

Ministre des  
Affaires du Nord



Minister of  
Northern Affairs

Ottawa, Canada K1A 0H4

September 23, 2020

Dr. Kathleen Racher  
Chair  
Giant Mine Oversight Board  
5014 – 50th Avenue  
P.O. Box 1602  
YELLOWKNIFE NT X1A 2P2

Dear Dr. Racher:

Thank you again for your correspondence of May 19, 2020, concerning the Giant Mine Oversight Board's 2019 Annual Report and recommendations.

I share the Oversight Board's view that additional important work must be undertaken to ensure the effective remediation of the Giant Mine site in a manner that will ensure benefits to local residents, and I am confident that we share a common goal to enable a successful project. At the same time, we must continue with critical care and maintenance, fulfilling regulatory obligations (e.g. the water licence process) and supporting the early works of the Remediation Project, and risk mitigation activities.

Further to my correspondence of June 19, 2020, acknowledging the receipt of the report, I am pleased to provide additional details in response to each of the recommendations that have been put forth by the Oversight Board, appended to this letter.

Canada shares your opinion that the remediation of the Giant Mine is an opportunity for significant social and economic benefits. We welcome your ideas and support as the project team continues to work with rights holders, Indigenous organizations, and other stakeholders to maximize Indigenous and northern employment and business opportunities. Maximizing these benefits is a key consideration to the project's socioeconomic implementation plan and approach.

As always, I look forward to receiving updates on this important project. I've asked Mr. Serge Beaudoin, Assistant Deputy Minister of the Northern Affairs Organization, to keep me informed of future discussions that he and his team have with you and the Oversight Board on the advancement of the Giant Mine Remediation Project.

I encourage you to reach out regularly to Mr. Beaudoin and the project team to offer your insight and perspective.

Sincerely,

***Original signed by the***

Hon. Daniel Vandal, P.C., M.P.

c.c.: The Honourable Robert McLeod, M.L.A.

Mr. Michael McLeod, M.P.

Encl.

**Giant Mine Remediation Project Responses to Recommendations from  
Giant Mine Oversight Board (GMOB) 2019 Annual Report**

<b><u>Subject</u></b>	<b><u>GMOB Comments</u></b> <sup>1</sup>	<b><u>GMOB Recommendations</u></b> <sup>2</sup>	<b><u>Giant Mine Project Team Response</u></b>
<p>1. Appoint a special Envoy to lead the Socio-economic aspects of the Project</p>	<p>The responsibilities of the special envoy would, for example, include:</p> <ul style="list-style-type: none"> <li>• Coordinate the development and implementation of the socio-economic strategy with governments, community representatives and organizations.</li> <li>• Monitor the outcomes of the two socio-economic committees, evaluate their effectiveness, and negotiate changes as required.</li> <li>• Report directly to the relevant federal and territorial Ministers on the strategy and its progress and make those findings public in an annual report.</li> <li>• Identify barriers and recommend improvements to the strategy and its implementation.</li> <li>• Facilitate information sharing with the broader Yellowknife community, including the city, education and business organizations, health services, social services, policing services, tourism and recreation associations, transportation and infrastructure organizations.</li> <li>• Facilitate discussion on Project-related reconciliation.</li> </ul> <p>The special envoy should have significant experience in senior level positions across government and</p>	<p><b>Directed to: Minister, CIRNAC</b></p> <p>We recommend the CIRNAC Minister appoint a special envoy to work with federal, territorial, municipal, and Indigenous agencies and the Parties to develop and implement a comprehensive and integrated economic strategy. The strategy should identify and capture the Project economic, social, and educational opportunities and help deal with community health concerns and reconciliation efforts</p>	<p>The Giant Mine Remediation Project has co-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. The strategy was made publicly available in September 2019. This strategy includes measures to support successful participation in the project as well as reduce and limit barriers that might prevent Indigenous and Northern persons 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. This is a live document that will be updated as additional implementation items are identified.</p> <p>The project includes a number of staff dedicated to leading the socio-economic aspects of the project, including:</p> <ul style="list-style-type: none"> <li>• a CIRNAC Economic Development Officer;</li> <li>• the Main Construction Manager (Parsons') Economic Development Officer and Community Liaison Officer; and</li> <li>• a YKDFN Economic Development Officer position, held by a community member and dedicated to the project.</li> </ul> <p>The project team has also established a governance structure dedicated to providing oversight and strategic direction on the ongoing implementation and adjustment of the socio-economic strategy.</p> <ul style="list-style-type: none"> <li>• The Socio-economic Working Group (SEWG) is a working-level committee that consists of representatives from federal, territorial, municipal, and Indigenous governments. It is mandated to develop and implement the Socio-economic Implementation Plan and seek opportunities to improve collaboration amongst its</li> </ul>

