



**GIANT MINE  
Oversight Board**

Box 1602 . 5014-50th Avenue . Yellowknife, NT X1A 2P2  
**Phone** 867.675.0788 . **Fax** 867.675.0789 . **Web** [www.gmob.ca](http://www.gmob.ca)

**Ms. Natalie Plato**

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

March 17, 2023

**Review of 2021-22 Annual Report Giant Mine Remediation Project**

The Giant Mine Oversight Board (GMOB) has completed the review of the 2021-22 Annual Report of the Giant Mine Remediation Project (GMRP). The final report was received by GMOB on December 12, 2022 with a corrected version received on December 20, 2022. Please find attached the table of our comments.

The document was reviewed by GMOB against the requirements set out in Sections 5.1 and 5.2 of the Giant Mine Remediation Project Environmental Agreement. Additionally, we have provided comments on the content and format of the document.

It is important to note that our review is focused on the report itself and does not include an assessment of the overall progress of the Project.

If you have any questions in this regard, please contact me through the GMOB office.

Sincerely,



David Livingstone  
Chair, Giant Mine Oversight Board

cc. Parties to the Environmental Agreement

<u>PAGE</u>	<u>TOPIC</u>	<u>COMMENT</u>	<u>RECOMMENDATION</u>
14	<b>PROGRESS IN 2021-2022 &amp; PLANS FOR 2022-23 Design and Remediation Table - Waste Disposal and Management: Section 3.1</b>	As noted in last years review comments, "advance" is not a precise term. The word has several interpretations and may not provide full insight into the status of the initiative. Consider using "started", "continued", "partially completed" or other descriptors that have a more definite interpretation. <b>Note:</b> there are instances where terms are used in the report that should be adjusted to make the meaning clearer.	GMOB recommends the GMRP consider ways to make the language clearer and increase the specificity of the terminology.
22	<b>1.0 Project Overview</b>	There is <b>no</b> mention in this section of the potential economic opportunities that the Project provides and that one of the Projects' goals is to maximize Northern and Indigenous employment opportunities.	GMOB recommends that the GMRP include "economic opportunities" and the "maximization of Northern and Indigenous employment opportunities" as part of the Objectives and Outcomes of the Project Overview.
29	<b>3.1.3 Remedial Strategy for Contaminated Soil and Sediment and 3.2 Freeze Designs</b>	What is the difference between "detailed design" and "substantive design" from a project engineering point of view? The difference needs to be clearly defined as it is confusing.	GMOB recommends the GMRP clarify the difference between the terms "detailed design" and "substantive design".
30	<b>3.3.3 Site-Specific Passive Treatment System. Next steps</b>	If wetland plants (presumably) accumulate metals (As, Sb, Cu, Pb etc.) and thereby reduce the concentrations in the water, do the plants need to be harvested and disposed periodically to remove the contaminants from the environment?	GMOB recommends the GMRP explain how passive treatment and the management of it remove metals of concern from the environment?

35	<b>Section 4.1.1.1 - Infrastructure Review, Terminology</b>	The second paragraph references a "structural review" of buildings on the site. The third paragraph refers to a "Building Assessment" on all remaining buildings. GMOB assumes this refers to the same type of assessment, but it is unclear. For clarity and to improve the understanding of what work is being done year over year, the same terminology should be used to describe project activity.	GMOB recommends the GMRP use consistent terminology to describe work activities.
35	<b>Section 4.1.1.1 - Infrastructure Review, Classified Buildings</b>	The opening portion of the paragraph refers to an assessment conducted on 68 buildings, but then provides a further breakdown of yellow, green and red classifications for 63 buildings. There are 5 building assessments not included in this breakdown.	GMOB recommends the GMRP confirm the number of assessments that were conducted.
39	<b>4.3 SUMMARY OF FISCAL YEAR 2021-2022 EXPENDITURES Table 2 Planned Versus Actual Expenditures</b>	Under Category in Table 2, does Consultation refer to Crown requirements for Indigenous consultation, or is this a broad category that includes all engagement, meetings, and communications with Indigenous, Metis, and the broader spectrum of Yellowknife residents?	GMOB recommends the GMRP define what broadly is covered by the term 'Consultation' as it refers to the expenditure. This could be a footnote for all of the terms used in Table 2.
41	<b>Spills and Environmental Training</b>	There is no definition of what a reportable spill is. This should be clearly defined.	GMOB recommends the GMRP define what a reportable spill is.

