

# GIANT MINE Oversight Board



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Giant Mine Remediation Project

Crown-Indigenous Relations and Northern Affairs Canada

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## **Review of Table of Contents for the Status of the Environment Report**

The Giant Mine Oversight Board (GMOB) has completed its review of the draft Table of Contents for the Status of the Environment Report, which you provided on December 21, 2021. I apologize for the slight delay in responding.

As you note, the Status of the Environment Report (the Report) is required pursuant to Article 6 of the Environmental Agreement. Section 6.1 sets out the required elements of the Report. Section 6.3 requires the Co-Proponents provide the report required by section 6.1 seven years after the effective date. Given the delays in preparing the Perpetual Care Plan, GMOB is sensitive to potential delays in meeting the requirements of Article 6.

GMOB's comments on the draft Table of Contents are as follows:

1. A central purpose of the Report is to enable GMOB, the Parties and the broader public to understand the current state of the environment with respect to the Giant Mine Remediation Project, important trends in the chosen indicators over the past seven years, and, importantly, the broader context in which the Report fits. The Report needs to be written in clear and simple terms so that readers of all backgrounds will understand what the state of the environment is at the time of writing, how things have changed over the seven years prior, and expected trends into the future. In this way, readers will not only understand what has happened and why but will be able to anticipate what will happen over the next five years. The Report will provide an important benchmark in that regard. We note that the Report itself cannot be all things to all people, so it will be important that there be linkages in the report to the more detailed sources.
2. Generally speaking, the wider public understanding of the Giant Mine Remediation Project and its effects on the environment is low. Although the Project Team

provides regular reports including monitoring results, much of the technical information provided can be difficult for the general public to access and digest.

To address this challenge, at least in part, GMOB suggests that the Report include a more simplified visual display that would allow readers to easily understand project status and environmental effects. An analogue to this would be a green, yellow, red forest-fire risk sign. GMOB acknowledges that doing so may be complicated and risks over-simplification but is of the view that this can be done if approached carefully.

For example, reporting could be broken down into valued components or indicators, where each valued indicator has its own colour scale (green - good, yellow - keeping an eye, red - there is a problem). For example, the AEMP action levels offer the opportunity to simplify reporting whereby no exceedance of the low action level would be considered green, relatively minor exceedances yellow, and significant exceedances red, with concurrent explanations. A similar approach could be used for any indicator in the Report and could be applied in other cases, including socio-economic reporting.

3. It is critical that appropriate key indicators be established for each element of the Report. This will help to ensure that the Report establishes a baseline for future comparison, enabling easy tracking of trends, excursions, and the effectiveness of adaptive management/mitigation measures. The rationale for selecting each indicator should be clearly described and supported by and linked to the relevant source data.
4. GMOB recommends that Climate Change be a stand-alone chapter in the Report rather than a sub-section of the Water chapter given the importance of tracking greenhouse gas emissions, trends, excursions, and the effectiveness of mitigation measures. In addition, the Government of Canada has placed a high priority on climate change adaptation and mitigation especially for federal programs and projects. Likewise, the subsection "Greenhouse Gas Emissions" should be removed from the Air chapter and included in the Climate Change chapter. As for the other sections, it will be important that the Report identify key indicators, trends, excursions, mitigation measures/adaptive management and the effect of those actions on reducing greenhouse gas emissions. This reporting should be linked to the document prepared by Environment and Climate Change Canada entitled "Strategic Assessment of Climate Change - Technical Guide".
5. The Land chapter does not include a soil subsection. This is a significant oversight that needs to be corrected.
6. GMOB recommends that the Wildlife sub-section be removed from the land chapter and be a stand-alone chapter in the Report. Wildlife is of significant interest to residents of the region and there are dedicated monitoring and reporting requirements under the Wildlife and Wildlife Habitat Management and Monitoring

Plan that could be described here. As in other chapters, key indicators, trends, excursions, mitigation measures and the effectiveness of mitigation measures/adaptive management should be described in the Report.

7. GMOB recommends that a "Lessons Learned" section be included in the report. A clear and frank discussion of how the project has adapted and evolved since taking over the Giant Mine site could be drawn from existing "lessons learned" reports routinely prepared by the Project Team. Importantly, this would demonstrate how the Project Team has improved its operations over time. The Project Team should consider extending the time frame for this aspect of the Report to 2004 to ensure that all the lessons of the care and maintenance period and the first years of the active remediation stage are captured.
8. The 'Where Do We Go from Here' chapter should set out a solid roadmap describing what is expected over the remediation period before the next report. As noted above, careful selection of appropriate indicators will enable easy tracking of trends, excursions, and the effectiveness of adaptive management measures taken to mitigate negative effects or enhance positive ones.

I hope the Project Team finds the above comments helpful. GLOB is prepared to meet with the Project Team to discuss its recommendations at a mutually convenient time. If you have any questions in the meantime, please feel free to contact me through the GLOB office.

Sincerely,



David Livingstone  
Chair, Giant Mine Oversight Board

cc. Parties to the Environmental Agreement