<sup>1</sup> This text is taken directly from the Giant Mine Oversight Body 2019 Annual Report

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	<p>industry, and experience negotiating complex northern and cross-cultural issues. The special envoy should have experience reporting directly to Federal and Territorial Ministers.</p> <p><i>Reporting</i> The special envoy should report directly to both the relevant federal Minister and territorial Minister.</p> <p><i>Resources and Timing</i> The special envoy should be given enough money and people to do their job effectively, ideally from an office in Yellowknife. The position should remain in place until the community sees that this role is no longer needed.</p> <p><b>Why This is Needed</b></p> <p>Since 2016, GMOB has advocated that all levels of government make local economic opportunities and benefits associated with the Giant Mine Remediation Project their priority.</p> <p>In each of our Annual Reports, we recommended more efforts to create meaningful economic opportunities in time for residents to capture those opportunities. This is essential if the Project is to incorporate the principles of reconciliation and correct some systemic social and economic disparities within the Indigenous communities.</p> <p>Given the lack of progress during 2019, GMOB views the appointment by the CIRNAC Minister of a special envoy as the best option to resolve the impasses, develop novel solutions to the problems, and to</p>		<p>members. The SEWG reports directly to, and seeks advice from, the Socio-economic Advisory Body, with respect to the SEWG's socio-economic activities.</p> <ul style="list-style-type: none"> <li>The Socio-economic Advisory Body (SEAB) is a senior-level committee chaired by CIRNAC's Director General of the Northern Contaminated Sites Branch. It includes representatives from federal, territorial, municipal, and Indigenous governments. It is mandated to provide the project with strategic advice and input on socio-economic aspects of the project, to brief their respective organizations on the project's approaches, and to raise potential organizational barriers to implementation so ways to address them can be explored. All signatories of the Giant Mine Environmental Agreement were invited to participate on the SEAB.</li> </ul> <p>In addition, to advance regional commitments and to address key barriers highlighted in the strategy, the project team committed to co-developing a Socio-economic Implementation Plan. In February 2020, the project team and the SEWG were joined by rights-holders and stakeholders to identify actions needed for successful implementation of the strategy. Since February, the project team and the SEWG have prepared a draft plan. The next step will be to engage the Socio-economic Advisory Body to receive their review and recommendations. The project team anticipates the plan will be approved in fall 2020; however, where possible and in the interest of moving forward on the socio-economic commitments, the project team and the SEWG are already implementing certain plan activities.</p> <p>Some examples of the socio-economic activities that have either recently been completed or are currently being worked on by the project team and the SEWG are:</p> <ul style="list-style-type: none"> <li>In fall 2019, the project team and the SEWG, with advice from the SEAB, set out to develop targets for select key performance indicators. The targets were finalized in June 2020. The targets are a benchmark against which to measure the project.</li> <li>The project team established a working group to assist the GNWT in exploring the possibility of establishing a North Slave Training Partnership group.</li> <li>Considering current restrictions in holding large gatherings, the project team is examining alternative approaches to holding Industry Day 2.0, a session to present interested parties with information about the early-works packages.</li> <li>To coincide with Industry Day 2.0, the Project is also drafting a Work Package Readiness Assessment tool which will enable local firms to assess their readiness to bid on contracts.</li> </ul>

