



Crown-Indigenous Relations
and Northern Affairs Canada

Relations Couronne-Autochtones
et Affaires du Nord Canada

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YELLOWKNIFE, NT X1A 2R3

Dr. Kathleen Racher
Chair
Giant Mine Oversight Board
Box 1602, 5015 - 50th Avenue
YELLOWKNIFE NT X1A 2P2

June 18, 2019

Dear Dr. Racher:

Thank you for providing me with a copy of the Giant Mine Oversight Board Annual Report 2018. Similar to the process used for the previous Annual Reports, I have attached responses to each of the 11 recommendations from the Report, for your review and future discussion. I would be happy to discuss the attached responses when we next meet.

Thank you for your continued involvement in advancing the Giant Mine Remediation project.

Sincerely,

Natalie Plato
Deputy Director
Giant Mine Remediation Project
Crown-Indigenous Relations and Northern Affairs Canada

c.c.: Parties to the Giant Mine Oversight Body Society

Giant Mine Remediation Project (GMRP) Responses to Recommendations from

Giant Mine Oversight Board (GMOB) 2018 Annual Report

Subject	GMOB Comments¹	GMOB Recommendations²	Giant Mine Project Team Response
1. Socio-economic and Community Development Opportunities	<p>The Project socio-economic activities offer the greatest opportunities for long-term improvements to overall community well-being in the region. There is the potential for training, education, jobs, income and business development. A successful socioeconomic strategy should focus on all of these possibilities, because they support each other.</p> <p>All levels of government should make local economic opportunities and benefits associated with the Giant Mine Remediation Project their priority. The Project has the potential to inject hundreds of millions of dollars into the local economy but, based on what we have seen to date, this is not happening.</p> <p>Parsons Inc. (hired in 2018 by the Project as the Main Construction Manager) provided some socioeconomic information. That information does not</p>	<p>Directed to: Minister and Deputy Minister, CIRNAC</p> <p>We recommend that the Yellowknife CIRNAC office make it a priority to produce a socio-economic strategy and act on it.</p> <ul style="list-style-type: none"> • The strategy should identify barriers to local business and job opportunities and ways the Project will improve community well-being, increase trained workers, and other community assets. • CIRNAC should work with federal, territorial, municipal, and Indigenous agencies to develop and act on this strategy. 	<p>The Giant Mine Remediation Project has developed and is implementing a socio-economic strategy to ensure Northerners and Indigenous persons are positioned to benefit from opportunities that result from the remediation of the Giant Mine site. A summary of the strategy was shared with partners and stakeholders in December 2018. The Project team intends to make the strategy publically available in 2019 and will work with the Socio-Economic Working Group to start developing the Action Plan to implement the strategy.</p> <p>The Project team would like to highlight that this strategy includes measures to support successful participation in the Project and reduce and limit barriers that might prevent Indigenous and Northern persons, including those living in the Môwhì Gogha De Niitlee claim area and Akaitcho Asserted Territory, from benefitting from employment opportunities that arise out of the Giant Mine site's remediation. It also looks at ways to support and build capacity in the North, such as access to relevant training to support work required at the site, and includes working within the Department and with other federal departments, the Government of the Northwest Territories, community groups, and local service providers.</p> <p>As part of implementing the Strategy, the Project has:</p> <ul style="list-style-type: none"> • Completed an update in 2018 to the Labour Resource Study Report. This assessed local employment and procurement capacity and assessed against the needs of the Project. It also described training programs that can address identified gaps. • Funded the Yellowknives Dene First Nation Dechita Naowo environmental monitoring training program.

¹ This text is taken directly from the Giant Mine Oversight Body 2018 Annual Report

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	<p>tell us the level of benefits to local businesses and individuals. More details are needed to show which Project expenditures are being 'leveraged' to build community capacity and secondary opportunities.</p> <p>In our last two annual reports GMOB recommended that the Project Team take a broad approach to social and economic development, by including factors of community well-being, such as education, housing, and income. These and other factors make up the social determinants of health.</p> <p>In its 2016 Establishment Report, GMOB recommended a framework to "assist the Project Team to analyze and optimize local education, training, procurement, and jobs skills development opportunities".</p> <p>In its 2017 annual report, GMOB noted "a socioeconomic impact assessment¹ framework would enable governments to identify issues and boost activities that improve the long-term public health and outlook for community well-being into the next generation(s)".</p>		<ul style="list-style-type: none"> • Funded three full time positions at the Yellowknives Dene First Nation, including a Giant designated Economic Development Officer. • Established the Socio-Economic Advisory Body, a senior level committee responsible for coordinating regional socio-economic programs and maximizing opportunities from remediation activities on the Giant Mine site. It consists of senior management representatives from federal, territorial, municipal and Indigenous partners. The Advisory Body's purpose is to provide the Project with strategic advice and input on socio-economic aspects of the project, to brief their respective organizations on Project's approaches, and to raise potential organizational barriers to implementation so ways to address them can be explored. • Held an Industry Day on November 26, 2018 in Yellowknife. Close to 100 participants attended. Presentations focused on: <ul style="list-style-type: none"> ○ the main work packages over Term 1 (2018-2020) and Term 2 (2020-2028), as well as employment needs; ○ the procurement approach for the project, including key steps and components; the Procurement Strategy for Aboriginal Business (PSAB); and, Aboriginal Opportunities Considerations (AOCs). • Developed a set of Key Performance Indicators for the Project. • Worked with Parsons on developing an Indigenous Socio-economic Benefits Strategy, including a Skills Inventory to inform Parsons' recruitment and hiring of local staff. • Established a working group between the Yellowknives Dene First Nation, Parsons (Main Construction Manager) and the Project team, whose purpose is to create an inventory of Yellowknives Dene First Nation members' labour and skill capacity, as well as identify potential barriers to employment and training. Parsons and CIRNAC plan to do a similar exercise with the NSMA and Tłıchq. <p>The Giant Mine Remediation Project has a good track record of maximizing benefits to Northern and Indigenous groups and businesses; for example, of the \$ 430.8 million in contracts awarded to date for the Giant Mine</p>

