bring together a number of commitments made by the Developers and to being to address the significant public concern around the GRMP as outline in above:

- s. 4.0 Public Concern;
- s. 5.4 Environmental Management Plans;
- s. 5.5 Independent Oversight;

- s. 5.6 Need for On-going Research and Development into a Permanent Solution; and
- s. 5.7 Perpetual Care Planning and Management.

An Environmental Agreement is really about building better relationships and defining roles and responsibilities in a collaborative way. A Giant Mine Environmental Agreement should be seen and considered as a package of mutually reinforcing commitments and measures to build confidence, accountability, transparency and trust. The Ekati Environmental Agreement ([PR#20](#) and [411](#)) can and should serve as very helpful model.

AN is also aware that there will likely be no way to require financial security for the GMRP so a binding Environmental Agreement serves a similar purpose in backstopping and building public confidence that the GMRP will be carried out as approved but with the additional measures required to begin to satisfy significant public concern.

Without a mutually agreeable Giant Mine Environmental Agreement it is difficult to see how the Development can move ahead without there being significant public concern. We strongly urge the Review Board to make the recommendation below, keep the pressure on the Oversight Working Group and allow us to finish our work but provide some strong incentives for us to reach agreement.

***Recommendation to Review Board:***

**Measure 11--**In the event that an agreement-in-principle for a legally binding Environmental Agreement is not concluded by the current members of the Oversight Working Group prior to the public hearing, and to prevent significant adverse environmental effects related to accidents or malfunctions and resulting emissions of arsenic to the environment, and to reduce and avoid significant public concern, the parties to the Environmental Assessment conclude an Environmental Agreement within 90 days of the government response to the Report of Environmental Assessment. In the event such an Agreement is not reached, the parties should enter into mediation and if necessary, a binding arbitration to secure such an Agreement before the project proceeds.

An Environmental Agreement for the Giant Mine shall provide for the following:

- An independent oversight body made of appointees from the current members to the Oversight Working Group with a clear advisory mandate, public reporting, and adequate funding from the Developers for the duration of the project;
- Public reporting by the developers on environmental matters including environmental effects and trends, project performance and adaptive management;
- Ability to receive project information without recourse to formal Access to Information and Privacy processes;
- Environmental management plans and monitoring programs that meet or exceed ANDC's own policies and guidelines including adaptive management, performance criteria, triggers and thresholds for specific actions;
- A perpetual care plan (as outlined in Measure 10);
- On-going research and development program and public reporting into a permanent solution to the arsenic trioxide to be stored underground;
- A step-wise, binding dispute resolution process; and
- A regular review and process for amending the Agreement with the consent of all the parties.



## 6.0 CONCLUSIONS

### 6.1 Outstanding Information Request Issues

IR issues constraining the technical review are identified as follows:

- The table in the March 8, 2012 AN shows which Round Two IRs were not answered in our view ([PR#417](#)); and
- The June 18, 2012 AN letter sent to the Review Board on the Developers response to IR#3 on long-term funding where various issues are raised ([PR#436](#))

### 6.2 Process Observations

The collateral benefits of the Environmental Assessment included the need for all the parties to be together in the same place, at the same time, such that better working relationship have begun to emerge with some small progress on building public confidence. The time taken for the Environmental Assessment has also allowed the Developers to better refine and design aspects of the GMRP that were only conceptual at best.

AN is concerned that the Developers, as Responsible Ministers, have all the authority and can proceed in whatever manner they wish with the GMRP, including exemption of the entire project using emergency powers under s. 119 of the *MVRMA*.

A very troubling precedent on the post-Environmental Assessment process was set with the Mackenzie Gas Project Joint Review Panel where the governments attempted to keep the consult-to-modify process secret. The governments also responded to most of the recommendations with “accept the intent” which is not one of the options allowed under s. 130(1)(b)(ii) of the *MVRMA*.

We request that the Review Board take a strong stand against any significant modification of its recommended measures for this Environmental Assessment, consistent with its own June 2005 Reference Bulletin [\*Procedures for Post Report of EA or EIR Consultation by the Federal Minister and the Responsible Ministers or a Designated Regulatory Agency\*](#). Significant modification of recommended measures is actually rejection and automatically leads to an Environmental Impact Review of the GMRP.

### 6.3 Summary of Recommendations

Measures are required conditions to avoid or reduce significant environmental impacts from the GMRP as proposed, or to reduce significant public concern with the GMRP as proposed. Suggestions are non-binding recommendations or advice.

**Measure 1**--To reduce significant public concern with the development and to build better working relationships, trust and public confidence, AANDC will work collaboratively with YKDFN and others in Yellowknife, to make a formal apology for the environmental and social legacy of the Giant Mine. A healing process and/or programs and a ceremony should be

considered as part of an apology. There should be negotiated compensation to the YKDFN for the impacts of the Giant Mine on its citizens and traditional territory.

**Measure 2--**To prevent significant adverse impacts on winter users of Back Bay as a result of ice thinning caused by diffuser effluent discharges, the Developers need to do the following before any approval or construction:

- Complete thermal modelling and field tests for the potential to cause ice thinning on Back Bay;
- Prove to the satisfaction of regulatory authorities that a diffuser can be designed in such a way as to not thin ice on Bay Bay; and
- Prepare an ice thickness monitoring program for the approval of regulatory authorities that includes public reporting of the results.

**Measure 3--**To prevent significant adverse impacts from Giant Mine water effluent, the Developers need to do the following before any approval or construction:

- Complete far field water quality modelling to properly assess the effects of the diffuser and minewater effluent on water quality in Back and Yellowknife bays;
- Commit to pay for any incremental costs for municipal water treatment costs caused by the Development;
- Prepare a comprehensive aquatic effects monitoring program for the approval of regulatory authorities. Such a program should include an adaptive management or response framework where thresholds are identified and tied to specific actions for key contaminants of concern including arsenic.

**Measure 4--**To prevent significant adverse environmental effects related to exposure of wildlife or humans to arsenic in the tailings, the Developers submit the final cover design, objectives and performance criteria for approval by regulatory authorities prior to any construction of this part of the development.

**Measure 5--**To prevent significant adverse environmental effects related to exposure of wildlife or humans to arsenic in the tailings from wind-blown dust, the Developers prepare a comprehensive air quality monitoring program for the approval of regulatory authorities to test the performance of any tailings covers with regard to dust control. Such a program should include an adaptive management or response framework where thresholds are identified and tied to specific actions for key contaminants of concern including arsenic.

**Measure 6--**To prevent significant adverse environmental effects related to accidents and malfunctions or non-performance of elements of the project resulting in arsenic releases to water or air, environmental management plans be approved by regulatory authorities prior to any construction of the project. Such plans to be developed based on mine components and contain the following elements:

- objectives;
- measureable performance or closure criteria (measures of success);
- monitoring systems to track performance;
- triggers or thresholds for specific actions; and
- research and design work and a schedule to fill gaps, where there is uncertainty.

The environmental management plans be developed collaboratively with interested parties as part of an overall Environmental Agreement (see Measure 11).

**Measure 7--**To reduce and avoid significant public concern, AANDC develop clear written guidelines for its employees who perform various functions with regard to Giant Mine including project management, inspections and technical advice, so as to avoid real and perceived conflicts of interest. The guidelines should be publicly available within six months of the government response to this Report of Environmental Assessment.

**Measure 8--**To reduce and avoid significant public concern, a mutually agreeable public oversight body for the Giant Mine be established before the project proceeds (see Measure 11).

**Measure 9--**To prevent significant adverse environmental effects related to accidents or malfunctions and resulting emissions of arsenic to the environment, and to reduce and avoid significant public concern, a research and development plan be developed collaboratively amongst the parties to investigate a more permanent solution (one that minimizes perpetual requirements for Giant Mine) for the underground arsenic within a year of the government response to this Report of Environmental Assessment. AANDC and GNWT shall fund the tasks and activities to carry out the plan. This plan will be part of an Environmental Agreement for Giant Mine (see Measure 11), and subject to regular review and public reporting.

**Measure 10--**To prevent significant adverse environmental effects related to accidents or malfunctions and resulting emissions of arsenic to the environment, and to reduce and avoid significant public concern, a perpetual care plan be developed collaboratively amongst the parties in the Oversight Working Group within a year of the government response to the Review Board EA report. This plan will be part of an Environmental Agreement for Giant Mine (see Measure 11). The Plan will build on lessons learned from waste management in other locations and apply best practices. The Plan shall contain provisions for the following:

- A comprehensive inventory of historical and project related records and a records management and preservation system including full public disclosure;
- An assessment and selection of appropriate land use controls and site designations;
- Long-term funding options for perpetual care of the site;
- Communicating with future generations including signage, monuments, symbols or other culturally-appropriate means of communications suggested by the YKDFN;
- Building possible future scenarios that include;
  - o inadvertent or purposeful human intrusion into the underground workings and arsenic storage chambers,
  - o collapse or transition of central government authority, and
  - o long-term but high consequence events such as glaciations or shoreline change;
- Transition planning for the change of the site from active remediation to passive care and maintenance.

**Measure 11--**In the event that an agreement-in-principle for a legally binding Environmental Agreement is not concluded by the current members of the Oversight Working Group prior to the public hearing, and to prevent significant adverse environmental effects related to accidents or malfunctions and resulting emissions of arsenic to the environment, and to reduce and avoid

significant public concern, the parties to the Environmental Assessment conclude an Environmental Agreement within 90 days of the government response to the Report of Environmental Assessment. In the event such an Agreement is not reached, the parties should enter into mediation and if necessary, a binding arbitration to secure such an Agreement before the project proceeds.

An Environmental Agreement for the Giant Mine shall provide for the following:

- An independent oversight body made of appointees from the current members to the Oversight Working Group with a clear advisory mandate, public reporting, and adequate funding from the Developers for the duration of the project;
- Public reporting by the developers on environmental matters including environmental effects and trends, project performance and adaptive management;
- Ability to receive project information without recourse to formal Access to Information and Privacy processes;
- Environmental management plans and monitoring programs that meet or exceed ANDC's own policies and guidelines including adaptive management, performance criteria, triggers and thresholds for specific actions;
- A perpetual care plan (as outlined in Measure 10);
- On-going research and development program and public reporting into a permanent solution to the arsenic trioxide to be stored underground;
- A step-wise, binding dispute resolution process; and
- A regular review and process for amending the Agreement with the consent of all the parties.

**Suggestion 1**--AANDC should implement an ongoing participant funding program for all Environmental Assessments and Environmental Impact Reviews in the Mackenzie Valley. There should be a lessons learned meeting or workshop after the government response to this Report of Environmental Assessment with a view to improving the application, review and disbursement of participant funding.

**Suggestion 2**--AANDC and/or GNWT (in the case of devolution) should conduct a public review of the legal framework for mine closure and reclamation with a view to strengthening the regulatory system and make mandatory requirements for closure plans and financial security to avoid further perpetual care mine sites.

**Suggestion 3**--AANDC should develop a management team and structure for implementation of the Giant Mine Remediation Plan with authority and technical support located in Yellowknife so as to increase accountability, transparency, responsiveness and build local confidence.

**Suggestion 4**—Environment Canada as the lead agency on the Federal Contaminated Sites Action Program should develop a policy framework and guidance for the perpetual care and management of remediated contaminated sites. Giant Mine should serve as a case study and model of how proper perpetual care planning can be conducted with community involvement and the full implementation of the measures recommended from this Environmental Assessment.

## 6.4 Overall Conclusion

In considering the options for the Review Board under s. 128 of the *MVRMA*, AN asked itself the following questions.

Is development likely to have a significant adverse impact on the environment or likely to be a cause of significant public concern? Should the development proceed or not, and if so, under what terms or conditions (measures to prevent significant adverse impact or reduce or avoid significant public concern)? Should the GMRP be referred or should aspects of it be referred for further study (i.e. perpetual care planning and management) through an Environmental Impact Review?

**AN finds that the project can proceed but only if the measures recommended above are accepted and implemented as a complete package to prevent significant adverse environmental impacts and to reduce significant public concern.**

## **Appendix 1. Public Registry Documents**

## Giant Mine Remediation Project - EA0809-001 [2008] Public Registry Document List

Numbers in Red are assigned in chronological order according to date of receipt of document as the Review Board has not maintained the numbering system.

### 0.4 MB [Letter to Parties- Upcoming dates and reminders July 6 2012](#)

This letter reminds parties of upcoming dates and advises them of a change of contact for the week week of July 10th to 13th 2012.

**Received:** Jul 6, 2012  
**Document Date:** Jul 6, 2012  
**Originator:** Review Board  
**Public Registry:** 459  
**Stage:** [Other public registry materials](#)

### 0.04 MB [Resume of K.A. Enns](#)

This is the CV of Katherine A. Enns, an ecotoxicologist the Board is considering engaging as a part of its experts group for the Giant Mine EA. Parties wishing to comment should do so before July 16, 2012.

**Received:** Jul 6, 2012  
**Document Date:** Jul 6, 2012  
**Originator:** Review Board  
**Public Registry:** 458  
**Stage:** [Other public registry materials](#)

### 0.06 MB [AN e-mail- Halocarbon spill](#)

This e-mail discusses the recent halocarbon spill at the Giant Mine site. [Two accompanying documents are posted seperately].

**Received:** Jul 4, 2012  
**Document Date:** Jul 4, 2012  
**Originator:** Parties/Public  
**Public Registry:** 457  
**Stage:** [Other public registry materials](#)

### 4 MB [Halocarbon Material Safety Data Sheet](#)

This is the Material Safety Data Sheet for refrigerant R-507, the halocarbon spilled on the Giant Mine site on June 29th, 2012.

EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report

**Received:** Jul 4, 2012  
**Document Date:** Jul 4, 2012  
**Originator:** Parties/Public  
**Public Registry:** 456  
**Stage:** [Other public registry materials](#)

### 2 MB [Halocarbon spill report](#)

This is a spill report by Deton/Cho Nuna Joint Venutre to the NWT SPill Line about a halocarbon spill at the Freeze Optimization Study at Giant Mine.

**Received:** Jul 4, 2012  
**Document Date:** Jun 29, 2012  
**Originator:** Parties/Public  
**Public Registry:** 455  
**Stage:** [Other public registry materials](#)

### 0.1 MB [AN e-mail re: perpetual care in France](#)

This e-mail from Alternatives North describes financing of perpetual care nuclear waste sites in France. [ It accompanes four reports posted seperately].

**Received:** Jul 2, 2012  
**Document Date:** Jul 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 454  
**Stage:** [Other public registry materials](#)

### 0.06 MB [AN e-mail re: roaster complex](#)

This e-mail from Alternatives North asks the Giant team for plans regarding the demolition of the roaster complex, legal jsutification, and a related comittment.

**Received:** Jul 2, 2012  
**Document Date:** Jul 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 453  
**Stage:** [Other public registry materials](#)

### 4 MB [ANDRA- Making Nuclear Waste Governable](#)

This is a report titled Making Nuclear Waste Governable: Deep Underground Disposal and the Challenge of Reversability, by ANDRA, the nuclear waste management authority of France.



**Received:** Jul 2, 2012  
**Document Date:** Jul 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 452  
**Stage:** [Other public registry materials](#)

## 2 MB [ANDRA- Disposal Facilities: Preserving a Collective Memory](#)

This is an ANDRA report, submitted by Alternatives North, titled Disposal Facilities: Preserving a Collective Memory for Future Generations.

**Received:** Jul 2, 2012  
**Document Date:** Jul 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 451  
**Stage:** [Other public registry materials](#)

## 0.4 MB [ANDRA- Radioactive Materials and Waste Planning Act](#)

This is the consolidated version of the "French Radioactive Materials and Waste Planning Act of 28 June 2006" by ANDRA, submitted by Alternatives North.

**Received:** Jul 2, 2012  
**Document Date:** Jul 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 450  
**Stage:** [Other public registry materials](#)

## 0.3 MB [French law- management of radioactive materials and wastes](#)

This is the French law titled THE 2006 PROGRAMME ACT ON THE SUSTAINABLE MANAGEMENT OF RADIOACTIVE MATERIALS AND WASTES. Submitted by Alternatives North.

**Received:** Jul 2, 2012  
**Document Date:** Jul 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 449  
**Stage:** [Other public registry materials](#)

## 0.02 MB [AN e-mail - meeting summaries, oversight meetings](#)

This e-mail from Alternatives North asks the Giant team about meeting summaries and information about oversight committee meetings.

**Received:** Jun 27, 2012  
**Document Date:** Jul 27, 2012  
**Originator:** Parties/Public  
**Public Registry:** 448  
**Stage:** [Other public registry materials](#)

## 0.05 MB [AN e-mail re: Deep Geological Repository documents](#)

This e-mail from Alternatives North accompanies three documents pertaining to the Deep Geological Repository for nuclear waste in Ontario.

**Received:** Jun 24, 2012  
**Document Date:** Jun 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 447  
**Stage:** [Other public registry materials](#)

## 0.03 MB [AN e-mail re: UK Nuclear Decommissioning Authority reports](#)

This e-mail from Alternatives North accompanies two reports from the UK Nuclear Decommissioning Authority.

**Received:** Jun 24, 2012  
**Document Date:** Jun 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 446  
**Stage:** [Other public registry materials](#)

## 7 MB [Nuclear Decommissioning Authority- Environmental Safety Case](#)

This report, by the UK Nuclear Decommissioning Authority, describes the environmental safety case for geological disposal of nuclear waste. It was submitted by Alternatives North.

**Received:** Jun 24, 2012  
**Document Date:** Jun 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 445  
**Stage:** [Other public registry materials](#)

## 3 MB [Nuclear Decommissioning Authority- Operational Safety Case](#)

This report, by the UK Nuclear Decommissioning Authority, describes the operational safety case for geological disposal of nuclear waste. It was submitted by Alternatives North.

**Received:** Jun 24, 2012  
**Document Date:** Jun 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 444  
**Stage:** [Other public registry materials](#)

### 0.3 MB [BNWMO: Financial Surety Backgrounder](#)

This backgrounder on financial surety from the Nuclear Waste Management Organization describes a trust fund for managing nuclear waste disposal sites in Ontario. It was submitted by Alternatives North.

**Received:** Jun 24, 2012  
**Document Date:** Jun 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 443  
**Stage:** [Other public registry materials](#)

### 0.5 MB [BNWMO: Planning for Climate Change backgrounder](#)

This backgrounder from the Nuclear Waste Management Organization describes how future climate change and glaciation is considered in the long-term storage of nuclear waste. It was submitted by Alternatives North.

**Received:** Jun 24, 2012  
**Document Date:** Jun 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 442  
**Stage:** [Other public registry materials](#)

### 5 MB [OPG responses to DGR CEAA panel IRs](#)

These are responses to information requests from a CEAA Panel regarding the Deep Geological Repository for nuclear waste in Ontario. See responses EIS-01-16 and EIS-01-17 (on pages 50-54) re: glaciation +shoreline change. Submitted by Alt. North.

**Received:** Jun 24, 2012  
**Document Date:** Jun 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 441  
**Stage:** [Other public registry materials](#)

### 0.1 MB [AECOM report- Structural condition of Mill Conveyor](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
 This is an AECOM report on the structural condition of the mill conveyor, submitted by the developer.

**Received:** Jun 19, 2012  
**Document Date:** Sep 12, 2011  
**Originator:** Developer  
**Public Registry:** 440  
**Stage:** [Other public registry materials](#)

### 4 MB [CALPUFF dispersion modelling final draft report](#)

This SENES report, submitted by the developer, describes the results of CALPUFF air quality dispersion modelling.

**Received:** Jun 19, 2012  
**Document Date:** Mar 13, 2011  
**Originator:** Developer  
**Public Registry:** 439  
**Stage:** [Other public registry materials](#)

### 0.2 MB [Giant workshop for parties- June 27, 28- agenda](#)

This is an agenda for a workshop that will be hosted by the Giant Team for EA parties. It will include an update on site work and progress since the technical sessions and IRs.

**Received:** Jun 19, 2012  
**Document Date:** Jun 19, 2012  
**Originator:** Developer  
**Public Registry:** 438  
**Stage:** [Other public registry materials](#)

### 0.02 MB [AN e-mail re: June 27-28 2012 session expectations](#)

This e-mail describes Alternatives North's expectations for the June 27-28 2012 workshop that the Giant Team will host.

**Received:** Jun 18, 2012  
**Document Date:** Jun 18, 2012  
**Originator:** Parties/Public  
**Public Registry:** 437  
**Stage:** [Other public registry materials](#)

### 0.2 MB [AN letter re: IR reponse on stable long-term funding](#)

This letter from Alternatives North is a reply to the developer's information request response regarding long-term funding.

**Received:** Jun 18, 2012  
**Document Date:** Jun 18, 2012  
**Originator:** Parties/Public  
**Public Registry:** 436  
**Stage:** [Information requests](#)

#### 0.02 MB [AN e-mail requesting AECOM reports](#)

This e-mail from Alternatives North requests two report from the developer, one about the roaster complex and one about the main conveyor gallery. These relate to the site stabilization plan.

**Received:** Jun 12, 2012  
**Document Date:** Jun 12, 2012  
**Originator:** Parties/Public  
**Public Registry:** 435  
**Stage:** [Other public registry materials](#)

#### 0.4 MB [Additional IR Responses](#)

This document contains the developer's responses to the Review Board's three additional information requests regarding long term funding, Baker Creek and oversight.

**Received:** Jun 11, 2012  
**Document Date:** Jun 11, 2012  
**Originator:** Developer  
**Public Registry:** 434  
**Stage:** [Information requests](#)

#### 0.2 MB [AN letter to Commissioner of Environment](#)

This is a letter from Alternatives North to the Commissioner for the Environment and Sustainable Development regarding the Giant Mine Remediation Project.

**Received:** Jun 5, 2012  
**Document Date:** May 31, 2012  
**Originator:** Parties/Public  
**Public Registry:** 433  
**Stage:** [Other public registry materials](#)

#### 0.3 MB [Temp contact until June 4, 2012](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
This advises parties of a temporary change of contact until June 4, 2012.

**Received:** May 23, 2012  
**Document Date:** May 23, 2012  
**Originator:** Review Board  
**Public Registry:** 432  
**Stage:** [Other public registry materials](#)

#### 2 MB [Regulator Meeting Materials- Giant SSP](#)

This file contains photos, tables and a spreadsheet provided by the developer on May 10th, 2012 at a meeting on the Site Stabilization Plan at the Mackenzie Valley Land and Water Board.

**Received:** May 18, 2012  
**Document Date:** May 10, 2012  
**Originator:** Developer  
**Public Registry:** 431  
**Stage:** [Other public registry materials](#)

#### 0.7 MB [Commissioner for the Env. 2012 Spring Report](#)

This is Chapter 3 of a report released by the Federal Commissioner for the Environment and Sustainable Development titled "Federal Contaminated Sites and Their Impacts". It was submitted to the registry by Alternatives North.

**Received:** May 9, 2012  
**Document Date:** May 8, 2012  
**Originator:** Parties/Public  
**Public Registry:** 430  
**Stage:** [Other public registry materials](#)

#### 0.6 MB [Additional IRs + covering letter May 7 2012](#)

These additional Information Requests have been issued by the Review Board to the developer and parties. Responses are due on June 11, 2012.

**Received:** May 7, 2012  
**Document Date:** May 7, 2012  
**Originator:** Review Board  
**Public Registry:** 429  
**Stage:** [Information requests](#)

#### 1 MB [Hanford Long Term Stewardship Plan](#)

This is a plan for long term care for the Hanford perpetual care site in the US. It has been submitted to the registry by Alternatives North as an example of a perpetual care plan.

**Received:** May 7, 2012  
**Document Date:** May 7, 2012  
**Originator:** Parties/Public  
**Public Registry:** 428  
**Stage:** [Other public registry materials](#)

**0.01 MB**[Email correspondence from Kevin O'Reilly to AANDC -May 4 2012](#)

This is an email from Kevin O'Reilly to Adrian Paradis on May 4 2012 regarding notification of upcoming information sessions for the Giant Mine Project.

**Received:** May 4, 2012  
**Document Date:** May 4, 2012  
**Originator:** Parties/Public  
**Public Registry:** 427  
**Stage:** [Technical or community sessions](#)

**0.01 MB**[Email correspondence from Kevin O'Reilly to AANDC- May1, 2012](#)

This is an email dated May 1 2012 from Kevin O'Reilly to Adrian Paradis regarding planned technical sessions for Giant Mine Project.

**Received:** May 1, 2012  
**Document Date:** Jun 1, 2012  
**Originator:** Parties/Public  
**Public Registry:** 426  
**Stage:** [Technical or community sessions](#)

**0.9 MB**[Environmental Management System presentation](#)

This is a summary of a meeting about the Environmental Management System that occurred between the developer and parties on March 5, 2012.

**Received:** Apr 27, 2012  
**Document Date:** Mar 5, 2012  
**Originator:** Developer  
**Public Registry:** 425  
**Stage:** [Other public registry materials](#)

**0.5 MB**[Environmental Management System update cov letter](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

This is the covering letter that accompanied the summary of a meeting about the Environmental Management System that occurred between the developer and parties on March 5, 2012.

**Received:** Apr 27, 2012  
**Document Date:** Apr 26, 2012  
**Originator:** Developer  
**Public Registry:** 424  
**Stage:** [Other public registry materials](#)

**0.6 MB**[Environmental Management System update summary notes](#)

This is a summary of a meeting about the Environmental Management System that occurred between the developer and parties on March 5, 2012.

**Received:** Apr 27, 2012  
**Document Date:** Apr 17, 2012  
**Originator:** Developer  
**Public Registry:** 423  
**Stage:** [Other public registry materials](#)

**0.02 MB**[Into Eternity- Perpetual care documentary](#)

This documentary deals with perpetual care issues in Europe. It was presented by Alternatives North at the Giant Mine Perpetual Care Workshop in Dettah.

**Received:** Apr 25, 2012  
**Document Date:** Apr 25, 2012  
**Originator:** Parties/Public  
**Public Registry:** 420  
**Stage:** [Other public registry materials](#)

**1 MB**[Giant Mine Perpetual Care Funding Options](#)

This is a report by the Pembina Institute on report on Perpetual Care Funding Options for Giant Mine. It was prepared for and submitted by Alternatives North.

**Received:** Apr 24, 2012  
**Document Date:** Apr 24, 2012  
**Originator:** Parties/Public  
**Public Registry:** 421  
**Stage:** [Other public registry materials](#)

**0.02 MB**[Alternatives North e-mail to City re: conveyor approvals](#)

This is correspondence from Alternatives North to the City of Yellowknife regarding approvals for the demolition of the mill conveyor at the Giant site.

**Received:** Apr 20, 2012  
**Document Date:** Apr 20, 2012  
**Originator:** Parties/Public  
**Public Registry:** 422  
**Stage:** [Other public registry materials](#)

**0.06 MB**[Board decision- YKDFN request for extension](#)

In this letter the Board extends the deadline for technical reports to July 11, 2012, as requested by the YKDFN. It also identifies other dates that have been adjusted to reflect this change.

**Received:** Apr 13, 2012  
**Document Date:** Apr 13, 2012  
**Originator:** Review Board  
**Public Registry:** 416  
**Stage:** [Other public registry materials](#)

**0.7 MB**[Giant Mine Designation Options discussion paper](#)

This is a discussion paper prepared for the Review Board by Alternatives North. It examines designation options for the Giant Mine.

**Received:** Apr 13, 2012  
**Document Date:** Apr 13, 2012  
**Originator:** Parties/Public  
**Public Registry:** 415  
**Stage:** [Other public registry materials](#)

**0.1 MB**[Letter from Giant Team re: legal basis for dismantling mill](#)

This letter from the developer describes the legal basis for dismantling the mill conveyor. It is a response to the Review Board's letter of March 26, 2012.

**Received:** Apr 3, 2012  
**Document Date:** Apr 2, 2012  
**Originator:** Developer  
**Public Registry:** 413  
**Stage:** [Other public registry materials](#)

**0.1 MB**[Alternatives North letter re YKDFN extension request](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
This letter provides Alternatives North's views on the YKDFN request for an extension.

**Received:** Apr 2, 2012  
**Document Date:** Apr 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 412  
**Stage:** [Other public registry materials](#)

**7 MB**[Report from Alternatives North-Yellowknives Dene First Nation Workshop on Oversight of Giant Mine Remediation Project](#)

The following document is a report from a joint Alternatives North/Yellowknives Dene First Nation workshop on independent oversight for AANDC's Giant Mine Remediation Project.

**Received:** Mar 30, 2012  
**Document Date:** Mar 7, 2012  
**Originator:** Parties/Public  
**Public Registry:** 411  
**Stage:** [Other public registry materials](#)

**0.4 MB**[Letter to Giant Team re: Legal basis for site work](#)

This letter from the Review Board asks the Giant Team for the legal basis for the mill conveyor work and other any other site stabilization activities that are within the scope of the ongoing environmental assessment

**Received:** Mar 26, 2012  
**Document Date:** Mar 26, 2012  
**Originator:** Review Board  
**Public Registry:** 409  
**Stage:** [Other public registry materials](#)

**0.1 MB**[Request from NSMA regarding hearing notification](#)

This is a request from NSMA for extension of hearing notification for the Giant Mine Environmental Assessment.

**Received:** Mar 26, 2012  
**Document Date:** Mar 23, 2012  
**Originator:** Parties/Public  
**Public Registry:** 419  
**Stage:** [Technical or community sessions](#)

**0.1 MB**[YKDFN letter re: Mill Conveyor](#)

This letter from the YKDFN describes concerns regarding the mill conveyor work.

**Received:** Mar 26, 2012  
**Document Date:** Mar 26, 2012  
**Originator:** Parties/Public  
**Public Registry:** 410  
**Stage:** [Other public registry materials](#)

#### 0.4 MB [Letter to Parties re YKDFN extension request](#)

This letter requests parties' comments regarding the YKDFN request to extend the technical report submission deadline to mid-July.

**Received:** Mar 23, 2012  
**Document Date:** Mar 23, 2012  
**Originator:** Review Board  
**Public Registry:** 408  
**Stage:** [Other public registry materials](#)

#### 0.7 MB [Attachments to Giant Mar 13 letter re mill conveyor](#)

These attachments to the March 13 2012 letter from the developer were received on March 21 2012. They provide additional technical details about the mill conveyor work.

**Received:** Mar 21, 2012  
**Document Date:** Mar 13, 2012  
**Originator:** Developer  
**Public Registry:** 414  
**Stage:** [Other public registry materials](#)

#### 1 MB [BacTech infosheet and report](#)

This fact sheet and report, submitted by the YKDFN, describes BacTech technology for tailings remediation.