<b>43</b>	<b>Section 5.2.3 - GHG Emissions Reporting Period</b>	The report presents very precise numbers for calculations that are mostly model estimates or CO2 equivalent calculations based on average emissions from fuel use. Would rounding to two significant figures provide the level of comparative reporting that is generally needed? i.e. 2.2M kg CO2e and 2.7M kg CO2e	GMOB recommends the GMRP review and update the calculation if appropriate.
<b>43</b>	<b>Section 5.2.3 - GHG Emissions Reporting Period</b>	The third paragraph indicates: "The indirect emissions emitted on site in 2021-22 (April 2012 to March 2022) were...." GMOB suspects the date range should be April <u>2021</u> to March 2022.	GMOB recommends the GMRP review and update the date range if appropriate.
<b>44</b>	<b>Footnote</b>	The footnote on Page 44 is the same as, and relates to, the discussion on Page 43. The footnote on Page 44 should be removed.	GMOB recommends the GMRP make the editorial correction.
<b>47</b>	<b>Table 4: Annual Water Quality Monitoring 2021-2022: Groundwater</b>	GMOB notes this as a positive approach to groundwater sampling and confirming hydrogeologic information as it will keep the hydrogeologic models updated.	GMOB recommends the GMRP continue to develop positive and proactive approaches to reporting on monitoring, as is evident in this case.
<b>66</b>	<b>Key Stakeholder Concerns: Dust Management</b>	GMOB notes that the Dust Communication Strategy is a positive reaction to concerns raised by the rights holders and stakeholder over the management of dust issues on the site.	GMOB recommends the GMRP continue to develop positive and proactive approaches to community concerns, as is evident in this case.
<b>66</b>	<b>Key Stakeholder Concerns: Arsenic</b>	GMOB notes that the Arsenic 101 Workshop in Dettah was well run and received.	GMOB recommends the GMRP continue to develop positive and proactive approaches to educate and inform the community, as is evident in this case.

73	<b>Modify Procurement Tools to maximize local and Indigenous participation</b>	GMOB notes an error in the following Invitation Tender: \$25,000-\$99,000 to \$100,00-\$1,000,000. It is presumed to read - \$100,000-\$1,000,000	GMOB recommends the GMRP make the editorial correction.
74	<b>2021-22 Employment Results and Results Compared to Target Ranges</b>	GMOB notes that Employee Type reporting does not include on separate lines those who are employed by the Project Team (CIRNAC and GNWT) or Parson (MCM). In line with other major developments in the North, projects are expected to report on their staff numbers and differentiate between a Yellowknife office and non-NWT staff.	GMOB recommends that the GMRP and the MCM report separately their own employment associated with the Project and that these be defined also between a Yellowknife office and non-NWT staff.
74	<b>Table 8. Total Number of Persons and Total Person Hours and target ranges (Parsons + CIRNAC and their contractors) for 2021-22, by Category</b>	<p>GMOB notes that the explanation of employment results remains confusing. The information is all there, but so many statistics are being reported together.</p> <ul style="list-style-type: none"> <li>- For example, it is not clear in Table 8 whether IOC employees is a subset of Northern Indigenous.</li> <li>- By excluding southern employees as a line item under total from these tables, the numbers never add up and therefore it is difficult to understand.</li> <li>- Total # of persons can be very misleading on its own. Some persons contribute no more than a few hours to the Project. They are important to report, but context is needed.</li> </ul>	GMOB recommends that the GMRP rework the reporting of the "Total Number of Persons and Total Person Hours and target ranges (Parsons + CIRNAC and their contractors) by Category" so that there is no confusion about the reported data.

77	<b>Table 11: Employment - total number of persons and person-hours, by Northern sub-category (Parsons and their contractors), in 2021-22</b>	GMOB notes that the Total Employment 2021-22 Data reads 33. GMOB is assuming that this is incorrect.	GMOB recommends the GMRP review the data in Table 11 and make any required corrections.
77	<b>Data Availability</b>	The second paragraph ends with the statement "...although the Project is hopeful that CIRNAC information will be available in the future." This is an unusual statement, is there a reason why CIRNAC would not be able to provide this data?	GMOB recommends that the GMRP provide the socio-economic data required to effectively track project performance.
78	<b>Table 12: NWT Resident status (total # and %) (Parsons and their contractors only) in 2021-22 and Table 13. Number of employers and skill level by category in 2021-22 (Parsons and its contractors).</b>	GMOB notes that the results in these two tables should be compared to the results in Table 9. I. It is also noted that the stated '319 individuals in each category' cannot be found in either Table 9 or 13. Is there a difference between NWT Resident and Northern?	GMOB recommends the GMRP review the data in all Tables and make any required corrections and ensure that they can be cross-referenced clearly.
79	<b>Table 14. Total Number of Suppliers and Total Value of Contracts (Combined Parsons + CIRNAC and its contractors), in 2021-22, by Category</b>	Does this Table include contracts to engineering and environmental consulting firms? i.e., AECOM, WSP(Golder), etc.?	GMOB recommends the GMRP define what broadly is covered by the term 'Suppliers' as it refers to the expenditure.
81	<b>Table 16: Total Number of Suppliers and Total Value of Contracts (CIRNAC contractors), in 2021-22, byCategory</b>	GMOB notes that the Total Spent in Table 16 is less than some of the sub-categories. As a result, the data is incorrect in this Table.	GMOB recommends the GMRP review the data in Table 16 and adjust accordingly.