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	<p>champion local opportunities. We expect this recommendation to result in an experienced and independent individual leading the social and economic aspects of the Project.</p>		<ul style="list-style-type: none"> <li>• Planning is currently underway to initiate the collection of data needed to develop 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 North Slave Métis Alliance and Tlicho.</li> <li>• The project team continues to take a number of actions to help rights-holders and stakeholders participate meaningfully in the project. The project team funds annual proposals from the Yellowknives Dene First Nation, North Slave Métis Alliance, the City of Yellowknife, and Alternatives North to provide them with technical and administrative resources to participate in all aspects (including socio-economic) of the project.</li> </ul> <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 \$493 million spent to date for the Giant Mine Remediation Project, approximately \$214 million (or 43%) was to Indigenous businesses.</p> <p>The project team also notes the Indigenous workforce participation on the project between 2007–2019 averaged 21% and, between 2013–2019, Northern participation averaged at 48%. The Northern workforce category was not tracked prior to 2013.</p> <p>The project team has provided funding to the Yellowknife Dene First Nation for the Dechita Naowo Program in the amount of: \$115,000 in 2017–2018, \$166,895 in 2018–2019, and \$150,000 in 2019–2020. As well, the project funded an additional \$14,200 in 2019–2020 specific to professional development for the Yellowknives Dene First Nation's Giant Mine community liaison and technical advisor. This year, the project has confirmed funding of \$450,000 for project related training. The project team also provided \$44,000 to the North Slave Metis Alliance for capacity and training in 2019–2020. In addition, the project team has committed to working with the Yellowknife Dene First Nation and the North Slave Metis Alliance to develop a long-term training program (e.g. five years).</p> <p>The project team has committed to reconciliation through the Health Effects Monitoring Program (focused on physical health) and the Study for Understanding Community Wellbeing Around Giant Mine (formerly known as the "Stress Study"). Both of these programs have oversight bodies with wide ranging expertise (e.g. university professors, Health Canada experts, mental health experts, and local Indigenous experts).</p>

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			The project team believes that progress has been made on the socio-economic aspects of the project throughout these various activities. The Giant Mine Remediation Project would like the opportunity to openly discuss with GMOB any additional items that could be added to ensure maximized socio-economic benefits.
2. Give each Party the Needed Resources	<p>In our last annual report, we made a recommendation (2018-2) intended to help the Parties to the Environmental Agreement participate in various aspects of the Project. In 2019, the Project Team was able to provide capacity funding to all of the Parties. This helped the Parties participate in such matters as the water licence reviews, technical sessions and hearings.</p> <p>The Parties are concerned about their future capacity. Capacity pressures remain with such responsibilities as upcoming health and mental stress studies and regulatory reviews. For this reason, we have updated our previous recommendation to extend capacity funding beyond the initial water licencing phase and into subsequent phases of the Project.</p> <p>If this recommendation is implemented, we expect the Co-Proponents to ensure that the ongoing capacity needs of the Parties are met. This includes financial resources and accommodations to avoid consultation overload.</p>	<p><b>Directed to: Minister and Deputy Minister CIRNAC; Minister and Deputy Minister, ENR</b></p> <p>GMOB recommends that the Parties continue to receive the necessary funding to support their full engagement in all aspects of the Project, including regulatory processes, health and mental stress studies, economic opportunities, and site remediation planning and implementation.</p>	<p>The project team continues to recognize that capacity is an issue across the Northwest Territories and takes a number of actions to help rights-holders and stakeholders participate meaningfully in the project. This includes working to both adapt project engagement and technical processes and schedules in response to their needs. It also includes funding to support their participation in the project.</p> <p>The project team funds annual proposals from the Yellowknives Dene First Nation, North Slave Métis Alliance, the 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"> <li>• Approximately, \$522,000 in 2019–2020 , \$582,000 in 2018–2019, and \$309,000 in 2017–2018 to the Yellowknives Dene First Nation, with \$365,000 in funding anticipated for 2020–2021. This does not include the training funding for Dechita Naowo noted above, which was provided in addition to this funding.</li> <li>• Approximately \$174,000 in 2019–2020, \$89,000 in 2018–2019, and \$26,000 in 2017–2018 to the North Slave Métis Alliance, with \$180,000 in funding anticipated for 2020–2021 .</li> <li>• Approximately \$53,000 in 2019–2020, \$53,000 in 2018–2019 and \$37,000 in 2017–2018 to Alternatives North, with \$62,000 in funding anticipated for 2020–2021.</li> <li>• Approximately \$125,000 in 2019–2020 and, \$60,000 in 2018–2019 to the City of Yellowknife, with \$75,000 in funding anticipated for 2020–2021.</li> </ul> <p>In addition, the project continues to provide funding (through the North Slave Métis Alliance) for Bill Slater to act as the technical advisor to the Giant Mine Working Group. In this capacity, he assists with the review of technical documents and provides recommendations for the consideration of Working Group members.</p>
3. Increase City Involvement	The Giant Mine Remediation Project and its legacy will have significant implications for the City of Yellowknife. The City improved its engagement with	<b>Directed to: Mayor and Council, City of Yellowknife</b>	N/A