**Received:** Mar 15, 2012  
**Document Date:** Mar 15, 2012  
**Originator:** Parties/Public  
**Public Registry:** 406  
**Stage:** [Technical reports](#)

#### 0.4 MB [Technical Report further deadline extension](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
This letter informs parties that the hearing will be no sooner than mid-May 2012, and that the deadline for parties' technical reports has been extended to April 16, 2012 for this reason.

**Received:** Mar 15, 2012  
**Document Date:** Mar 15, 2012  
**Originator:** Review Board  
**Public Registry:** 403  
**Stage:** [Technical reports](#)

#### 0.1 MB [YKDFN letter re: BacTech tailings remediation](#)

This letter from the YKDFN discusses BacTech tailings remediation.

**Received:** Mar 15, 2012  
**Document Date:** Mar 15, 2012  
**Originator:** Parties/Public  
**Public Registry:** 405  
**Stage:** [Technical reports](#)

#### 0.08 MB [YKDFN request to delay tech reports, hearings](#)

This letter from the YKDFN requests a delay in the technical report deadline and hearing dates.

**Received:** Mar 15, 2012  
**Document Date:** Mar 15, 2012  
**Originator:** Parties/Public  
**Public Registry:** 404  
**Stage:** [Technical reports](#)

#### 0.2 MB [Alternatives North letter re: mill conveyor](#)

This letter describes Alternatives North's concerns regarding the March 13th, 2012 letter from AANDC about dismantling the mill conveyor.

**Received:** Mar 14, 2012  
**Document Date:** Mar 14, 2012  
**Originator:** Parties/Public  
**Public Registry:** 402  
**Stage:** [Other public registry materials](#)

#### 0.04 MB [Letter re: Dismantling Mill Conveyor](#)

This letter states that the Giant Team is preparing to dismantle the mill conveyor by April 30, 2012 to address risks on site.

**Received:** Mar 13, 2012  
**Document Date:** Mar 13, 2012  
**Originator:** Developer  
**Public Registry:** 401  
**Stage:** [Other public registry materials](#)

#### 0.4 MB [Alternatives North Concerns Following Round Two IR Responses](#)

This is a letter from Alternatives North highlighting concerns and requesting additional information regarding the responses received to the Round Two Information Requests.

**Received:** Mar 8, 2012  
**Document Date:** Mar 8, 2012  
**Originator:** Parties/Public  
**Public Registry:** 417  
**Stage:** [Information requests](#)

#### 0.2 MB [Regulatory Process Concerns](#)

This e-mail and its attachments highlight Alternatives North's concerns about AANDC's plans to apply for new land use permits and water licences before completion of the Environmental Assessment and without prior public consultation.

**Received:** Mar 8, 2012  
**Document Date:** Mar 8, 2012  
**Originator:** Parties/Public  
**Public Registry:** 418  
**Stage:** [Other public registry materials](#)

#### 0.02 MB [Note to File- Hearing no sooner than mid-May](#)

This Note to File describes the developer advising the Board that it will be ready for hearings no sooner than mid-May 2012.

**Received:** Mar 5, 2012  
**Document Date:** Mar 5, 2012  
**Originator:** Review Board  
**Public Registry:** 400  
**Stage:** [Public hearings](#)

#### 0.3 MB [Agenda- Workshop on Independence and Oversight at Giant Mine](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

This is an e-mail, proposal and agenda for a workshop on independence and oversight at Giant Mine, organized by Alternatives North and the YKDFN.

**Received:** Feb 23, 2012  
**Document Date:** Feb 23, 2012  
**Originator:** Parties/Public  
**Public Registry:** 396  
**Stage:** [Other public registry materials](#)

#### 0.2 MB [Long term funding option study- Statement of work](#)

This is an e-mail and Statement of Work for a study of long term funding options for Giant Mine. The study is being commissioned by Alternatives North and YKDFN.

**Received:** Feb 23, 2012  
**Document Date:** Feb 23, 2012  
**Originator:** Parties/Public  
**Public Registry:** 397  
**Stage:** [Other public registry materials](#)

#### 0.06 MB [Letter to City of YK re:water pipeline and EA scope](#)

This is a letter from the Review Board to the City of Yellowknife regarding the municipal water pipeline and the scope of this EA.

**Received:** Feb 20, 2012  
**Document Date:** Feb 20, 2012  
**Originator:** Review Board  
**Public Registry:** 392  
**Stage:** [Scoping](#)

#### 0.06 MB [IR round 2 covering letter](#)

This is the covering letter that accompanies the developer's responses to the second round of information requests.

**Received:** Feb 17, 2012  
**Document Date:** Feb 17, 2012  
**Originator:** Developer  
**Public Registry:** 393  
**Stage:** [Information requests](#)

#### 8 MB [Rnd 2 responses to Alt North IRs](#)



These are the developer's responses to the second round of information requests #1-28 from Alternatives North

**Received:** Feb 17, 2012  
**Document Date:** Feb 17, 2012  
**Originator:** Developer  
**Public Registry:** 394  
**Stage:** [Information requests](#)

### 3 MB [Rnd 2 Responses to Board IRs](#)

These are the developer's responses to the second round of information requests #1-7 from the Review Board

**Received:** Feb 17, 2012  
**Document Date:** Feb 17, 2012  
**Originator:** Developer  
**Public Registry:** 390  
**Stage:** [Information requests](#)

### 0.8 MB [Rnd 2 Responses to DFO IRs](#)

These are the developer's responses to the second round of information requests #1 and #2 from DFO.

**Received:** Feb 17, 2012  
**Document Date:** Feb 17, 2012  
**Originator:** Developer  
**Public Registry:** 391  
**Stage:** [Information requests](#)

### 2 MB [Rnd 2 Responses to YKDFN IRs](#)

These are the developer's responses to the second round of information requests #1-5 from the YKDFN.

**Received:** Feb 17, 2012  
**Document Date:** Feb 17, 2012  
**Originator:** Developer  
**Public Registry:** 389  
**Stage:** [Information requests](#)

### 0.02 MB [Environment Canada response to Alt North IR #13](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
This is the response from Environment Canada to Alternatives North's IR #13 regarding air quality.

**Received:** Feb 7, 2012  
**Document Date:** Feb 7, 2012  
**Originator:** Parties/Public  
**Public Registry:** 388  
**Stage:** [Information requests](#)

### 0.6 MB [Principles of Perpetual Care- Report from Alt North](#)

This is a report examining principles of perpetual care for Giant Mine, prepared for and submitted by Alternatives North.

**Received:** Feb 7, 2012  
**Document Date:** Feb 7, 2012  
**Originator:** Parties/Public  
**Public Registry:** 395  
**Stage:** [Technical reports](#)

### 7 MB [City of YK tech session undertaking #6](#)

This is a preliminary design report of the City of Yellowknife's new solid waste facility, submitted as technical session Undertaking #6.

**Received:** Feb 6, 2012  
**Document Date:** Feb 2, 2012  
**Originator:** Parties/Public  
**Public Registry:** 399  
**Stage:** [Technical or community sessions](#)

### 0.4 MB [Technical Report deadline and instructions](#)

This letter informs parties that the deadline for technical reports is March 16, 2012. It includes instructions for preparing technical reports.

**Received:** Feb 3, 2012  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 387  
**Stage:** [Technical reports](#)

### 0.3 MB [Letter from Review Board to AANDC Regarding Information Request Response Submission Date](#)

The following document is a letter from the Review Board to Aboriginal Affairs and Northern Development Canada regarding the Giant Remediation Team's submission date extension request.

**Received:** Jan 19, 2012  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 385  
**Stage:** [Information requests](#)

**0.02 MB**[Letter from AANDC to the Review Board Regarding a Submission Date Extension Request](#)

The following document is a letter from Aboriginal Affairs and Northern Development Canada to the Review Board requesting an extension to the submission date for Information Request responses.

**Received:** Jan 18, 2012  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 384  
**Stage:** [Information requests](#)

**0.05 MB**[Letter to Review Board from City of Yellowknife Regarding Revised Scope for Giant Remediation EA](#)

The following document is a letter to the Review Board from Dennis Kefalas, Director of Public Works and Engineering for the City of Yellowknife. The letter proposes a revised scope for the environmental assessment of the Giant Mine Remediation.

**Received:** Jan 17, 2012  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 386  
**Stage:** [Other public registry materials](#)

**0.04 MB**[Rnd 2 Responses from DFO to Board IRs](#)

This is DFO's response to the second round of information requests from the Review Board.

**Received:** Jan 16, 2012  
**Document Date:** Dec 16, 2011  
**Originator:** Parties/Public  
**Public Registry:** 398  
**Stage:** [Information requests](#)

**0.2 MB**[Giant EA Note-to-File regarding Temporary Alternate Contact 11-Jan-12](#)

The following document is a Note-to-File regarding a temporary alternate contact for the Giant Mine environmental assessment.

**Received:** Jan 11, 2012  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 382  
**Stage:** [Information requests](#)

**0.08 MB**[E-mail \(10-Jan-12\) and attachment from Kevin O'Reilly regarding Giant Mine Remediation Project and Highway #4 Realignment](#)

The following document is an e-mail and attachment from Kevin O'Reilly regarding the Giant Mine Remediation Project and the realignment of Highway #4.

**Received:** Jan 10, 2012  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 383  
**Stage:** [Information requests](#)

**0.09 MB**[YKDFN Round 2 IRs](#)

This is the YKDFN's second round of information requests.

**Received:** Dec 2, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 380  
**Stage:** [Information requests](#)

**0.3 MB**[Covering Letter- Review Board IRs, Round Two](#)

This is the Review Board's covering letter for the second round of information requests.

**Received:** Dec 1, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 377  
**Stage:** [Information requests](#)

**0.03 MB**[DFO Round 2 IRs](#)

This is DFO's second round of information requests.

**Received:** Dec 1, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 379  
**Stage:** [Information requests](#)

### 0.2 MB [Review Board IRs, Round Two](#)

This is the Review Board's second round of information requests. They are directed to the developer and to DFO. The covering letter is posted as a separate document.

**Received:** Dec 1, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 378  
**Stage:** [Information requests](#)

### 0.3 MB [Alternatives North Round 2 IRs](#)

This is Alternative North's second round of information requests.

**Received:** Nov 30, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 381  
**Stage:** [Information requests](#)

### 0.3 MB [Reminder- Round 2 IR deadline](#)

This letter reminds parties that the deadline for submitting their second round of information requests to the Giant team is November 30th, 2011.

**Received:** Nov 24, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 376  
**Stage:** [Information requests](#)

### 0.5 MB [Revised Giant EA Workplan, Nov 2011](#)

This is a revised workplan for the Giant EA, updated to reflect the current status of the environmental assessment as of November 2011.

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

**Received:** Nov 24, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 375  
**Stage:** [Terms of Reference and workplans](#)

### 0.03 MB [Cover letter for Giant Mine Tech Session undertakings](#)

This is a cover letter for the undertakings from the Giant Mine Technical Sessions.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 374  
**Stage:** [Technical or community sessions](#)

### 3 MB [Giant Mine Technical Session Undertaking 1\(a\)](#)

This document is part (a) of Undertaking #1 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 363  
**Stage:** [Technical or community sessions](#)

### 0.4 MB [Giant Mine Technical Session Undertaking 10](#)

This document is Undertaking #10 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 371  
**Stage:** [Technical or community sessions](#)

### 2 MB [Giant Mine Technical Session Undertaking 11](#)

This document is Undertaking #11 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011

**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 372  
**Stage:** [Technical or community sessions](#)

### 3 MB [Giant Mine Technical Session Undertaking 12](#)

This document is Undertaking #12 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 373  
**Stage:** [Technical or community sessions](#)

### 7 MB [Giant Mine Technical Session Undertaking 1b](#)

This document is part (b) of Undertaking #1 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 364  
**Stage:** [Technical or community sessions](#)

### 1 MB [Giant Mine Technical Session Undertaking 1c](#)

This document is part (c) of Undertaking #1 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 365  
**Stage:** [Technical or community sessions](#)

### 0.6 MB [Giant Mine Technical Session Undertaking 2 and 4](#)

This document is Undertaking #2 and #4 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011

**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 366  
**Stage:** [Technical or community sessions](#)

### 0.8 MB [Giant Mine Technical Session Undertaking 3 and 9](#)

This document is Undertaking #3 and #9 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 367  
**Stage:** [Technical or community sessions](#)

### 0.6 MB [Giant Mine Technical Session Undertaking 5](#)

This document is Undertaking #5 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 368  
**Stage:** [Technical or community sessions](#)

### 4 MB [Giant Mine Technical Session Undertaking 7](#)

This document is Undertaking #7 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 369  
**Stage:** [Technical or community sessions](#)

### 5 MB [Giant Mine Technical Session Undertaking 8](#)

This document is Undertaking #8 from the Giant Mine Technical Sessions held on October 17 to 21, 2011.

**Received:** Nov 15, 2011

**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 370  
**Stage:** [Technical or community sessions](#)

### 3 MB [Estimated roaster waste volumes + pictures- undertaking #7](#)

This document describes volumes of waste at the roaster complex, and includes pictures. It has been submitted by the Giant team as part 2 of undertaking #7 from the technical sessions.

**Received:** Oct 28, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 358  
**Stage:** [Technical or community sessions](#)

#### 0.1 MB [MSDS fact sheet- Ammonia](#)

This is the Material Safety Data Sheet for ammonia, provided to the YKDFN by the Giant team at the technical session on Oct. 18, 2011.

**Received:** Oct 28, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 361  
**Stage:** [Technical or community sessions](#)

#### 0.08 MB [MSDS Fact Sheet- Dynalene HC](#)

This is the Material Safety Data Sheet for Dynalene HC, provided to the YKDFN by the Giant team at the technical session on Oct. 18, 2011.

**Received:** Oct 28, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 360  
**Stage:** [Technical or community sessions](#)

#### 0.3 MB [MSDS Fact Sheet- SUVA](#)

This is the Material Safety Data Sheet for Dupont SUVA, provided to the YKDFN by the Giant team at the technical session on Oct. 18, 2011.

**Received:** Oct 28, 2011

**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 359  
**Stage:** [Technical or community sessions](#)

### 0.9 MB [Roaster report- tech session undertaking #7](#)

This is a Feb. 2003 report titled "An Examination of Arsenic Contamination in the Roaster and Gas Handling Complex at the Giant Mill". It has been submitted by the Giant team as part of undertaking #7 from the technical sessions.

**Received:** Oct 28, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 357  
**Stage:** [Technical or community sessions](#)

#### 0.4 MB [Tech session transcript- Oct. 21 2011](#)

This is the transcript of the October 21st 2011 technical session for the Giant EA.

**Received:** Oct 24, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 356  
**Stage:** [Technical or community sessions](#)

#### 0.4 MB [Tech session transcript- Oct. 20 2011](#)

This is the transcript of the October 19th 2011 technical session for the Giant EA.

**Received:** Oct 21, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 355  
**Stage:** [Technical or community sessions](#)

#### 0.4 MB [Tech session transcript- Oct. 19 2011](#)

This is the transcript of the October 19th 2011 technical session for the Giant EA.

**Received:** Oct 20, 2011  
**Document Date:** Unknown  
**Originator:** Review Board

**Public Registry:** 354  
**Stage:** [Technical or community sessions](#)

#### 0.4 MB [Tech session transcript- Oct 18 2011](#)

This is the transcript of the October 18th 2011 technical session for the Giant EA.

**Received:** Oct 19, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 353  
**Stage:** [Technical or community sessions](#)

#### 0.4 MB [Tech session transcript- Oct. 17](#)

This is the transcript of the October 17th 2011 technical session for the Giant EA.

**Received:** Oct 18, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 352  
**Stage:** [Technical or community sessions](#)

#### 3 MB [AN Giant Perpetual Care Workshop Report](#)

This is the report of the Giant Mine Perpetual Care Workshop held by Alternatives North in Dettah on September 26-27, 2011.

**Received:** Oct 17, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 362  
**Stage:** [Other public registry materials](#)

#### 4 MB [Day 1 Freeze and Underground](#)

The following document is AANDC's FReeze and Underground presentation for Day 1 of the Review Board's technical sessions for the Giant Mine Remediation Project Environmental Assessment.

**Received:** Oct 13, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 348

**Stage:** [Technical or community sessions](#)

#### 2 MB [Long Term Monitoring Evaluation & Management Day 5 Presentation](#)

The following document is AANDC's Long Term Monitoring Evaluation & Management presentation for Day 5 of the Review Board's technical sessions for the Giant Mine Remediation Project Environmental Assessment.

**Received:** Oct 13, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 351  
**Stage:** [Technical or community sessions](#)

#### 0.5 MB [Risk Assessment Day 4 Presentation](#)

The following document is AANDC's Risk Assessment presentation for Day 4 of the Review Board's technical sessions for the Giant Mine Remediation Project Environmental Assessment.

**Received:** Oct 13, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 350  
**Stage:** [Technical or community sessions](#)

#### 3 MB [Water-Baker Creek Day 2](#)

The following document is AANDC's Baker Creek presentation for Day 2 of the Review Board's technical sessions for the Giant Mine Remediation Project Environmental Assessment.

**Received:** Oct 13, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 349  
**Stage:** [Technical or community sessions](#)

#### 3 MB [AANDC's GIANT Remediation Project's Surface Remediation Presentation - Tech Session](#)

The following document is AANDC's Surface Remediation presentation for Day 3 of the Review Board's technical sessions for the Giant Mine Remediation Project Environmental Assessment.

**Received:** Oct 11, 2011

**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 347  
**Stage:** [Technical or community sessions](#)

**0.6 MB** [Clarification of EA Scope - YKDFN](#)

This clarification of the scope of the EA is a response to the YKDFN letter of Sept. 6, 2011.

**Received:** Oct 7, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 343  
**Stage:** [Scoping](#)

**1 MB** [Letter to Parties- Giant Technical Sessions](#)

This letter provides parties with an introduction to the upcoming technical sessions for the Giant Mine EA.

**Received:** Oct 7, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 345  
**Stage:** [Technical or community sessions](#)

**0.08 MB** [Note to File- Venue change for technical sessions](#)

This Note to File tells parties that the Oct. 17-21 technical session venue has changed to the Champagne Room in Yellowknife.

**Received:** Oct 7, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 346  
**Stage:** [Technical or community sessions](#)

**0.2 MB** [Technical session agenda](#)

This is the agenda for the technical session for the Giant Mine EA, to be held at the Champagne Room in Yellowknife Oct. 17th to 21st, 2011

**Received:** Oct 7, 2011  
**Document Date:** Unknown

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
**Originator:** Review Board  
**Public Registry:** 344  
**Stage:** [Technical or community sessions](#)

**0.05 MB** [Sept. 6 2011 letter from YKDFN- Giant Scope Clarifications](#)

This is a letter from the YKDFN requesting a clarification of the scope of environmental assessment for the Giant Mine EA

**Received:** Sep 15, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 339  
**Stage:** [Scoping](#)

**0.06 MB** [Note to File- tech session planning \(w. parties' correspondence\)](#)

This is a Note to File on a recent discussions with AANDC about technical session planning. It includes an e-mail correspondence between parties.

**Received:** Aug 11, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 338  
**Stage:** [Technical or community sessions](#)

**0.07 MB** [AN email to AANDC re: Jo-Jo Lake tailings work](#)

This is correspondence between Alternatives North and the developer describing issues regarding proposed work on tailings at Jo-Jo Lake.

**Received:** Aug 5, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 337  
**Stage:** [Other public registry materials](#)

**0.03 MB** [Cover Letter re: Jo-jo lake tailings work](#)

Cover letter for the document regarding the reclamation plan to permanently mitigate the historic tailings at Jo-Jo Lake (NT Spill 11-159) .

**Received:** Aug 3, 2011  
**Document Date:** Unknown



**Originator:** Developer  
**Public Registry:** 335  
**Stage:** [Other public registry materials](#)

#### 7 MB [Jo Jo Lake reclamation Plan for Giant Mine-document](#)

Reclamation Plan to permanently mitigate the historic tailings at Jo-Jo Lake in response to the May 2011 tailings spill (NT Spill 11-159)

**Received:** Aug 3, 2011  
**Document Date:** Unknown  
**Originator:** Other  
**Public Registry:** 336  
**Stage:** [Technical or community sessions](#)

#### 0.02 MB [Letter from INAC re: Technical Sessions for Giant Mine](#)

This is a letter to up-date Review Board and parties of the assessment regarding the up-coming technical session for the Giant Mine EA.

**Received:** Aug 3, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 334  
**Stage:** [Technical or community sessions](#)

#### 0.2 MB [AN covering letter and perpetual care study summary](#)

This is a covering letter from Alternatives North for a study of perpetual care of contaminated sites by Dr. Joan Kuyek. The study summary is included in the same file.

**Received:** Jul 20, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 332  
**Stage:** [Other public registry materials](#)

#### 1 MB [Perpetual Care of Contaminated Sites:Theory and Practice](#)

This is a study titled "The Theory and Practice of Perpetual Care of Contaminated Sites" by Dr. Joan Kuyek, submitted by Alternatives North. The summary of this study is available on this web page in a separate file.

**Received:** Jul 20, 2011

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 333  
**Stage:** [Other public registry materials](#)

#### 0.01 MB [Note to File re: subsidence of the B1 pit wall](#)

This is a Note to File describing a meeting with the developer regarding new subsidence of the B1 pit wall and possible new activities on the Giant site.

**Received:** Jul 18, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 331  
**Stage:** [Other public registry materials](#)

#### 2 MB [Baker Creek Overflow Final Report](#)

This is the Baker Creek Reach 7 Overflow Monitoring Program Final Report. It describes and characterizes the recent transport of tailings from the Giant Mine site into Yellowknife Bay via Baker Creek.

**Received:** Jul 7, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 330  
**Stage:** [Other public registry materials](#)

#### 8 MB [IR round 1 responses to Alternatives North](#)

For the convenience of parties, this document includes all the responses to Alternatives North's information requests. (These are also available as several individual files on this website)

**Received:** Jun 24, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 325  
**Stage:** [Information requests](#)

#### 4 MB [IR round 1 responses to Environment Canada](#)

For the convenience of parties, this document includes all the responses to Environment Canada's information requests. (These are also available as several individual files on this website)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 24, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 327  
**Stage:** [Information requests](#)

#### 4 MB [IR round 1 responses to the City of Yellowknife](#)

For the convenience of parties, this document includes all the responses to the City of Yellowknife's information requests. (These are also available as several individual files on this website)

**Received:** Jun 24, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 326  
**Stage:** [Information requests](#)

#### 5 MB [IR round 1 responses to the NSMA](#)

For the convenience of parties, this document includes all the responses to the North Slave Metis Alliance's information requests. (These are also available as several individual files on this website)

**Received:** Jun 24, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 328  
**Stage:** [Information requests](#)

#### 7 MB [IR round 1 responses to the Review Board](#)

For the convenience of parties, this document includes all the responses to the Review Board's information requests. (These are also available as several individual files on this website)

**Received:** Jun 24, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 329  
**Stage:** [Information requests](#)

#### 0.8 MB [AltNrth IR 01 Q3 Attachment](#)

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 310  
**Stage:** [Information requests](#)

#### 0.5 MB [AltNrth IR 01 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 309  
**Stage:** [Information requests](#)

#### 0.5 MB [AltNrth IR 03 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 311  
**Stage:** [Information requests](#)

#### 0.5 MB [AltNrth IR 05 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 312  
**Stage:** [Information requests](#)

#### 0.5 MB [AltNrth IR 11 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 313  
**Stage:** [Information requests](#)

0.5 MB [AltNrth IR 12 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 314  
**Stage:** [Information requests](#)

0.5 MB [AltNrth IR 18 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 315  
**Stage:** [Information requests](#)

0.5 MB [AltNrth IR 19 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Alternatives North.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 316  
**Stage:** [Information requests](#)

0.5 MB [CityYK IR 03 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the City of Yellowknife.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 317  
**Stage:** [Information requests](#)

0.5 MB [CityYK IR 04 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the City of Yellowknife.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 318  
**Stage:** [Information requests](#)

0.4 MB [CityYK IR 06 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the City of Yellowknife.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 319  
**Stage:** [Information requests](#)

0.5 MB [CityYK IR 11 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the City of Yellowknife.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 320  
**Stage:** [Information requests](#)

0.5 MB [CityYK IR 13 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the City of Yellowknife.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 321  
**Stage:** [Information requests](#)

#### 0.4 MB [EC IR 03 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Environment Canada.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 322  
**Stage:** [Information requests](#)

#### 0.5 MB [EC IR 08 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Environment Canada.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 323  
**Stage:** [Information requests](#)

#### 0.7 MB [EC IR 14 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from Environment Canada.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 324  
**Stage:** [Information requests](#)

#### 0.02 MB [INAC covering letter for remaining IR responses](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
This is a covering letter for INAC's remaining responses to the first round of information requests.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 282  
**Stage:** [Information requests](#)

#### 0.4 MB [NSMA IR 01 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 300  
**Stage:** [Information requests](#)

#### 0.5 MB [NSMA IR 02 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 301  
**Stage:** [Information requests](#)

#### 0.4 MB [NSMA IR 03 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 302  
**Stage:** [Information requests](#)

#### 0.5 MB [NSMA IR 04 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 303  
**Stage:** [Information requests](#)

0.6 MB [NSMA IR 11 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 304  
**Stage:** [Information requests](#)

0.6 MB [NSMA IR 11 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 304  
**Stage:** [Information requests](#)

0.4 MB [NSMA IR 14 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 305  
**Stage:** [Information requests](#)

0.4 MB [NSMA IR 15 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 306  
**Stage:** [Information requests](#)

0.3 MB [NSMA IR 18 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 307  
**Stage:** [Information requests](#)

0.4 MB [NSMA IR 20 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the NSMA.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 308  
**Stage:** [Information requests](#)

0.5 MB [RB IR 11 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 283  
**Stage:** [Information requests](#)

0.5 MB [RB IR 12 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 284  
**Stage:** [Information requests](#)

#### 0.9 MBRB IR 12 Response Attachment

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 285  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 14 Response

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 286  
**Stage:** [Information requests](#)

#### 0.6 MBRB IR 16 Response

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 287  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 22 Response

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 288  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 23 Response

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 289  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 27 Response

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the Review Board.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 290  
**Stage:** [Information requests](#)

#### 0.5 MBYKDFN IR 01 Response

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 291  
**Stage:** [Information requests](#)

#### 1 MBYKDFN IR 09 Response

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 292  
**Stage:** [Information requests](#)

0.5 MB [YKDFN IR 10 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 293  
**Stage:** [Information requests](#)

0.4 MB [YKDFN IR 11 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 294  
**Stage:** [Information requests](#)

0.4 MB [YKDFN IR 12 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 295  
**Stage:** [Information requests](#)

0.5 MB [YKDFN IR 16 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 296  
**Stage:** [Information requests](#)

0.5 MB [YKDFN IR 22 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 297  
**Stage:** [Information requests](#)

0.5 MB [YKDFN IR 23 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 298  
**Stage:** [Information requests](#)

0.5 MB [YKDFN IR 27 Response](#)

This is one of INAC's / AANDC's remaining responses to the first round of information requests from the YKDFN.

**Received:** Jun 17, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 299  
**Stage:** [Information requests](#)

3 MB [Baker Creek Overflow Report](#)

This is the Baker Creek Reach 7 Overflow Monitoring Program Interim Report. It describes and characterizes the recent transport of tailings from the Giant Mine site into Yellowknife Bay via Baker Creek.

**Received:** Jun 8, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 281  
**Stage:** [Other public registry materials](#)

**0.5 MB**[AltNrth IR 02 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 216  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 04 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 217  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 06 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 218  
**Stage:** [Information requests](#)

**0.4 MB**[AltNrth IR 07 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

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**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 219  
**Stage:** [Information requests](#)

**0.4 MB**[AltNrth IR 08 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 220  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 09 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 221  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 10 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 222  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 13 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 223



**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 14 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 224  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 15 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 225  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 16 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 226  
**Stage:** [Information requests](#)

**0.4 MB**[AltNrth IR 17 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 227  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 20 Response](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 228  
**Stage:** [Information requests](#)

**0.5 MB**[AltNrth IR 21 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 229  
**Stage:** [Information requests](#)

**0.4 MB**[AltNrth IR 22 Response](#)

This is INAC's response to the first round of information requests from Alternatives North.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 230  
**Stage:** [Information requests](#)

**0.5 MB**[CityYK IR 01 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 231  
**Stage:** [Information requests](#)

**0.5 MB**[CityYK IR 02 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 232  
**Stage:** [Information requests](#)

0.5 MB [CityYK IR 05 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 236  
**Stage:** [Information requests](#)

0.4 MB [CityYK IR 10 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 233  
**Stage:** [Information requests](#)

0.4 MB [CityYK IR 07 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 237  
**Stage:** [Information requests](#)

0.4 MB [CityYK IR 12 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 234  
**Stage:** [Information requests](#)

0.5 MB [CityYK IR 08 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 238  
**Stage:** [Information requests](#)

0.3 MB [Covering letter for INAC IR Responses](#)

This is a covering letter for INAC's response to the first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 235  
**Stage:** [Information requests](#)

0.5 MB [CityYK IR 09 Response](#)

This is INAC's response to the first round of information requests from the City of Yellowknife.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 192  
**Stage:** [Information requests](#)

0.5 MB [EC IR 01 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

**Received:** May 31, 2011  
**Document Date:** Unknown

**0.4 MB**[EC IR 07 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	272
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.5 MB**[EC IR 09 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	273
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.4 MB**[EC IR 10 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	274
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.4 MB**[EC IR 11 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	275
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.4 MB**[EC IR 12 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Originator:</b>	Developer
<b>Public Registry:</b>	267
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.4 MB**[EC IR 02 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	268
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.4 MB**[EC IR 04 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	269
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.6 MB**[EC IR 05 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	270
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**0.4 MB**[EC IR 06 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

<b>Received:</b>	May 31, 2011
<b>Document Date:</b>	Unknown
<b>Originator:</b>	Developer
<b>Public Registry:</b>	271
<b>Stage:</b>	<a href="#"><u>Information requests</u></a>

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 276  
**Stage:** [Information requests](#)

**Stage:** [Information requests](#)

#### 0.1 MB [EC response to YKDFN IR#26](#)

This is Environment Canada's response to YKDFN's IR#26 (Round 1).