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	<p>GMOB has still not yet seen such a framework although we still see the need for it. The importance of a broad approach is supported by the conclusions of the NWT Labour Market Forecast and Needs Assessment (2016). This document accepts that “socio-economic factors including unsuitable housing, substance abuse, food insecurity, and young single parent families have emerged as vulnerabilities that inhibit Northern education attainment.”</p> <p>It is important that the Project recognize and resolve the barriers that may prevent Northerners from taking advantage of training opportunities, including family obligations and the inability to take time off work to attend training sessions.</p> <p>Creating meaningful economic opportunities and helping residents to capture those opportunities, makes a comprehensive plan a priority. The plan should incorporate the principles of reconciliation into the Project to correct systemic social and economic inequalities within the Indigenous communities. GMOB is of the view that CIRNAC's</p>		<p>Remediation Project, approximately \$196.5 million were awarded to Indigenous businesses. Contracts with Indigenous businesses have also increased, from 28% in 2015-16 to 45.6% in 2018-19, as a proportion of total spending on this Project.</p> <p>The Project team also notes that the Indigenous workforce participation on the project between 2007-2017 averaged 18%, and between 2013-2017 Northern participation averaged at 27%. The Northern workforce category was not tracked prior to 2013. There are a variety of factors that have contributed to the numbers in previous years, including the relatively short nature of the contracts, specialization required for some of the work, as well as competition from other mines and major projects throughout the NWT for skilled workers.</p> <p>The Project team is providing funding for training to begin preparing community members to participate more fully as the Project moves closer to implementation. The Project team provided \$115,000 in 2017/18 and \$166,895 in 2018/19 to the Yellowknife Dene First Nation for the Dechita Naowo Program, as well as an additional \$5,800 in 2018/19 specific to professional development for the Yellowknives Dene First Nation's Giant Mine Community Liaison and Technical Advisor. The Project team provided \$88,809 to the North Slave Metis Alliance for capacity and training in 2018/19.</p>

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	Yellowknife office is best placed to take on this task due to its understanding of local needs and dynamics and given its nearness to the Project.		
2. Give each Party the Needed Resources	<p>The capacity issue, or need for more resources, continues to be one of the most difficult challenges for the Parties. The Parties have several responsibilities. They must:</p> <ul style="list-style-type: none"> • Review the many documents distributed by the Project Team. • Attend regular meetings. • Update the people they represent. • Compile and pass on community feedback. • Help the Project Team to interact with the community. <p>The YKDFN, NSMA, Alternatives North, and the City of Yellowknife have at least one person in their organization to fulfill these responsibilities, but often this person has other duties unrelated to the Project. The Parties say they do not have adequate knowledge, staff, and time to participate effectively in the technical and socio-economic aspects of the Project. The high demands faced by the Parties will only increase as the water licensing process for the Project proceeds in 2019. As numerous court</p>	<p>Directed to: Minister and Deputy Minister CIRNAC; Minister and Deputy Minister, ENR</p> <p>We recommend that the federal and territorial government give each Party enough resources so they can fully participate in all aspects of the Project, including:</p> <ul style="list-style-type: none"> • Critical review of technical reports linked to water licensing. • Informed participation in water licensing workshops and hearings. • Adequate consultation with their constituents. 	<p>The Project team recognizes that capacity is an issue across the Northwest Territories, and takes a number of actions to help stakeholders participate meaningfully in the project. This includes working to both adapt Project engagement and technical processes and schedules in response to stakeholders needs. It also includes funding to support participation in the Project.</p> <p>The Project team funds annual proposals from the Yellowknives Dene First Nation, North Slave Métis Alliance, City of Yellowknife and Alternatives North for technical and administrative resources to participate in the Project. For example, based on the work proposed by the parties, the Project team has provided the following funding to facilitate participation in the Project:</p> <ul style="list-style-type: none"> • Approximately \$315,000 in 2016/17, \$309,000 in 2017/18, and \$582,000 in 2018/19 to the Yellowknives Dene First Nation, with \$520,000 in funding anticipated for 2019/20. This does not include the training funding for Dechita Naowo noted above, which was provided in addition to this funding. • Approximately \$26,000 in 2016/17, \$26,000 in 2017/18, and \$89,000 to the North Slave Métis Alliance, with \$149,000 in funding anticipated for 2019/20. • Approximately \$35,000 in 2016/17, \$37,000 in 2017/18, and \$53,000 in 2018/19 to Alternatives North, with \$53,000 in funding anticipated for 2019/20. • Approximately \$60,000 to the City of Yellowknife in 2018/19, with \$125,000 in funding anticipated for 2019/2020.

