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Review of 2015-2016 Annual Report Giant Mine Remediation Project

The Giant Mine Oversight Board (GMOB) has reviewed the 2015-2016 Annual Report of the Giant Mine Remediation Project (GMRP) entitled “Remediating the Mine” and dated October 2016. The document was reviewed by GMOB against the requirements set out in Section 5.2 of the Giant Mine Remediation Project Environmental Agreement (the Agreement). It is important to note that our review has focussed on the report itself and does not include an assessment of the overall progress of the Project. The latter assessment will form part of GMOB’s own annual report.

Although GMOB has identified areas where we believe the report can be improved in future, overall we found that the Annual Report addresses the requirements outlined in Section 5.2 of the Agreement. Importantly, it is clear that the GMRP has put a lot of effort into summarizing a large amount of information and has tried hard to develop a report that will be useful to a diverse audience. In making comments on this report, we realize that this is the first report under the terms of the Agreement and that it is early days for reporting under this structure. We also note and appreciate the GMRP’s efforts to address the suggestions GMOB made on the draft report format earlier this year.

Below we have provided our observations and recommendations with respect to areas of the 2015-2016 Annual Report or of the reporting process where we feel improvements could be made for the next reporting cycle.

1. Subject: Plain Language Summary

Observations: The Agreement requires that the report contain a plain language summary. The Report Summary, on pages 8-11, is very technical and cannot, in our opinion, be classified as a “plain language” summary. A stand-alone, plain language summary document would be very beneficial for distribution to the Parties to the Agreement and the general public.

Recommendations: The GMRP should either revise the language of the Report Summary next year so that it is more accessible to readers at all levels of technical knowledge and/or that it provide a standalone plain language summary document. The latter document could be produced independently from the Annual Report and be made available for wider public distribution.

2. Subject: Reporting Cycle

Observations: The reporting cycle for the Annual Report covers activities that took place from April 2015-March 2016 with mention of some activities that took place in 2014. As the Annual Report was provided to GMOB in October 2016 and we are now at the end of the field season for 2016, the reporting is one year behind the Project’s activities. The nature of the current reporting cycle means that there is little opportunity for Parties to use the Annual Report information as a basis for making recommendations for the next year’s Project activities.

Recommendations: GMOB would like discuss with the Project Team how best to maximize the utility of the Annual Report. For example, one way to address the reporting cycle issue might be through the presentation of a preliminary project report in May of each year so that feedback from GMOB and the community could be applied adequately to the following year’s planning cycle.

3. Subject: Annual Project Plan

Observations: There is no Project Plan included in the Annual Report. Without it, the process for reporting progress is not meaningful. The approved working plan is necessary so that cross referencing of what was planned and what was delivered can be clearly followed and explained. The Annual Report, as it stands now, does not allow for an assessment of actual schedule performance against a baseline schedule on a multi-year basis. For example, does the current project status align with plans that were established 3 or 5 years ago? If not, why?

Recommendation: An Annual Project Plan be included in the Annual Report.

4. Subject: Performance Measures

Observations: There are no stated performance measures included in the Annual Report. Information in the Annual Report is listed as either “objectives”, “commitments” or “vision”. Without performance measures, it is hard to know whether mitigation measures are working as intended or expected.

Recommendation: Quantifiable performance measures should be further developed and included in the Annual Report.

- 5. Subject: Expenditures**
Observations: The project expenditure figures are provided in the Annual Report as only a lump sum figure and there is no comparison of planned versus actual expenditures.
Recommendations: A further breakdown of the project expenditure figures as well as a multi-year trend analysis of the total cost estimate of spending versus budget would be helpful to include in future Annual Reports. The latter item should include a justification for any significant variances. The cost vs. budget trend analysis would help us to understand if and where there may be issues with scope creep, schedule slippage etc.
- 6. Subject: Trends**
Observations: Contrary to what is stated in the Annual Report, we do feel that there is more than adequate historical information collected by the Project that could be analyzed for trends (e.g., water quality, health and safety indicators, engagement, socio-economic measures, regulatory compliance).
Recommendations: There are a lot of potential datasets that could be analyzed for trends but likely only a few key analyses would be truly useful. We recommend that the Project Team consult with the Parties to the Agreement as to what datasets should be analyzed for trend reporting in the Annual Report.
- 7. Subject: Air**
Observations: The Annual Report refers to the Air Quality Monitoring Program and there are very helpful links to the monitoring data online. However, there is no reference or link provided to the current Air Quality Monitoring Plan. As a result, an assessment of the basis for the current monitoring program is not possible.
Recommendation: The Air Quality Monitoring Plan should be referenced in the Annual Report and a link to the plan provided.
- 8. Subject: Water**
Observations: The report includes information on the outfall design/location, the potential re-routing of Baker Creek, the design of the new Effluent Treatment Plant (ETP) and the development of the site-specific water quality objectives (SSWQO) but there is no clear explanation of how these important items relate or how work on these items will be sequenced. Also, we note that unlike the air quality monitoring results, the GMRP does not seem to have any way of sharing water quality monitoring results from routine or special studies. Finally, there is mention of a settling pond dredge being removed but we were unable to find mention of how the dredge was managed after removal.

Recommendations: It would be helpful if the Annual Report could provide a roadmap and timeline as to how the outfall design, the re-routing of Baker Creek, the ETP design and the development of SSWQO relate to each other and how the Project team plans to sequence work on these items. The GMRP should work with the Parties to develop a way of sharing key water monitoring data as is done for air quality. All operational details, such as the dredge removal, should be followed through in future Annual Reports.