#### 0.4 MB [EC IR 13 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 277  
**Stage:** [Information requests](#)

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 191  
**Stage:** [Information requests](#)

#### 0.4 MB [NSMA IR 05 Response](#)

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

#### 0.4 MB [EC IR 15 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 278  
**Stage:** [Information requests](#)

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 255  
**Stage:** [Information requests](#)

#### 0.4 MB [NSMA IR 06 Response](#)

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

#### 0.5 MB [EC IR 16 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 279  
**Stage:** [Information requests](#)

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 256  
**Stage:** [Information requests](#)

#### 0.5 MB [NSMA IR 07 Response](#)

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

#### 0.5 MB [EC IR 17 Response](#)

This is INAC's response to the first round of information requests from Environment Canada.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 280

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 257  
**Stage:** [Information requests](#)

**0.4 MBNSMA IR 08 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 258  
**Stage:** [Information requests](#)

**0.4 MBNSMA IR 09 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 259  
**Stage:** [Information requests](#)

**0.3 MBNSMA IR 10 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 260  
**Stage:** [Information requests](#)

**0.6 MBNSMA IR 11 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 261  
**Stage:** [Information requests](#)

**0.4 MBNSMA IR 12 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 262  
**Stage:** [Information requests](#)

**0.7 MBNSMA IR 13 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 263  
**Stage:** [Information requests](#)

**0.4 MBNSMA IR 16 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 264  
**Stage:** [Information requests](#)

**0.4 MBNSMA IR 17 Response**

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 265  
**Stage:** [Information requests](#)

#### 0.4 MBNSMA IR 19 Response

This is INAC's response to the first round of information requests from the North Slave Metis Alliance.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 266  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 01 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 193  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 02 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 197  
**Stage:** [Information requests](#)

#### 0.6 MBRB IR 03 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 198  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 04 Response

This is INAC's response to the Review Board's first round of information requests.

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**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 199  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 05 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 200  
**Stage:** [Information requests](#)

#### 0.4 MBRB IR 06 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 201  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 07 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 202  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 08 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 203

**Stage:** [Information requests](#)

#### 0.5 MBRB IR 09 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 204  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 10 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 205  
**Stage:** [Information requests](#)

#### 0.6 MBRB IR 13 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 206  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 15 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 207  
**Stage:** [Information requests](#)

#### 0.4 MBRB IR 17 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 208  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 18 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 209  
**Stage:** [Information requests](#)

#### 0.4 MBRB IR 19 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 210  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 20 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 211  
**Stage:** [Information requests](#)

#### 0.5 MBRB IR 21 Response

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown

**0.3 MBRB01 2-C05 Downhole Freeze Pipes-C5-FreezePipes 4-27-2011 60**

This is one of three graphics submitted as part of INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 194  
**Stage:** [Information requests](#)

**1 MBRB01 3-U02 Underground Drillhole Layout 4-27-2011 60**

This is one of three graphics submitted as part of INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 195  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 02 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 239  
**Stage:** [Information requests](#)

**0.4 MBYKDFN IR 03 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 240  
**Stage:** [Information requests](#)

**Originator:** Developer  
**Public Registry:** 212  
**Stage:** [Information requests](#)

**0.5 MBRB IR 24 Response**

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 213  
**Stage:** [Information requests](#)

**0.5 MBRB IR 25 Response**

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 214  
**Stage:** [Information requests](#)

**0.4 MBRB IR 26 Response**

This is INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 215  
**Stage:** [Information requests](#)

**0.3 MBRB01 1-C04 Drillhole Layout and Methods-C4-Drilling Layout 4-27-2011 558**

This is one of three graphics submitted as part of INAC's response to the Review Board's first round of information requests.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 196  
**Stage:** [Information requests](#)



**0.4 MBYKDFN IR 04 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 241  
**Stage:** [Information requests](#)

**0.6 MBYKDFN IR 05 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 242  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 06 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 243  
**Stage:** [Information requests](#)

**0.4 MBYKDFN IR 07 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 244  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 08 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 245  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 13 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 246  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 14 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 247  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 15 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 248  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 17 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 249  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 18 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 250  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 20 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 251  
**Stage:** [Information requests](#)

**0.5 MBYKDFN IR 21 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 252  
**Stage:** [Information requests](#)

**0.4 MBYKDFN IR 26 Response**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 254  
**Stage:** [Information requests](#)

**0.1 MBYKDFN IR 26 Response EC**

This is INAC's response to the first round of information requests from the Yellowknives Dene First Nation.

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 253  
**Stage:** [Information requests](#)

**0.6 MBYKDFN IR 26 response from DFO**

This is DFO's response to IR#26 by the YKDFN. [Note: This is being re-posted now because it did not appear on the web site earlier due to a technical error].

**Received:** May 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 340  
**Stage:** [Information requests](#)

**0.01 MBNote to File- IR extension for INAC**

This Note to File states that the Review Board has granted the 60 day extension requested by INAC for its responses to information requests.

**Received:** Apr 1, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 190  
**Stage:** [Information requests](#)

**0.1 MB** [Covering letter- YKDFN IR 19 Response from DFO](#)

This is a covering letter for DFO's response to IR#19 by the YKDFN. [Note: This is being re-posted now because it did not appear on the web site earlier due to a technical error].

**Received:** Mar 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 341  
**Stage:** [Information requests](#)

**0.05 MB** [INAC Request for Extension on IR responses round 1](#)

This is a request from INAC for an extension for responses to the first round of information requests.

**Received:** Mar 31, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 189  
**Stage:** [Information requests](#)

**0.02 MB** [YKDFN IR #19 Response by DFO](#)

This is DFO's response to IR#19 by the YKDFN. [Note: This is being re-posted now because it did not appear on the web site earlier due to a technical error].

**Received:** Mar 31, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 342  
**Stage:** [Information requests](#)

**0.05 MB** [Clarification of IRs 3.6 and 7c](#)

This is the Review Board's response to an e-mail from INAC asking for clarification of IRs 3.6 and 7c. (Includes the original e-mail from INAC)

**Received:** Mar 21, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 186  
**Stage:** [Information requests](#)

**0.07 MB** [YKDFN IR clarification to INAC](#)

This is a request from INAC for clarification of YKDFN's IR 10b, and the response from YKDFN.

**Received:** Mar 21, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 187  
**Stage:** [Information requests](#)

**0.2 MB** [Alternatives North Round 1 IRs](#)

This is the first round of information requests from Alternatives North to Indian and Northern Affairs Canada.

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 180  
**Stage:** [Information requests](#)

**0.5 MB** [City of Yellowknife Round 1 IRs](#)

This is the first round of information requests from the City of Yellowknife to Indian and Northern Affairs Canada.

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 181  
**Stage:** [Information requests](#)

**0.05 MB** [Cover letter- UBC Independent Environmental Oversight Report](#)

This is a covering letter to a UBC report on Independent Environmental Oversight.

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 184  
**Stage:** [Other public registry materials](#)

**0.9 MB** [DFO Letter re: Giant IRs](#)

This is a letter from DFO regarding information requests for the Giant Mine EA and the role of DFO with respect to the project. (Re-posted due to a technical error)

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 188  
**Stage:** [Information requests](#)

**0.05 MB**[Environment Canada Round 1IRs](#)

This is the first round of information requests from Environment Canada to Indian and Northern Affairs Canada.

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 182  
**Stage:** [Information requests](#)

**0.8 MB**[Independent Environmental Oversight Report](#)

This is a report on independent environmental oversight prepared for the Giant EA. It was prepared independently by a team from the UBC Faculty of Law at the request of the Yellowknives Dene First Nation, the City of Yellowknife and Mr. Kevin O'Reilly.

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 185  
**Stage:** [Technical reports](#)

**0.1 MB**[NSMA Round 1 IRs](#)

This is the first round of information requests from the North Slave Metis Alliance to Indian and Northern Affairs Canada.

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 183  
**Stage:** [Information requests](#)

**0.2 MB**[YKDFN Round 1 IRs](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
This is the first round of information requests from the Yellowknives Dene First Nation to Indian and Northern Affairs Canada.

**Received:** Feb 28, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 179  
**Stage:** [Information requests](#)

**0.9 MB**[Review Board IRs, Revised Party Deadline](#)

This is the Review Board's first round of information requests to INAC. It includes a covering letter stating that parties' IR submission deadline has been extended to Feb. 28, 2011 at INAC's request .

**Received:** Feb 9, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 178  
**Stage:** [Information requests](#)

**0.07 MB**[INAC Request for IR deadline extension](#)

This letter from INAC requests that the deadline for parties to submit the first round of information requests be extended from Feb.14th 2011 to Feb. 28th, 2011.

**Received:** Feb 3, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 177  
**Stage:** [Information requests](#)

**0.5 MB**[Participant funding decision and letter](#)

This letter describes the allocation of participant funding for the Giant EA. It includes the decision of the review committee as an attachment.

**Received:** Jan 27, 2011  
**Document Date:** Unknown  
**Originator:** Federal or responsible minister  
**Public Registry:** 176  
**Stage:** [Other public registry materials](#)

**0.7 MB**[Letter from Review Board Re: IR deadline and process](#)

This is a letter to parties from the Review Board regarding the Information Request deadline as well as the process change request for EA 0809-001. Information Request submissions are due February 14th, 2011. They are to be submitted as planned to INAC.

**Received:** Jan 20, 2011  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 175  
**Stage:** [Information requests](#)

**0.6 MB**[NSMA support for INAC request re: IR deadline](#)

This e-mail from the North Slave Metis Alliance supports INAC's request to delay the IR submission deadline.

**Received:** Jan 18, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 173  
**Stage:** [Information requests](#)

**0.1 MB**[Alternatives North support for INAC request re: IR deadline](#)

This e-mail from Alternatives North supports INAC's request to delay the IR submission deadline.

**Received:** Jan 17, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 170  
**Stage:** [Information requests](#)

**0.3 MB**[Lessons Learned on Community Involvement in Remediation](#)

This is a study titled "Lessons learned on community involvement in the remediation of orphaned and abandoned mine sites: Case studies and analysis". It was submitted by Alternatives North for use in its later submissions.

**Received:** Jan 17, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 171  
**Stage:** [Other public registry materials](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
**1 MB**[NOAMI Policy Framework Guidance Document](#)

This is a document titled "The policy framework in Canada for mine closure and management of long-term liabilities: A guidance document". It was submitted by Alternatives North for use in its later submissions.

**Received:** Jan 17, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 172  
**Stage:** [Other public registry materials](#)

**0.04 MB**[YKDFN support for INAC request re: IR deadline](#)

This e-mail from the YKDFN supports INAC's request to delay the IR submission deadline.

**Received:** Jan 17, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 169  
**Stage:** [Information requests](#)

**0.04 MB**[INAC Request for Amendment to Workplan](#)

This letter from INAC requests a change to the information request process described in the Revised Workplan of Dec. 23, 2010.

**Received:** Jan 14, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 167  
**Stage:** [Information requests](#)

**0.02 MB**[INAC request re: postponing IRs](#)

This letter from INAC requests a delay in the information request deadline.

**Received:** Jan 14, 2011  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 168  
**Stage:** [Information requests](#)

**0.02 MB**[Alternatives North re: participant funding, IRs](#)

This is an e-mail from Alternatives North regarding participant funding and information requests.

**Received:** Jan 5, 2011  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 174  
**Stage:** [Information requests](#)

#### 0.07 MB [Note to File- Information Requests by Parties](#)

This is a note to file stating that January 25th 2010 is the deadline for parties to submit information requests to the developer. This note includes guidance on the information request process and format.

**Received:** Dec 24, 2010  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 166  
**Stage:** [Information requests](#)

#### 0.1 MB [Revised Giant EA Workplan, Dec 2010](#)

This is a revised workplan for the Giant EA, updated to reflect the actual Developer's Assessment Report submission date and timing considerations related to information requests. Updates to the information request process are included.

**Received:** Dec 23, 2010  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 165  
**Stage:** [Terms of Reference and workplans](#)

#### 0.2 MB [Alternatives North Party Status](#)

This letter from the Review Board informs Alternatives North that it has been granted party status.

**Received:** Dec 21, 2010  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 162  
**Stage:** [Assessment/review startup](#)

#### 0.4 MB [Conformity Letter](#)

This letter states that the Review Board has found that the Developer's Assessment Report is in conformity with the Terms of Reference.

**Received:** Dec 21, 2010  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 163  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 1 MB [Giant geotechnical study 2011](#)

This letter from INAC describes geotechnical investigations proposed for January 2011. These are related to the Giant Mine Remediation Project. Two letters are attached, one to GNWT Municipal and Community Affairs and another to the Mackenzie Valley Land and Water Board.

**Received:** Dec 17, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 164  
**Stage:** [Other public registry materials](#)

#### 0.03 MB [Deficiency response covering letter](#)

This is the covering letter for the deficiency response. It supplements the Developers Assessment Report for the Giant EA. Four detailed items and an attachment are posted as separate files on this website.

**Received:** Dec 15, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 156  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.3 MB [Deficiency response item 1](#)

This is the first of four deficiency response items, supplementing the Developer's Assessment Report for the Giant EA. A related supporting document is posted separately on this site.

**Received:** Dec 15, 2010  
**Document Date:** Unknown  
**Originator:** Developer

**Public Registry:** 157

**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 4 MB [Deficiency response item 1 supporting document](#)

This is Tier 2 risk assessment, submitted as a supporting document attached to deficiency response item 1.

**Received:** Dec 15, 2010

**Document Date:** Unknown

**Originator:** Developer

**Public Registry:** 161

**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.07 MB [Deficiency response item 2](#)

This is the second of four deficiency response items, supplementing the Developer's Assessment Report for the Giant EA.

**Received:** Dec 15, 2010

**Document Date:** Unknown

**Originator:** Developer

**Public Registry:** 158

**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.1 MB [Deficiency response item 3](#)

This is the third of four deficiency response items, supplementing the Developer's Assessment Report for the Giant EA.

**Received:** Dec 15, 2010

**Document Date:** Unknown

**Originator:** Developer

**Public Registry:** 159

**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.2 MB [Deficiency response item 4](#)

This is the fourth of four deficiency response items, supplementing the Developer's Assessment Report for the Giant EA.

**Received:** Dec 15, 2010

**Document Date:** Unknown

**Originator:** Developer

**Public Registry:** 160

**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.08 MB [Alternatives North party status application](#)

This is an application for party status in the Giant EA by Alternatives North.

**Received:** Dec 6, 2010

**Document Date:** Unknown

**Originator:** Parties/Public

**Public Registry:** 155

**Stage:** [Assessment/review startup](#)

#### 0.2 MB [Giant EA Participant Funding Guide and Application Forms](#)

This is a MS Word version of INAC's participant funding guide and application form. It can be modified by applicants to include their particulars when applying for funding.

**Received:** Dec 1, 2010

**Document Date:** Unknown

**Originator:** Federal or responsible minister

**Public Registry:** 154

**Stage:** [Other public registry materials](#)

#### 2 MB [Deficiency Statement- Giant DAR](#)

This is a deficiency statement from the Review Board identifying items in the Terms of Reference that need to be addressed by INAC. [Note: Response deadline corrected to Dec. 15th, 2010]

**Received:** Nov 26, 2010

**Document Date:** Unknown

**Originator:** Review Board

**Public Registry:** 153

**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 2 MB [Participant Funding guide and application forms](#)

This document is a guide to participant funding and application forms. It is an attachment to the Nov. 24th, 2010 letter from Indian and Northern Affairs Canada regarding participant funding for the Giant Mine environmental assessment.

**Received:** Nov 24, 2010

**Document Date:** Unknown

**Originator:** Federal or responsible minister  
**Public Registry:** 152  
**Stage:** [Other public registry materials](#)

**0.07 MB**[Participant Funding letter from INAC](#)

This is a letter from Indian and Northern Affairs Canada regarding participant funding for the Giant Mine environmental assessment.

**Received:** Nov 24, 2010  
**Document Date:** Unknown  
**Originator:** Federal or responsible minister  
**Public Registry:** 150  
**Stage:** [Other public registry materials](#)

**0.06 MB**[Public Notice- Participant Funding](#)

This public notice from Indian and Northern Affairs Canada announces participant funding for the Giant Mine environmental assessment.

**Received:** Nov 24, 2010  
**Document Date:** Unknown  
**Originator:** Federal or responsible minister  
**Public Registry:** 151  
**Stage:** [Other public registry materials](#)

**0.04 MB**[BBCA e-mail re: Giant assessment](#)

This is an e-mail from the Back Bay Community Association regarding the Giant Remediation assessment process.

**Received:** Nov 12, 2010  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 148  
**Stage:** [Other public registry materials](#)

**0.05 MB**[Response to BBBCA e-mail](#)

This is an e-mail responding to the Back Bay Community Association's request for information on the Giant environmental Assessment

**Received:** Nov 12, 2010  
**Document Date:** Unknown

**Originator:** Review Board  
**Public Registry:** 149  
**Stage:** [Other public registry materials](#)

**0.04 MB**[YKDFN e-mail to INAC re IR round 1](#)

This is an e-mail from the YKDFN to INAC regarding the scheduling of the first round of information requests.

**Received:** Nov 9, 2010  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 144  
**Stage:** [Information requests](#)

**0.06 MB**[DFO review- Human Health and Ecological Risk Assessment](#)

This is one of three documents submitted by INAC as the Government of Canada's review comments on the Human Health and Ecological Risk Assessment.

**Received:** Nov 5, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 145  
**Stage:** [Technical reports](#)

**0.06 MB**[EC Review- Human Health and Ecological Risk Assessment](#)

This is number two of three documents submitted by INAC as the Government of Canada's review comments on the Human Health and Ecological Risk Assessment.

**Received:** Nov 5, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 146  
**Stage:** [Technical reports](#)

**0.04 MB**[INAC request re: Round 1 IRs](#)

This is a request from INAC to begin the first round of information requests in the new year.

**Received:** Nov 5, 2010  
**Document Date:** Unknown  
**Originator:** Developer



**Public Registry:** 143  
**Stage:** [Information requests](#)

#### 0.4 MB [SENES Review- Human Health and Ecological Risk Assessment](#)

This is number three of three documents submitted by INAC as the Government of Canada's review comments on the Human Health and Ecological Risk Assessment.

**Received:** Nov 5, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 147  
**Stage:** [Technical reports](#)

#### 0.009 MB [Giant DAR on Board's FTP site](#)

This is a note to file stating that the Developer's Assessment Report for the proposed Giant Mine Remediation Project was available on the Review Board's FTP site. The ftp site is no longer available.

**Received:** Nov 1, 2010  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 142  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.007 MB [Note to File: Giant DAR distribution and conformity check](#)

This is a note to file about the distribution of the Developer's Assessment Report, the conformity check, and upcoming revisions of the workplan for the environmental assessment.

**Received:** Oct 29, 2010  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 140  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 4 MB [Giant DAR Figures \(Chapters 1 through 5\)](#)

These are the figures from chapters 1 through 5 of the Developer's Assessment Report for the Giant Mine Remediation Project. Higher resolution versions were originally posted on the Review Board's FTP site, which is no longer available.

**Received:** Oct 28, 2010

**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 139  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 6 MB [Giant DAR Figures \(Chapters 7 through 14\)](#)

These are the figures from chapters 7 through 14 of the Developer's Assessment Report for the Giant Mine Remediation Project. Higher resolution versions were originally posted on the Review Board's FTP site, which is no longer available.

**Received:** Oct 28, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 139  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 4 MB [Giant DAR](#)

This is the Developer's Assessment Report (DAR) for INAC's Giant Mine Remediation Project. Note that figures will be posted separately.

**Received:** Oct 27, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 139  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.05 MB [Giant DAR covering letter](#)

This is the covering letter that accompanied the Developer's Assessment Report for the Giant Mine Remediation Project.

**Received:** Oct 27, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 141  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 4 MB [Giant DAR Figures \(Chapter 6 Figs. 6.1.1- 6.11.1\)](#)

These are the figures from chapter 6 of the Developer's Assessment Report for the Giant Mine Remediation Project. Higher resolution versions were originally posted on the Review Board's FTP site, which is no longer available.

**Received:** Oct 27, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 139  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 1 MB [Giant Implementation Schedule](#)

This is figure 6.13.1 from chapter 6 of the Developer's Assessment Report for the Giant Mine Remediation Project. It is a Gantt chart showing the proposed implementation schedule.

**Received:** Oct 27, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 139  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.07 MB [O'Reilly e-mail re: participant funding](#)

This e-mail from K. O'Reilly described participant funding provided by CEAA for the Gunnar Mine Site Rehabilitation Project in Saskatchewan.

**Received:** Sep 21, 2010  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 138  
**Stage:** [Other public registry materials](#)

#### 0.05 MB [Correspondance from INAC regarding the DAR](#)

A letter was recieved by the Review Board from INAC regarding the Developers Assessment Rerport (DAR) submission for the Giant Mine Remediation EA0809-001, scheduled for the end of June 2010.

**Received:** Jul 2, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 137  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.4 MB [O'Reilly submission re: participant funding for Giant EA](#)

This is correspondence from K. O'Reilly regarding participant funding for the Giant EA. It includes attachments providing an example from Nunavut.

**Received:** Jun 25, 2010  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 136  
**Stage:** [Other public registry materials](#)

#### 0.07 MB [YKDFN letter re: Meetings on Giant Remediation](#)

This is a letter from the Yellowknives Dene First Nation regarding meetings about the Giant remediation. It is a response to the INAC letter of March 29th, 2010.

**Received:** May 6, 2010  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 135  
**Stage:** [Other public registry materials](#)

#### 0.04 MB [Letter from INAC- Revised submission date](#)

This letter from INAC states that the Developer's Assessment Report will be submitted by June 30th, 2010.

**Received:** May 5, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 134  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

#### 0.06 MB [INAC 2010 Summer Workplan for Giant](#)

This letter describes Indian and Northern Affairs Canada's workplan for activities at the Giant Mine site for the summer of 2010.

**Received:** Apr 16, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 133  
**Stage:** [Other public registry materials](#)

#### 0.1 MB [INAC letter to YKDFN re: Information sessions](#)

This is a letter from INAC to the Yellowknives Dene First Nation announcing project information sessions in Yellowknife.

**Received:** Apr 1, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 132  
**Stage:** [Other public registry materials](#)

**0.09 MB**[INAC Meeting Request to YKDFN](#)

This is a letter from INAC to the Yellowknives Dene First Nation requesting a meeting.

**Received:** Mar 30, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 131  
**Stage:** [Other public registry materials](#)

**0.1 MB**[UBC Faculty of Law Research Proposal](#)

This is a letter and proposal from the University of Winnipeg and the Faculty of Law at UBC. It describes work that is being conducted (with outside funding) to examine different types of independent oversight agencies for consideration in the Giant Mine EA.

**Received:** Mar 3, 2010  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 130  
**Stage:** [Other public registry materials](#)

**0.01 MB**[Note to File- Temporary Contact Info](#)

Until February 19th 2010, all contact regarding this environmental assessment should be directed to Nicole Spencer, Environmental Assessment Officer (Tel: (867) 766-7062; nspencer@reviewboard.ca ).

**Received:** Feb 5, 2010  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 129  
**Stage:** [Other public registry materials](#)

**0.2 MB**[Reply from INAC to Bob Bromley, MLA](#)

This is INAC's reply to the Dec. 8, 2009 letter from MLA Bob Bromley.

**Received:** Feb 4, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 128  
**Stage:** [Other public registry materials](#)

**0.2 MB**[YKDFN letter re: INAC meeting request](#)

This is the Yellowknives Dene First Nation's response to the request from Indian and Northern Affairs Canada for a meeting regarding concerns and consultation initiatives.

**Received:** Feb 3, 2010  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 127  
**Stage:** [Other public registry materials](#)

**0.1 MB**[INAC request for meeting w YKDFN](#)

This is a request from Indian and Northern Affairs Canada for a meeting with the Yellowknives Dene First Nation regarding concerns and consultation initiatives.

**Received:** Jan 25, 2010  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 126  
**Stage:** [Other public registry materials](#)

**0.03 MB**[INAC Letter- Revised DAR Submission Date: April 2010](#)

This letter from INAC identifies April 2010 as the anticipated submission date for the Developer's Assessment Report for the Giant environmental assessment.

**Received:** Dec 17, 2009  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 125  
**Stage:** [Developer's Assessment Report/Environmental Impact Statement](#)

**0.2 MB**[Letter from B. Bromley, MLA, to INAC](#)

This is a letter from MLA Bob Bromley to INAC Minister Chuck Strahl.

**Received:** Dec 8, 2009

**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 124  
**Stage:** [Other public registry materials](#)

#### **0.4 MBE-mail from Kevin O'Reilly Regarding Funding Requests for Independent Oversight**

This document contains an e-mail from Kevin O'Reilly (and attached letters from the Yellowknives Dene, City of Yellowknife and Indian and Northern Affairs Canada) regarding funding for independent oversight of Indian and Northern Affairs Canada's proposed remediation of the GIANT mine. This file is an addendum to the November 9th, 2009 letter from Kevin O'Reilly.

**Received:** Nov 24, 2009  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 123  
**Stage:** [Other public registry materials](#)

#### **0.2 MBE-mail and letter re: authorizations for freeze optimization study**

This is an e-mail from K. O'Reilly with an attachment from the Mackenzie Valley Land and Water Board to INAC. Both pertain to authorizations for the current freeze optimization study being conducted at the Giant mine site. (Note that the activities currently occurring at the Giant mine site are not included in the scope of the development for the environmental assessment)

**Received:** Nov 9, 2009  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 122  
**Stage:** [Other public registry materials](#)

#### **0.2 MBLetter to INAC re: Funding of Parties**

This is a letter from the Yellowknives Dene First Nation, the City of Yellowknife and K. O'Reilly to INAC regarding funding for participation in the current environmental assessment.

**Received:** Nov 9, 2009  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 121  
**Stage:** [Other public registry materials](#)

#### **0.1 MBLetter re: arsenic discharge at Giant**

This is an e-mail from K. O'Reilly regarding a discharge of arsenic dust that occurred during the current freeze optimization study. Attached is a departmental statement from INAC about the incident. (Note that the activities currently occurring at the Giant mine site are not included in the scope of the development for the environmental assessment)

**Received:** Oct 29, 2009  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 120  
**Stage:** [Other public registry materials](#)

#### **0.05 MBLetter re: current activities at Giant**

This e-mail pertains to current activities that are part of the freeze optimization study. Note that the activities currently occurring at the Giant mine site are not included in the scope of the development for the environmental assessment.

**Received:** Sep 16, 2009  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 119  
**Stage:** [Other public registry materials](#)

#### **0.5 MBFreeze Optimization Study- progress and steps**

This letter outlines the progress made and steps being taken for INAC's freeze optimization study for the Giant Mine remediation.

**Received:** May 29, 2009  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 118  
**Stage:** [Technical reports](#)

#### **0.09 MBCovering Letter- Giant Mine Terms of Reference + Workplan**

This is the covering letter for the Terms of Reference and Workplan documents for the environmental assessment of the Giant Mine Remediation Plan.

**Received:** May 12, 2009  
**Document Date:** Unknown  
**Originator:** Review Board

**Public Registry:** 115  
**Stage:** [Terms of Reference and workplans](#)

### 0.3 MB [Terms of Reference- Giant EA](#)

This document is the Terms of Reference for the environmental assessment of the Giant Mine Remediation Plan.

**Received:** May 12, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 116  
**Stage:** [Terms of Reference and workplans](#)

### 0.1 MB [Workplan- Giant EA](#)

This document is the Workplan for the environmental assessment of the Giant Mine Remediation Plan.

**Received:** May 12, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 117  
**Stage:** [Terms of Reference and workplans](#)

### 1 MB [DFO Comments on Draft ToR- Giant EA](#)

These are the comments of the Department of Fisheries and Oceans on the Draft Terms of Reference for the Giant Mine Remediation Plan.

**Received:** Apr 9, 2009  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 114  
**Stage:** [Terms of Reference and workplans](#)

### 0.2 MB [INAC Comments on Draft ToR for Giant EA](#)

These are the comments of the developer (INAC) on the Draft Terms of Reference for the Giant Mine Remediation Plan.

**Received:** Apr 9, 2009  
**Document Date:** Unknown  
**Originator:** Developer

**Public Registry:** 113  
**Stage:** [Terms of Reference and workplans](#)

### 0.2 MB [K. O'Reilly Comments on Draft ToR](#)

These are the comments of Kevin O'Reilly on the Draft Terms of Reference for the Giant Mine Remediation Plan.

**Received:** Apr 9, 2009  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 112  
**Stage:** [Terms of Reference and workplans](#)

### 0.2 MB [CV of Dr. Franco Oboni](#)

CV of Oboni Riskope Associates expert that the Review Board has selected to assist it in the Giant Mine Remediation Plan EA.

**Received:** Mar 20, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 111  
**Stage:** [Other public registry materials](#)

### 0.2 MB [CV of Jerome Nriagu](#)

CV of Dr. Jerome Nriagu, an expert that the Review Board has selected to assist it in the Giant Mine Remediation Plan EA.

**Received:** Mar 20, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 111  
**Stage:** [Other public registry materials](#)

### 2 MB [CVs of BGC Engineering's team](#)

CVs of BGC Engineering Inc. experts that the Review Board has selected to assist it in the Giant Mine Remediation Plan EA.

**Received:** Mar 20, 2009  
**Document Date:** Unknown  
**Originator:** Review Board

**Public Registry:** 111  
**Stage:** [Other public registry materials](#)

## 0.2 MB [Draft Work Plan](#)

Comments on this draft document are due on April 9, 2009. They can be submitted to Tawanis Testart by [email](#) or by fax at (867) 766-7074. The cover letter, with further instructions, for this document is attached

**Received:** Mar 20, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 110  
**Stage:** [Terms of Reference and workplans](#)

## 0.1 MB [Notification of expert advisory services](#)

This notification advises the distribution list of expert advisors that have been retained by the Review Board, or that the Review Board intends to retain, for the provision of advisory services in the environmental assessment of the Giant Mine Remediation

**Received:** Mar 20, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 111  
**Stage:** [Other public registry materials](#)

## 0.3 MB [Draft Terms of Reference](#)

Comments on this draft document are due on April 9, 2009. They can be submitted to Tawanis Testart by [email](#) or by fax at (867) 766-7074.

**Received:** Mar 16, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 109  
**Stage:** [Terms of Reference and workplans](#)

## 0.05 MB [Support from INAC for Technical Experts](#)

Letter from Indian and Northern Affairs to support and encourage the experts and the Board to raise any unresolved issues or questions for party comment if they arise in the future. INAC was referring to the fact that the experts were not in attendance at

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

**Received:** Feb 3, 2009  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 108  
**Stage:** [Other public registry materials](#)

## 0.08 MB [Letter to INAC re: Expert Advisors](#)

This is a response to Indian and Northern Affairs letter of Jan 21, 2009 and clarifies the Review Board's approach to hiring outside, independent expert advisors to assist the Review Board during EAs.