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	<p>the Project Team since GMOB's last report and previous recommendation (2018-4). This was achieved in part by capacity funding provided by the Project Team that has allowed the City to hire a consultant with remediation project responsibilities. Nonetheless, GMOB views more engagement as essential to meet the interests of residents. The City needs to be more proactive in making sure residents know about the many implications of the Project.</p> <p>In GMOB's view, the City has not planned for unintended negative impacts from the Project, such as potential traffic congestion, and the effects of in-migration of perhaps many southern workers. In GMOB's view, the City has not planned for unintended negative impacts from the Project, which range from increased traffic congestion to the effects of a possible influx of workers from the south. Finally, many residents are unsure about what aspects of the Project the City has been or will be involved in, so it would be helpful if the City could find ways to better share that information publicly.</p>	<p>GMOB recommends that the City of Yellowknife continue to improve its ability to fully engage in aspects of the Project affecting residents of Yellowknife.</p>	
4. Reconciliation and Legacy Issues	<p>Public concern about the legacy of Giant Mine remains a key issue and is particularly acute for the YKDFN. GMOB made recommendations (e.g., 2018-5) on this issue in all of its annual reports.</p> <p>We note that there has been some progress, as discussions continue between the Yellowknife CIRNAC office and YKDFN leadership. The GNWT has provided resources to YKDFN to support their research and preparation of materials regarding the historic effects upon their community.</p>	<p><b>Directed to: Minister, CIRNAC</b></p> <p>GMOB recommends that the Federal Government immediately resolve the repeated requests from YKDFN for an apology and compensation for the historic operations at the Giant Mine. We also expect funding to</p>	<p>Legacy issues, including apology and compensation, are led by the Northwest Territories (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>Crown–Indigenous Relations and Northern Affairs Canada, NWT Region, is working to better understand the nature of the Yellowknives Dene First Nation's concerns and how the Government of Canada can meaningfully address them while continuing to strengthen our nation-to-nation relationship.</p> <p>The Department has provided financial support to the Yellowknives Dene First Nation so that they may research and assess their historical record. This information will help the</p>

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	<p>We look forward to further progress on this recommendation in the coming year.</p>	<p>continue for legacy documentation projects being led by the YKDFN.</p>	<p>Department and the Government of Canada determine our response to this long-standing issue. It is the understanding of the Department that the Yellowknives Dene First Nation have completed their research and we look forward to them sharing it with us.</p> <p>The Department is currently in discussions with the Yellowknives Dene First Nation to determine the best path forward in relation to an apology and compensation.</p>
<p>5. Information on Plans, Schedules, How Activities are Connected, and How Performance is Measured</p>	<p>Since its establishment, GMOB has asked the Project Team for a high-level Project plan that clearly lays out the multi-year timeline and critical path for all Project elements and major activities (e.g., recommendation 2018-6). The plan should contain performance measures so that GMOB and other parties are able to assess if the Project Team is meeting its goals and targets, and where improvements should be made. Finally, the plan should allow us to assess whether the Project Team's remediation schedule is feasible and incorporates the results from all the Project-related studies.</p> <p>The kind of project plan GMOB seeks is a common practice for major industrial developments. Although the Project Team provided GMOB with some documentation, these responses do not adequately address our request. We expect the Project Team to plan for closure and lay out the key steps leading to that outcome despite its differences from the private sector.</p> <p>There is clearly a lack of understanding regarding the intent of GMOB's previous requests. Instead of restating previous recommendations, GMOB believes it is necessary to meet with the Project Team to come to a common understanding of just what is possible. We look forward to resolving this issue with the Project Team.</p>	<p><b>Directed to: Project Team and GMOB</b></p> <p>GMOB recommends a dedicated meeting between the Project Team and GMOB to come to a common understanding on a sufficiently comprehensive Project plan that meets the expectations described in previous GMOB recommendations</p>	<p>The Giant Mine Remediation Project team has provided a five-year work plan to the Giant Mine Oversight Board – this included a high-level schedule, information about budget activities, and the critical path as part of the document. The project team is happy to commit to attending a dedicated meeting with the Board to determine how to better present this information and provide it in a format that meets their needs.</p> <p>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>