9. Subject: Biodiversity

Observations: In the section on Biodiversity, there does not seem to be a direct link between monitoring results and actions for biodiversity components. For wildlife and birds, the actions are to consider results or recommendations in the future for remediation design but no further detail is provided. For EEM monitoring, the only action listed is to continue monitoring.

Recommendations: As written, it is not clear what the objective of monitoring wildlife/birds is or what mitigations or plans this monitoring will inform. It would be helpful if there was a more systematic way to link the results of monitoring to corrective actions or to design planning.

10. Subject: Land

Observations: Much of the work to date in this section of the Annual Report deals with soil sampling and characterization which will inform a remediation plan.

Recommendation: No specific recommendation; however, we will be very interested in reviewing the proposed soil remediation plan, including the development of soil criteria, as this aspect of the Project moves forward.

11. Subject: Health

Observations: In the section on Health and Safety in the Annual Report, it would be helpful to have an analysis on the effectiveness of the measures used to address the exceedances of urinalysis tests for onsite workers. The current work in the next year on the Human Health Risk Assessment and the Health Effects Monitoring Program will be very important elements that GMOB will be tracking.

Recommendations: The Annual Report should include a section on the effectiveness of the measures used to address the exceedances of urinalysis tests for present onsite workers.

12. Subject: Community and Engagement

Observations: The number of attendees at engagement events is not very meaningful without an analysis of the concerns identified by the attendees and what will/is being done to address these concerns. The efforts to heal the legacy issues created by the long history of the mine, as well as previous

Project activities, also remain to be addressed. Perhaps it is beyond the scope of the Project Team to deal with activities outside the immediate remediation but it is within the purview of the Co-Proponents to undertake a long term proactive community based healing process.

Recommendation: This section of the Annual Report could to be strengthened by, for example, including an analysis of concerns identified during engagement and how those concerns are being addressed.

13. Subject

Employment

Observations: The employment data provided in the Annual Report does not provide sufficient detail to allow analysis. For example, the figures provided are not clear as to whether each group reported is separate and distinct from each other. There is little information on the number of contractors, value of contracts and jobs created etc.

Recommendations: The Annual Report should provide more detailed information on employment, contractors and value of contracts as well as any other information linked to direct socio-economic activity. The Project team should consult with GMOB and the Parties about exactly what kinds of information would be most useful to report on.

14. Subject

Training

Observations: It is not clear if the training information in the Annual Report is comprehensive or only drawn from contractors who are required to deliver Health and Safety and Orientation sessions to their workers. The Project itself could be much more proactive in its efforts to identify how and what local training, employment opportunities and economic spinoffs to the community were maximized.

Recommendations: The Project team should consider including a section in the report that describes the overall socio-economics of the Project including, for example, comprehensive and measurable local training and employment initiatives as well as secondary economic effects of the project.

15. Subject

Traditional Knowledge

Observations: There is no mention of consultations regarding traditional knowledge or the incorporation of any traditional knowledge for project activities in the Annual Report. This is an important aspect of the Project team's community consultation and project planning.

Recommendation: A specific section reporting on consultation and incorporation of traditional knowledge should be included in the Annual Report.

16. Subject

Off-Site Considerations

Observations: The surface contamination that is present within the Project boundaries extends to off-site locations. The Annual Report does not indicate how

the Project Team is working with the applicable authorities to ensure the effective and consistent management of both off and on-site contamination.

Recommendation: The Annual Report should describe how the Project Team is working with applicable authorities to ensure the effective and consistent management of both off and on site contamination.

17. Subject

Emergency Measures

Observations: The annual Report does not reflect what the criteria is for work to be categorized as an emergency measure versus care and maintenance. GMOB would like to understand how the Project makes these determinations. There is also no mention in the Annual Report of any Emergency Preparedness Plan to deal with potential system or structural failures.

Recommendations: The Annual Report should provide the criteria and rationale used to categorize on-site activities that are deemed to be of an emergency measure and describe or provide a link to an Emergency Preparedness Plan.

18. Subject

Plans to Incorporate New Remediation Technologies in the Future

Observations: There is no information in the Annual Report explaining how the Project Team intends to address potential changes in remediation technologies or techniques or processes that may be recommended as a result of the research program currently undertaken by GMOB. For example, how will the Project Team's remediation plan address future access to stopes and access to the site for possible arsenic trioxide remediation?

Recommendations: The Annual Report should outline the process and actions taken to address any potential changes in remediation technologies or techniques or processes that may be recommended as a result of the research program currently undertaken by GMOB.

The Annual Report, under the heading of About this Report, states that, "The content of this report was largely shaped by the Environmental Agreement, signed in June 2015, and by the GMOB..." As noted earlier, we do appreciate that the Project team solicited and then incorporated many of GMOB's suggestions on the draft report for the 2014-2015 period; however, we want to be clear that GMOB did not have any part in the drafting of the contents of this Annual Report.

As indicated earlier, this review represents GMOB's format assessment of the of the 2015-16 Project Report and we hope that our recommendations will be useful in strengthening next year's Annual Report. We will be providing comments on our assessment of the overall progress of the Project in the GMOB Annual Report to be released in early 2017.

In closing, we would like to thank the Project Team for your efforts in writing this year's Annual Report as well as for your continued responsiveness to our requests and queries over the past year. We look

forward to discussing our recommendations directly with the Project Team in upcoming meetings. If you have any questions in the meantime, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathy Racher", is centered within a light blue rectangular background.

Dr. Kathy Racher

Chair, Giant Mine Oversight Board

cc. Parties to the Environmental Agreement