**Received:** Jan 23, 2009  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 107  
**Stage:** [Other public registry materials](#)

## 0.04 MB [Letter from INAC Clarifying Concerns over Request for Proposals](#)

Comments from Indian and Northern Affairs regarding the retention of experts in the Giant Mine Environmental Assessment. This is a letter clarifying INAC's concerns with the Review Board's recent Request for Proposals. A letter of concern was submitted by

**Received:** Jan 21, 2009  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 106  
**Stage:** [Other public registry materials](#)

## 0.04 MB [Letter from INAC to MVEIRB re: Comments on RfD](#)

This letter provides comments on the recent Reasons for Decision on Scope issued by the Review Board in the EA of the Giant Mine Remediation plan.

**Received:** Jan 15, 2009  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 105  
**Stage:** [Scoping](#)

## 3 MB [Reasons for Decision on Scope](#)

The Review Board has made its determination on both the scope of development and scope of assessment in the Giant Mine Remediation EA. This document outlines this decision as it pertains to issues that were raised by participants during the scoping phase

**Received:** Dec 19, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 104  
**Stage:** [Scoping](#)

**0.02 MB**[RE: URGENT October 9, 2008 e-mail from DIAND to MVEIRB on the Giant Mine Environmental Assessment](#)

This email exchange is in regards to a delay in posting certain registry items.

**Received:** Nov 20, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 100  
**Stage:** [Other public registry materials](#)

**0.2 MB**[Request for Proposals -Provision of Expert Services](#)

On november 20, 2008, Request for Proposals were issued for expert services regarding the Giant Mine Remediation Environmental Assessment.

**Received:** Nov 20, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 102  
**Stage:** [Other public registry materials](#)

**0.07 MB**[Letter from INAC Regarding Posting Information on the Public Registry](#)

Letter from Indian and Northern Affairs to the Review Board regarding posting additional material on the Public Registry, specifically for the Giant Mine Remediation EA.

**Received:** Nov 19, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 103  
**Stage:** [Other public registry materials](#)

**0.5 MB**[Letter from INAC to MVEIRB re: Additional Information](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

This letter outlines information requested by the Review Board on this matter. The Review Board is currently considering the scope of assessment for this EA and has not yet made an determination in this matter.

**Received:** Oct 17, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 101  
**Stage:** [Scoping](#)

**0.01 MB**[Email exchange from INAC to MVEIRB between Oct 6 and Oct 9](#)

INAC has expressed an interest in conducting a freeze optimization study, as described in Undertaking #1, submitted prior to the scoping hearing for Giant Mine. This correspondence includes a request from the Review Board for additional information o

**Received:** Oct 6, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 98  
**Stage:** [Scoping](#)

**0.8 MB**[Mining Heritage Society Letter to MVEIRB Regarding Society Property](#)

Letter from the NWT Mining Heritage Society regarding heritage buildings and materials. This letter details various interests that the Mining Heritage Society holds at the Giant Mine site. This includes buildings, equipment and a potential transfer of l

**Received:** Oct 1, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 97  
**Stage:** [Other public registry materials](#)

**0.1 MB**[Letter from Kevin O'Reilly to MVEIRB re: Comments on responses to undertakings](#)

Mr. O'Reilly has provided comments on the responses received by the Review Board to undertakings that arose during the public scoping hearing for the Giant Mine Remediation Plan.

**Received:** Sep 22, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 95

**Stage:** [Scoping](#)

**1 MB**[Discussion Paper on Colomac Mine Remediation](#)

Submitted by Kevin O'Reilly.

**Received:** Sep 3, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 94  
**Stage:** [Other public registry materials](#)

**0.01 MB**[Email from Lois Little re: Intervenor funding](#)

**Received:** Sep 3, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 93  
**Stage:** [Scoping](#)

**0.07 MB**[Response to Undertaking #4](#)

Letter submitted by INAC that contains their response to Undertaking #4 from the scoping hearing for Giant Mine.

**Received:** Aug 21, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 91  
**Stage:** [Scoping](#)

**0.2 MB**[A submission by Warren Heath to MVEIRB](#)

A request from Warren Heath to the Board to send the Giant Mine Remediation Project to EIR.

**Received:** Aug 19, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 90  
**Stage:** [Scoping](#)

**0.02 MB**[Letter from MVEIRB to INAC re: Request for Extension](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
Response from MVEIRB to INAC's request for extension regarding the submission of undertaking #4.

**Received:** Aug 19, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 89  
**Stage:** [Scoping](#)

**0.03 MB**[EC's Response to Undertaking #9 - Expertise from government departments](#)

Environment Canada clarifies their role in the EA process. Please note that this document incorrectly identifies this information as responding to Undertaking #8 and #9. It should read Undertaking #9.

**Received:** Aug 18, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 87  
**Stage:** [Scoping](#)

**0.05 MB**[INAC Request for extension re: Undertaking #4](#)

INAC has requested an extension to August 22, 2008 to submit its response to Undertaking #4. The Review Board will consider this request at its next board meeting, August 19 & 20, 2008.

**Received:** Aug 18, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 85  
**Stage:** [Scoping](#)

**5 MB**[YKDFN response to Undertaking #10](#)

The Yellowknives Dene First Nation undertook to provide their updated presentation to the Review Board.

**Received:** Aug 18, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 88  
**Stage:** [Scoping](#)

**0.5 MB**[INAC Undertaking #5 - MVRMA s. 118](#)



Undertaking explains INAC's opinion on whether the interim activities ongoing at the site contravene s.118, which states that no permit or authorization shall be granted while an EA is ongoing.

**Received:** Aug 15, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 86  
**Stage:** [Scoping](#)

#### 0.2 MB [INAC's Response to Undertaking #1 - Freeze Optimization Study](#)

INAC proposes to complete a study of the proposed frozen ground method at a location on site. They agreed to provide more information on this proposed work to the Review Board.

**Received:** Aug 15, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 83  
**Stage:** [Scoping](#)

#### 0.4 MB [INAC's Response to Undertaking #3](#)

INAC clarifies whether participant funding might be made available during an EA or an EIR.

**Received:** Aug 15, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 84  
**Stage:** [Scoping](#)

#### 0.5 MB [Letter from Private Citizen-Bruce MacLean](#)

A submission by private citizen on behalf of his family who are YKD band members, regarding the Giant Mine Remediation Plan.

**Received:** Aug 14, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 81  
**Stage:** [Scoping](#)

#### 5 MB [Con Mine Reclamation Status Report](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
 Submitted by Kevin O'Reilly.

**Received:** Aug 8, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 77  
**Stage:** [Scoping](#)

#### 1 MB [GNWT Response to Undertaking #2](#)

In response to questions regarding the Ingraham Trail realignment, GNWT has submitted information about the status of that project.

**Received:** Aug 8, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 79  
**Stage:** [Scoping](#)

#### 0.02 MB [Letter from Kevin O'Reilly to MVEIRB re: Follow-up to scoping hearing](#)

Letter from Kevin O'Reilly, submitted after the scoping hearing held on July 22-23, 2008.

**Received:** Aug 8, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 76  
**Stage:** [Scoping](#)

#### 0.02 MB [City of Yellowknife Response to Undertakings 6-8](#)

Undertakings deal with property taxes, surface lease and water quality study results. This document is too large for the website. If interested in seeing the document please contact MVEIRB office.

**Received:** Aug 6, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 82  
**Stage:** [Scoping](#)

#### 0.05 MB [Letter from the Native Women's Assn. Training Centre](#)

This letter deals with concerns related to training and education for northerners that includes a basic understanding of contaminated sites and the impacts of large-scale development.

**Received:** Jul 31, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 74  
**Stage:** [Other public registry materials](#)

#### 5 MB [Document on Arsenic Levels in Yellowknife - Exhibit 1](#)

Arsenic Levels in the Yellowknife Area: A report written by \r\r\nEnvironmental Science Group February 2001 for YASRC submitted as evidence by YKDFN introduced at the Giant Mine Scoping Hearing July 22 and 23, 2008 in Yellowknife, NT. It is marked as Exhibit 1.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 65  
**Stage:** [Scoping](#)

#### 0.2 MB [Letter from G. Vaillancourt, resident of Yellowknife](#)

Mr. Vaillancourt submitted this letter to the Review Board after the scoping hearing held on July 22 and 23, 2008. It details his concerns regarding the Giant Mine Remediation Plan.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 75  
**Stage:** [Scoping](#)

#### 0.02 MB [Letter from MVEIRB requesting EC and DFO send reps to hearing](#)

In this letter, the Review Board respectfully asks that representatives from Environment Canada and Fisheries and Oceans attend the scoping hearing for the Giant Mine Remediation environmental assessment on July 23, 2008 in order to provide the Review Board

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 61  
**Stage:** [Scoping](#)

#### 0.2 MB [Presentation from Kevin O'Reilly](#)

Presented by Kevin O'Reilly at the scoping hearing for the Giant Mine EA. Updated to include written submission also submitted to the Review Board.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 71  
**Stage:** [Scoping](#)

#### 2 MB [Presentation from NSMA](#)

Presented on July 23, 2008 by the North Slave Metis Alliance during the scoping hearing for the Giant Mine EA.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 69  
**Stage:** [Scoping](#)

#### 4 MB [Presentation from YKDFN](#)

Presented by the Yellowknives Dene First Nation at the scoping hearing for the Giant Mine EA.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 70  
**Stage:** [Scoping](#)

#### 0.3 MB [Presented by the City of Yellowknife](#)

Presented by the City of Yellowknife at the scoping hearing for the Giant Mine EA.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 72  
**Stage:** [Scoping](#)

#### 0.2 MB [Sign in Sheet - Scoping Hearing](#)

Sign in sheets from the second day of the Giant Mine Public Scoping Hearing, July 23, 2008

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 92  
**Stage:** [Scoping](#)

**0.5 MB**[Sustainability-Based Assessment & Frameworks](#)

Report prepared for the Joint Review Panel in their review of the Mackenzie Gas Project. Submitted by Kevin O'Reilly as an attachment to his submission for the public scoping hearing held on July 22 & 23, 2008.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 78  
**Stage:** [Scoping](#)

**0.2 MB**[Transcript from July 23, 2008](#)

This is the transcript from the second day of the Giant Mine scoping hearing, conducted by the Review Board on July 23, 2008. This includes a listing of undertakings 6 through 10.

**Received:** Jul 23, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 67  
**Stage:** [Scoping](#)

**0.02 MB**[Posters from July 2008 scoping hearing](#)

Several posters from INAC's Contaminants and Remediation Division displayed at Giant Mine Scoping Hearing July 2008. Documents too large for website. Please contact MVEIRB office to see posters.

**Received:** Jul 22, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 66  
**Stage:** [Scoping](#)

**5 MB**[Presentation from INAC](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
INAC Presentation at the Giant Mine Scoping Hearing at the Explorer Hotel July 22 and 23

**Received:** Jul 22, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 73  
**Stage:** [Scoping](#)

**0.4 MB**[Sign-in Sheet for Giant Mine Scoping Hearing](#)

Sign-in sheet for first day of scoping hearing at Explorer Hotel. Includes media and public attendance sheet.

**Received:** Jul 22, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 92  
**Stage:** [Scoping](#)

**0.2 MB**[Transcript from July 22, 2008](#)

This is the transcript from the first day of the Giant Mine scoping hearing, conducted by the Review Board on July 22, 2008. This includes undertakings 1 through 5.

**Received:** Jul 22, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 68  
**Stage:** [Scoping](#)

**0.5 MB**[City of Yellowknife special meeting minutes - GMRP referral march 18 2008](#)

Adopted council minutes from the March 18, 2008 Special Meeting of the City of Yellowknife to consider whether to refer the Giant Mine Remediation Project to environmental assessment. Includes resolution to refer the development to EA. Placed on the pu

**Received:** Jul 18, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 63  
**Stage:** [Other public registry materials](#)

**0.7 MB**[Giant Mine Arsenic Management Workshop Summary Report July 2003](#)

Giant Mine Underground Arsenic Trioxide Management Alternatives. May 2003 Workshop Summary Report written for the Giant Mine Remediation Project.

**Received:** Jul 18, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 62  
**Stage:** [Other public registry materials](#)

#### 0.4 MB [Prioritization of Issues from City of Yellowknife](#)

Letter from the City of Yellowknife Mayor Gordon Van Tighem regarding the main issues to be presented at the July 22 and 23 scoping hearing for the Giant Mine Remediation EA.

**Received:** Jul 18, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 64  
**Stage:** [Scoping](#)

#### 0.02 MB [Agenda for Scoping Hearing July 22-23, 2008.](#)

This is the proposed agenda for the upcoming scoping hearing for the Giant Mine Remediation Plan. The hearing is scheduled for July 22-23, 2008, Yellowknife.

**Received:** Jul 17, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 60  
**Stage:** [Scoping](#)

#### 0.03 MB [DFO Comments on Giant Mine EA Scope](#)

Letter from the Department of Fisheries and Oceans Canada (DFO) to MVEIRB highlighting 5 major DFO concerns regarding the scope of the Giant Mine Remediation Plan.

**Received:** Jul 15, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 96  
**Stage:** [Scoping](#)

#### 0.05 MB [Reminder re: public issues scoping hearing dates and times](#)

#### *EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

This is a letter reminding parties about dates and times for the upcoming public issues scoping hearing scheduled for July 22nd and 23rd 2008 in Yellowknife at the Explorer Hotel.

An agenda will be circulated later this week.

**Received:** Jul 15, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 59  
**Stage:** [Scoping](#)

#### 2 MB [A Partial Annotative list of the Giant Mine Remediation Plan Process](#)

A comprehensive list of 86 documents held at the Giant Mine Remediation Team's physical public registry in the Precambrian Building. Completed during the planning stages for the GMRP.

**Received:** Jul 9, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 58  
**Stage:** [Other public registry materials](#)

#### 0.02 MB [HydroQual Consultant Study from 1985](#)

A water quality study from 1985 that examines arsenic levels in Back Bay, near Yellowknife, NT. This study was requested by the North Slave Metis Alliance and provided to MVEIRB by the developer. The document is too large to put on the registry. Please contact MVEIRB if you wish to obtain a copy.

**Received:** Jul 2, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 44  
**Stage:** [Other public registry materials](#)

#### 0.02 MB [Letter from MVEIRB re: Workplan & Party Status](#)

In this letter, the Review Board gives party status to an organization and an individual. Also, the Review Board issues the initial workplan for this assessment.

**Received:** Jul 2, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 45

**Stage:** [Scoping](#)

**0.02 MB**[Letter from MVEIRB re: Scoping hearing requirements](#)

This letter contains important deadlines for participation in the upcoming scoping hearing for Giant Mine. If parties intend to present during the hearing, they should inform Review Board staff before Jul 8, 2008.

**Received:** Jun 27, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 42  
**Stage:** [Scoping](#)

**0.02 MB**[Audio from Giant Mine Scoping Meeting June 17 2008](#)

This is the audio recording of the scoping meeting held at the Tree of Peace Friendship Centre on June 17 2008. This recording includes presentations from MVEIRB & the developer, along with questions. We were unable to upload the recording on the registry however if you are interested in listening to it please contact our office.

**Received:** Jun 20, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 43  
**Stage:** [Scoping](#)

**0.6 MB**[Meeting notes from Giant Mine Remediation Project EA scoping session - June 17 2008](#)

Review Board staff record of proceeding and compilation of comments from parties and members of the public made at the scoping session on June 17th, 2008, at the Tree of Peace Friendship Centre.

**Received:** Jun 20, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 41  
**Stage:** [Scoping](#)

**0.1 MB**[Comments on the draft workplan from YKDFN-LMD](#)

Comments from the Yellowknives Dene First Nation-Land and Environment Department on the draft workplan.

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*

**Received:** Jun 19, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 37  
**Stage:** [Terms of Reference and workplans](#)

**0.02 MB**[Comments on workplan from NSMA](#)

This email includes comments on the draft workplan from the North Slave Metis Alliance, including comments regarding participant funding.

**Received:** Jun 19, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 34  
**Stage:** [Terms of Reference and workplans](#)

**0.1 MB**[Comments from INAC regarding workplan](#)

This letter includes comments from the developer on the draft workplan.

**Received:** Jun 18, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 36  
**Stage:** [Terms of Reference and workplans](#)

**0.2 MB**[Comments on workplan](#)

This letter from Kevin O'Reilly includes comments on the draft workplan, comments on participant funding and general comments on the Giant. It also includes an attachment referring to funding requests from a past project regarding public participation.

**Received:** Jun 18, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 33  
**Stage:** [Terms of Reference and workplans](#)

**0.02 MB**[Email from NSMA re: Documents](#)

Email from North Slave Metis Alliance requesting documents. Includes Environmental Assessment Officer's forward to Indian and Northern Affairs Canada requesting that the documents be provided to Mackenzie Valley Environmental Impact Review Board.

**Received:** Jun 17, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 32  
**Stage:** [Other public registry materials](#)

#### 4 MB [Presentation from INAC for scoping meeting](#)

The developer gave this presentation to the attendees of a scoping meeting held on June 17th, 2008 at the Tree of Peace Friendship

**Received:** Jun 17, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 38  
**Stage:** [Scoping](#)

##### 0.1 MB [Sign in sheet from scoping meeting June 17, 2008](#)

**Received:** Jun 17, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 40  
**Stage:** [Scoping](#)

#### 5 MB [Compiled Preliminary Screening Comments](#)

A compilation of the preliminary screening comments received by the Mackenzie Valley Land and Water Board during the Water Licence application period for INAC's Giant Mine Remediation Plan. The comments have been organized chronologically and have been

**Received:** Jun 16, 2008  
**Document Date:** Unknown  
**Originator:** Other  
**Public Registry:** 17  
**Stage:** [Preliminary screening](#)

##### 0.08 MB [List of Supporting Documents](#)

Attached is list of support document (appendices) to the main report of the Giant Mine Remediation Plan. Due to the large volume and size of these documents, they have not been put on the MVEIRB website. Hard copies of these documents may be viewed by

**Received:** Jun 16, 2008

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 5  
**Stage:** [Preliminary screening](#)

#### 3 MB [YKDFN Medicinal Plant Study Report](#)

Medicinal Plant Study Report 2002-2003, from the Yellowknives Dene First Nations- Land and Environment Committee's. Submitted for the Giant Mine Remediation EA.

**Received:** Jun 5, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 80  
**Stage:** [Scoping](#)

##### 0.2 MB [Invitation to Scoping Hearing](#)

This letter invites participants to a scoping hearing on July 22 & 23 and a scoping session on June 17, 2008. Attached is an agenda for the June 17, 2008 session.

**Received:** Jun 3, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 12  
**Stage:** [Scoping](#)

##### 0.1 MB [Draft Workplan](#)

This draft work plan & notification of party status is issued by the Review Board in the EA of the Giant Mine Remediation Plan. The deadline for comments is June 18th, 2008. If you would like to submit comments on this work plan please contact Tawanis Tes

**Received:** May 26, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 11  
**Stage:** [Scoping](#)

##### 0.1 MB [Presentation from INAC for site visit](#)

On May 22, 2008, the Review Board and Review Board staff attended a site visit at the Giant Mine. The developer gave this presentation to the attendees.

**Received:** May 20, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 39  
**Stage:** [Scoping](#)

**0.09 MB** [Initial Workplan for Giant Mine Remediation](#)

This document lays out a preliminary scope of assessment, timelines and milestones for the environmental assessment of the proposed Giant Mine Remediation Plan.

**Received:** May 14, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 46  
**Stage:** [Scoping](#)

**0.6 MB** [Comments from Environment Canada](#)

These comments were submitted to the Mackenzie Valley Land and Water Board during their preliminary screening of the Giant Mine Remediation Plan. These comments were submitted to the public registry by Kevin O'Reilly.

**Received:** May 12, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 31  
**Stage:** [Scoping](#)

**0.2 MB** [Letter from Kevin O'Reilly to MVEIRB re: Submission to the record](#)

This letter is an overview of concerns and issues Mr. O'Reilly would like to bring to the attention of the Review Board. The letter references several documents; all of which are included in the online public registry.

**Received:** Apr 24, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 21  
**Stage:** [Scoping](#)

**0.2 MB** [Environmental Agreement for the BHP Billiton Ekati Diamond Mine](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
Attachment to Kevin O'Reilly's letter. The relevant sections pertaining to Mr. O'Reilly's submissions to the Review Board are found in Article 4 and deal with the establishment of an independent oversight body.

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 20  
**Stage:** [Scoping](#)

**0.09 MB** [Environmental Guideline for Contaminated Site Remediation Nov 2003.](#)

Attachment to Kevin O'Reilly's letter.

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 26  
**Stage:** [Scoping](#)

**3 MB** [Giant Mine Abandonment & Restoration: Preliminary Identification of the Issues & Potential Impacts on the City of Yellowknife](#)

Attachment to Kevin O'Reilly's letter. Terriplan Consultants, March 30, 2007.

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 22  
**Stage:** [Scoping](#)

**9 MB** [Giant Mine Lease Area Land/Water Use Plan](#)

Attachment to Kevin O'Reilly's letter. City of Yellowknife, Revision 4- June 2006

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 23  
**Stage:** [Scoping](#)

**0.1 MB** [Letter from Kevin O'Reilly to the MVLWB re: Concerns over Giant Mine Remediation](#)

Attachment to Kevin O'Reilly's letter. This letter was submitted to the Mackenzie Valley Land and Water Board during the review of CARD-INAC's proposed remediation plan. Feb 13, 2008

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 29  
**Stage:** [Scoping](#)

### 0.3 MB [Mine Site Reclamation Guidelines for the NWT](#)

Attachment to Kevin O'Reilly's letter. Indian and Northern Affairs Canada, January 2007.

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 19  
**Stage:** [Scoping](#)

### 0.3 MB [Mine Site Reclamation Policy for the NWT](#)

Attachment to Kevin O'Reilly's letter. Indian and Northern Affairs Canada, 2002.

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 27  
**Stage:** [Scoping](#)

### 0.7 MB [Port Radium Action Plan, December 2002](#)

Attachment to Kevin O'Reilly's letter.

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 18  
**Stage:** [Scoping](#)

### 1 MB [The Mining Reclamation Regime in the NWT: A Comparison with Selected Canadian and US Jurisdictions](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
Attachment to Kevin O'Reilly's letter. Canadian Institute of Resources Law and Canadian Arctic Resources Committee. Wenig, M. & O'Reilly, K., 21-January-2005

**Received:** Apr 23, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 28  
**Stage:** [Scoping](#)

### 0.02 MB [Letter from MVEIRB to CARD-INAC re: Clarification](#)

Responding to the request for clarification from the Contaminants & Remediation Directorate.

**Received:** Apr 22, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 8  
**Stage:** [Assessment/review startup](#)

### 0.1 MB [Letter from CARD-INAC to MVEIRB re: Clarification](#)

This letter asks from clarification of the letter of referral from the City of Yellowknife. The original letter states that the referral is made pursuant to MVRMA s.126(2)(c); CARD-INAC correctly points out that the referral should be made pursuant to MVR

**Received:** Apr 18, 2008  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 9  
**Stage:** [Assessment/review startup](#)

### 0.03 MB [EA Roles Identification Form](#)

The attachment to the Request for Submissions letter is an outdated version of this form. This is the updated version. The old form differentiates between 'directly affected party' and 'intervenor'; the new one combines these choices as 'party'. By select

**Received:** Apr 17, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 7  
**Stage:** [Scoping](#)

### 0.1 MB [Request for Submissions](#)



This letter is a request to participants in the Giant Mine EA for any relevant material they would like to add to the public registry for this EA. Any submissions should be sent to MVEIRB by fax at (867) 766-7074 or by email to [ttestart@mveirb.nt.ca](mailto:ttestart@mveirb.nt.ca) before

**Received:** Apr 17, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 7  
**Stage:** [Scoping](#)

## 2 MB [Letter of Referral from the City of Yellowknife](#)

This letter outlines the basis of the referral from the City of Yellowknife for the Giant Mine Remediation project.

**Received:** Apr 7, 2008  
**Document Date:** Unknown  
**Originator:** Parties/Public  
**Public Registry:** 1  
**Stage:** [Assessment/review startup](#)

### 0.03 MB [Notice of Referral](#)

This letter notifies a distribution list of the referral to EA of the Giant Mine Remediation project. This development is being proposed by the Contaminants & Remediation Directorate, INAC.

**Received:** Apr 7, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 2  
**Stage:** [Assessment/review startup](#)

### 0.03 MB [Notice of Referral to the Developer](#)

This letter notifies the developer of the referral to EA of the Giant Mine Remediation project. This development is being proposed by the Contaminants & Remediation Directorate, INAC.

**Received:** Apr 7, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 3  
**Stage:** [Assessment/review startup](#)

### 0.02 MB [Request to be on the Distribution List](#)

If you, as a member of the public, or your organization want to receive updates on this EA, please complete and return this form to Tawanis Testart at [ttestart\(at\)mveirb.nt.ca](mailto:ttestart(at)mveirb.nt.ca) or (86

**Received:** Apr 7, 2008  
**Document Date:** Unknown  
**Originator:** Review Board  
**Public Registry:** 2  
**Stage:** [Assessment/review startup](#)

### 0.3 MB [MVLWB Reasons for Decision](#)

The Reasons for Decision prepared by the Mackenzie Valley Land and Water Board for INAC's water licence application for the Giant Mine Remediation Project

**Received:** Feb 21, 2008  
**Document Date:** Unknown  
**Originator:** Other  
**Public Registry:** 14  
**Stage:** [Preliminary screening](#)

### 0.8 MB [MVLWB Preliminary Screening Report](#)

The Preliminary Screening Report conducted by the Mackenzie Valley Land and Water Board for the water licence application of INAC's Giant Mine Remediation Project

**Received:** Feb 20, 2008  
**Document Date:** Unknown  
**Originator:** Other  
**Public Registry:** 13  
**Stage:** [Preliminary screening](#)

### 2 MB [MVLWB Staff Report on Giant Mine Remediation Project](#)

A staff report prepared by the Mackenzie Valley Land and Water Board on the matter of INAC's water licence application for the Giant Mine Remediation Project

**Received:** Feb 13, 2008  
**Document Date:** Unknown  
**Originator:** Other  
**Public Registry:** 15  
**Stage:** [Preliminary screening](#)

### 1 MB [Application for a Type "A" Water License](#)

Submitted by the Contaminants & Remediation Directorate, INAC to the Mackenzie Valley Land and Water Board.

**Received:** Oct 19, 2007  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 30  
**Stage:** [Preliminary screening](#)

### 1 MB [Giant Mine Remediation Plan](#)

This is the main overview of the Contaminants and Remediation Directorate's (INAC) plan to remediate the Giant Mine Site and contain the arsenic trioxide dust that is currently being stored there. This is a larger file. Please contact MVEIRB at (867)

**Received:** Jul 1, 2007  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 4  
**Stage:** [Preliminary screening](#)

### 0.02 MB [Giant Mine Remediation Plan \(Figures\)](#)

*EA0809-001 Giant Mine Remediation Plan—Alternatives North Technical Report*  
Figures attached to the remediation plan. Please contact MVEIRB at (867) 766-7050 for a copy of this file.

**Received:** Jul 1, 2007  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 4  
**Stage:** [Preliminary screening](#)

### 6 MB [Final Report: Arsenic Trioxide Management Alternatives](#)

This is the main document of INAC Contaminants Remediation Directorate's report which presents the work undertaken to evaluate in-situ and ex-situ alternatives for the remediation of the arsenic trioxide stored in stopes and chamber at Giant Mine. A numb

**Received:** Dec 1, 2002  
**Document Date:** Unknown  
**Originator:** Developer  
**Public Registry:** 6  
**Stage:** [Preliminary screening](#)

**Total Number of Documents: 453**

## **Appendix 2. Preliminary Evaluation of the Giant Mine Participant Funding Process**

## **A PRELIMINARY EVALUATION OF PARTICIPANT FUNDING FOR THE GIANT MINE REMEDIATION PLAN ENVIRONMENTAL ASSESSMENT**

### **Background**

For the very first time, the Department of Indian Affairs and Northern Development (DIAND) has made participant funding available for environmental assessment in the NWT under the *Mackenzie Valley Resource Management Act (MVRMA)* in December 2010. This paper is a preliminary evaluation of the process used to disburse those funds and is meant to improve future processes rather than as a criticism of those involved with this first time through.

The issue of participant funding under the *MVRMA* has been raised consistently over the years, as early as the drafting stage and in parliamentary review, as Canadians generally enjoy a legislated right to participant funding for federal environmental assessment under the *Canadian Environmental Assessment Act*. This right to funding was extended from panel reviews to comprehensive studies (equivalent to environmental assessments under the *MVRMA*) during the last review of *CEAA* in 2003.

Diverse bodies such as the National Roundtable on the Environmental and Economy, the Mackenzie Valley Environmental Impact Review Board (MVEIRB), Aboriginal governments and non-governmental organizations have all recommended that residents of the NWT should receive equal consideration and treatment to other Canadians when it comes to meaningful participation in federal environmental assessment with the assistance of participant funding. Although these same concerns were raised with Neil McCrank during his northern regulatory review, they did not form part of his recommendations or the federal action plan in response to his report.

The case for participant funding has been made through the literature on environmental assessment and is not repeated here. If governments want truly inclusive and participatory decision-making, participant funding is an essential requirement. It also encourages regulatory certainty by ensuring that all parties have the means and resources to properly and fairly participate in decisions that affect their rights and interests. Early and adequate participant funding is a sound investment in the efficiency of the process, offering potential savings to a developer and the public purse.

### **Giant Mine Remediation Plan Environmental Assessment Participant Funding**

The need for participant funding for the Giant Mine Remediation Plan Environmental Assessment (GMRPEA) was raised by participants very early in the process, during the scoping phase at MVEIRB sponsored public meetings and at the scoping hearings. DIAND representatives at the scoping hearings indicated a willingness to entertain specific proposals for funding. When a joint proposal was submitted for \$40,000 from the Yellowknives Dene First Nation, City of Yellowknife and a private citizen for a study on independent oversight, DIAND spent 11 months reviewing the proposal before it was denied. The reason provided was that

DIAND itself was going to do this work, yet the Developer's Assessment Report is devoid of any details on independent oversight at Giant Mine.

The first public indication of any participant funding for the GMRPEA came in the form of a posting to the MVEIRB public registry. It appears the Canadian Environmental Assessment Agency participant funding guide and forms were adopted without many changes to serve the NWT process administered by DIAND.