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	<p>decisions have shown, Indigenous organizations must have the capacity to fully engage in regulatory processes for their outcomes to be considered valid. GMOB understands it is not easy to solve capacity issues. More money would be helpful, though not the entire solution. We are challenged in the NWT to get and keep the necessary technical resources. Skilled people are often unavailable. GMOB holds the view that more can and should be done to increase the Parties' capacity to fully participate. The co-proponents must work more closely with the Parties to fully understand their needs and challenges, and to collectively develop solutions. We need to better coordinate consultations with the public to avoid consultation fatigue and overload. This might reduce workloads and improve effectiveness. This is discussed further in the following recommendation.</p>		
3. Value Communication and Engagement	<p>GMOB recommended in 2016 that: "communication and engagement be treated with an importance equal to other aspects of the Project and that they be resourced accordingly". In its 2017 report, GMOB again recommended that, "the Project Team communication and engagement responsibilities be given equal importance as other parts of the</p>	<p>Directed to: Minister and Deputy Minister, CIRNAC; all Parties; GMOB</p> <p>We recommend again that the Project Team give its duty to communicate and engage with the public an equal importance to other parts of the Project by:</p> <ul style="list-style-type: none"> • Funding communication and 	<p>The Project team appreciates the perspective from the Board when it comes to engagement. The Project team is fully committed to communication and engagement with stakeholders and the public, and considers this an important and valued part of the Giant Mine remediation process.</p> <p>Over the past year our focus has been on preparation of the Water Licence Package and has focused engagement to help all parties prepare to participate meaningfully in this regulatory process.</p> <p>Engagement activities throughout 2018 included:</p>

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	<p>Project and that they be resourced accordingly.” Similarly, the Parties and GMOB should ask the people they represent how to best represent their interests, and increase awareness of the challenges and opportunities provided by the Project. The Project Team held many meetings with various groups for different purposes. There is also evidence that the Project Team followed community direction when making some decisions about closure options for the site. This shows that the Project Team has listened. The Project Team has also used plain language in some documents and presentations. Still, some of the Parties continue to be frustrated with communications, leaving doubt as to whether a positive, effective, and ongoing relationship has been established. Such relationships require more than frequent meetings; they require mutual understanding, a shared vision, and support. The Project Team should also focus more effort to communicate effectively with the public. The general public has difficulty getting information, providing input, or asking about opportunities, except through quarterly newsletters and yearly public meetings. The Project Team still does not have an accessible “storefront” office and its website remains limited. GMOB</p>	<p>engagement activities adequately.</p> <ul style="list-style-type: none"> • Evaluating their effectiveness. • Responding to gaps. <p>The Parties and GMOB should assist the Project Team by:</p> <ul style="list-style-type: none"> • Asking their audiences how to best ensure the Project Team understands their interests. • Asking their audiences how to best help them understand the Project Team’s challenges and opportunities. 	<ul style="list-style-type: none"> • The Annual Public Forums (March 2018) with the Yellowknives Dene First Nation, the North Slave Métis Alliance, and Yellowknife-area public, which included an update on project and introductions to the Main Construction Manager, the Socio-Economic Approach and the Water Licence timeline, and the Closure and Reclamation Plan. • Participation in the Yellowknives Dene First Nation Job Fair. • Quantitative Risk Assessment (QRA) engagement, with several sessions over 2018, which focused on community sessions to identify risks and identify thresholds. • Engagement to complete the Archeological Impact Assessment (AIA), which was included as part of Giant Mine Advisory Committee (a group that represents the Yellowknives Dene First Nation interests in the remediation Project) meetings, at the Yellowknives Dene First Nation Elders Senate, as well as ground-truthing on site with YKDFN members, and with NSMA Elder interview input. • Participation in the Yellowknife Chamber of Commerce Spring Trade Show • Community meetings with Yellowknives Dene First Nation and Yellowknife general public specific to pre-engage on the Water Licence Package in June 2019, as well as a three day session to discuss technical elements in Fall 2019 • Funding a Traditional Knowledge Study, which is currently underway (being conducted by Trailmark) • Engagement on the Stress Study discussions with the Giant Mine Working Group and the Giant Mine Advisory Committee • Site tours with Yellowknives Dene First Nation and North Slave Métis Alliance members, focused on closure plan aspects • Project participation in the NWT Geoscience Forum Trade Show • Hosting of an Industry Day specific to Project procurement for Indigenous/Local businesses <p>A record of the Project team’s engagement activities has been provided to</p>