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6. Use Legislation to Guarantee Long-Term Funding	<p>Measure 6 of the Environmental Assessment required the Project Team to report on options for long-term funding of the Project (i.e., for the funding necessary to safely maintain the remediated site for the long-term). In 2019, the Project Team provided a report on long-term funding as prepared by the company Deloitte LLP. Despite the Project Team's efforts, GMOB is of the view that Measure 6 has not been satisfactorily addressed. Post-remediation budget estimates, governance issues, and confidence in the Deloitte report raised questions and concerns that remain unresolved.</p> <p>For example, the Project Team's initial estimate of \$2.5 million for annual care and maintenance post-remediation lacked specific assumptions and rationale. Cost estimates provided later continue to get higher. This moving cost estimate undermines confidence in other aspects of the Project Team's response to the long-term funding requirement by the Environmental Assessment. The estimates also don't deal with who will be responsible after the mine closure when reclamation work is done. This is a problem because the "who" and the "how" of long-term management of the site will affect not only the cost estimate but also the way the funding is ultimately provided so that it will be stable over the years.</p> <p>The status quo for funding the Project is through applications to the Treasury Board of Canada. Unfortunately, the Deloitte report did not provide an objective analysis of this way of funding the long-term care of the site. For example, while the report evaluated the administrative costs of different long-</p>	<p><b>Directed to: Minister, CIRNAC</b></p> <p>GMOB recommends that the CIRNAC Minister develop legislation to guarantee long-term funding for the Giant Mine remediation and maintenance. Residents need to know that there will be guaranteed funding, independent of changes in government and policy.</p>	<p>The Government of Canada is committed to the protection of human health and safety and the environment. Canada will continue to collaborate with communities, Indigenous partners, the territories, and interested rights-holders and stakeholders to protect Canadians and the environment, and to make sure lands and waters are healthy for future generations. The responsibility for the Giant Mine Remediation Project remains with the Government of Canada (as represented by Crown-Indigenous Relations and Northern Affairs Canada) and the Government of the Northwest Territories (as represented by Environment and Natural Resources) as co-proponents for 100 years, as defined in the Report of Environmental Assessment. This includes responsibility for ensuring the project remains funded. The Giant Mine Remediation Project and consultant Deloitte, with input from rights-holders and stakeholders, completed a final report on options for long-term funding, in response to Measure 6 of the Environmental Assessment. This report was shared with rights-holders and stakeholders and posted to the Giant Mine Remediation Project public SharePoint site on August 7, 2019.</p> <p>The report was intended to inform the development of potential future funding options for consideration by the Government of Canada and Parliament; it was not meant to result in a final decision on the selection of a funding option.</p> <p>Significant progress has been made in some important areas concerning funding since the Environmental Assessment, such as the Environmental Agreement that provides long-term funding into research for alternative solutions for the arsenic trioxide dust. Further, <i>Budget 2019</i> provided \$2.2 billion of long-term funding over 15 years, starting in 2020–2021, for the new Northern Abandoned Mine Reclamation Program. This funding is intended to cover the full implementation cost for the Giant Mine Remediation Project.</p> <p>Future funding for the Giant Mine Remediation Project will be revisited once the remediation is nearing completion and a more accurate estimate of the long-term costs of site management and monitoring can be developed; this is expected approximately ten years from now.</p> <p>Advancing this project is a priority for the Government of Canada. The Northern Contaminated Sites Branch is responsible for securing funding for a portfolio of projects in the North. Within the context of current government funding processes, the Branch is committed</p>