The following schedule provides an overview of the timing:

- November 24, 2010 DIAND files public notice on participant funding with MVEIRB;
- December 1, 2010 DIAND provides user-friendly application forms to Alternatives North after three requests;
- December 10, 2010 DIAND deadline for participant funding applications;
- December 23, 2010 MVEIRB releases revised Giant Mine EA work plan;
- December 24, 2010 MVEIRB files memo to public registry stating deadline for filing of 1st round of information requests is January 24, 2011;
- January 13, 2011 DIAND convenes Funding Review Committee to review participant funding applications (three received: Yellowknives Dene First Nation, Alternatives North and North Slave Metis Alliance);
- January 14, 2011 DIAND request for extension to filing deadline for 1<sup>st</sup> round of information requests to February 14, 2011 to allow decisions on participant funding;
- January 17, 2011 Yellowknives Dene First Nation and Alternatives North file documents to support DIAND request for extension to filing deadline for 1<sup>st</sup> round of information requests;
- January 18, 2011 North Slave Metis Alliance supports extension request;
- January 20, 2011 MVEIRB approves extension request to February 14, 2011;
- January 27, 2011 DIAND letter on participant funding allocations filed with the MVEIRB; and
- February 1, 2011 Debriefing meeting held on participant funding with representatives of successful applicants. Agreement to pursue a further IR extension to February 28, 2011.

The following sections provide an evaluation of the participant funding process to date.

### **Timing of Participant Funding**

There were at least two issues related to the timing of the participant funding for the GMRPEA that are problematic—the point at which it was made available during the review process and the time it took to make allocation decisions.

With most CEAA participant funding, it appears to be the case that it is made available as early as possible during the process. This is a good thing as it ensures participants have a meaningful role in setting the scope of the assessment and the scope of the project or development. This was clearly not the case with the GMRPEA. The development was referred for an Environmental Assessment by the City of Yellowknife on March 31, 2008. A scoping hearing was held in July

2008 where DIAND committed to participant funding but it was not made available until more than two years later, well after the scoping phase.

### Recommendation

1. DIAND should make participant funding available as early as possible in the Environmental Assessment process, hopefully for the scoping phase.

Specific to the GMPREA, DIAND must have known that participant funding would be made available at the time that the Developer's Assessment Report (DAR) was filed in October 2010. DIAND could have made this a win-win situation by simply waiting and coordinating the release of the DAR with a news release on the availability of participant funding. Internal coordination on communications, environmental assessment and participant funding within DIAND appears to be less than ideal.

Clearly there was inadequate public notice of the participant funding for the GMPREA and insufficient time for applicants to provide the necessary information for the complex application forms. If decisions on the applications were not to be made until January, then the applications deadline should have been pushed back to January 2011.

DIAND should also consider a phased approach to the availability of participant funding for the different stages of an environmental assessment as is the practice of the Canadian Environmental Assessment Agency. This approach will allow reallocations of unused funds and some consideration of the track record of individual applicants. This will only prove workable if DIAND can improve its efficiency in administering participant funding.

### Recommendation

2. DIAND should publicly advertize the availability of participant funding in local newspaper(s) and on its own website with downloadable, user-friendly forms.
3. DIAND should provide adequate time for applications to be prepared and submitted. A minimum of 30 days should be provided to allow applicants to coordinate proposed work amongst themselves, and to put together credible proposals with supporting CVs, quotes from potential expert witnesses, and letters of support.
4. DIAND should consider a phased approach to the availability of participant funding for the different stages of an environmental assessment.

## **Participant Funding Guide and Application Form**

As mentioned above, the CEAA participant funding guide and application forms available at:

[http://www.ceaa-acee.gc.ca/9772442E-9A6B-4302-968E-3946E19700D0/Guide\\_to\\_the\\_Participant\\_Funding\\_Program.pdf](http://www.ceaa-acee.gc.ca/9772442E-9A6B-4302-968E-3946E19700D0/Guide_to_the_Participant_Funding_Program.pdf)

appear to have been adopted by DIAND without much modification to reflect the needs of northerners. While these may be a useful starting point, given their complexity, they require an

unreasonable amount of time to properly complete them (at least two or three full days for someone with a post-graduate degree). It would be unrealistic to expect community-based organizations to understand and properly complete the existing forms. DIAND likely has other application based funding programs such as the Interim Resource Management Assistance program that could provide some useful lessons in how to develop guidance and applications forms in a user-friendly manner.

The requirement of the forms to divide funding requirements up into various stages of an environmental assessment is clearly counter-intuitive where many applicants will approach the work from a project perspective.

#### Recommendation

5. DIAND should make a concerted attempt to revise the participant funding guide to reflect northern concerns and develop forms using plain language. Simplifying the forms and providing clearer guidance on their completion would also be helpful, including the use of relevant northern examples where possible.

Clearer information should be available in the guidance document that fully explains the process and including estimates of time for each step such as:

- consideration of the applications by the Funding Review;
- DIAND decision-making and how it will be communicated to applicants;
- negotiation of contribution agreements, including any holdbacks and claw-back provisions, if any, should an applicant secure other outside funding;
- contribution agreement requirements including the flexibility to move funding within agreed upon limits or types of expenses with examples; and
- where cheques will be written and when they will be available.

While proper guidance cannot cover all possibilities or questions, the current guide provides little if any information on these aspects of participant funding.

#### Recommendation

6. Add information into the guidance document that explains the DIAND process and requirements in more detail with time estimates.

### **Transparency of Decision-Making**

DIAND has provided no information or criteria on how the participant funding envelope for the GMRPEA was set, or whether there is some sort of policy guiding this investment of public funds. It would be helpful to know if there is an annual internal allocation for participant funding, and DIAND should make this information publicly available given the long-standing public interest and recommendations around this topic.

Presumably there are criteria for deciding what the participant funding will be for any particular environmental assessment such as level of public interest or concern, potential for significant adverse environmental or socio-economic effects, size and complexity of a development, and proximity to communities.

The amount of participant funding made available for the GMRPEA is \$250,000 which is miniscule in comparison to the actual project costs of about \$480,000,000 or about 0.0005% of the total project costs. While this is the first time such funding has been made available, it is clearly welcome but a very small amount for such a complex, long-term (forever) project. Some explanation of how this allocation of participant funding was decided upon would be helpful, as well as an indication of whether any additional funding might be made available for later stages of this Environmental Assessment.

### Recommendation

7. DIAND should state publicly what its policy and funding allocation is for participant funding under the *MVRMA*.
8. DIAND should make explicit its criteria and decisions for allocating participant funding for individual environmental assessments to build public confidence in the process.

The stated criteria for making decisions on the applications submitted for the GMRPEA were found in the guide as follows:

- the Funding Review Committee will give higher priority to expenses associated with supporting the participation of local parties; and the provision of value-added expertise by other parties. (section 1.5)
- table found in section 2.3 as follows:

<b>Designation</b>	<b>Review Process</b>
High priority	In reviewing all applications for funding, the Committee will give first priority to these expenses. Such expenses are generally associated with the kind of participation that participant funding seeks to support, such as specific expertise that can contribute to the EA.
Medium priority	These expenses will be given medium priority, and generally will not be funded until requests for high priority expenses have been accommodated.
Low priority	These expenses will be given low priority, and generally will not be funded until requests for high- and medium priority expenses have been accommodated.

The only publicly available information on the work of the Funding Review Committee is a one-page letter that outlined its funding allocation recommendations. No explanation was provided on how the allocation was reached. There was no report from the Committee as is the case with similar bodies established under CEAA. For example, those reports often provide the precise criteria used in evaluating applications and general observations on the quality of applications. (See for example:



(<http://www.ceaa-acee.gc.ca/default.asp?lang=en&xml=B2E2DFA2-59C7-46CA-90E1-E2F0A754F2F2>  
<http://www.ceaa-acee.gc.ca/default.asp?lang=en&xml=8E995396-D732-4DC4-AB3E-A00C6A182B7F>  
<http://www.ceaa-acee.gc.ca/default.asp?lang=en&xml=41843454-B358-476B-A308-07529FAF44E7>  
<http://www.ceaa-acee.gc.ca/default.asp?lang=en&xml=1914FE7F-66ED-437A-B118-826FE571419A>)

During the discussion at the February 1, 2011 debriefing on participant funding, DIAND officials indicated that the GMRPEA Funding Review Committee decided unilaterally to standardize consulting rates and that any excess above a set rate was removed from the proposed budget of an applicant. If this is true, this was patently unfair to the applicants as this was not in the above referenced criteria and not explained to applicants in advance. DIAND should not have allowed this to happen. It also seems unreasonable that a standard daily rate should be used given the varying experience and costs of professional experts. The use of standard rate makes no allowance for the value that an expert may bring to the environmental assessment process. All of this to say that whatever the criteria may be for participant funding allocation decisions, they should be transparent, provided in advance to the public and evenly applied by whomever makes decisions. It is also suggested that there be close regional senior management oversight of the administration of participant funding until an efficient process is fully developed.

Consideration should be given to additional criteria such as the following:

- the track record, if any, of an applicant with regard to past participant funding use and compliance with funding arrangements;
- the capacity of an organization or individual to properly manage participant funding and carry out the activities proposed;
- demonstrated coordination with other interested parties to the environmental assessment (including letters of support);
- value of any contributed services and reductions in usual commercial rates;
- activities that are clearly referenced back to the terms of reference as set by the MVERIB;
- coherence, linkages and flow of proposed activities in relation to the value-added to the environmental assessment; and
- details on professional expertise to be engaged (for example, CVs or resumé, scope of work, offers or quotes, indications of no conflicts of interest, etc.).

### Recommendation

9. DIAND should develop, publicize and ensure fair application of funding allocation criteria.
10. DIAND consider additional evaluation criteria related to the track record of applicants, capacity, coordination with other interested parties, value of in-kind contributions, coherence and level of detail on professional experts.

11. The Funding Review Committee should prepare a report on its deliberations that provides some explanation of funding allocations in relation to the criteria applied and any general observations that could prove of assistance for future applicants. This report should be posted to DIAND's website and be made available to applicants at the time that final allocation decisions are announced.

Prepared by Kevin O'Reilly, Alternatives North  
February 2, 2011

### **Appendix 3. New Documents Referenced in the Technical Report**

- A. Social Licence Reference Document**
- B. Documents Relating to Ministerial Approval of the Site Stabilization Plan**
- C. Examples of Government of Canada Apologies**
- D. Documents Relating to the Arsenic Spill at Giant Mine October 2009**

## **A. Social Licence Reference Document**

<http://sociallicense.com/definition.html>

### **What Is the Social License?**

The Social License has been defined as existing when a project has the ongoing approval within the local community and other stakeholders, ongoing approval or broad social acceptance and, most frequently, as ongoing acceptance.

At the level of an individual project the Social License is rooted in the beliefs, perceptions and opinions held by the local population and other stakeholders about the project. It is therefore granted by the community. It is also intangible, unless effort is made to measure these beliefs, opinions and perceptions. Finally, it is dynamic and non-permanent because beliefs, opinions and perceptions are subject to change as new information is acquired. Hence the Social License has to be earned and then maintained.

The differentiation into approval (having favorable regard, agreeing to, or being pleased with) and acceptance (disposition to tolerate, agree or consent to) can be shown to be real and indicative of two levels of the Social License; a lower level of acceptance and a higher level of approval. While the lower level is sufficient to allow a project to proceed and enjoy a quiet relationship with its neighbors, the higher level is more beneficial for all concerned.

On occasions, the Social License can transcend approval when a substantial portion of the community and other stakeholders incorporate the project into their collective identity. At this level of relationship it is not uncommon for the community to become advocates or defenders of the project since they consider themselves to be co-owners and emotionally vested in the future of the project, such is the strength of self-identification.

The concept of an informal ‘social’ license is comfortably compatible with legal norms in countries that operate under the principles of common law. However, the concept runs into difficulties in countries such as those in Latin America that operate under the principles of civil law, whereby only an official authority can grant a ‘license’. As a consequence, while communities and civil society are eager to see the social license in terms of a dynamic, ongoing relationship between the company and its stakeholders, regulators (and in turn many companies) see the ‘license’ in terms of a formal permission linked to specific tasks and events in which the regulator plays the central role in granting the ‘license’.

## **Gaining and Granting the Social License**

A social license is usually granted on a site-specific basis. Hence a company may have a social license for one operation but not for another. Furthermore, the more expansive the social, economic and environmental impacts of a project, the more difficult it becomes to get the social license. For example, an independent fisherman who is member of an indigenous group will normally get an automatic social license from his community. A mining company wanting to relocate an entire village faces a much bigger challenge.

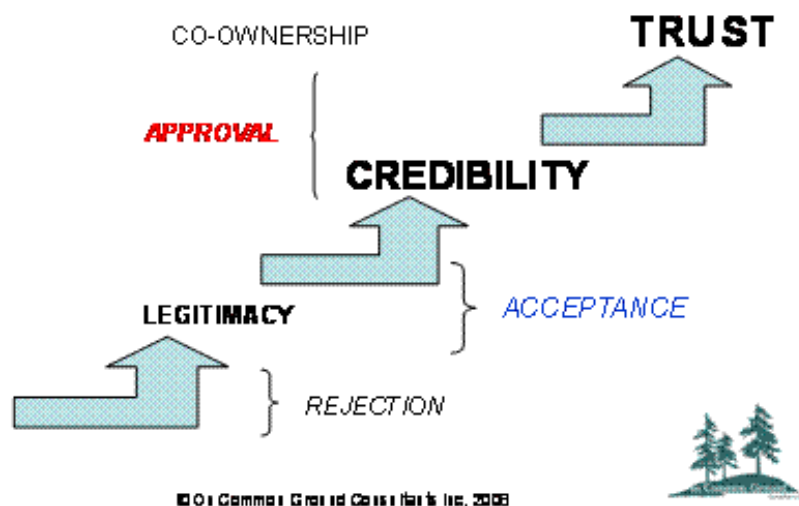
The license is granted by “the community”. In most cases, it is more accurate to describe the granting entity as a “network of stakeholders” instead of a community. Calling it a *network* makes salient the participation of groups or organizations that might not be part of a geographic community. Calling them *stakeholders* means the network includes groups and organizations that are either affected by the operation or that can affect the operation. For example, ranchers that would have to accept a land swap involving part of their pasture land would *be affected by* a proposed mining operation, without having much affect on it, provided they accepted the deal. By contrast, a para-military group of insurgents, or an international environmental group, that might attack the project site, each in their own way, would *have effects on* the operation, without being affected much by it. They would be stakeholders too.

The requirement that the license be a sentiment shared across a whole network of groups and individuals introduces considerable complexity into the process. It begs the question whether a community or stakeholder network even exists. If one exists, how capable is it of reaching a consensus? What are the prerequisites a community or stakeholder network must have before it becomes politically capable of granting a social license? These complexities make it more difficult to know when a social license has truly been earned.

## What makes up the Social License?

More than fifteen years of accumulated research and experience has allowed recognition that the normative components Social License comprise the community/stakeholder perceptions of the social legitimacy and credibility of the project, and the presence or absence of true trust. These elements are acquired sequentially and are cumulative in building towards the Social License. The project must be seen as legitimate before credibility is of value and both must be in place before meaningful trust can develop.

## Gaining the Social License



In practice, the absence of legitimacy leads to rejection of a project, the presence of legitimacy and credibility leads to acceptance of a project while a high level of credibility and the presence of trust is the basis for approval. The most significant level of Social License, co-ownership, can only occur when a high level of trust is present.

In more detail the normative components are:

- **Social Legitimacy:** Social legitimacy is based on established norms, the norms of the community, that may be legal, social and cultural and both formal and informal in nature. Companies must know and understand the norms of the community and be able to work with them as they represent the local ‘rules of the game’. Failure to do so risks rejection. In practice, the initial basis for social legitimacy comes from engagement with all members of the community and providing information on the project, the company and what may happen in the future and then answering any and all questions.
- **Credibility:** The capacity to be credible is largely created by consistently providing true and clear information and by complying with any and all commitments made to the community. Credibility is often best established and maintained through the application of formal agreements where the rules, roles and responsibilities of the company and the community are negotiated, defined and consolidated. Such a framework helps manage expectations and reduces the risk losing credibility by being perceived as in breach of promises made, a situation common where relationships have not been properly defined. A tip to company people – avoid making verbal commitments since, in the absence of a permanent record, these are always open to reinterpretation at a later date.
- **Trust:** Trust, or the willingness to be vulnerable to the actions of another, is a very high quality of relationship and one that takes both time and effort to create. True trust comes from shared experiences. The challenge for the company is to go beyond transactions with the community and create opportunities to collaborate, work together and generate the shared experiences within which trust can grow.

## **What are the principal challenges to gaining the Social License?**

As indicated above, there is often considerable complexity involved in gaining and maintaining a Social License but, properly prepared and supported, the challenges created by such circumstance can usually be overcome. Difficulties arise most frequently when companies are unable or unwilling to make the nominal investment to make things work. The most common problems encountered in our experience are:

- The company sees gaining a Social License in terms of a series of tasks or transactions (in effect making a deal), while the community

grants the License on the basis of the quality of the relationship – a cultural mismatch that risks failure.

- The company confuses
  - Acceptance for Approval
  - Co-operation for Trust
  - Technical Credibility with Social Credibility
- The company
  - Fails to understand the local community (Social Profile) and the local ‘rules of the game’ and so is unable to establish social legitimacy
  - Delays stakeholder engagement
  - Fails to allocate sufficient time for relationship building
  - Undermines its own credibility by failing to give reliable information or, more commonly, failing to deliver on promises made to the community.
  - Fails to respect and listen to the community
  - Under-estimates the time and effort required to gain a SLO
  - Over-estimates (or, worse, assumes) the quality of the relationship with the community

## **Can the community fail to grant the License?**

Yes, the term ‘community’ is frequently used in a way that suggests a singleness and purpose that does not always exist. Most ‘communities’ are really aggregations of communities, kinships or interest groups that operate as a network. However, the concept of the Social License to Operate presupposes that all of the families, clans, interest groups and institutions in a geographic area have arrived at a shared vision and attitude towards a resource development project. This kind of cohesion is often absent, and therefore may have to be built. That is why earning a Social License to Operate often involves building social capital in a process that is also known as ‘community building’, ‘capacity building’ and ‘institutional strengthening’, among others.

The key to a community’s capacity to issue a meaningful Social License is the pattern of social capital it has in its network structure. Without the right patterns of social capital within the community and between the project and the various elements of the community network, it is difficult, if not impossible, to gain and retain a Social License to Operate.

Companies that want Social License need to know the patterns of social capital in the network they wish to interact with. With this information, the company knows where to place effort. However, one size does not fit all. Each community has its own specific issues and interests that can form the basis for relationship building between the company and the community, and can create social capital and, in turn, the Social License –An early requirement is therefore the need for the company

to undertake social studies to map and understand the social structure, issues and vision of the various individuals, groups and organizations in the network that collectively form the ‘community’.

## **Can you measure the Social License?**

Yes, a survey instrument, ‘SocialLicense™’, has been developed that uses a number of indicators to measure the level of Social License that exists at any one time in terms of Rejection, Acceptance, Approval and Co-ownership. However, it is important to remember that the quality of the Social License is dynamic and responsive to changes in perceptions regarding the company and the project and is also susceptible to outside influences; it therefore has to be maintained. To be confident as to the status of a Social License, it should be measured periodically and the results of the survey used to modify practice with the intention of improving the quality of the relationship between the project and the community/stakeholders.

## **Do you want to know more about the Social License to Operate?**

For more information on gaining, maintaining and measuring the Social License to Operate, please contact:

**Ian Thomson:** [rockdoc@direct.ca](mailto:rockdoc@direct.ca)

On Common Ground Consultants Inc ([www.oncommonground.ca](http://www.oncommonground.ca))

Or

**Robert Boutilier:** [rboutilier@stakeholder360.com](mailto:rboutilier@stakeholder360.com)

Robert Boutilier and Associates ([www.stakeholder360.com](http://www.stakeholder360.com))



### **Appendix 3.**

#### **B. Documents Relating to Ministerial Approval of the Site Stabilization Plan**



Affaires autochtones et  
Développement du Nord Canada

Aboriginal Affairs and  
Northern Development Canada

*Access to Information and Privacy Directorate  
Ottawa, Ontario  
K1A 0H4*

*Facsimile: (819) 953-5492*

*Your file      Votre référence*

*Our file      Notre référence*

JUL 03 2012

A-2011-02171 / LLD

Mr. Kevin O'Reilly  
P.O. Box 444  
Yellowknife, Northwest Territories  
X1A 2N3

Dear Mr. O'Reilly:

This is further to your request under the *Access to Information Act* for:

***"Briefing notes, analysis, correspondence and any other documents related to the approval of the Site Stabilization Plan for the Giant Mine by senior management and the Minister of Aboriginal Affairs and Northern Development Canada from October 2011 to present."***

Enclosed you will find the interim package of records that respond to this request. You will note that some information has been withheld from disclosure pursuant to sections 21(1), (a), (b), and (c) of the *Act*. Please note that upon receipt of consultations with other departments, further documentation may be available. A copy of the sections of the *Act* is enclosed for your information.

Please be advised that you are entitled to submit a complaint to the Information Commissioner for Canada concerning the processing of your request within 60 days of the receipt of this letter. In the event that you decide to avail yourself of this right, your notice of complaint should be addressed to: Place de Ville, Tower B, 112 Kent Street, 7th Floor, Ottawa, Ontario, K1A 1H3.

Do not hesitate to contact Laurie Dumoulin at 819 997-8162, who will be pleased to address any concerns or questions, you may have regarding this matter.

Yours sincerely,

Cameron Fraser  
A/Director  
Access to Information and Privacy Directorate

Enclosures

Canada

## 21(1) OPERATIONS OF GOVERNMENT

21. (1) The head of a government institution may refuse to disclose any record requested under this Act that contains

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### 21(1)(a) ADVICE OR RECOMMENDATIONS

(b) an account of consultations or deliberations in which directors, officers or employees of a government institution, a minister of the Crown or the staff of a minister participate,

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### 21(1)(b) CONSULTATIONS OR DELIBERATIONS

(b) an account of consultations or deliberations involving officers or employees of a government institution, a minister of the Crown or the staff of a minister of the Crown,

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### 21(1)(c) PLANS OR POSITIONS

(c) positions or plans developed for the purpose of negotiations carried on or to be carried on by or on behalf of the Government of Canada and considerations relating thereto, or

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**Pages 1 to / à 5  
are not relevant  
sont non pertinentes**

**From:** Paula Isaak  
**To:** Senchuk, Barbara; Traynor, Stephen  
**CC:** King, Janet  
**Date:** 10/18/2011 1:08 PM  
**Subject:** Re: Giant Mine Site Stabilization Plan - Urgent docket

Understood. We are trying to find the balance of when to put things on when we are not sure when we can get them out of sector. We don't have the balance quite right. My apologies.  
Paula

>>> Barbara Senchuk 10/18/2011 1:04 PM >>>

The idea is to get the items on the list in advance so we/they know to expect them (irrespective of Paul having been briefed). It serves as a key issues management tool for both DM and Minister. Barbara

>>> Paula Isaak 10/18/2011 12:57 PM >>>

It should be on the signatures list - not sure when that comes up from ADMO but is on there this week. Yes, Paul has been briefed - this is follow up to Min office briefing and Min trip to Giant mine in the summer.  
Paula

>>> Barbara Senchuk 10/18/2011 12:33 PM >>>

Paula/Stephen,

We've just received this docket in DMO and I note it's not on the signature list. Have you briefed Paul on this initiative? Is he aware of this plan and its urgency?

Thanks,  
Barbara

**Page 7**

**is withheld pursuant to sections  
est retenue en vertu des articles**

**21(1)(a), 21(1)(b)**

**of the Access to Information Act  
de la Loi sur l'accès à l'information**

**Pages 8 to / à 11  
are duplicates  
sont des duplicatas**

**Pages 10 to / à 11**  
**are withheld pursuant to sections**  
**sont retenues en vertu des articles**

**21(1)(a), 21(1)(b)**

**of the Access to Information Act**  
**de la Loi sur l'accès à l'information**



**From:** Ryan Parmenter  
**To:** Paradis, Adrian  
**Date:** 11/3/2011 11:49 AM  
**Subject:** Re: Site Stabilization Plan

It is true! We just heard late yesterday that he signed off on the whole package.

Oh, and I spoke to Joanna about your suggestion for the Management Board meeting. She agrees and has asked you to provide a "Next Steps Schedule" from now until the Public Hearings. I don't think it has to be overly detailed or complex. I am thinking a one-pager should suffice.

If you could provide that to my on the 14th that would be great. Joanna and Henry can review it, and we will send it out to the Management Board on the 16th.

Cheers,  
Ryan

>>> Adrian Paradis 11/3/2011 11:35 AM >>>

Ryan, a birdy told me that the site stability plan has been approved.

Ap

>>> Ryan Parmenter 11/3/2011 6:48 AM >>>

Adrian,  
Not a problem. I don't know if you have seen all of the annexes to the plan - but all the information you need is there in multiple formats. A table with costs over the years when the elements will be addresses. As well as a full schedule of when each activity will be completed. A little bit of a reorganization should very quickly get you what you need. I will flip those two docs to you shortly and we can discuss whenever you have time.

Cheers,  
Ryan

-----Original Message-----

From: Adrian Paradis  
Cc: Octavio Melo <Octavio.Melo@aadnc-aandc.gc.ca>  
To: Ryan Parmenter <Ryan.Parmenter@aadnc-aandc.gc.ca>

Sent: 11/3/2011 12:24:28 AM  
Subject: Site Stabilization Plan

Ryan,

We are prepping to meet with the MVLWB later in the month. Before we go we'll need a break down of the Site Stabilization Plan. Basically, we'll need a table of the elements of the plan with time frames for implementation. After we get this we can break down the table into emergency and non EA related activities.

Do you have time to discuss tomorrow or Friday?

Adrian

**From:** Monique Binda  
**To:** Ankersmit, Joanna; Parmenter, Ryan  
**CC:** Lidder, Anureet; Murray, Alex  
**Date:** 11/2/2011 3:01 PM  
**Subject:** G8414 -SITE STABILIZATION PLAN FOR THE GIANT MINE - signed copy  
**Attachments:** NCR-#3917212-v1-G8414\_-  
SITE\_STABILIZATION\_PLAN\_FOR\_THE\_GIANT\_MINE\_.TIF

For our records...wout wout!!!

M

**Pages 14 to / à 57**  
**are withheld pursuant to sections**  
**sont retenues en vertu des articles**

**21(1)(a), 21(1)(c), 21(1)(b)**

**of the Access to Information Act**  
**de la Loi sur l'accès à l'information**

## Appendix 3. New Documents Referenced in the Technical Report

### C. Examples of Government of Canada Apologies

<http://www.aadnc-aandc.gc.ca/eng/1100100015644>

#### **Prime Minister Harper offers full apology on behalf of Canadians for the Indian Residential Schools system**

11 June 2008  
Ottawa, Ontario  
[Statement of Apology](#)

PLEASE CHECK AGAINST DELIVERY

The treatment of children in Indian Residential Schools is a sad chapter in our history.

For more than a century, Indian Residential Schools separated over 150,000 Aboriginal children from their families and communities. In the 1870's, the federal government, partly in order to meet its obligation to educate Aboriginal children, began to play a role in the development and administration of these schools. Two primary objectives of the Residential Schools system were to remove and isolate children from the influence of their homes, families, traditions and cultures, and to assimilate them into the dominant culture. These objectives were based on the assumption Aboriginal cultures and spiritual beliefs were inferior and unequal. Indeed, some sought, as it was infamously said, "to kill the Indian in the child". Today, we recognize that this policy of assimilation was wrong, has caused great harm, and has no place in our country.

One hundred and thirty-two federally-supported schools were located in every province and territory, except Newfoundland, New Brunswick and Prince Edward Island. Most schools were operated as "joint ventures" with Anglican, Catholic, Presbyterian or United Churches. The Government of Canada built an educational system in which very young children were often forcibly removed from their homes, often taken far from their communities. Many were inadequately fed, clothed and housed. All were deprived of the care and nurturing of their parents, grandparents and communities. First Nations, Inuit and Métis languages and cultural practices were prohibited in these schools. Tragically, some of these children died while attending residential schools and others never returned home.

The government now recognizes that the consequences of the Indian Residential Schools policy were profoundly negative and that this policy has had a lasting and damaging impact on Aboriginal culture, heritage and language. While some former students have spoken positively about their experiences at residential schools, these stories are far overshadowed by tragic accounts of the emotional, physical and sexual abuse and neglect of helpless children, and their separation from powerless families and communities.

The legacy of Indian Residential Schools has contributed to social problems that continue to exist in many communities today.

It has taken extraordinary courage for the thousands of survivors that have come forward to speak publicly about the abuse they suffered. It is a testament to their resilience as individuals and to the strength of their cultures. Regrettably, many former students are not with us today and died never having received a full apology from the Government of Canada.

The government recognizes that the absence of an apology has been an impediment to healing and reconciliation. Therefore, on behalf of the Government of Canada and all Canadians, I stand before you, in this Chamber so central to our life as a country, to apologize to Aboriginal peoples for Canada's role in the Indian Residential Schools system.

To the approximately 80,000 living former students, and all family members and communities, the Government of Canada now recognizes that it was wrong to forcibly remove children from their homes and we apologize for having done this. We now recognize that it was wrong to separate children from rich and vibrant cultures and traditions that it created a void in many lives and communities, and we apologize for having done this. We now recognize that, in separating children from their families, we undermined the ability of many to adequately parent their own children and sowed the seeds for generations to follow, and we apologize for having done this. We now recognize that, far too often, these institutions gave rise to abuse or neglect and were inadequately controlled, and we apologize for failing to protect you. Not only did you suffer these abuses as children, but as you became parents, you were powerless to protect your own children from suffering the same experience, and for this we are sorry.

The burden of this experience has been on your shoulders for far too long. The burden is properly ours as a Government, and as a country. There is no place in Canada for the attitudes that inspired the Indian Residential Schools system to ever prevail again. You have been working on recovering from this experience for a long time and in a very real sense, we are now joining you on this journey. The Government of Canada sincerely apologizes and asks the forgiveness of the Aboriginal peoples of this country for failing them so profoundly.

Nous le regrettons  
We are sorry  
Nimitataynan  
Niminchinowesamin  
Mamiattugut

In moving towards healing, reconciliation and resolution of the sad legacy of Indian Residential Schools, implementation of the Indian Residential Schools Settlement Agreement began on September 19, 2007. Years of work by survivors, communities, and Aboriginal organizations culminated in an agreement that gives us a new beginning and an opportunity to move forward together in partnership.