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	<p>continues to encourage the Project Team to use communication tools that engage the community in effective and meaningful ways. For example, the Project has a heading in its annual report identifying key stakeholder concerns but there the Project does not appear to systematically collect, quantify and qualify this information. As presented, it is difficult to know the weight that individual stakeholder concerns are given. If necessary, CIRNAC should give the Project Team additional resources to improve communications and relationships.</p>		<p>the Mackenzie Valley Land and Water Board, and is available on the public registry.</p> <p>http://registry.mvlwb.ca/Documents/MV2007L8-0031/MV2007L8-0031%20-%20DIAND-GIANT%20-%20%20Post%20EA%20-%20Engagement%20Plan%20-%20Apr1-19.pdf</p> <p>In addition to these specific activities the Project team continued with its regular meetings including monthly Giant Mine Working Group Meetings, Giant Mine Advisory Committee meetings based on the schedule supported by the Yellowknives Dene First Nation, and with other groups on an as and when needed basis.</p> <p>The GMRP also engaged with the GMRP Working Group on the draft Engagement Plan late 2018 to request input from affected parties. Valuable input from received on improvements to engagement objectives and considerations for reconciliation.</p> <p>The Project team works hard to address stakeholder concerns about how information is communicated. In 2018, the Project team worked to make presentations more visual (e.g. videos) in response to stakeholder recommendations. The Project team also developed a virtual reality tour of the site to assist stakeholders to better understand and visualize the site. This was enhanced in 2019 to reflect what the site could look like following implementation of the Closure and Reclamation Plan. The Project continues to look at new ways to use this technology.</p> <p>The Project team does collect and track stakeholder concerns, and acknowledges that we can improve how we report back on these concerns. The Project remains open to ideas for improvement in this area.</p>
4. Increase City Involvement	<p>The Giant Mine Remediation Project will influence the environment in and around the City of Yellowknife. It can also be a major socio-economic opportunity for</p>	<p>Directed to: Mayor and Council, City of Yellowknife</p> <p>We recommend that the City of</p>	N/A

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	<p>the community. GMOB believes that the City of Yellowknife is best placed to let city residents know about the Project opportunities and challenges. City Hall should provide current and ongoing information about the Project and find sound ways to receive feedback from its residents. The City could significantly strengthen its role through its website, through more public forums, and by taking on a leadership role to promote socio-economic and capacity-building opportunities. We know the City lacks resources to devote to the Project and that it is discussing with the Project Team how to get more resources. GMOB is concerned that a lack of resources may affect the City's ability to anticipate the Project effects on the City, including the availability of clean gravel and construction fill for City projects. The City is dealing with other development issues in addition to the Project. This both complicates the situation and creates synergistic opportunities. Surface work on the mine site opens up the possibility for development and the City to be involved in planning that safeguards residents' concerns. Surface remediation will impact City boundaries and may affect the land in the City that can be taxed. Other potential impacts of the Project on residents include the</p>	<p>Yellowknife do more to make sure its citizens are informed, involved, and realize the possible social and economic benefits from the remediation Project. The Project could impact City residents in several ways, including:</p> <ul style="list-style-type: none"> • Availability of clean construction fill. • Possible change in city boundary. • Possible change in city tax base. • Public boat launch closure. • Blasting noise and dust. 	

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	<p>proposed closure of the public boat launch, possible noise and dust from blasting, and possible traffic issues. The new location of the City water source will be in part influenced by the remediation activities including the Baker Creek discharge point and discharge water standards. The City should be more actively involved in discussions to plan for the future and to ensure residents' views are reflected in Project plans. The City has no time to waste if residents are to be prepared to take advantage of Project benefits.</p>		
<p>5. Respond to Reconciliation and Legacy Issues</p>	<p>Public concern about the legacy of Giant Mine remains a key issue and is particularly acute for the Yellowknives Dene First Nation. GMOB understands that the Yellowknife CIRNAC office has been delegated the lead agency to resolve YKDFN concerns. Progress remains slow, however, and potential opportunities for reconciliation, at least in part through socio-economic capacity-building opportunities continue to slip by.</p>	<p>Directed to: Minister, CIRNAC</p> <p>We recommend the federal government immediately respond to the YKDFN requests for an apology and compensation for the historic operations at the Giant Mine.</p>	<p>Legacy issues, including apology and compensation are led by the NWT Regional office of Crown-Indigenous Relations and Northern Affairs Canada, as they are outside the scope of the Giant Mine Remediation Project. The NWT Regional office has provided the following response:</p> <p>The Government of Canada recognizes this issue is of great importance to the Yellowknives Dene First Nation. Senior officials from CIRNAC's NWT Region have met with the Chiefs to discuss how best to engage the community, and especially the Elders.</p> <p>In October 2018, Minister Carolyn Bennett wrote to Chief Ernest Betsina and Chief Edward Sangris to advise that she instructed Matthew Spence, Regional Director General, CIRNAC NWT Region, to further engage with the Yellowknives Dene First Nation on this matter. The reason for the engagement is to better understand the nature of the Yellowknives Dene First Nation's concerns and how Canada can meaningfully address them in the interests of reconciliation and strengthen our nation-to-nation relationship with them.</p>