82	<b>7.2.2.2. Major Procurements</b>	GMOB asks, what are the values of contracts awarded to professional consulting companies? E.g., AECOM, WSP, etc., and is there a statistic of the number of staff who reside in or out of the NWT?	GMOB recommends the GMRP report specifically on contracts awarded to professional consulting companies and that these include a tracking of the number of staff who reside in or out of the NWT.
83	<b>7.2.2.3. Additional Procurement Key Performance Indicators: Table 18: Procurement accounted for by Northern Indigenous and Northern Non-Indigenous suppliers (Total number, \$ spent and % of total value spent) (Parsons + CIRNAC) for 2021-22</b>	GMOB notes that IOC deductions issued for not meeting IOC commitments, are specified in contracts. However, it seems to be an open "secret" that companies simply add the penalty percentage to their overhead in a bid, so the deduction is not a disincentive. The concern is that these bonuses or deductions are insignificant in terms of the overall expenditure. Does the Project track these bonus and deduction trends and report on them?	GMOB recommends the GMRP review and report on the trends in contracting regarding IOC commitments.
84	<b>Next Steps: Employment and Procurement: Employment: Enhance apprenticeship / trainee uptake</b>	GMOB notes that the Project target is only 1 apprenticeship per year. Could there be more uptake if there was an increase in apprenticeship opportunities, whether through Parsons, CIRNAC, or any of the procurement companies?	GMOB recommends the GMRP review and adjust its apprenticeship/trainee uptake.
87	<b>2021-22 Training Results</b>	GMOB notes that including mandatory training may account for most of the upward trend in training stats. Also, the Dechinta Nawo program will elevate the stats for Indigenous employees if that is included in Indigenous	GMOB recommends the GMRP review, adjust and account for training statistics as they apply to all aspects of the Project.

		training. Do these statistics account for career training by the MCM or the Contractors?	
91	<b>7.2.4 Social &amp; Cross-cutting Actions and Deliverables</b>	GMOB notes that this section can be strengthened especially when accounting for potential negative social issues. Currently its focus is on increasing Indigenous opportunities and addressing equity. There is only one reference under next steps to continue to build relations with service providers.	GMOB recommends the GMRP review, adjust and account for the range of social impacts and begin to monitor and report on these for subsequent Annual Reports.
102	<b>GMOB Report Recommendations - MW00-02 is an operational monitoring program(OMP) shallow groundwater well. As such, it is monitored internally to the GMRP. However, follow-up on this evaluation will be included in the 2021 report to GMOB.</b>	GMOB notes that the response to previous GMOB comment on evaluation of a hydraulic head increase and arsenic fluctuation in MW00-02 indicated that the results of the evaluation would be included in the 2021 report to GMOB. There was no update provided in the 2021-2022 Annual Report.	GMOB requests that the GMRP provide an update on the evaluation of MW00-02.
102	<b>GMOB Report Recommendations - The training stats in categories could be correlated with job retention and other measures, etc. Mandatory training is now included as part of the overall training statistics, but it is not clear that this type of training leads to the desired long-term goals - e.g. retention, career development, etc.</b>	GMOB notes that this Annual report from the GMRP does not offer any further breakdown or information on measures such as job retention or career development; improvement in these areas is a desired long-term goal.	GMOB recommends the GMRP review, adjust and account for training, job retention and other measure statistics as they apply to all aspects of the Project.



110	<b>Risk Profile Summary</b>	GMOB notes that under Number of Risks by Status it is not clear what Total Issues 3 specifically refers to. This should be upfront in the Annual Report and not included as part of a summary under a separate cover.	GMOB recommends the GMRP clarify what each of the total risk issues are for subsequent Annual Reports.
111	<b>Figure 16: Active Risks by Level</b>	GMOB notes that the "Activity Risk Type Distribution" identifies 89 legacy and 21 activity risks, which total 110. Information elsewhere in the section suggests that the total sum is 112.	GMOB recommends the GMRP confirm the data in this section.
121	<b>Appendix D Table 24: Giant Mine Environmental Assessment Suggestions Tracking Table (as of April 2022) Suggestion #2</b>	GMOB notes that the EA process is completed but recommends that this initiative should also include Con and Negus Mines which, with Giant Mine, contributed to historic contamination impacts on Indigenous communities and the environment.	GMOB recommends the GMRP include Con and Negus Mines in this initiative and engage on this with affected parties prior to finalizing the details of a monument and communicate this decision to the public.
130	<b>APPENDIX G – PLAIN LANGUAGE SUMMARY</b>	GMOB notes that the Plain Language Summary is for the most part well done and asks if this would it be worth while having as a stand-alone document for the public? As is, the Summary is lost as an Appendix in this Annual Report. GMOB does note that there is no mention of social impact issues in the Summary.	GMOB recommends the GMRP consider ways to use the Plain Language Summary as a possible communication tool and consider translation of this into the local Indigenous language. GMOB also recommends that the Summary include social impact issues.
139	<b>Summary Table</b>	The reported Gap for "Employment Accounted by Northerners" is 9 to 24%; it is assumed that this should read 24-39%.	GMOB recommends the GMRP review the data in this table.