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Giant Mine Remediation Project

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

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**Comments on the Terms of Reference for the Giant Mine Remediation Project
Socio-economic Advisory Body**

Thank you for the opportunity to review the Terms of Reference for the socio-economic Advisory Body and supporting sub-groups. While GMOB is encouraged that senior leadership of both the federal and territorial government agencies will be involved in these groups, the very limited mandate is of concern. For example, there is no mention of the Advisory Body having any role in defining an overall holistic socio-economic strategy. Without that, it is difficult to see how the Advisory Body will have any effective role in influencing how socio-economic issues will identified, prioritized and evaluated.

GMOB is also unclear as to how these groups will work. For example the Terms of reference state:

“The SE Advisory Body’s mandate is to provide strategic advice to the Socio-Economic (SE) Working Group and act as senior government champions for the implementation of the SE Working Group’s approach. More specifically, the SE Advisory Body’s objectives are to:

- (1) Provide strategic advice to the Socio-Economic Working Group on: how its work relates to relevant government priorities; how emerging priorities or developments could affect the project’s socio-economic management or performance; and on strategy development, refinement and implementation**
- (2) Brief their respective organizations on the GMRP’s approach to maximizing socio-economic benefits, and bring forward questions, ideas and/or concerns**

Collectively identify and address organizational barriers to implementing agreed-upon priorities and actions, as needed.

A footnote states that:

“The SE Working Group is a working-level coordinating body with representatives from Crown-Indigenous Relations and Northern Affairs, Government of the Northwest Territories, the Main Construction Manager and Public Services and Procurement Canada. They meet on a regular basis to discuss progress in implementing the GMRP Socio-economic Action Plan and propose adjustments that may be required”

From the text above it seems that the Project will define the Socio-economic Action Plan, the Working Group will discuss progress on implementation of the Plan and the Advisory Body will act as champions for the implementation of the Working Group’s approach. This means that the same government departments, which will define the Plan, will also be the ones evaluating it, implementing it and reviewing it. More troubling is the section on Confidentiality and Transparency, a title which seems to be a contradiction of terms. It states that

“To create an environment that enables candid and open discussion, no points raised during the meeting are to be attributed to individual participants. While the meeting record is shared with all participants, it is not to be distributed more widely, beyond GMRP governance bodies. ‘

So how can the interested parties have any sense of what is the intent of the plan or how successful it might be if no meeting records are allowed to be shared outside the Project’s governance bodies, whichever those might be – and that is also unclear. Is it really the intent of the Advisory Body and its supporting sub-groups to restrict the availability of what should be public records? Would interested parties such as GMOB have to request meeting minutes under the Access to Information Act? This is concerning.

The Terms of Reference and the membership of the Working Group seem to lean heavily towards the employment and contracting aspects of the Project. The term socio-economic continues to be used by the Project when it is only the economic side which is being considered. This narrow definition has been the focus of the Project’s efforts in the past when GMOB has raised the issue of a socio-economic strategy. Jobs and contract benefits are certainly important, but as GMOB has repeatedly highlighted, this Project and the investment it can make into the regional economy can have a much larger community impact if considered as both a remediation and development project.

The Project to date has not looked at the social opportunities that its investment can make on community well-being, whether it is in education, social services or reconciliation. GMOB is not sure if this very narrow focus on jobs and contracting is a result of limited Government experience with evaluating and defining social opportunities/benefits when implementing large remediation projects or a lack of senior Government direction that would encourage consideration of the broader definition. Whatever the reason, this narrow focus constitutes a missed opportunity.

GMOB is also concerned about the limited membership on the Advisory Body. The Giant Mine Environmental Agreement had six signatories and discussed both

environmental and socio-economic issues. Why are all six Parties to the agreement not therefore included in Advisory Body membership?

GMOB strongly recommends that the involved governments rethink their approach on this matter. In GMOB's view, a broader focus and membership plus an open and transparent process would greatly benefit the Advisory Body and its sub-groups, and result in greater social and economic benefits overall.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Racher', written in a cursive style.

Dr. Kathleen Racher
Chair, Giant Mine Oversight Board

cc. Parties to the Environmental Agreement
Regional Director General, CIRNAC