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			<p>The Department is currently reviewing and assessing the historical record so Canada can respond to the Yellowknives Dene First Nation in a meaningful way. This process is ongoing, and the findings will be shared with the First Nation.</p> <p>Canada is committed to working with the Yellowknives Dene First Nation in support of our commitment towards reconciliation and is working closely with them on next steps.</p> <p>The Region would like to note that, in the last quarter of 2018-2019, the Department, via the Regional office, provided the YKDFN with \$197,000 in funding to cover the costs associated with their research. This includes their review of historical documents and traditional knowledge.</p>
<p>6. More Information Needed on Plans, Schedules, How Activities are Connected, and How Performance is Measured</p>	<p>GMOB has consistently asked the Project Team for a high-level Project plan that clearly lays out the multiyear timeline and critical path for all Project elements and major activities. This plan is needed to give GMOB and the Parties confidence that the Project is on schedule and on budget. We have seen other government-led projects fail to meet timelines and increase greatly in cost. The Project Team developed a number of shorter-term project schedules, but we still need a broad Project schedule for the next 20 years. GMOB knows there will be fewer details available for the longer term, but we expect the same degree of planning as would happen if this were a private sector mining operation. The Project Team should lay</p>	<p>Directed to: Project Team</p> <p>We recommend that the Project Team provide a five-year project plan that:</p> <ul style="list-style-type: none"> • Shows how activities are linked, scheduled, ordered, and integrated. • Highlights major milestones. • Includes the budget. • Includes targets to measure performance. • Includes a flowchart that shows how and when Project decisions are made. <p>The Project Team's annual report should detail:</p> <ul style="list-style-type: none"> • Achievements, and compare them to plans. • Reasons if achievements did not meet goals • The budget and the money actually 	<p>The Giant Mine Remediation Project team has provided five year work plan to the Giant Mine Oversight Board, which included a schedule, information about budget activities, and the critical path as part of the document. The team commits to working with the Board to determine how to better present this information and provide it in a format that meets their needs. In the meantime, the Project team will continue to provide the Giant Mine Oversight Board with annual reports and regular Project updates via the Giant Mine Working Group, and to work closely with the Board to provide additional information they request.</p> <p>The Project would like to clarify that the five year work plan provided to the Board was clear that remediation activities will be implemented starting in 2021, not 2020. The Project team has stated that it anticipates regulatory approvals should be in place in 2020, followed by implementation of the Closure and Reclamation Plan in 2021.</p> <p>The Project has submitted the Closure and Reclamation Plan and associated management and monitoring plans to the Mackenzie Valley Land and Water Board as part of the Water Licence and Land Use Permit processes.</p>

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	<p>out key steps leading to closure of the remediation work. The upcoming water licensing process may help address our concerns in part, but the need remains for a long-term, detailed and integrated work plan and budget. GMOB and other parties also need a detailed plan to assess whether the Project Team's commitment to begin remediation in 2020 is feasible. GMOB wants to know that the final closure plan appropriately considers the results from all the relevant studies. These studies need to be integrated into management and monitoring plans. For example, GMOB continues to ask how the results of the recent Human Health Ecological Risk Assessment (HHERA) will be integrated into the final closure plan, as required by the environmental assessment. GMOB is unable to properly evaluate the critical path for the Project without an overall Project plan and until a defined water licence is in place. The lack of targets to measure performance also makes it difficult to know if the Project Team is meeting its goals, or where improvements should be made.</p> <p>Continued next page > 17 GMOB understands that the recently hired Main Construction Manager, Parsons Inc., will have a significant role in project planning and management. We look forward to</p>	<p>spent.</p>	<p>The Project remains committed to keeping partners, stakeholders, and interested parties apprised should the regulatory process impact the anticipated timelines.</p>

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	<p>explanations about the roles and responsibilities of Parsons Inc., and the targets expected of this manager. We still need the assurance asked for in previous years that the project management capacity will be enough for the remediation program to flow smoothly. We also want assurances that communication between the Project Team and Parsons will facilitate the remediation efforts. Given past examples where this type of management relationship has been inefficient and perhaps ineffective, and in the absence of clear evidence to the contrary GMOB remains unconvinced that this Project will be any different.</p>		
<p>7. Explain Main Construction Manager Responsibilities and Impact on Relationships</p>	<p>In late 2017, the Project Team contracted Parsons Inc. to be the Main Construction Manager on the Project. Parsons will take over a substantial part of the management of the Project and will work closely with the Project Team. The co-proponents – the federal and territorial governments – will keep final authority over the Project. GMOB needs a complete list of Parsons' responsibilities, as well as details about how responsibilities will be transferred and delegated to understand this new Project management model. This is especially important given the possible roles Parsons could play in the Giant Mine</p>	<p>Directed to: Project Team</p> <p>We recommend that the Project Team describe in detail the responsibilities of the Main Construction Manager, Parsons Inc., and how they will share duties. The Team should also describe how the construction manager will work with the Parties, GMOB, the Project Team, and the public.</p>	<p>The Government of Canada, along with the Government of the Northwest Territories as co-proponent, are responsible for the Giant Mine site and its remediation.</p> <p>The Main Construction Manager is a key partner and advisor as it relates to procurement, scheduling, resourcing, and other aspects related to the socio-economic benefits. They maintain a website where they provide information about upcoming contracts and socio-economic opportunities. http://www.giantminerp.ca/ Parsons also has an office located downtown Yellowknife to ensure easy access to Parsons staff on any number of issues from the public.</p> <p>The Main Construction Manager has also taken over the role of Mine Manager, which is a role required under Northwest Territories Mining Regulations. Since the Government of Canada assumed responsibility of the site, this role has been filled by the site's Care and Maintenance contractor.</p>