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	<p>term funding models, it did not consider the financial costs associated with the government's existing processes. This and other aspects of the evaluation skewed the selection towards the status quo approach and away from other options that might otherwise be superior.</p> <p>Local residents need to know that changes in the federal government or its policies will not put at risk the health of the land and local people. For this reason, we have recommended that long-term funding be secured through legislation.</p>		<p>to engaging the appropriate Government of Canada officials around options for long-term funding of the Giant Mine Remediation Project.</p> <p>While incoming administrations are not bound by the funding allocations of their predecessors, the environmental liabilities for which the department of Crown–Indigenous and Northern Affairs Canada are responsible have been recognized in the Public Accounts of Canada. This recognition and responsibility would apply to any future administration.</p> <p>The project team acknowledges the continued concern of rights-holders and stakeholders regarding the long-term funding of the project. The Perpetual Care Plan, required under the Environmental Agreement, must “address...long-term access to funds for the Project.” The project team has begun co-developing the Perpetual Care Plan with rights-holders and stakeholders, and will continue to ensure that long-term funding requirements are outlined within this plan.</p>
7. Offsite Legacy Contamination Issues	<p>The issue of off-site arsenic contamination (sometimes called “toxic legacy” from roaster operations) remains unresolved and extends beyond the effects of the Giant Mine. Both Con and Negus mines operated roasters—Con for decades and Negus for a few years—that also contributed to off-site contamination. While the Project is focused on the Giant Mine site itself, off-site contamination cannot be ignored by the Co-Proponents. Limiting attention to the Giant Mine site only is neither responsible nor effective.</p> <p>In the past year, we have seen progress on our previous years’ recommendation (2018-11) on this topic. For example, the GNWT’s Interdepartmental Legacy Contaminants Committee brought in consultants to perform a Human Health Risk Assessment on arsenic impacted areas outside the Giant Mine site. We note that the Committee worked with YKDFN and NSMA to ensure that the off-site risk</p>	<p><b>Directed to: Minister and Deputy Minister, CIRNAC; Minister and Deputy Minister, ENR; City of Yellowknife; YKDFN; NSMA</b></p> <p>As in 2016, 2017 and 2018, GMOB recommends that the federal, territorial, municipal and Indigenous governments work together and finally resolve off-site contamination issues. These issues include public health and environmental concerns, land use planning, safety measures to reduce potential exposure, and other remediation,</p>	<p>The Government of the Northwest Territories (GNWT) and the Government of Canada (NWT Region) 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 has looked at areas where people have cabins, camp and fish (for example, the Ingraham Trail area), and other traditionally-used areas, as identified by local Indigenous communities, within a 25 km radius around Yellowknife and Ndilo. It also included additional sample collection to ensure a comprehensive data set to evaluate exposure pathways. Lab analysis is currently underway, followed by engagement with the communities in fall/winter 2020.</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> <p>In addition, the GNWT is developing a risk communication brochure to better communicate messaging from the GNWT Health Public Health Advisory on land use with respect to arsenic considerations.</p>

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	<p>assessment includes environmental samples from traditional and other commonly used areas.</p> <p>With respect to our updated recommendation, GMOB believes that both the federal and territorial governments are responsible for resolving the off-site toxic legacy. But leaders from the affected communities—Yellowknife, Ndilo , and Dettah—should also be involved in the development of a strategy and action plan to deal with issues that affect public confidence in residents’ health, safety, and quality of life. Community leaders should represent the concerns of their constituencies and more effectively advocate that senior governments resolve the off-site toxic legacy.</p>	<p>management and planning concerns.</p>	
<p>8. Land Use Planning</p>	<p>There is no consensus among the key parties, let alone the general public, regarding what the Giant Mine site should look like after remediation is complete. How should the Giant Mine site be used? Who will make decisions about it? What should the site look like? A land use plan for the area is needed.</p> <p>A land use plan for the area will be linked to long-term care requirements that are meant to be described in the Perpetual Care Plan. These requirements include post-closure governance (i.e., who will be responsible for managing the site after closure) and long-term funding. The process of developing the land use plan and the long-term care plan will require reconciling the different visions for the site and reaching a consensus vision that will provide needed certainty for residents now and into the future.</p>	<p><b>Directed to: Minister and Deputy Minister, CIRNAC; Minister and Deputy Minister, ENR; City of Yellowknife; YKDFN; NSMA</b></p> <p>GMOB recommends that by 2025 the federal, territorial, municipal and Indigenous governments jointly develop and approve a land use plan for the Giant Mine site post-remediation. In addition to addressing post-remediation uses of the site, the land use plan should incorporate related aspects of the long-term care plan.</p>	<p>The project team committed during the Water Licence Public Hearings with the Mackenzie Valley Land and Water Board to work with the City of Yellowknife and participate in a land use planning activity. The project team intends to provide further clarity with respect to the constraints map within the next version of the Closure and Remediation Plan. This will also be submitted to the GNWT Department of Lands.</p> <p>The project’s role in the city’s planning exercise, whether with the city or a larger group, will be to provide information regarding land use constraints based on documentation, research, and analysis available at the time.</p>