A cornerstone of the Settlement Agreement is the Indian Residential Schools Truth and Reconciliation Commission. This Commission presents a unique opportunity to educate all Canadians on the Indian Residential Schools system. It will be a positive step in forging a new relationship between Aboriginal peoples and other Canadians, a relationship based on the knowledge of our shared history, a respect for each other and a desire to move forward together with a renewed understanding that strong families, strong communities and vibrant cultures and traditions will contribute to a stronger Canada for all of us.

On behalf of the Government of Canada  
The Right Honourable Stephen Harper,

Prime Minister of Canada

<http://www.cic.gc.ca/english/multiculturalism/asian/20years-jap.asp>

**20th Anniversary of the Canadian Government's Formal  
Apology for Japanese Internment during World War II**

Shortly after Japan's entry into World War II on December 7, 1941, Japanese Canadians were removed from the West Coast. "Military necessity" was used as a justification for their mass removal and incarceration despite the fact that senior members of Canada's military and the RCMP had opposed the action, arguing that Japanese Canadians posed no threat to security. And yet, the exclusion from the West Coast was to continue for four more years, until 1949. This massive injustice was a culmination of the movement to eliminate Asians from the West Coast begun decades earlier in British Columbia (BC).

The order in 1942, to leave the "restricted area" and move 100 miles (160 km) inland from the West Coast, was made under the authority of the *War Measures Act*. This order affected more than 21,000 Japanese Canadians. Many were first held in the livestock barns in Hastings Park (Vancouver's Pacific National Exhibition grounds) and then were moved to hastily-built camps in the BC Interior. At first, many men were separated from their families and sent to road camps in Ontario and on the BC/Alberta border. Small towns in the BC Interior — such as Greenwood, Sandon, New Denver and Slocan — became internment quarters mainly for women, children and the aged. To stay together, some families agreed to work on sugar beet farms in Alberta and Manitoba, where there were labour shortages. Those who resisted and challenged the orders of the Canadian government were rounded up by the RCMP and incarcerated in a barbed-wire prisoner-of-war camp in Angler, Ontario.

Despite earlier government promises to the contrary, the "Custodian of Enemy Alien Property" sold the property confiscated from Japanese Canadians. The proceeds were used to pay auctioneers and realtors, and to cover storage and handling fees. The remainder paid for the small allowances given to those in internment camps. Unlike prisoners of war of enemy nations who were protected by the Geneva Convention, Japanese Canadians were forced to pay for their own internment. Their movements were restricted and their mail censored.

As World War II was drawing to a close, Japanese Canadians were strongly encouraged to prove their "loyalty to Canada" by "moving east of the Rockies" immediately, or sign papers agreeing to be "repatriated" to Japan when the war was over. Many moved to the Prairie Provinces, others moved to Ontario and Quebec. About 4,000, half of them Canadian-born, one third of whom were dependent children under 16 years of age, were exiled in 1946 to Japan.

In September 1988, the Government of Canada formally apologized in the House of Commons and offered compensation for wrongful incarceration, seizure of property and the disenfranchisement of Japanese Canadians during WW II.

"I know that I speak for Members on all sides of the House today in offering to Japanese Canadians the formal and sincere apology of this Parliament for those past injustices against them, against their families, and against their heritage, and our solemn commitment and undertaking to Canadians of every origin that such violations will never again in this country be countenanced or repeated."

*Prime Minister Brian Mulroney's remarks to the House of Commons, September 22, 1988*

<http://www.cbc.ca/news/canada/story/2007/01/26/harper-apology.html>

## Harper's apology 'means the world': Arar

**Last Updated: Friday, January 26, 2007 | 5:21 PM ET**

Maher Arar said his innocence has been confirmed by the formal apology Prime Minister Stephen Harper issued to him on Friday.

"This means the world to me," Arar said during a one-hour press conference in Ottawa on Friday afternoon.

Earlier Friday, Harper apologized and offered a \$10.5 million compensation package to Arar and his family, along with money for legal fees, for the "terrible ordeal" they suffered after Arar spent nearly a year in a Syrian jail.

"On behalf of the government of Canada, I wish to apologize to you...and your family for any role Canadian officials may have played in the terrible ordeal that all of you experienced in 2002 and 2003," Harper said.

"I sincerely hope that these words and actions will assist you and your family in your efforts to begin a new and hopeful chapter in your lives," he said.

Arar said the apology and package will allow him to finally put his difficulties aside.

"The struggle to clear my name has been long and hard," he said, with his lawyers at his side. "I feel now I can put more time into being a good father [to my children], and to being a good husband and to rebuilding my life."

He said he is thankful for the Canadians who supported him and helped him get home.

He said he's also grateful to the previous federal Liberal government, which called an inquiry into his case, and the current Conservative government, which is implementing the recommendations of the inquiry.

Arar said he would like to use the compensation money to contribute to Canadian society, although he hasn't worked out specific plans yet. He wants to help ensure that others do not end up in the same situation that he did.

"This struggle has taught me how important it is to stand up for human rights," he said. "I feel proud as a Canadian and I feel proud of what we've been able to achieve."

Still, Arar said his life has not gone back to normal. He's still on a security watch list in the United States and he's afraid to travel anywhere outside of Canada.

He also said he is stigmatized as a terrorist, and he can't shake that label. He often Googles his own name and sees it tied with the words "suspected terrorist."

"There's no amount of money that would compensate me on what my family and I have gone through," Arar said. "I wish there was a way I could buy my life back."

Harper, who made the announcement in the foyer of the House of Commons in Ottawa, said the settlement negotiated with Arar includes \$10.5 million for pain and suffering, along with an estimated \$1 million in legal fees.

Arar, a Canadian citizen born in Syria, had been seeking \$37 million in compensation and an official government apology.

Initially, Arar had wanted to sue the government for \$400 million but later lowered the amount. Harper said the \$10.5 million is roughly what Arar would have received through a lawsuit.

Harper also said that Canada has sent letters to the U.S. and Syrian governments to object to Arar's treatment.

"We cannot go back and fix the injustice that occurred to Mr. Arar. However, we can make changes to lessen the likelihood that something like this will ever happen again," he said.

Arar now lives in Kamloops, B.C., but was in Ottawa on Friday to hear the government's announcement.

In 2002, the engineer was living in Ottawa and returning from a vacation when he was arrested during a stopover at New York's JFK Airport. U.S. authorities deported him to Syria, where he was tortured.

### **Inquiry found Arar had no terrorist links**

Ottawa set up a judicial inquiry into the case, led by Justice Dennis O'Connor, after Arar returned to Canada more than a year later.

O'Connor released his report in September 2006, concluding that Arar had no links to terrorist organizations or militants.

He also concluded the RCMP had provided misleading information to the U.S. authorities, which may have been the reason he was sent to Syria.

The government intends to implement the report's recommendations to ensure such an incident does not happen again, Harper said.

Earlier this week, U.S. Ambassador David Wilkins criticized Ottawa's efforts to have Arar removed from a U.S. security watch list, saying Washington alone will decide who to let into the country.

The prime minister said the government will continue to press the U.S. to remove Arar from the watch list.

"We believe the evidence is clear that Mr. Arar has been treated unjustly," Harper said.

Late Friday, Stockwell Day, Canada's public safety minister, said he will continue to discuss the watch list with American officials.

"The issue won't be closed," he told CBC News. "This conversation will come up again."



He said the American government has a sovereign right to put Arar on a watch list, but that doesn't mean the Canadian government won't go to bat for him.

The NDP said Friday's apology and settlement was overdue, saying Arar's wife Monia Mazigh should receive credit for pushing the government to acknowledge its role.

"From the beginning, New Democrats, along with countless Canadians from every corner of this country, stood side by side with Ms. Mazigh in her battle to bring her husband home to justice and to his family," said New Democrat MP Alexa McDonough.

A U.S. politician, meanwhile, said Friday after the apology was issued to Arar that it is time for the U.S. to look at its role in the Arar affair.

Senator Patrick Leahy, a Democrat who represents Vermont, said the U.S. government could have treated Arar differently than it did.

"The question remains why, even if there were reasons to consider him suspicious, the U.S. government shipped him to Syria where he was tortured, instead of to Canada for investigation or prosecution."

<http://pm.gc.ca/eng/media.asp?category=2&id=1220>

## **Address by the Prime Minister on the Chinese Head Tax Redress**

22 June 2006

Ottawa, Ontario

Notes for an Address by  
The Right Honourable Stephen Harper  
Prime Minister of Canada

PLEASE CHECK AGAINST DELIVERY

Mr. Speaker, I rise today to formally turn the page on an unfortunate period in Canada's past.

One during which a group of people - who only sought to build a better life - was repeatedly and deliberately singled out for unjust treatment.

I speak, of course, of the head tax that was imposed on Chinese immigrants to this country, as well as the other restrictive measures that followed.

The Canada we know today would not exist were it not for the efforts of the Chinese labourers who began to arrive in the mid-nineteenth century.

Almost exclusively young men, these immigrants made the difficult decision to leave their families behind in order to pursue opportunities in a country halfway around the world they called "gold mountain."

Beginning in 1881, over 15,000 of these Chinese pioneers became involved in the most important nation-building enterprise in Canadian history – the construction of the Canadian Pacific Railway.

From the shores of the St. Lawrence, across the seemingly endless expanses of shield and prairie, climbing the majestic Rockies, and cutting through the rugged terrain of British Columbia,

– This transcontinental link was the ribbon of steel that bound our fledgling country together.

It was an engineering feat –one for which the back-breaking toil of Chinese labourers was largely responsible-

– That was instrumental to the settlement of the West and the subsequent development of the Canadian economy.

The conditions under which these men worked were at best harsh, and at times impossible: tragically, some one thousand Chinese labourers died building the CPR.

But in spite of it all, these Chinese immigrants persevered, and in doing so, helped to ensure the future of Canada.

But from the moment that the railway was completed, Canada turned its back on these men.

Beginning with the Chinese Immigration Act of 1885, a head tax of \$50 was imposed on Chinese newcomers in an attempt to deter immigration.

Not content with the tax's effect, the government subsequently raised the amount to \$100 in 1900, and then to \$500 – the equivalent of two years' wages – in 1903.

This tax remained in place until 1923, when the government amended the Chinese Immigration Act and effectively banned most Chinese immigrants until 1947.

Similar legislation existed in the Dominion of Newfoundland, which also imposed a head tax between 1906 and 1949, when Newfoundland joined Confederation.

The Government of Canada recognizes the stigma and exclusion experienced by the Chinese as a result.

We acknowledge the high cost of the head tax meant many family members were left behind in China, never to be reunited, or that families lived apart and, in some cases, in poverty, for many years.

We also recognize that our failure to truly acknowledge these historical injustices has led many in the community from seeing themselves as fully Canadian.

Therefore, Mr. Speaker, on behalf of all Canadians and the Government of Canada, we offer a full apology to Chinese Canadians for the head tax and express our deepest sorrow for the subsequent exclusion of Chinese immigrants.

Gar nar dai doe heem.

This apology is not about liability today: it is about reconciliation with those who endured such hardship, and the broader Chinese-Canadian community,

– One that continues to make such an invaluable contribution to our great country.

And while Canadian courts have ruled that the head tax, and immigration prohibition, were legally authorized, we fully accept the moral responsibility to acknowledge these shameful policies of our past.

For over six decades, these race-based financial measures, aimed solely at the Chinese, were implemented with deliberation by the Canadian state.

This was a grave injustice, and one we are morally obligated to acknowledge.

To give substantial meaning to today's apology, the Government of Canada will offer symbolic payments to living head tax payers and living spouses of deceased payers.

In addition, we will establish funds to help finance community projects aimed at acknowledging the impact of past wartime measures and immigration restrictions on ethno-cultural communities.

No country is perfect. Like all countries, Canada has made mistakes in its past, and we realize that.

Canadians, however, are a good and just people, acting when we've committed wrong.

And even though the head tax – a product of a profoundly different time -- lies far in our past, we feel compelled to right this historic wrong for the simple reason that it is the decent thing to do, a characteristic to be found at the core of the Canadian soul.

Mr. Speaker, in closing, let me assure the House that this government will continually strive to ensure that similar unjust practices are never allowed to happen again.

We have the collective responsibility to build a country based firmly on the notion of equality of opportunity, regardless of one's race or ethnic origin.

Our deep sorrow over the racist actions of our past will nourish our unwavering commitment to build a better future for all Canadians.

Thank you.

[http://www.nunatsiagonline.ca/stories/article/1808101\\_canada\\_says\\_its\\_sorry\\_to\\_the\\_high\\_arctic\\_exiles/](http://www.nunatsiagonline.ca/stories/article/1808101_canada_says_its_sorry_to_the_high_arctic_exiles/)

NUNATSIAQ NEWS: Nunavik August 18, 2010 - 1:19 pm

## **Canada says sorry to High Arctic exiles**

### **"We would like to offer a full and sincere apology to Inuit for the relocation of families from Inukjuak and Pond Inlet to Grise Fiord and Resolute Bay during the 1950s"**

JANE GEORGE

More than 14 years after Ron Irwin, then the minister of Indian affairs and northern development, settled financially with the High Arctic exiles on behalf of Canada, the survivors and descendants of the 19 Inuit families who were moved to Resolute Bay in 1953 and to Grise Fiord in 1955 received a measure of emotional satisfaction Aug. 18.

In Inukjuak, the original home of most of the relocatees, John Duncan, the new minister of INAC, offered what Irwin didn't: an official apology from Canada.

"On behalf of the Government of Canada and all Canadians, we would like to offer a full and sincere apology to Inuit for the relocation of families from Inukjuak and Pond Inlet to Grise Fiord and Resolute Bay during the 1950s," Duncan said in [a speech](#).

"We would like to express our deepest sorrow for the extreme hardship and suffering caused by the relocation. The families were separated from their home communities and extended families by more than a thousand kilometres. They were not provided with adequate shelter and supplies. They were not properly informed of how far away and how different from Inukjuak their new homes would be, and they were not aware that they would be separated into two communities once they arrived in the High Arctic. Moreover, the government failed to act on its promise to return anyone that did not wish to stay in the High Arctic to their old homes."

The apology was delivered at Inukjuak's Innalik School gym with Mary Simon, president of Inuit Tapiriit Kanatami, Pita Aatami, president of Makivik Corp., Paul Kaludjak, president of Nunavut Tunngavik Inc., and Okalik Egeesiak, president of the Qikiqtani Inuit Association, in attendance.

"Today's events are a step in the right direction," Simon said to those gathered.

At a news conference in Inukjuak, shortly after delivering the apology, Duncan admitted that there were a string of broken promises made to the families moved north from what was then the settlement of Port Harrison.

“Mistakes were made in the 1950s,” Duncan said, adding that “the government has no way to determine what the government of the day was motivated by when they made this relocation.”

Acknowledging that federal officials told the relocatees were they going to a “more abundant place,” promised that they would remain in one communities and that they could leave and return to their home communities after two years if they were unhappy, Duncan said the federal government is “sorry for the hardship, the suffering and the relocation having taken place.”

“Those are significant promises, and we’re apologizing for the relocation itself. We feel it was an inappropriate thing to do to move them from their ancestral lands, at least on those kinds of promises,” he said.

On the positive, residents of Grise Fiord and Resolute Bay are now proud of their communities, Duncan said — and then he made another promise: to “do is do everything we can to ensure that they can share Canada they way other Canadians do.”

The apology is “the first of a series” of events that will include ceremonies in Grise Fiord and Resolute Bay next month to unveil memorials to the relocatees, a work by Simeonie Amagoalik in Resolute Bay on Sept. 8 and another by Looty Pijamini in Grise Fiord on Sept. 10.

Today, only 34 of the original group are still alive. But they left numerous descendants now living throughout Nunavut, Nunavik and southern Canada.

In 1996, when Irwin made no apology in Inukjuak at Makivik Corp.’s annual general meeting that year, many exiles and their descendants were disappointed.

A report done by the Royal Commission on Aboriginal Peoples had found that the federal government’s actions at the time of the relocation were “coercive” and done without the consent of the Inuit.

In 1996, Larry Audlaluk of Grise Fiord and Markoosi Patsauq of Inukjuak, members of the original families, told *Nunatsiaq News* that the agreement reached with the federal government was a “take it or leave it” deal, and that they, like many of the exiles, accepted it because elders wanted to see some positive outcome from the years of telling their story — although they were upset that it did not include an apology.

Patsauq said in an Aug. 18 email comment to [www.nunatsiaqonline.ca](http://www.nunatsiaqonline.ca) that he accepts the apology made in Inukjuak.

“This historic event is written in our heart. God bless Canada,” Patsauq said.

The apology also produced reaction from Inuit leaders.

“Today’s apology brings some relief to the surviving Inuit who were forcibly relocated, and to the family and community members who struggled with the intergenerational effects this terrible experience caused,” NTI’s Kaludjak said in a news release.

Nunavut premier Eva Aariak called Aug. 18 an “historic day for Inuit of the High Arctic, northern Quebec, and indeed for all Canadians.”

“It is my great hope that these long-awaited words from the federal government will help to heal the pain still felt by so many. My thoughts are with them, their families, and those who are no longer with us today to hear these words of apology,” Aariak said in a statement.

The QIA’s Eegeesiak urged Harper to attend the memorial unveilings scheduled for next month and develop a broader view of sovereignty.

“The Prime Minister has shown strong leadership in asserting Canadian sovereignty through the military and scientific research,” she said in an Aug. 19 statement. “Now it is time to finally recognize the tremendous role played by Inuit in asserting Canadian sovereignty, and put a difficult chapter in Canadian history behind us. Let us move forward based on the principle that sovereignty is based on socio-economic and cultural development and well-being.”

The Aug. 18 apology came with no money attached because the issue of compensation was settled in 1996 when Ottawa agreed in a “reconciliation” deal to pay \$10 million in compensation for the suffering caused after the relocation of the Inuit families.

The High Arctic Relocates Trust, or “HART fund,” then stood at \$10 million, when the federal government turned it over to a six-person Makivik-appointed board of trustees, but its value had dwindled as of Dec. 31, 2009.

In 1996 and 1997, the trustees took \$2 million of it to distribute in equal amounts to the original High Arctic exiles, leaving \$8 million invested to produce earnings for future cash distributions.

A financial statement acquired by *Nunatsiaq News* earlier this year showed the fund was valued at only \$8 million as of Dec. 31, 2009, and that because of current market conditions, the trust was not able to generate enough income to pay administrative expenses and produce payments to beneficiaries, especially to the aging group of “original” High Arctic Exiles.

In Inukjuak, Duncan praised Makivik’s management of the trust.

“The trust fund is well managed by Makivik along with everything else they manage. They seem to be very professional, so we believe it’s in good hands,” he said.

<http://www.aadnc-aandc.gc.ca/eng/1100100015397>

## Government Of Canada Apologizes For Relocation Of Inuit Families To The High Arctic

**Ref. #2-3398**

**INUKJUAK, QUEBEC (August 18, 2010)** – Today, on behalf of the Government of Canada and all Canadians, the Honourable John Duncan, Minister of Indian Affairs and Northern Development and Federal Interlocutor for Métis and Non-Status Indians, apologized for relocating Inuit from Inukjuak and Pond Inlet to Grise Fiord and Resolute Bay in the High Arctic in the 1950s, and for the hardship, suffering and loss they experienced as a result of the relocation.

"The Government of Canada apologizes for having relocated Inuit families and recognizes that the High Arctic Relocation resulted in extreme hardship and suffering for Inuit who were relocated," said Minister Duncan. "We deeply regret the mistakes and broken promises of this dark chapter of our history."

In the 1950s, 19 Inuit families from Inukjuak were relocated by the federal government to Resolute Bay and Grise Fiord in the High Arctic. Three families from Pond Inlet were also relocated in order to assist the Inukjuak families with adjustment to the unfamiliar environment. Moved 1200 km from their [home community](#), the relocatees persevered against the odds to build communities in the far North.

The Inukjuak apology is the first in a series of events taking place this year in the North to commemorate the sacrifices made by High Arctic relocatees. The Arctic Exiles Monument Project, led by Nunavut Tunngavik Incorporated (NTI) will unveil monuments by Inuit sculptors in Grise Fiord and Resolute Bay in the fall. Minister Duncan will attend these events on behalf of the Government of Canada.

The Government of Canada is committed to renewing and rebuilding its relationship with Inuit across Inuit Nunangat, and to supporting social and economic development in the North as part of the Northern Strategy.

- [Backgrounder - Apology for Inuit High Arctic Relocation](#)
- [Map - Inuit Nunangat Relocation Route](#)

### For more information, please contact:

**Minister's Office**

Michelle Yao  
Press Secretary  
Office of the Honourable John Duncan  
(819) 997-0002

### **Appendix 3.**

#### **D. Documents Relating to the Arsenic Spill at Giant Mine October 2009**





# Info Source

## Access to Information Request Form

Protected when completed

For official use only

### Access to Information Act

#### Step 1

Determine which federal government institution is most likely to have the information you are seeking. Decide whether you wish to submit an informal request for the information or a formal request under the *Access to Information Act*. If you wish to make an informal request, contact the appropriate institution. The address can likely be found in *Info Source* publications which are available across Canada, generally in major public and academic libraries, constituency offices of federal Members of Parliament and most federal government public enquiry and service offices.

#### Step 2

To apply for information under the *Access to Information Act*, complete this form or a written request mentioning the Act. Describe the information being sought and provide any relevant details necessary to help the institution find it. If you require assistance, refer to *Info Source (Sources of Federal Government Information)* for a description of program records held by the institution or contact its Access to Information Coordinator.

#### Step 3

Forward the access request to the Coordinator of the institution holding the information. The address is listed in the "Introduction" to *Info Source*. Enclose a \$5.00 money-order or cheque payable to the Receiver General of Canada. Depending upon the type or amount of information being sought, you may be asked to authorize further charges.

#### Step 4

When you receive an answer to your request, review the information to determine whether you wish to make a further request under the Act. You also have the right to complain to the Access to Information Commissioner should you believe that you have been denied any of your rights under the Act.

#### Federal Government Institution

Department of Indian Affairs and Northern Development

#### Provide details regarding the information being sought

All records regarding spills (including drilling muds and arsenic) at the Giant Mine during work undertaken as part of the Freeze Optimization Study from June 2009 to present. Records relating to the actual spills, causes, reporting, follow-up, investigations, inspections, public communications and other related matters are of particular interest. Such records are likely to be in the possession of the Contaminants and Remediation Directorate, Field Operations Directorate, and the Executive Office Directorate.

#### Method of access preferred



Receive copies of originals



Examine originals in government offices

#### Name of applicant

Kevin O'Reilly

#### Street, address, apartment

P.O. Box 444

#### City or town

Yellowknife

#### Province

NT

#### Postal Code

X1A 2N3

#### Telephone number

8679202765 H 8676699141 Day

This request for access to information under the *Access to Information Act* is being made by



a Canadian citizen, permanent resident or another individual present in Canada, or



a corporation present in Canada

Signature

*Kevin O'Reilly*

Date

*December 7, 2009*

The personal information provided on this form is protected under the provisions of the *Access to Information Act* and the *Privacy Act*.



Indian and Northern  
Affairs Canada

Affaires indiennes  
et du Nord Canada

*Access to Information and Privacy  
Ottawa, Ontario  
K1A 0H4*

*Facsimile: (819) 953-5492*

*Your file      Votre référence*

*Our file      Notre référence*

**MAY 05 2011**

A-2010-00034 / CF  
c/r: A-2009-00230

Mr. Kevin O'Reilly  
P.O. Box 444  
Yellowknife, Northwest Territories X1A 2N3

Dear Mr. O'Reilly:

This is further to your request under the *Access to Information Act* for:

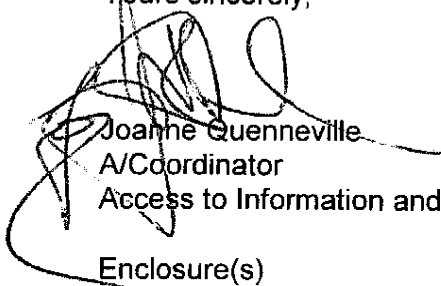
***"All records regarding spills (including drilling muds and arsenic) at the Giant Mine during work undertaken as part of the Freeze Optimization Study from June 2009 to present. Records relating to the actual spills, causes, reporting, follow-up, investigations, inspections, public communications and other related matters are of particular interest. Such records are likely to be in the possession of the Contaminants and Remediation Directorate, Field Operations Directorate, and the Executive Office Directorate."***

Enclosed you will find the final release of records that respond to this request. You will note that some information has been withheld from disclosure pursuant to sections 19(1) and 23 of the *Act*. A copy of the sections of the *Act* is enclosed for your information.

Please be advised that you are entitled to submit a complaint to the Information Commissioner for Canada concerning the processing of your request within 60 days of the receipt of this letter. In the event that you decide to avail yourself of this right, your notice of complaint should be addressed to: Place de Ville, Tower B, 112 Kent Street, 7th Floor, Ottawa, Ontario, K1A 1H3.

Do not hesitate to contact Cameron Fraser at 819-953-9357, who will be pleased to address any concerns or questions you may have regarding this matter.

Yours sincerely,

  
Joanne Guenneville  
A/Coordinator  
Access to Information and Privacy

Enclosure(s)

**Canada**

## 19(1) PERSONAL INFORMATION

19. (1) Subject to subsection (2), the head of a government institution shall refuse to disclose any record requested under this Act that contains personal information as defined in section 3 of the Privacy Act.

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## 23 SOLICITOR-CLIENT PRIVILEGE INFORMATION

23. The head of a government institution may refuse to disclose any record requested under this Act that contains information that is subject to solicitor-client privilege. 1980-81-82-83, c. 111, Sch. I "23".

---

**From:** Trish Merrithew-Mercredi  
**To:** Patrick Borbey  
**CC:** Annette Hopkins; Bill Mitchell; Darnell McCurdy; Marc Meloche; Marty...  
**Date:** 10/26/2009 5:10 PM  
**Subject:** IMPORTANT: Giant Mine Spill

Patrick -

Marc spoke to Annette as you requested, and indicated you had some questions of clarification on the spill report received, and timing of our getting to site to investigate. The explanation follows:

The 24 hour spill line is monitored under contract by a local firm - Arctic Alarms. When they receive a spill report, they fill in the Spill Report Form and send it to the responsible lead agency.

In this particular instance: (times verified by viewing the spill report form itself \*including fax time stamps)

Oct 22 - 1:00 a.m. Spill occurred. (Arctic Alarms takes this info from whomever reported the spill and transcribes it to the form).

Oct 23 - 5:15 p.m. Spill Line called by proponent. (Form indicates Arctic Alarms received the report at this time).

Oct 24 - 8:58 a.m. Spill Form faxed to INAC Spill Line Monitor. (Monitor = carries spill line cell phone 24/7)

Oct 24 - 11:04 a.m. Spill Form faxed to INAC Inspector Office From Spill Line Monitor.

Oct 24 - 12:07 p.m. Inspector notified by telephone of the spill report.

Oct 24 - 1:10 Inspector attended to the office to review the report, and contacted Giant Mine Manager (Nuna Logistics) regarding the spill. Inspector advised operations had shut down, and area cordoned off - assurance that spill was contained, not active and that clean-up efforts were under way.

At this point, the inspector would have made a determination of whether or not he needed to visit the site immediately. If the spill was active, he would have went to the site. Since the spill was contained by the proponent, he determined he would go to the site on Monday morning shortly after reporting to work (would have to gather field testing equipment etc). Inspector arrived at site to do initial investigation at 9:30 a.m. October 26.

Marc advised that you wondered if it was normal to have a spill reported 1 or 2 days after it happened. I have Teresa Joudrie looking into the reporting protocols for me, as her Directorate is in charge of the Spills Agreement and the contract with Arctic Alarms. As far as I am aware, when Arctic Alarms receives a spill report, no matter what time, it is to be reported almost immediately to the lead agency. Each lead agency has a 24 hour spill monitor - which is staff that have a 24/7 cell phone in case there is a major spill event that requires immediate action for containment, etc. I am at a loss to explain why it took Arctic Alarm that long to inform us but we responded immediately as soon as we became aware.

Marc also advised you wished to see the Communications Lines, Media Q's and A's asap. These are being worked on and will be sent as soon as they are approved here in Region. They will go through the HQ Communications approvals as well.

Annette explained to Marc there will be 2 Comms Issue sheets on this matter (which includes potential media q's and a's):

1) One from the Giant Mine Remediation Project Manager as Proponent - responsible to respond to questions about the project, how this occurred, what has been done to ensure it doesn't happen again, confirms no personnel injuries etc. (Lead: Bill Mitchell)

2) The second Issue Sheet will be around INAC's enforcement/compliance/spills investigations (Lead Darnell McCurdy) - responsible to respond to questions about the spill, how it was contained, what is being done to ensure the spill hasn't spread, and will also address questions about whether or not charges could/would be laid for the incident etc.

We will need to ensure the two aspects (proponent/enforcement) are clearly separate - to show our inspection officers are not biased and treat all proponents in the same matter - doesn't matter if it is INAC, or private industry - all are treated the same.

If you require additional information, please let me know.

Thanks, Trish

This message will be stored to CIDM (NWT) by:

Trish Merrithew-Mercredi  
Regional Director General  
Northwest Territories Region  
Department of Indian and Northern Affairs  
Tel: 867-669-2501

**From:** Paula Harker  
**To:** Carla Conkin  
**CC:** Annette Hopkins; Trish Merrithew-Mercredi  
**Date:** 10/28/2009 9:13 AM  
**Subject:** RE: Giant Mine Issue  
**Attachments:** YELLOWKN-#343952-v6-STATEMENT\_-\_OPS\_-\_GIANT\_MINE\_ARSENIC\_DUST\_SPILL\_-\_OCT\_27\_2009.DOC

Carla - We were planning on releasing a statement (see attached) once approved by HQ/MO. Have a look and see what you think. I will mention that Justice thinks only Darnell should speak to media. Are you okay with the statement? Also, should we advise PWGSC not to speak to media while this investigation is ongoing?

The only thing that worries me, is this is not just a small contaminated site in the far north away from a community. This site is within the city limits and has been in the media a lot recently. As well, this is a health and safety issue. I think it is important to reassure the community that everything is okay.

Let me know what you think, and any comments on the statement. We would like to issue it late today or early tomorrow - pending approvals.

Paula

Paula Harker  
Director  
Communications & Public Affairs  
INAC, NWT Region  
P.O. Box 1500  
Yellowknife, NWT X1A 2R3  
Phone: 867-669-2572  
Cell: 867-445-6267  
Fax: 867-669-2715

>>> "Conkin, Carla" <[Carla.Conkin@justice.gc.ca](mailto:Carla.Conkin@justice.gc.ca)> 10/27/2009 5:52 PM >>>

I've had a quick look at the project team lines. Note my advice is directed at the project team on a spill that is from what I understand, under investigation by the inspectors, as per normal protocols of which I am not entirely familiar.