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	Working Group sessions, in community consultations, in developing and implementing socio-economic plans, and in dealing with GMOB.		<p>The Main Construction Manager took over this role from the previous care and maintenance contractor, Deton Cho / Nuna.</p> <p>The Project team has taken the opportunity to explain Parsons Inc.'s role on several occasions, including:</p> <ul style="list-style-type: none"> • March 2018 and March 2019 annual community forums for the Yellowknives Dene First Nation, for the North Slave Metis Alliance, and for the Yellowknife-area general public; • various Giant Mine enewsletters; • Industry Day session in November 2018; and, <p>Parsons Inc. were present at the annual community forums in 2018 and 2019. The Project team will continue to ensure Parsons Inc. is present at public engagement related to the MCM role in contracting and socio-economic opportunities, as appropriate.</p> <p>The Project team appreciates the Giant Mine Oversight Board clarifying the intent of the recommendation, including additional listing of the specific roles and responsibilities of the Main Construction Manager. The roles and responsibilities of Parsons were defined in the Terms of Reference included in the tender solicitation documents. These documents are publically available on Buy and Sell: https://buyandsell.gc.ca/procurement-data/tender-notice/PW-GMP-012-6553</p>
8. Meet Environmental Assessment Conditions	Measure 5 of the environmental assessment report requires the Project Team to conduct a Quantitative Risk Assessment. The findings of the assessment were to be used to improve the remediation plan, where appropriate. Ideally this work would be completed before the regulatory process.	<p>Directed to: Project Team</p> <p>We recommend that the Project Team immediately:</p> <ul style="list-style-type: none"> • Complete a quantitative risk assessment for the remediation plan. • Complete its report on long-term 	<p>The Project team is working to progress those environmental assessment measures that must be completed prior to receiving a Water Licence.</p> <p>With regard to Measure 5 which is the direction to carry out a Quantitative Risk Assessment (QRA), engagement started with the Giant Mine Working Group in 2017 and engagement sessions for the implementation of the Quantitative Risk Assessment occurred throughout 2018. The process to complete a Quantitative Risk Assessment is complicated, and the work being</p>

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	<p>We understand that the delay is partly due to the lack of resources for some of the Parties to participate in the assessment before 2018. Despite the late start, the Project Team made progress on the assessment last year and GMOB appreciates their efforts to constantly improve their workshop formats and presentation materials to better capture community concerns. Still more work is needed to make sure the community concerns are fully reflected in the final remediation strategy. This work will be discussed during the upcoming water licensing workshops and hearings since the environmental assessment report said that the risk assessment must be completed before regulatory approvals. Less progress has been made on Measure 6 which requires to report on options for long-term funding of the Project (i.e., after remediation). The Project Team started late, and GMOB views its report as a failure to meet the intent or spirit of the measure. The report initially concluded that the status quo (i.e., reliance on Treasury Board funding allocations as needed) remained the best funding option. That conclusion is under review. Most troubling is the absence of a clear statement of who will be responsible over the long term. There was also no discussion about options for</p>	<p>funding and management options for the Giant Mine site.</p> <p>These actions were among the conditions set out in the Project environmental assessment.</p>	<p>done by the Project team is leading-edge. As the Project team and participants began to scope out the work, it became evident that the initial engagement plan and schedule needed to be adjusted and adapted. To complete the Assessment work, further sessions were planned for 2019. All parties have expressed satisfaction with the inclusiveness of the process and are overall pleased with the opportunities to provide valuable input. The Quantitative Risk Assessment will be finalized later in 2019. Outcomes of the QRA will be used to further inform management and monitoring plans.</p> <p>With regard to Measure 6 which is the direction to evaluate long-term funding options, a draft report was completed and the Project team presented this to the Giant Mine Working Group in 2017. A consultant was hired to further develop the report. A subcommittee of the working group has been involved in discussions and feedback on the development of the report and presented with a final draft in March 2019. The Project Team is working toward finalizing the report and anticipates this will be complete in 2019. The development of the Perpetual Care Management Plan, as required by the Environmental Agreement, will begin, in consultation with affected parties this June. This work will provide a framework for further assessment of long-term funding mechanisms for the Project.</p>