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	<p>We understand that, at this time, there does not seem to be a clear process for how such a land use plan could be developed. We encourage the Parties to begin with laying out a feasible process along with their core interests and to integrate this work with discussions on the Perpetual Care Plan.</p>		
<p>9. Greenhouse Gas Emissions</p>	<p>The Government of Canada places great emphasis on reducing and adapting to climate change. Climate change is largely driven by human-caused greenhouse gas emissions resulting from the burning of fossil fuels. The Project uses huge amounts of fuel, especially diesel and gasoline, but has not assessed the greenhouse emissions. The assessment of different options for site remediation have largely ignored the greenhouse gas implications. In the current context including the rapidly warming temperatures in the North—this needs to change.</p> <p>For all future decisions, greenhouse gas emissions should be a key consideration in the evaluation of site remediation options. When practical, the least greenhouse-gas costly options should be chosen. If another option is chosen, the Project should offset those costs through other means. Where possible, renewable energy sources should be used to power operations, for example wind turbines and solar panels, to generate electricity.</p> <p>Finally, the Project Team should undertake a comprehensive baseline audit of Project energy use and greenhouse gas emissions. It should follow this up with annual reports on its emissions, the factors considered when selecting remediation options, and greenhouse gas offsets where those were implemented.</p>	<p><b>Directed to: Project Team</b> GMOB recommends that the Project Team factor into its plans and activities any associated greenhouse gas emissions.</p> <ul style="list-style-type: none"> <li>• Where feasible, the Project Team should choose options that generate the lowest emissions.</li> <li>• Where this is not feasible, the Project Team should investigate and implement greenhouse offsets.</li> <li>• The Project Team should conduct a baseline energy use and greenhouse gas emissions audit. It should annually document and report its greenhouse gas emissions and offsets against the baseline.</li> </ul>	<p>Reducing and adapting to the impacts of climate change is important to the Government of Canada and the Giant Mine Remediation Project.</p> <p>The project notes that the Closure and Reclamation Plan is currently awaiting final approval through the Mackenzie Land and Water Board’s regulatory process, and therefore there are limited opportunities for closure option reviews that would provide a significant reduction of greenhouse gas (GHG) emissions. Further, the project disagrees with the GMOB assertion that options for reducing power requirements and associated emissions were not considered during the selection of remediation options. For example, a passive freeze system was selected partially on the basis that it will require much less power and significantly reduce long-term emissions and maintenance requirements at the Giant Mine site.</p> <p>Going forward, the project is fully committed to looking for opportunities to further reduce its GHG emissions during implementation. The principal source of GHG emissions from the implementation will be through the operation of heavy construction equipment. The use of heavy equipment for earthmoving activities is unavoidable in any remediation or mine closure project, as there are no practical alternatives to carry out the work. Given that heavy construction equipment must be used, the principal tool available to minimize GHG emissions will be to minimize fuel use and reduce haul distances where possible. The project has already committed to the efficient use of borrow materials on site to prevent blasting and hauling more material than required. The project is also looking at the feasibility of alternative energy sources for the water treatment plant, including the utilization of solar energy as a supplemental power source for its operation.</p> <p>To demonstrate the project’s continued commitment to this important goal of reducing GHG emissions, the team is willing to follow the recommendation of GMOB to undertake an audit of project energy use and GHG emissions. It should be noted that current emissions, while the project is still in care and maintenance, cannot be considered a baseline for implementation when the level of activity will significantly increase on site. Further, year-to-year comparisons</p>

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			will not be useful, since the level and nature of remediation activities will change depending on the type of work being carried out each year. However, the project will report annually on project emissions and efforts taken to reduce them wherever possible within the limitations of a remediation project.