Overall, in my view Bill shouldn't be speaking to the evidentiary issues beyond that a spill is being investigated by the inspectors, that the project team is following all requirements of the inspectors and to refer contact to Darnell. In my view if the matter is under inspection investigation Darnell should be the main contact/lead and speaker on this issue. In this context I think it would also be problematic for Bill to speak about the permitting issue given these circumstances.

Moreover on the firewall protocols and the last section of media lines on being both proponent and inspector, I'm not aware of what the INAC firewall protocols are. While DOJ has attempted to instate some measures so as to not exacerbate or contribute to the potential risks related to having the same legal counsel (DOJ) advise both the inspectors and the project team, these DOJ's measures do not otherwise work to reduce the risks INAC faces regarding the bias issue related to being both the inspector and the proponent. Overall, a reference to DOJ in this regard is inappropriate and likely opens the issue for more scrutiny - DOJ should not be referenced.

I'm happy to discuss these comments further as needed.

Carla

Carla R. Conkin  
Legal Counsel / Avocate  
Northwest Territories Office, Northern Region | Bureau des Territoires du Nord-ouest, Région du Nord  
Department of Justice Canada | Ministère de la Justice Canada  
5020 48th Street P.O. Box 8 | C.P. 8, 5020-48è rue  
Yellowknife, NT X1A 2N1  
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Government of Canada/Gouvernement du Canada

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-----Original Message-----

From: Paula Harker [mailto:Paula.Harker@inac-ainc.gc.ca]

Sent: October 27, 2009 4:01 PM

To: Conkin, Carla

Cc: Annette Hopkins; Jennifer Moores; Toni Riley

Subject: Giant Mine Issue

Hi Carla. Attached are the media lines we have drafted on Giant Mine following small spill at site. There are two sets - one to respond to regulatory/inspections questions (A/Director Operations), and one to respond to the project/contract work (with Giant and PWGSC spokesperson).

We are drafting a statement to alert the local FN's and then to distribute to media. The statement is being finalized and sent to RDG, and then we will forward to you for review. The media lines are in HQ for approvals (needed to get them into the system ASAP) but are attached below for your review. The statement will also have to go to HQ for approval before we issue.

No media calls yet, and hoping it will stay quiet while we finalize our messaging. Any questions, give me a call.

Paula

Paula Harker  
Director  
Communications & Public Affairs  
INAC, NWT Region  
P.O. Box 1500  
Yellowknife, NWT X1A 2R3  
Phone: 867-669-2572  
Cell: 867-445-6267  
Fax: 867-669-2715

**From:** Paula Harker  
**To:** Maryse Pesant  
**Date:** 11/3/2009 11:50 AM  
**Subject:** Giant Communications

Hi Maryse. I would like to flag something to you on Giant. I think it is worth following up with PWGSC, but I will leave that up to you.

When the region received word of this issue, we immediately pulled our holding lines and updated them. We also contacted PWGSC communications to coordinate with them. PWGSC did not know about the issue as their program folks had not let them know.

**However, my immediate concern is the fact that, although PWGSC drafted media lines, they would not put them into approvals until they received a media call. PWGSC knew that INAC would be issuing a statement, and that due to the fact that the spill report would be posted online, we would receive media calls soon ... and this is a huge health and safety issue located inside the Yellowknife city limits.**

This means that when INAC received calls and was ready to talk, PWGSC was still in a holding pattern. Even when I told PWGSC that CBC had requested an interview with the Giant team and PWGSC, they would not move until the media call came into them directly. Although PWGSC eventually approved the spokesperson to speak, at the last minute they pulled him and left our guy to speak to the media alone.

I think this is very unfortunate - especially given the media interest around Giant. If something else (or something worse) was to happen,

21(1)(b)

PWGSC is the one who manages the contract for the site cleanup, so they should be the ones talking to the media about what happened up there.

As I said, I know you have a lot to do and not sure if you want to take this on, but if we have another issue arise, I would hope that PWGSC is better able to respond .... or are at least aware of the importance of keeping the most accurate information about this project in the public domain. Perhaps even a quick conversation with the DG to discuss the importance of getting their media lines on Giant through approvals in an expedited fashion when a situation arises - even if it means moving outside their normal system??

Paula

Paula Harker  
Director  
Communications & Public Affairs  
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## Operational Update – Giant Mine Arsenic Discharge

**October 29, 30, 2009**

Several media interviews were given by 1) Darnell McCurdy, A/Director, Operations on the enforcement, compliance, investigation of the arsenic spill; and, 2) Bill Mitchell, A/Director, CARD on the Giant Mine Freeze Optimization Study drilling, and release of arsenic dust from that drilling operation:

- 1) CJCD Radio, Oct 29
- 2) CJCD Radio, Oct 29
- 3) CBC North Radio News, 12:31 pm, Oct 29
- 4) CBC North Television Northbeat (evening), Oct 29
- 5) Yellowknifer newspaper brief, Oct 30
- 6) CBC North Radio News 630 am, Oct 30
- 7) CBC North Radio Trailbreaker 715 am, Oct 30

\*See Attachment A for details of each interview/story.

**October 30, 2009**

- INAC received an independent report on the incident from Brodie Consulting which summarizes: (transcribed verbatim from Consultant Report).
  - *No worker was injured in any way. A comprehensive H&S protocol had been updated prior to the start of the project. The workers had been trained in the appropriate H&S procedures and had appropriate safety gear; most important of this was the use of fit-tested respirators.*
  - *There was no release of arsenic dust to the environment. All dust remained within the controlled work area. Water sampling in a pond which is within the mine water management system and nearest to the incident area has not shown a detectable increase in arsenic concentration.*
  - *Protocols for protection of health and safety of workers and the environment were effective. With the addition of the minor modifications identified below, the protocols are expected to be even better should there be another incident in the future. (Note: This review of the dust incident is not a comprehensive assessment of the H&S or Spill Response protocols. They have been considered only to the extent that they appear to have been effective in this case.)*
  - *This is almost a “non-event”. The exact amount of arsenic dust on the ground is not known. The quantity was described as about 1 litre, but the mass cannot be determined because we do not know if this is an accurate estimate, nor do we know the density of the material. It appears the amount was at the threshold amount for spill reporting (1 kg in NWT Regulations). It may have been prudent to have reported the incident as a “spill”. However, not reporting the incident does not appear to have been irresponsible considering the quantity may have been less than the threshold, and there was no release to the environment. That said, the incident was not promptly addressed via internal communication*

*(contractor, mine manager, project owner) such that the mine manager could have decided upon the need for reporting. This aspect of internal communications should be addressed, including clarification of which party is responsible for spill reporting.*

- o It is understood that there is a spill response plan. This has not been assessed as part of this assessment of the incident. Review of the spill response plan would be a prudent addition to the review of the communications, as noted above.*
- o The specific mechanism and timing of the deposit of arsenic dust is uncertain. Some minor process and monitoring changes to the drilling protocol should significantly reduce the risk of a similar incident.*
- o The drilling activity associated with this incident relates to the special requirements of data collection for the Freeze Optimization Study. This type of drilling activity will be a very small component of the ultimate remediation project.*
- Recommendations from the Consultant include a review of the H&S and Spill Response protocols to ensure that they are adequate to deal with future events, should one occur, and completion of the installation of the instrumentation, however, implementing modifications to the method to minimize the risk of future incidents.
- INAC will be reviewing the report and recommendations with PWGSC in the immediate future.
- A/Director, CARD, Bill Mitchell has confirmed that the water samples that were submitted for analysis on "Mill Pond" did not show any elevated levels of arsenic. In fact, the levels of arsenic in Mill Pond were half of what was reported in the spring. From these results, we can say that Mill Pond was not affected by this accidental discharge of arsenic dust.
- Arsenic exposure on ground was limited to the Drill Pad Area, which has controlled access.

#### **November 2 & 3, 2009**

- No additional media enquiries filed with INAC on the accidental discharge of arsenic.

#### **November 3, 2009**

- Spill investigation is ongoing, however, should be wrapped up within the next week. Further information will follow on the results of this investigation.
- Meeting of the Giant Mine Oversight Committee took place today, which went very well. Bill Mitchell, Martin Gavin (INAC), and Mark Cronk, Lisa Dyer (PWGSC) made presentations to the Committee explaining the accidental discharge, actions taken to date, as well as confirmation that current reporting protocols are being reviewed, with a view to revising them to ensure immediate reporting to both INAC and PWGSC for any incident at the site. Final report on the incident should be finalized in the next one to two weeks.

### **Current Status of Freeze Optimization Study (FOS)**

- Arctic Foundations is due back to site in the next couple of days to install 12 thermosyphons and ancillary equipment – this will take two weeks to complete.
- Northland Utilities are to install power poles and lines to the new electrical substation.
  - Following the power line install, they will start the ground grid installation for the substation.
  - Immediately following the ground grid, the substation will be installed and energized for the FOS site power requirements.
- Completion of concrete drift plugs (4)
- Northwest Sequoia is scheduled to return to site after November 9<sup>th</sup> to complete the remaining 6 instrumentation tubes into the dust (3 are already complete)
- Following that work, Northwest Sequoia will complete the freeze holes through the concrete drift plugs and a few remaining freeze system holes to underground.
- All work is expected to be completed by November 30<sup>th</sup>, as additional costs (10K/day) would be incurred for delays beyond current work schedule. As well, this work needs to be completed prior to full winter conditions setting in.
- Martin Gavin, Project Manager will update Regional REC on the FOS, including intent and necessity for the study, and update on progress of the FOS within the next two weeks.

Prepared by: Annette Hopkins  
A/Associate Regional Director General  
Northwest Territories  
Date: November 3, 2009

**From:** Bill Mitchell  
**To:** Martin Gavin  
**Date:** 10/29/2009 11:29 AM  
**Subject:** Re: FOS suspended

FOS on surface only is suspended until Tuesday.

-----Original Message-----

From: Martin Gavin  
To: Bill Mitchell <Bill.Mitchell@inac-ainc.gc.ca>  
To: <mark.cronk@pwgsc.gc.ca>

Sent: 10/29/2009 1:15:41 PM  
Subject: Re: FOS suspended

Thanks Bill

To Clarify

All FOS related Underground and surface work, electrical work piping work to be stopped until further notice?

MG

>>> Bill Mitchell 10/29/2009 11:10 AM >>>

Trish MM has asked that all work on the FOS be suspended until at least Tuesday next week until after the OC meeting has taken place.

You should inform the contractors of this delay but I would hope that the FOS could be given a go-ahead on Tuesday.

**From:** Bill Mitchell  
**To:** Annette Hopkins  
**CC:** Martin Gavin  
**Date:** 11/2/2009 9:37 AM  
**Subject:** Re: Fwd: Giant Mine FOS - Crown initiated shutdown  
**Attachments:** FinalLetter-DustIncident-009.pdf; Bill Mitchell.vcf

Annette:

Thank you for following up with Trish on the Freeze Optimization Study (FOS) shutdown. We can wait until tomorrow for the decision. In the meantime, I have attached a draft of the engineer's analysis of the dust release incident and recommendations to avoid any future similar occurrence. Please note that this is still not the final version of the engineer's report. A few more facts need to be added.

Given the amount of interest and concern, I think that it would be useful to have Martin make a special presentation to REC on the Freeze Optimization Study, including the intent and necessity for the study as well as update on progress with the FOS.

On another subject, I believe that my acting authority expired at the end of October, so we should try to discuss this soon.

Bill Mitchell  
Indian and Northern Affairs Canada

>>> Annette Hopkins 11/2/2009 9:00 AM >>>  
Thanks for this information Bill, very much appreciated.

I talked to Trish about this, and let her know that we would be expected to pay 10K / day after Nov 9th to have the drill on standby. This morning I indicated to her we were to have onsite work commencing today, re: thermo syphons and the installation of power poles by Northland Utilities. Trish reminded me that last week we agreed (at our Special REC I think) that we would hold off on any work until she has had an opportunity to meet with the GM Oversight Committee which is taking place tomorrow morning at 9:00 a.m.

Trish is aware of the pressures and activities and will give this her highest priority for resolution after the meeting on Tuesday.

Annette

>>> Bill Mitchell 10/30/2009 9:07 AM >>>  
Annette:

As per the attached e-mail, the Crown will begin to incur significant standby charges for the drill if the FOS remains shut down any longer than early next week. There is work that must be done on the site as outlined below before the drilling recommences on November 9th:

From: Mark Cronk  
Sent: Wednesday, October 28, 2009 4:56 PM  
To: 'Martin Gavin'; Henry Westermann  
Cc: Lisa Dyer; Robert Girvan  
Subject: Giant Mine - FOS upcoming activities

Hi Martin,

I just wanted to be sure you were kept current on upcoming activities on the FOS project:

1) Northlands Utilities is being scheduled to start on Monday to install power poles and lines to power the new FOS electrical substation

This work will not be in the immediate vicinity of the spill/release

2) Arctic Foundations is due back on site Monday to install 12 thermosyphons and ancillary equipment for 2 weeks

3) Following the powerline install we will need to start the ground grid installation for the substation

4) Immediately following the ground grid we will install the substation and energize it for FOS site power requirements

5) We need to complete the concrete drift plugs (4)

6) Northwest Sequoia is scheduled to return after Nov 9 to complete the remaining 6 instrumentation tubes into the dust (3 are completed now)

7) Following this work Northwest Sequoia will complete the freeze holes through the concrete drift plugs and a few remaining freeze system holes to underground.

I would expect this work to be completed within the next 2-4 weeks and the scopes are time critical to beat the coming winter conditions.

If there are any questions concerning the information presented herein, please contact the writer directly.

Bill Mitchell  
Indian and Northern Affairs Canada



October 30, 2009

Mr. Martin Gavin, P. Eng, INAC  
Giant Mine Remediation Project

By email: gavinm@inac.gc.ca

**RE: Dust Incident – Drilling Program – Freeze Optimization Study**

Dear Martin,

As requested, this letter presents an evaluation of the dust incident which occurred during the drilling program for the Freeze Optimization Study. This letter consists of 4 main parts: Summary, Facts, Uncertainties and Recommendations.

**Summary**

An incident occurred on Oct 21, 2009 at the Giant Mine while drilling a component of the Freeze Optimization Study (F.O.S.). The incident involved a deposit of an unverified amount of arsenic dust on the ground at the drilling area. The workers indicated that the amount of dust was approximately 1 litre of loose material. One worker was exposed to the dust. The worker was decontaminated and the loose dust was cleaned up. Key findings are:

- No worker was injured in any way. A comprehensive H&S protocol had been updated prior to the start of the project. The workers had been trained in the appropriate H&S procedures and had appropriate safety gear; most important of this was the use of fit-tested respirators.
- There was no release of arsenic dust to the environment. All dust remained within the controlled work area. Water sampling in a pond which is within the mine water management system and nearest to the incident area has not shown a detectable increase in arsenic concentration.
- Protocols for protection of health and safety of workers and the environment were effective. With the addition of the minor modifications identified below, the protocols are expected to be even better should there be another incident in the future. (Note: This review of the dust

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604-922-2034 fax: 604-922-9520 email: mjob@brodie@shaw.ca

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incident is not a comprehensive assessment of the H&S or Spill Response protocols. They have been considered only to the extent that they appear to have been effective in this case.)

- This is almost a “non-event”. The exact amount of arsenic dust on the ground is not known. The quantity was described as about 1 litre, but the mass cannot be determined because we do not know if this is an accurate estimate, nor do we know the density of the material. It appears that the amount was at the threshold amount for spill reporting (1 kg in NWT regulations). It may have been prudent to have reported the incident as a “spill”. However, not reporting the incident does not appear to have been irresponsible considering the quantity may have been less than the threshold, and there was no release to the environment. That said, the incident was not promptly addressed via internal communication (contractor, mine manager, project owner) such that the mine manager could have decided upon the need for reporting. This aspect of internal communication should be addressed, including clarification of which party is responsible for spill reporting.
- It is understood that there is a spill response plan. This has not been assessed as part of this assessment of the incident. Review of the spill response plan would be a prudent addition to the review of communications, as noted above.
- The specific mechanism and timing of the deposit of arsenic dust is uncertain. Some minor process and monitoring changes to the drilling protocol should significantly reduce the risk of a similar incident.
- The drilling activity associated with this incident relates to the special requirements of data collection for the Freeze Optimization Study. This type of drilling activity will be a very small component of the ultimate remediation project.

#### **Facts**

The following points are sufficiently certain that they can be considered as facts:

- Nine instrumentation drill holes which extend through the dust to the base of the chamber are planned for the F.O.S.
- The drilling of these holes was planned to be conducted in 2 stages:
  1. Stage 1 consisted of the drilling through soil and rock to the point of breaking through the roof of the chamber and had been completed before the incident



occurred. Steel casing was installed as required. This casing has an ID of 8" and OD of 8 5/8". In each hole, once the roof of the chamber was reached, drilling was halted, the top of the hole was temporarily capped and the drill rig moved to the next hole. Stage 1 had been completed for all 9 drillholes.

2. Stage 2 was the drilling through the dust to the base of the chamber. This was in progress on the first of nine drillholes when the incident occurred.
- This drilling was conducted using the down-hole hammer method to create a hole approximately 6" in diameter. The down-hole hammer is energized by compressed air which is driven down the inside of the drill rods and is exhausted up the annulus between the drill rods and the material it is drilling through.
  - The air compressor on the drill rig has a rating of 1000 cfm at 350 psi.
  - The capping of the drillholes consisted of a heavy gauge plastic taped over the protruding end of the casing. A steel plate approximately 12" in diameter and 1/4" thick was placed overtop of the plastic.
  - Drilling was proceeding on Drillhole S-35 on the night shift of Oct. 21, 2009.
  - On Drillhole S-23, approximately 5 m away from S-35, a HEPA air filter was operating to filter dust from the air which would be exhausting from within the chamber. The HEPA filter has a small fan which has a rating of 1400 cfm at roughly atmospheric pressure – with all filters clean.
  - The HEPA unit was inspected on Oct 28, 2009. At that time, there was visible dust on the external side of the filter. This suggests that it may have been overwhelmed with dust. It is not known when this occurred. However, if the filter is clogged, its air volume capacity will be significantly reduced.
  - The chassis of the drill rig was situated overtop of drillhole S-26 when it was drilling S-35.
  - Drilling on S-35 commenced at approximately 9 pm on Oct 21, 2009.
  - At approximately 1 am on Oct 22, 2009, one of the drillers walked around the drill rig and was exposed to dust emanating from S-26. The steel plate had fallen off. The condition of the plastic was not described.
  - Reportedly, drilling was halted in less than 1 minute. The worker went to the wash-down area for immediate cleaning. Subsequently, he went to the C Dry to shower and get clean clothes.

- Reportedly, there was approximately 1 litre of dust on the ground around the collar of S-26. The workers excavated this material and up 0.2 m<sup>3</sup> (5 ft<sup>3</sup>) of soil from around S-26. All of this material was disposed in an approved hazardous waste container.
- A "Niton" hand-held analyzer was used to give an indication of the extent of arsenic contamination around S-26. The results suggest there is arsenic dust up to 10 m around S-26 (mostly to the south). The results of the Niton are not equivalent to analytical determinations of total arsenic, but they do indicate that the arsenic levels may be elevated into the range or possibly above the threshold of 340 ppm for arsenic concentration in soils in an industrial setting.
- It is understood that at least one of the worker's urine analysis showed arsenic levels of about 200 ug/l (microgram/litre = parts per billion), which is twice the level established on site for removing workers from the exposure area. It is also understood that the threshold for adverse health effects (minor flu-like symptoms) is approximately 400 ug/l.
- It is understood that drilling was conducted through the dust to the base of the chamber in two subsequent drillholes without incident.

#### Uncertainties

The following points are outstanding, and likely un-resolvable, uncertainties associated with this incident;

- The operating records for the drill do not include details on the volume of compressed air forced down the drill rods. To do so would be unusual.
- The drillers report that the cap on S-26 "popped off" just at the moment when the driller walked past that part of the drill rig. Although this is possible, it seems to be a remarkable coincidence. It is conceivable that the cap on S-26 had been off for a period of time. The drill records indicate that the rods had been advanced down the hole starting at 9 pm and had reached the dust by approximately midnight. At this time there would have been a need to start using compressed air to continue advancing the drill rods. The cap on S-26 could have come off any time after this point, once sufficient excess air pressure had built up in the chamber.
- The amount of excess air pressure in the chamber would be very difficult to determine now that the event is over. There are several unknowns including: volume of the air void above the dust, how an air pressure gradient might move through the dust in the chamber, and the

effect of any other air leaks in the chamber. None-the-less, the drill rig has a capacity to deliver air at several hundred times greater rate than the vacuum on HEPA filter can remove it. An excess pressure in the order of 0.16 psi would be sufficient to pop the steel plate off the top of the drill casing on S-26 (assuming zero strength of the plastic held by tape).

- S-26 drillhole ended at the roof of the chamber and it is very unlikely that there was dust in the chamber against the roof. The question that arises from this situation is; "What configuration of dust and/or mechanism of air movement could result in dust being forced up the drillhole to surface?". It is conceivable that some dust was suspended in the air above the surface of the dust in the chamber around the active drillrods and that this was moved upward through S-26 due to the air movement in the chamber.

#### Recommendations

The following recommendations are presented for consideration in modifying the approach for drilling of the remaining holes in the dust:

- Conduct a review of the H&S and Spill Response protocols to ensure that they are adequate for to deal with future events, should one occur.
- The installation of instrumentation in the dust is an essential component of the F.O.S. This requires drilling with either air or water to advance the rods. Drilling with water is not recommended because of the concern for adding excess water to the chamber before a freeze perimeter is established. Therefore, drilling with air appears to be the preferred general approach. However, modifications to the method are required to minimize the risk of future incidents. Central to this is the need to provide a balance in the rate of air addition via the drill rods and the capacity of the HEPA filter system to remove and clean the air that is exhausting from the chamber. Some approaches for consideration before drilling resumes are:
  - Minimize the use of air in the drilling method. This was done successfully in the drillholes after S-26, but does not seem to be a reliable approach. A simple way to achieve this might be to limit the rate of advance, such as drill 3 feet, wait 10 minutes, then repeat. *(these values are example only, some testing would be required to determine the appropriate operational values)*
  - Provide a HEPA filter which has excess capacity over the compressed air supply on the drill rig. It is likely that will lead to a requirement for an extremely large

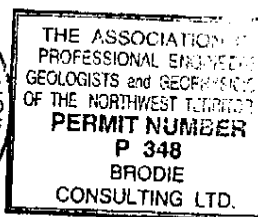
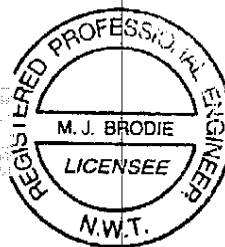
(and potentially impractical) filter system. However, a larger filter and associated vacuum would reduce the risk.

- o Provide more secure caps on the inactive drill holes.
- o Provide some type of warning system (pressure gauge with alarm/light) to alert the drillers when an excess pressure is developing in the chamber.
- o Situate the HEPA filter as far as practical from the active drillhole so that any liberated dust in the chamber has an opportunity to settle out before it reaches the exhaust drillhole.
- o Provide a wetting mist into the chamber to aid in settling of any airborne dust before it enters the exhaust drillhole.

I trust that this letter addresses your requirements. Please contact me at your convenience should there be any inaccuracies in the assessment or questions of clarification.

19(1)

Yours truly,  
Brodie Consulting Ltd.



M. J. Brodie, P. Eng.

CC: Mr. Mark Cronk, P. Eng. PWGSC

By email: [cronkm@inac.gc.ca](mailto:cronkm@inac.gc.ca)

#### References

The following information was considered in preparation of this review:

- Interview with Mr. Trevor Herd, project manager for Nuna Logistics,
- A site inspection, led by Mr. Trevor Herd, of the drilling area and drilling equipment (idle at the time of inspection),
- The driller's logs for Oct 21 day shift to Oct 22 night shift.
- Graphic results of Niton soil analysis.

\_\_\_\_\_  
Brodie Consulting Ltd.

**From:** Martin Gavin  
**To:** Mark.Cronk@pwgsc-tpsgc.gc.ca, Bill Mitchell, Benny Nordahn, Desmond.O'Co...  
**Date:** 11/3/2009 4:02 PM  
**Subject:** Re: Spill Reporting

Hi folks

Good work..totally appreciate the speed this is happening.

Once we get it finalized send to me and copy Ben and Bill and I will forward to recommendation the project be reinitiated based on the issues being addressed. (Following review but that will already be complete by the time we get the official e-mail)

Presentation of the e-mail should be as a notification that the issues have been addressed and advise how. And a request to reinitiate the suspended project tasks.

I will shoot that off to Bill with a recommendation to reinitiate.

I assume Bill will send up the line to the RDG and its in her hands hopefully she will act quickly.

Martin

-----Original Message-----

From: "Mark Cronk" <Mark.Cronk@pwgsc-tpsgc.gc.ca>  
To: Martin Gavin <Martin.Gavin@inac-ainc.gc.ca>  
To: Bill Mitchell <Bill.Mitchell@inac-ainc.gc.ca>  
To: Benny Nordahn <Benny.Nordahn@inac-ainc.gc.ca>  
To: Desmond O'Connor <Desmond.O'Connor@pwgsc-tpsgc.gc.ca>  
To: Henry Westermann <Henry.Westermann@pwgsc-tpsgc.gc.ca>  
To: Lisa Dyer <Lisa.Dyer@pwgsc-tpsgc.gc.ca>  
To: Robert Girvan <Robert.Girvan@pwgsc-tpsgc.gc.ca>

Sent: 11/3/2009 5:21:45 PM

Subject: Re: Spill Reporting

To all,

This information is to be released in draft and is not be delivered to the oversight until formally accepted by PWGSC.

We need to be certain we have this right.

Cheers,

Mark Cronk

(from a blackberry)

---

From: Lisa Dyer  
To: 'Martin Gavin' <Martin.Gavin@inac-ainc.gc.ca>; 'Benny Nordahn' <Benny.Nordahn@inac-ainc.gc.ca>; 'Bill Mitchell' <Bill.Mitchell@inac-ainc.gc.ca>; Henry Westermann; Mark Cronk; Desmond O'Connor; Robert Girvan  
Sent: Tue Nov 03 16:48:16 2009  
Subject: Spill Reporting

Rob arranged for a meeting at site to discuss the spill contingency plan and improvements required in

000697

communications.

Site personal are updating reporting requirements and will have a revised copy submitted to us tomorrow.

This revised copy will be submitted to Martin who can then submit it to the oversight committee as requested in today's meeting.

Highlights from our meeting at site

- \* Report all spills and incidences
- \* Mike Borden will report spills to Robert Girvan and Martin Gavin by phone (we will not rely on e-mail). Des O'Conner and Ben Nordhan will be alternative contacts if primary contacts cannot be reached in person by phone.
- \* Robert and Martin (or alternatives) will inform management in PWGSC and INAC of the spill
- \* DCN will document all discussions with Inspectors and keep PWGSC reps informed
- \* DCN will ensure that the Spill Plans are updated as operations or personal changes
- \* A report on the spill with field and lab results will be completed by DCN and submitted to PWGSC and INAC

Rob and Des please let me know if I have missed any major issues raised at the meeting.

Martin if you would like to change the INAC reporting structure please let me know.

Lisa

Lisa Dyer  
Project Manager  
Public Works and Government Services Canada  
Greenstone Building  
Suite 420, 4th Floor, 5101-50th Ave  
P.O. Box 518  
Yellowknife, NT  
X1A 2N4

Tel: 867-766-8377  
Fax: 867-873-5885  
Cell: 867-444-8808  
E-mail: Lisa.Dyer@pwgsc.gc.ca

**From:** Annette Hopkins  
**To:** Patrick Borbey  
**CC:** Paula Isaak, Marc Meloche, Martin Gavin, Paula Harker, Trish Merrithew-M...  
**Date:** 11/3/2009 6:41 PM  
**Subject:** Re: Giant Mine Update

Yes. The work being completed does not include further drilling activities and the investigation with regard to the reporting being less than stellar is an administrative review and site manager and supervisors are now well versed in ensuring reporting any and all incidents is of utmost importance. I will be solidifying the reporting procedures in an "incident" reporting protocol document that will identify who is to be contacted and will include 24 hour contact information for all.

As to the spill investigation, no damage to the environment, proper clean-up and containment was carried out immediately, and again, administrative review shows problems in reporting the incident. Charges not likely but will wait for file closure notification from the Inspector. I will complete the incident reporting procedures when I get back in the office Thursday.

Annette  
Thumbed from my blackberry.

-----Original Message-----

**From:** Patrick Borbey  
**Cc:** Paula Isaak <Paula.Isaak@ainc-inac.gc.ca>  
**Cc:** Marc Meloche <Marc.Meloche@ainc-inac.gc.ca>  
**Cc:** Martin Gavin <Martin.Gavin@inac-ainc.gc.ca>  
**Cc:** Paula Harker <Paula.Harker@inac-ainc.gc.ca>  
**To:** Annette Hopkins <Annette.Hopkins@inac-ainc.gc.ca>  
**Cc:** Trish Merrithew-Mercredi <Trish.MerrithewMercredi@inac-ainc.gc.ca>  
**Cc:** Bill Mitchell <Bill.Mitchell@inac-ainc.gc.ca>

**Sent:** 11/3/2009 8:12:11 PM  
**Subject:** Re: Giant Mine Update

Thanks Annette. Glad to see that all is in control. Just one quick question. Do you have lines to respond to inquiries as to why we are allowing work to resume while the incident is still under investigation?

Patrick

-----Original Message-----

**From:** Annette Hopkins  
**To:** Patrick Borbey <Patrick.Borbey@ainc-inac.gc.ca>  
**Cc:** Paula Isaak <Paula.Isaak@ainc-inac.gc.ca>  
**Cc:** Marc Meloche <Marc.Meloche@ainc-inac.gc.ca>  
**Cc:** Martin Gavin <Martin.Gavin@inac-ainc.gc.ca>  
**Cc:** Paula Harker <Paula.Harker@inac-ainc.gc.ca>  
**Cc:** Trish Merrithew-Mercredi <Trish.MerrithewMercredi@inac-ainc.gc.ca>  
**Cc:** Bill Mitchell <Bill.Mitchell@inac-ainc.gc.ca>

**Sent:** 11/3/2009 7:53:10 PM  
**Subject:** Giant Mine Update

Patrick,

I confirmed with Trish that I should provide an operational update on the Giant Mine file as to where we are today, and how things have progressed since your departure last week. Please note that Trish, and Bill have not reviewed this update, as I completed it late in the day, but wanted to get this out as I will not be in the office tomorrow.