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	the long-term management of the site.		
9. Integrate and Improve Environmental Monitoring	<p>The Project Team continues to conduct a broad range of environmental monitoring programs on and around the remediation site. The Project Team's annual report lists these programs and uses them to evaluate the current environmental conditions and to support its remediation plans. GMOB routinely reviews these environmental reports and comments or makes suggestions as appropriate. While the quality of individual reports is good, we have not seen yet a comprehensive and integrated Environmental Management System. An Environmental Management System is defined by the US Environmental Protection Agency² as "a framework that helps an organization achieve its environmental goals through consistent review, evaluation, and improvement of its environmental performance. The assumption is that this consistent review and evaluation will identify opportunities for improving and implementing the environmental performance of the organization." Without such a system, the Project Team and the construction manager will be unable to meet the goal of continuous review and improvement of their performance, let alone be able to track progress. During the upcoming</p>	<p>Directed to: Project Team</p> <p>We again recommend that the Project Team develop an in-depth and integrated way to regularly review, evaluate, and improve its various environmental actions. We recommend that the team explain its environmental programs and make it easy for the public to find the program results.</p>	<p>The Giant Mine Project team currently has a working Environment, Health, Safety and Community Management System in place for the Project. It includes aspects of an Environmental Management System (ISO-14001), Health and Safety (OHSAS-18001), and socio-economic aspects. The Project continues to update the Management System to be compliant with the revised 2015 ISO 14001 Standard. The Project is currently working with the MCM to develop an integrated management system.</p> <p>Environmental Management Plans and associated Environmental Protection Plans will be encompassed within this integrated system. The Project team will provide this to the Mackenzie Valley Land and Water Board (MVLWB), where they will be publically available once completed.</p> <p>Comprehensive environmental monitoring at Giant Mine is on-going, with results included in various annual reports and submitted to Environment and Climate Change Canada, the Giant Mine Oversight Board, and the Mackenzie Valley Land and Water Board. The Project team continues to work to ensure the public is informed about the Project via communication mechanisms such as the regular newsletter, and public forums, as well as notifications to the Project distribution list of Affected Parties such as the ongoing weekly Air Quality Monitoring Report.</p> <p>In addition, the team is happy to provide members of the public with information and reports, which can be requested by contacting the Project team at aadnc.giantmine.aandc@canada.ca or 669-2426.</p>

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	water licensing process, GMOB will continue to advocate for the necessary environmental programs during the remediation and post-remediation phases of the Project. Once the licensing process is underway, environmental monitoring results will be publicly available on the MVLWB website.		
10. Improve Public Understanding of Arsenic Risks	The Giant Mine Human Health and Ecological Risk Assessment (HHERA) and the Yellowknife Health Effects Monitoring Program (YkHEMP) are the main human health-related studies completed or underway by the Project Team. A third health-related study will assess the level and potential effects of stress on regional residents due to the Giant Mine. It was in the early planning stages in 2018. The final HHERA report was submitted in January 2018. It concluded that all residents in the Yellowknife region, including those who eat a high proportion of country food, have a low to very-low lifetime risk of cancer due to arsenic exposure. While still low, residents in Ndilo, and Latham Island were estimated to have a 10 times higher risk than people living in other parts of Yellowknife or Dettah. This is due to higher arsenic concentrations in soil. The YkHEMP involves YKDFN and NSMA community members and randomly-	<p>Directed to: Project Team; Minister, Health and Social Services, GNWT</p> <p>We continue to recommend that the Project Team develop a communication and education plan to improve the public's understanding of arsenic risks and safety.</p>	<p>The Giant Mine Remediation Project team recognizes that there remain public concerns about the risks associated with arsenic exposure, and will continue to work to ensure the public is aware of risks as they relate to the Project.</p> <p>Public information sessions on the results of the Human Health and Ecological Risk Assessment (HHERA), which confirmed that risks from the site were low to very low, were held in October 2017, prior to finalizing the report in January 2018. In addition to the public sessions in October, the Project team has continued to communicate results of the Human Health and Ecological Risk Assessment in its newsletter and at the community forums with the Yellowknives Dene First Nations members, North Slave Métis Alliance members, and members of the Yellowknife-area public in March 2018 and 2019. The full report is also available via a Sharepoint, and a Plain Language Summary of the report is available on the giant.gc.ca website.</p> <p>While the Human Health and Ecological Risk Assessment evaluated current and future risks to ensure remediation work on site will not increase exposure, the Project team recognizes that health concerns remain among area residents. A separate health study, called the Health Effects Monitoring Program, is being conducted to look at current exposure to arsenic and other chemicals of concern of residents of Dettah, Ndilo and Yellowknife, and to monitor exposure over time. This study is being conducted by Dr. Laurie Chan of the University of Ottawa. Dr. Chan was in Yellowknife to present the results of the study in May 2019. As part of this work, the Health Effects</p>