If additional information is required, please advise, and we will get that out to you Thursday afternoon.

**From:** Bill Mitchell  
**To:** Martin Gavin  
**Date:** 11/4/2009 1:04 PM  
**Subject:** Re: FOS  
**Attachments:** Bill Mitchell.vcf

I have not heard or seen anything that would imply that Trish has given a go-ahead.

Bill Mitchell  
Indian and Northern Affairs Canada

>>> Martin Gavin 11/4/2009 12:46 PM >>>  
Hey Bill

Been dealing with Paula this am. Apparently TMM thinks she gave the go ahead for the thermosyphons and electrical etc but not the drilling which is good news!!!

Are we good to go?

Martin



**Benny Nordahn - Re: Updated spill / comms plans**

**From:** "Mark Cronk" <Mark.Cronk@pwgsc-tpsgc.gc.ca>  
**To:** "Lisa Dyer" <Lisa.Dyer@pwgsc-tpsgc.gc.ca>, "Robert Girvan" <Robert.Girvan@pwgsc-tpsgc.gc.ca>  
**Date:** 11/4/2009 2:05 PM  
**Subject:** Re: Updated spill / comms plans  
**CC:** "Henry Westermann" <Henry.Westermann@pwgsc-tpsgc.gc.ca>, <Martin.Gavin@inac-ainc.gc.ca>, "Desmond O'Connor" <Desmond.O'Connor@pwgsc-tpsgc.gc.ca>, <Benny.Nordahn@inac-ainc.gc.ca>

LOL - nice touch.

Have spoken to Martin and Henry and we are agreed that we need to get out in front of the groups you have suggested. Let's organize how we roll this out.

Cheers,  
Mark Cronk  
(from a blackberry)

----- Original Message -----

**From:** Lisa Dyer  
**To:** Mark Cronk; Robert Girvan  
**Cc:** Henry Westermann; 'Martin Gavin' <Martin.Gavin@inac-ainc.gc.ca>; Desmond O'Connor; 'Benny Nordahn' <Benny.Nordahn@inac-ainc.gc.ca>  
**Sent:** Wed Nov 04 15:58:10 2009  
**Subject:** RE: Updated spill / comms plans

Mark I am not sure that mine safety approves spill response plans....they look at the requirement of having a H&S plan in place of which an emergency response plan is a component. They do not approve plans or comment on them. (This is my experience from Tundra)

Normally, INAC, EC, DFO and GNWT would review the spill or emergency response plan under a LUP or WL. Why not have the site formally submit the plans to these agencies to make sure that they are meeting all regulatory requirements and ask for comments back in a month. It may also be prudent to submit one to the MVLWB as information only since we are operating in C&M.

This would safely cover all are bases and meet the spirit and intent of regulatory requirements.

Lisa

-----Original Message-----

**From:** Mark Cronk  
**Sent:** Wednesday, November 04, 2009 1:42 PM  
**To:** Robert Girvan; Lisa Dyer  
**Subject:** Updated spill / comms plans

Hi folks,

INAC wants our request to reactivate the FOS by late this afternoon so we are going to need:

Updated comms plan

Confirmation that the site level response plans are being updated and this is being done in consultation with Mine Safety  
Anything else you can offer that helps support our request to reactivate the FOS.

Cheers,  
Mark Cronk  
(from a blackberry)

**Bill Mitchell - Re: Fwd: Re: Work at Giant**

---

**From:** "Mark Cronk" <Mark.Cronk@pwgsc-tpsgc.gc.ca>  
**To:** Robert.Girvan@pwgsc-tpsgc.gc.ca; Lisa.Dyer@pwgsc-tpsgc.gc.ca; Henry.Westermann@pwgsc-tpsgc.gc.ca; Martin.Gavin@inac-ainc.gc.ca; ...  
**Date:** 11/4/2009 4:18 PM  
**Subject:** Re: Fwd: Re: Work at Giant

Thank you for the release on the stop work - we are proceeding.

Cheers,  
Mark Cronk  
(from a blackberry)

----- Original Message -----

**From:** Bill Mitchell <Bill.Mitchell@inac-ainc.gc.ca>  
**To:** Martin Gavin <Martin.Gavin@inac-ainc.gc.ca>; Mark Cronk  
**Sent:** Wed Nov 04 18:01:34 2009  
**Subject:** Fw: Fwd: Re: Work at Giant

Go with the FOS.

Thanks, Trish

-----Original Message-----

From: Bill Mitchell

Cc: Annette Hopkins <[Annette.Hopkins@inac-ainc.gc.ca](mailto:Annette.Hopkins@inac-ainc.gc.ca)>

To: Trish Merrithew-Mercredi <[Trish.MerrithewMercredi@inac-ainc.gc.ca](mailto:Trish.MerrithewMercredi@inac-ainc.gc.ca)>

Sent: 11/11/2009 4:18:42 PM

Subject: Fwd: Re: Work at Giant

Trish:

PWGSC would like to recommence drilling on the Freeze Optimization Study on Thursday this week to insert the instrumentation into the remaining 6 holes of Chamber 10. In conjunction with advice from the Technical Advisor, PWGSC has decided not to use the compressed air drill rig that was involved in the arsenic release. Instead, to avoid any further potential problems associated with the use of a compressed air rotary drill, they have decided to finish the installation of the instrumentation using a diamond core rig. This type of rig does not require compressed air and is similar to the drill that has been used previously (2004) to drill into the chambers without incident. The diamond rig can be mobilized to the site on Thursday by a local contractor and because of the rapid onset of winter conditions, PWGSC are asking for approval to commence the work tomorrow. Although we do not have the Inspector's final report, and unless you have any concerns, I would plan to give the go-ahead to complete this work under the revised emergency response plan and updated spill contingency plan and using the safety protocols and procedures that the contractor already has in place.

Bill Mitchell

Indian and Northern Affairs Canada

>>> Paula Harker 11/4/2009 1:11 PM >>>

FYI

>>> Trish Merrithew-Mercredi 11/4/2009 1:08 PM >>>

They can go ahead.

Trish

-----Original Message-----

From: Paula Harker

Cc: Annette Hopkins <[Annette.Hopkins@inac-ainc.gc.ca](mailto:Annette.Hopkins@inac-ainc.gc.ca)>

To: Trish Merrithew-Mercredi <[Trish.MerrithewMercredi@inac-ainc.gc.ca](mailto:Trish.MerrithewMercredi@inac-ainc.gc.ca)>

Sent: 11/4/2009 3:01:02 PM

Subject: Work at Giant

Trish - Just spoke with Bill. He was still under the impression that the study work is on hold at Giant. They are waiting for an email from you giving them the go-ahead.

My question stands .... Are they being allowed to continue work on the study now, with the exception of the drilling until the inspector's report is in and PWGSC says the contractor can continue drilling?? (I think this makes the most sense). I understand that even without the drilling, other work can continue such as putting the thermosyphons into the holes, getting the electrical substation installed, etc.

Please advise and I will complete lines. Thanks.

Paula

Paula Harker  
Director  
Communications & Public Affairs  
INAC, NWT Region  
P.O. Box 1500  
Yellowknife, NWT X1A 2R3  
Phone: 867-669-2572  
Cell: 867-445-6267  
Fax: 867-669-2715

**From:** Martin Gavin  
**To:** Benny Nordahn  
**Date:** 11/4/2009 1:45 PM  
**Subject:** Re: FOS

Call me 19(1)

-----Original Message-----

**From:** Benny Nordahn  
**To:** Martin Gavin <Martin.Gavin@inac-ainc.gc.ca>

**Sent:** 11/4/2009 3:41:50 PM  
**Subject:** Re: FOS

Bill's at another meeting ---how do I get clearance/clarification on what / when we can proceed ?

>>> Martin Gavin 11/4/2009 12:46 PM >>>  
Hey Bill

Been dealing with Paula this am. Apparently TMM thinks she gave the go ahead for the thermosyphons and electrical etc but not the drilling which is good news!!!

Are we good to go?

Martin

**From:** Jennifer Moores  
**To:** Paula Harker  
**Date:** 11/12/2009 9:49 AM  
**Subject:** Fwd: GIANT MINE FREEZE OPTIMIZATION STUDY

Sent to:

Gary.Bohnet@gov.nt.ca; Mike Aumond (GNWT)

>>> Trish Merrithew-Mercredi 11/12/2009 8:30 AM >>>

As per our discussions at the most recent Giant Mine Oversight Committee, I have given approval to the Acting Director, CARD to allow PWGSC to recommence drilling at the site as part of the Study today, November 12, 2009. The drilling is required to insert the instrumentation into the remaining 6 holes in Chamber 10.

On the advice of the Technical Advisor, PWGSC has decided not to use the compressed air drill rig that was involved in the recent arsenic spill. They will complete the installation of the instrumentation using a diamond core rig. This type of rig does not require compressed air and is similar to the drill that was used in 2004 to drill into the chambers without incident. This rig can be mobilized to the site today by a local contractor. Given the rapid onset of winter conditions, PWGSC has requested approval to commence the actual drilling tomorrow.

Although we have not received the Inspector's Final Report, the Director, CARD will continue to monitor the project closely under the revised emergency response plan and the updated spill contingency plan, and using the safety protocols and procedures which the contractor already has in place.

Thanks, Trish

This message will be stored to CIDM (NWT) by:

Trish Merrithew-Mercredi  
Regional Director General  
Northwest Territories Region  
Department of Indian and Northern Affairs  
Tel: 867-669-2501

From: Jennifer Moores  
To: Martin Gavin  
Date: 11/13/2009 1:52 PM  
Subject: Re: Question

Tnks.

-----Original Message-----

From: Martin Gavin  
To: Jennifer Moores <Jennifer.Moores@inac-ainc.gc.ca>

Sent: 11/13/2009 3:51:34 PM  
Subject: Re: Question

data the one

>>> Jennifer Moores 11/13/2009 1:06 PM >>>

The one that Trish was referring to in her email to GNWT:

"As per our discussions at the most recent Giant Mine Oversight Committee, I have given approval to the Acting Director, CARD to allow PWGSC to recommence drilling at the site as part of the Study today, November 12, 2009. The drilling is required to insert the instrumentation into the remaining 6 holes in Chamber 10."

>>> Martin Gavin 11/13/2009 1:05 PM >>>

Which do u mean there was one last Tuesday

-----Original Message-----

From: Jennifer Moores  
To: Martin Gavin <Martin.Gavin@inac-ainc.gc.ca >

Sent: 11/13/2009 2:08:34 PM  
Subject: Question

When was the most recent Oversight Committee meeting?

**Benny Nordahn - RE: Giant Mine Arsenic Spill**

**From:** Katrina Nokleby <KatrinaN@nunalogistics.com>  
**To:** Lisa Dyer <Lisa.Dyer@pwgsc-tpsgc.gc.ca>, Mike Borden <mikeb@nunalogistics.com>, Robert Cook <robc@nunalogistics.com>, Mark Cronk <Mark.Cronk@pwgsc-tpsgc.gc.ca>, Desmond O'Connor <Desmond.O'Connor@pwgsc-tpsgc.gc.ca>, Robert Girvan <Robert.Girvan@pwgsc-tpsgc.gc.ca>, Murray Randall <MurrayRan@nunalogistics.com>, "martin.gavin@inac.gc.ca" <martin.gavin@inac.gc.ca>, "Benny.Nordahn@inac-ainc.gc.ca" <Benny.Nordahn@inac-ainc.gc.ca>  
**Date:** 11/20/2009 11:15 AM  
**Subject:** RE: Giant Mine Arsenic Spill

I'm in the process of trying to set this up with Mike. He's currently on the phone. I'll keep trying to get him and keep you all posted.

K

**From:** Lisa Dyer [mailto:Lisa.Dyer@pwgsc-tpsgc.gc.ca]  
**Sent:** Friday, November 20, 2009 10:59 AM  
**To:** Mike Borden; Robert Cook; Mark Cronk; Desmond O'Connor; Robert Girvan; Murray Randall; martin.gavin@inac.gc.ca; Benny.Nordahn@inac-ainc.gc.ca; Katrina Nokleby  
**Subject:** Re: Giant Mine Arsenic Spill

Based on this e-mail drilling should not occur on site until the inspector has completed his investigation. Katrina would you please set up a meeting with the Inspector this afternoon to go over his requirements and our program.

The meeting should occur at site. Please invite Trevor Herd, Murray Randall, the Inspector. Mark and I will attend from PWGSC.

Please let us know as soon as possible when the Inspector can meet.

Thanks,

Lisa

----- Original Message -----

**From:** Mike Borden <mikeb@nunalogistics.com>  
**To:** Robert Cook <robc@nunalogistics.com>; Mark Cronk; Lisa Dyer; Desmond O'Connor; Robert Girvan  
**Sent:** Fri Nov 20 12:42:34 2009  
**Subject:** FW: Giant Mine Arsenic Spill

Please note email from Mike Martin. Katrina is preparing a response. Sounds like our return to the pad is a surprise to Mike.

Regards,

Mike Borden  
Mine Manager  
Deton'Cho/Nuna Joint Venture  
Giant Mine  
P.O.Box 2951  
Yellowknife NT  
X1A 2R2



Tel: 867-669-3702 Cell: 867-445-5610  
Fax: 867-669-3701

---

From: Michael Martin [Michael.Martin@inac-ainc.gc.ca]  
Sent: Friday, November 20, 2009 10:25 AM  
To: Katrina Nokleby  
Cc: Darnell McCurdy; Marty Sanderson; Scott Stewart; Mike Borden; Ron Connell  
Subject: Giant Mine Arsenic Spill

Hi Katrina,

As per our conversation earlier today in regards to the recommencement of the drilling operations.

No drilling is to take place on site in the area of the Arsenic Spill in October 2009. I will authorize the drilling to continue once the clean up is completed and I have taken my samples to verify said clean up. This will help reduce the chance of increasing the footprint of the contaminated area.

Can you also provide me with an update on the clean up. I am looking for;

- Location of the physical samples taken at the estimated locations where elevated readings from the Niton gun were recorded.
- Date the samples were submitted to the lab.
- ETA of the analytical results of the samples.
- Projected date when the physical clean up will start and be completed.

Thank you for your assistance in this matter.

Sincerely,

Please note that my e-mail address has changed to Michael.Martin@inac-ainc.gc.ca effective January 1st, 2010

Michael W. Martin

Water Resource Officer

Indian and Northern Affairs Canada  
South Mackenzie District  
16 Yellowknife Airport  
Yellowknife, NT. X1A 3T2  
Phone: 867-669-2768  
Cell: 867-444-0711  
Fax: 867-669-2720  
E-mail: Michael.Martin@inac-ainc.gc.ca

**From:** Martin Gavin  
**To:** Darnell McCurdy; Michael Martin  
**CC:** Bill Mitchell  
**Date:** 11/20/2009 11:43 AM  
**Subject:** Re: Fwd: Re: Work at Giant

Thanks Darnell

Unfortunately that is not consistent with information passed to us.

As detailed in Bill's e-mail below "PWGSC would like to recommence drilling on the Freeze Optimization Study on Thursday this week to insert the instrumentation into the remaining 6 holes of Chamber 10" these are indeed over the 30mx15m chamber. This small area is in the area of the release.

It seems this is the source of the confusion.

I have advised PWGSC to hold on this drilling (into the chamber) until we work this out. The drilling outside of the chamber (and spill area) is still on track.

I have been advised that there is a meeting on the site this afternoon to discuss with Michael Martin, PWGSC and the contractor....I will be in attendance.

Martin

>>> Darnell McCurdy 11/20/2009 11:18 AM >>>  
Hi Martin,

Verbal approval was given to recommence with the proviso that this drilling/work would not be occurring in the immediate vicinity of the spill/incident. Mike Martin, the Inspector is going to be calling you to determine exactly where your works are occurring. Ultimately, if the work being undertaken is not satisfactory to the Inspector, it will have to be deferred in time or to another site until the Inspector gives final approval for the spill/site clean up.

I have asked Mike to keep me informed of your discussion and if required the results of a site visit.

Cheers

Darnell

>>> Martin Gavin 11/20/2009 11:02 AM >>>  
Hi Darnell

PWGSC has received instruction in the field that no drilling is to take place on the FOS site.

We received verbal direction to recommence last week as well as the e-mail below.

We are obviously confused.

I am acting for Bill this week but he is available for conference call if needed.

Martin

Martin Gavin, P.Eng, B.A  
Manager Giant Mine Remediation Project  
INAC CARD

(867)669-2846

STACK:

ERROR: undefined  
OFFENDING COMMAND: lKysp

>>> Bill Mitchell 11/11/2009 2:34 PM >>>

Bill Mitchell  
Indian and Northern Affairs Canada

>>> Trish Merrithew-Mercredi 11/11/2009 2:29 PM >>>  
You have my approval to proceed Bill. I will inform ENR and MACA tomorrow.

Thanks, Trish

-----Original Message-----

From: Bill Mitchell  
Cc: Annette Hopkins <[Annette.Hopkins@inac-ainc.gc.ca](mailto:Annette.Hopkins@inac-ainc.gc.ca)>  
To: Trish Merrithew-Mercredi <[Trish.MerrithewMercredi@inac-ainc.gc.ca](mailto:Trish.MerrithewMercredi@inac-ainc.gc.ca)>

Sent: 11/11/2009 4:18:42 PM  
Subject: Fwd: Re: Work at Giant

Trish:

PWGSC would like to recommence drilling on the Freeze Optimization Study on Thursday this week to insert the instrumentation into the remaining 6 holes of Chamber 10. In conjunction with advice from the Technical Advisor, PWGSC has decided not to use the compressed air drill rig that was involved in the arsenic release. Instead, to avoid any further potential problems associated with the use of a compressed air rotary drill, they have decided to finish the installation of the instrumentation using a diamond core rig. This type of rig does not require compressed air and is similar to the drill that has been used previously (2004) to drill into the chambers without incident. The diamond rig can be mobilized to the site on Thursday by a local contractor and because of the rapid onset of winter conditions, PWGSC are asking for approval to commence the work tomorrow. Although we do not have the Inspector's final report, and unless you have any concerns, I would plan to give the go-ahead to complete this work under the revised emergency response plan and updated spill contingency plan and using the safety protocols and procedures that the contractor already has in place.

Bill Mitchell  
Indian and Northern Affairs Canada

>>> Paula Harker 11/4/2009 1:11 PM >>>  
FYI

>>> Trish Merrithew-Mercredi 11/4/2009 1:08 PM >>>  
They can go ahead.

Trish

-----Original Message-----

From: Paula Harker  
Cc: Annette Hopkins <[Annette.Hopkins@inac-ainc.gc.ca](mailto:Annette.Hopkins@inac-ainc.gc.ca)>  
To: Trish Merrithew-Mercredi <[Trish.MerrithewMercredi@inac-ainc.gc.ca](mailto:Trish.MerrithewMercredi@inac-ainc.gc.ca)>

Sent: 11/4/2009 3:01:02 PM  
Subject: Work at Giant

Trish - Just spoke with Bill. He was still under the impression that the study work is on hold at Giant. They are waiting for an email from you giving them the go-ahead.

My question stands .... Are they being allowed to continue work on the study now, with the exception of the drilling until the inspector's report is in and PWGSC says the contractor can continue drilling?? (I think this makes the most sense). I understand that even without the drilling, other work can continue such as putting the thermosyphons into the holes, getting the electrical substation installed, etc.

Please advise and I will complete lines. Thanks.

**Michael Martin - Re: Fwd: Giant Mine FOS - Crown initiated shutdown**

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**From:** Darnell McCurdy  
**To:** Michael Martin  
**Date:** 11/20/2009 12:57 PM  
**Subject:** Re: Fwd: Giant Mine FOS - Crown initiated shutdown  
**Attachments:** Re: Fwd: Giant Mine FOS - Crown initiated shutdown

---

Good Morning,

Now that we have had an opportunity to brief the Giant Mine Oversight Committee, and now have approved media lines for the recommencement of operations while the investigation(s) are still active, the Giant Mine FOS work can recommence, as outlined to the Committee and below.

Thanks for your assistance in getting matters sorted out on this file in a very timely manner.

Regards,  
Annette  
A/ARDG

>>> Bill Mitchell 11/2/2009 9:37 AM >>>

Annette:

Thank you for following up with Trish on the Freeze Optimization Study (FOS) shutdown. We can wait until tomorrow for the decision. In the meantime, I have attached a draft of the engineer's analysis of the dust release incident and recommendations to avoid any future similar occurrence. Please note that this is still not the final version of the engineer's report. A few more facts need to be added.

Given the amount of interest and concern, I think that it would be useful to have Martin make a special presentation to REC on the Freeze Optimization Study, including the intent and necessity for the study as well as update on progress with the FOS.

On another subject, I believe that my acting authority expired at the end of October, so we should try to discuss this soon.

Bill Mitchell  
Indian and Northern Affairs Canada

>>> Annette Hopkins 11/2/2009 9:00 AM >>>

Thanks for this information Bill, very much appreciated.

I talked to Trish about this, and let her know that we would be expected to pay 10K / day after Nov 9th to have the drill on standby. This morning I indicated to her we were to have onsite work commencing today, re: thermo syphons and the installation of power poles by Northland Utilities. Trish reminded me that last week we agreed (at our Special REC I think) that we would hold off on any work until she has had an opportunity to meet with the GM Oversight Committee which is taking place tomorrow morning at 9:00 a.m.

Trish is aware of the pressures and activities and will give this her highest priority for resolution after the

000289

## **Michael Martin - Giant Meeting Re: Arsenic Spill**

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**From:** Marty Sanderson  
**To:** Michael Martin  
**Date:** 11/20/2009 6:19 PM  
**Subject:** Giant Meeting Re: Arsenic Spill

---

thanks Mike

>>> Michael Martin 11/20/2009 4:24 PM >>>  
Marty/Darnell,

I just got out of a meeting with CARD/PWGSC/ Deton Cho Nuna Joint Ventures. Here is a quick summary.

I found out from Katrina Nokleby (Nuna) that they were given permission to recommence drilling in the area of the FOS. I then sent out an e-mail saying there was to be no drilling at the FOS site until the spill had been cleaned up.

I received a call from Martin Gavin (INAC-CARD) saying that he was given approval from the RDG to start up the drilling process.

After talking to Darnell it was decided that more information was required to determine exactly where the work was being conducted. There were e-mails sent between Bill Mitchell, Annette Hopkins, Trish Merrithew-Merceredi and Paula Harker in regards to the drilling that unfortunately did not get disseminated down to the Inspector until after I found out about the drilling.

A meeting was then set for 1:30pm today at Giant Mine to determine the exact work that was going on and what would be allowed and not allowed.

Upon arriving on site there was a crane that was parked approximately 8 - 10 m from the point of Arsenic discharge that was installing the Thermosyphons. I had them move the crane away from the contaminated site. They were allowed to continue the instillation since the thermosyphons did not enter the FOS chamber.

The outcome of the meeting was this

- CARD has been told not to deal directly with the Inspector.

- To remedy this I will be dealing with Mark Cronk (PWGSC) for site/clean up information and assist in appropriate communication.

- I am going to issue a Direction on Monday (you will all have a chance to review it before it gets sent to the proponent and the board) It will include;

- 1) The defined contaminated area will be cordoned off with an additional 2m buffer to ensure that no work gets done in that area.

- 2) No workings or drilling into the dust (Arsenic Chamber for the FOS) until the site has been cleaned up and the spill closed and all casings that are into the dust are capped with metal caps and welded.

- 3) The Inspector will be notified when excavation commences and will come out to take soil samples and receive lab results before the area is back filled.

- This direction has been given verbally.

I will draft the Direction on Monday so that I have time to ensure that it encompasses everything and give you guys a chance to look at it before I send it out. Please note that the Direction will be going on the public registry with the MVLWB as per the regulations.

Any questions give me a call on my cell (444-0711)

Cheers

000287

Please note that my e-mail address has changed to Michael.Martin@inac-ainc.gc.ca effective January 1st, 2010

Michael W. Martin

Water Resource Officer

Indian and Northern Affairs Canada  
South Mackenzie District  
16 Yellowknife Airport  
Yellowknife, NT. X1A 3T2  
Phone: 867-669-2768  
Cell: 867-444-0711  
Fax: 867-669-2720  
E-mail: Michael.Martin@inac-ainc.gc.ca



Indian and Northern  
Affairs Canada

Affaires indiennes  
et du Nord Canada

16 Yellowknife Airport  
Yellowknife, NT. X1A 3T2

File: NIL2-0043

November 23<sup>rd</sup>, 2009

Giant Mine Manager  
Contaminants and Remediation Directorate  
Indian and Northern Affairs Canada  
4920 – 52<sup>nd</sup> St. Precambrian Building  
Yellowknife, NT. X1A 3T1

**Attention: Martin Gavin**

**RE: Inspectors Direction for Giant Mine Spill 09-483**

Dear Mr. Gavin,

In regards to our meeting and verbal direction given by the Inspector on November 20<sup>th</sup>, 2009 this letter is to serve as the official direction under ss. 37(1) of the Northwest Territories Water Act.

To ensure proper clean up and containment of the arsenic spill above Chamber 10, the Inspector hereby directs the following;

- The spill area must be redefined using total arsenic values and a perimeter constructed with a 2m buffer beyond the newly defined spill area that exceeds the industrial standard of 340mg/kg.
- Work can proceed on site outside of this contaminated site perimeter with the following exceptions;
  - No activities, including drilling, that enter arsenic chamber 10 can occur until all casings that enter the chamber have been capped to the satisfaction of the inspector and the spill report has been closed.
- The Inspector must be contacted prior to the excavation of the spill site. This will allow the Inspector to visit the site, take soil samples of the area and confirm clean up before the placement of clean fill.
- Clean fill will not be placed on the spill site until the initial lab results are received to confirm that the arsenic levels are within the prescribed industrial standard (340 mg/kg)

Failure to follow this direction may result in legal action being taken.

If you have any further questions please do not hesitate to contact me.

Yours truly,

Michael Martin  
Water Resource Officer  
Indian and Northern Affairs Canada

CC: MVLWB  
INAC SMD Manager (Via E-mail)

South Mackenzie District  
16 Yellowknife Airport  
Yellowknife, NT. X1A 3T2  
Phone: 867-669-2768  
Cell: 867-444-0711  
Fax: 867-669-2720  
E-mail: Michael.Martin@inac-ainc.gc.ca

>>> Katrina Nokleby <KatrinaN@nunalogistics.com> 11/25/2009 1:54 PM >>>  
Hi Mike,

Please find attached Deton'Cho/Nuna Joint Venture's proposed cleanup plan for the Arsenic Dusting Incident that occurred at the Giant Minesite on October 22, 09. We appreciate your patience and input regarding this matter. It is our hope, due to equipment availability, that you will be able to approve this plan so that we could begin excavation tomorrow. Weatherby Trucking has made available the use of an excavator and operator, and can be onsite as soon as approval has been granted.

Upon completion of excavation, we would like to move forward quickly in order to allow work at the FOS site to resume. Would you be available to come to site as soon as the work is complete? DCNJV will work with you to outline a sampling program that you think will adequately characterize the material within the excavated area.

Please let me know if you have any questions or concerns regarding the attached plan.

Kind regards,  
Katrina

Katrina Nokleby, BASc  
Environmental Coordinator  
Giant Mine Site  
Deton' Cho / Nuna Joint Venture  
(867) 669-3725 (office)  
(867) 445-7566 (cell)  
KatrinaN@nunalogistics.com<mailto:KatrinaN@nunalogistics.com>





Indian and Northern  
Affairs Canada

Affaires indiennes  
et du Nord Canada

16 Yellowknife Airport  
Yellowknife, NT. X1A 3T2

File: NIL2-0043

December 8th<sup>rd</sup>, 2009

Giant Mine Manager  
Contaminants and Remediation Directorate  
Indian and Northern Affairs Canada  
4920 - 52<sup>nd</sup> St. Precambrian Building  
Yellowknife, NT. X1A 3T1

Attention: Martin Gavin

RE: Backfill of Giant Mine Spill 09-483

*Handwritten: 8 J. 24 (Arsenic Spill)*

Dear Mr. Gavin,

After excavation of the spill area, the Inspector is satisfied that the contaminated material from spill 09-483 has been cleaned up and disposed of appropriately in the North Pond.

At this point the Inspector recommends backfilling of the excavated area using clean fill. The area should then be compacted and contoured to the surrounding topography.

Upon completion of the backfill and the welding of the caps on the casings entering the arsenic chamber the Inspector should be notified to facilitate a site visit to verify proper clean up of the spill area.

If you have any further questions please do not hesitate to contact me.

Yours truly,

*Handwritten signature of Michael Martin*

Michael Martin  
Water Resource Officer  
Indian and Northern Affairs Canada

CC: MVLWB  
INAC SMD Manager (Via E-mail)

*Handwritten: North 09-483/09  
but leave applic  
- No 26 OE*

*Handwritten: excavation of  
spill going  
slowly*

*Handwritten: - No 25/09  
Clean up plan  
submitted by  
B. J. J.*

*Handwritten: final  
spill sampling  
analysis only  
provided to  
inspector on Dec 7/09  
- Dec 3/09 sampling  
results provided to  
inspector still one spot  
over 340 ppm*

STACK:

ERROR: undec  
OFFENDING COMMAND: LKysp

Subject re: Giant Mine Spills  
From <kor@theedge.ca>  
Date Thursday, October 29, 2009 16:32  
To minder@nnsi.com



Mike

Have a close look at the timelines here for the arsenic spill.

June 11 spill of drill mud into Baker Creek

August 12 another spill of drill mud, unknown quantity

Thursday October 22 1 am spill of arsenic trioxide

Friday October 23 5:15 pm arsenic trioxide spill reported

Saturday October 24 DIAND notified of spill

Monday October 26 DIAND inspector visits site

Wednesday October 28 4:45 pm DIAND Departmental Statement issued

*Nov 4 - RDG gives go-ahead  
Nov 12 - = = = =*

Why did it take so long for the spill to be reported, especially as there was an employee's health involved?

Why was the spill not reported by the contractor directly to DIAND as the contracting authority?

Why did it take DIAND at least a couple of days to get an inspector to the site?

Why did DIAND sit on this until almost a week after the spill before going public and only after a media inquiry?

Why are they drilling into the arsenic chamber rather than around it?

Is there nothing better than plastic sheeting and duct tape to plug a drill hole in the winter?

Who is watching all of this? The DIAND inspector who says he has no jurisdiction?

Kevin