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	<p>selected Yellowknife residents. By taking toenail clipping and urine samples from people, the study will create a picture of the local exposure to arsenic and other metals from the Giant Mine site. The HHERA and YkHEMP scientific studies should give people information on exposures from various activities and sources, including imported food, and ideas of how to minimize exposure. The more local residents who participate in these studies the more valuable the results and their usefulness for monitoring future arsenic exposure. Health authorities should put more effort into informing residents about arsenic exposure from all sources, putting exposure to Giant Mine-related arsenic in perspective and context. A 2018 soil sampling program in Ndilo, indicated lower arsenic concentrations in soil than previous sampling programs. The more recent sampling was done because of long-standing concern about “hotspots” in Ndilo. This, and the higher estimated cancer risk for Ndilo, in the HHERA report, leads GMOB to encourage further discussion about the recent soil results and cancer risk in Ndilo. Scientists and the public have different perceptions about safety. Scientists tend to view risk from the perspective of what they can measure. Nonscientists may view risk</p>		<p>Monitoring Program Team is working to develop a volunteer program to facilitate engagement with youth, between the ages of 11 to 19 in Yellowknife, Ndilo, and Dettah, in order to foster interest and build knowledge around the Health Effects Monitoring Program as part of the Giant Mine Remediation Project. More information is available at ykhemp.ca.</p> <p>The GNWT Interdepartmental Legacy Contaminants Committee has also identified the need to better inform residents about arsenic exposure from all sources to put exposure to Giant Mine related arsenic in perspective and context. The GNWT-ENR and GNWT-HSS are leading this work and will be developing outreach material that will help better inform the public and youth educators of the risks related to arsenic in the Yellowknife area.</p> <p>The Chief Public Health Officer continues to monitor any new information related to arsenic in the Yellowknife, Ndilo and Dettah area and will update public health messaging as necessary. Current public health messaging on this subject is available on the GNWT public health advisories web page.</p> <p>In October 2018, the federal government announced that the more recent soil sampling data taken close to the Kalemi Dene School in N'dilo showed that the arsenic levels in the area were below residential.</p> <p>Representatives from Crown-Indigenous Relations and Northern Affairs Canada met with the Yellowknives Dene First Nation, including Chief Edward Sangris of Dettah, to discuss that finding and the issue was deemed closed.</p>

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	<p>from a broader perspective. More work by the Project Team and the GNWT (particularly Health and Social Services) is needed to bridge the gap in understandings. GMOB believes that the Project Team can and should better explain the methods and findings of health studies. While important, the monitoring and studies on the impacts of arsenic on human health alone are not enough. The practical challenge of communicating complex technical and scientific issues in plain language cannot be overstated. GMOB acknowledges the complexity of a broader model of health determinants and attempting to isolate the potential impacts of Giant Mine arsenic on human health. The Project Team must understand that the well-being of people depends on more than the measured exposure to contaminants.</p>		
11. Resolve Offsite Contamination Concerns	<p>In its 2016 and 2017 annual reports, GMOB raised the issue of arsenic in soils, vegetation, and lakes outside the Giant Mine lease boundary. Offsite contamination can lead to on-site contamination. For example, the, e.g., via Baker Creek watershed drainage into the mine site or through re-suspension of arsenic trioxide dust by offsite construction. Offsite contamination tends to dominate any public discussion</p>	<p>Directed to: Minister and Deputy Minister, CIRNAC; GNWT Minister and Deputy Minister, ENR; Mayor, City of Yellowknife</p> <p>We again recommend that the federal, territorial and municipal governments work together to ease the environmental and health concerns about arsenic levels on land outside the Giant Mine remediation site.</p>	<p>Legacy issues, including apology and compensation are led by the NWT Regional office of Crown-Indigenous Relations and Northern Affairs Canada.</p> <p>The Government of the Northwest Territories (GNWT) and the Government of Canada are working together to carry out a Human Health Risk Assessment (HHRA) on legacy contamination in the Yellowknife area.</p> <p>The purpose of the HHRA is to examine, and determine the risks associated with exposure to legacy arsenic and other contaminants in soil, water, sediment, fish, country foods, air, dust, plants and mushrooms. The focus of the HHRA is on the areas west of Giant Mine and around Con Mine. The HHRA will also look at areas where people have cabins, camp and fish to the</p>

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	<p>of the Giant Mine Remediation Project. Offsite issues must be resolved. GMOB notes that some progress has been made on this issue. Research and sampling studies have given a better understanding of the nature and extent of offsite contamination. Signs have been posted in some areas. CIRNAC and the GNWT are working together to address other offsite concerns. The Project Team contracted a private environmental consultant, CanNorth, to do a human health risk assessment for a broad area west and north of the mine lease. This is where prevailing winds would carry arsenic trioxide dust. CIRNAC conducted the soil sampling program in 2018 to investigate arsenic “hot spots” in Ndilo. Findings now indicate that there is no cause for concern in those study areas. Despite the positive progress, there is no agreement on which agency is responsible for offsite contamination. A comprehensive strategy for managing the contamination has yet to be developed.</p>		<p>east of Giant Mine (e.g. Ingraham Trail area), and other traditionally used areas identified by local Indigenous communities within a 25 km radius around Yellowknife, at which point contaminant levels reflect local background conditions.</p> <p>The outcomes of the risk assessment will be reviewed by both the GNWT and Government of Canada to determine what remedial actions or risk management options, if any, are required. These next steps will include engagement with community in the fall of 2019 on the draft HHRA.</p> <p>The GNWT Interdepartmental Legacy Contaminants Committee will also review the outcomes of the risk assessment to determine what appropriate messaging and communication tools are required to better inform local residents of the results.</p>