

Giant Mine Remediation Project Responses to Recommendations from Giant Mine Oversight Board on the GMRP 2021-22 Annual Report

Page	Topic	GMOB Comment¹	GMOB Recommendation¹	GMRP Team Response
14	PROGRESS IN 2021-2022 & PLANS FOR 2022-23 Design and Remediation Table - Waste Disposal and Management: Section 3.1	As noted in last year's 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. Note: 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.	The GMRP is appreciative of the suggestion to make the language clearer to readers and will look to make terminology changes in subsequent Annual Reports.
22	1.0 Project Overview	There is no 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.	<p>The objectives GMOB has listed come from the socio-economic plan/strategy and are not for the Project as a whole. GMRP does not intend to provide an exhaustive list of all objectives within the Project.</p> <p>However, upon review, the GMRP discovered some discrepancies that will be addressed in future reports. The objectives listed in the Annual Report were originally drawn from the DAR, where they are termed 'objectives', however, in the CRP the same objectives are listed as goals in the CRP. The GMRP recognizes objectives as being the individual or smaller actions that the GMRP takes to achieve a goal, therefore, the GMRP will update the terminology to reflect what is found in the CRP and change the term 'objectives' to 'goals' in future reports.</p> <p>The goals of the GMRP are as follows:</p> <ul style="list-style-type: none"> • Minimize public and worker health and safety risks; • Minimize the release of contaminants from the Site to the surrounding environment; • Remediate the Site in a manner that instills public confidence; and • Implement an approach that is cost-effective and robust over the long-term.
29	3.1.3 Remedial Strategy for Contaminated Soil and Sediment and 3.2 Freeze Designs	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".	<p>The GMRP is appreciative of the suggestion to make the language clearer to readers and will look to make terminology changes in subsequent Annual Reports.</p> <p>Substantive design is a term used by the GMRP to indicate the level of design required to develop the cost estimate for the remediation activities. The cost estimate was required to receive GMRP's project, expenditure, and contracting authorities from the Treasury Board. The purpose of this level of design is to adapt the conceptual design to the specific site. It is based on field investigations and confirms feasibility of conceptual</p>

¹ This text is taken directly from the GMOB Review of the 2021-22 Giant Mine Remediation Project Annual Report

				<p>designs. Substantive design provides sufficient detail for the development of the Project Implementation Plan and to gain regulatory approval.</p> <p>Detailed design is a term used by the GMRP to refer to the level of detail required to procure each Construction Work Package. This design level is based on more detailed analysis of design elements and site features and results in contract specifications.</p>
30	3.3.3 Site-Specific Passive Treatment System. Next steps	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?	The GMRP does not currently have details associated with the likely maintenance of a potential passive or semi-passive treatment wetland. However, the GMRP commits to updating GMOB when further information becomes available.
35	Section 4.1.1.1 - Infrastructure Review, Terminology	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.	The GMRP will use consistent terminology in future reports for clarity and to improve the understanding of work completed throughout the life of the project.
35	Section 4.1.1.1 - Infrastructure Review, Classified Buildings	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.	<p>The report lists the following structures as not having been assessed because they were slated for demolition as part of the Townsite demolition work (in the following 2 years):</p> <ul style="list-style-type: none"> • 059 New Diesel Plant • 144 Planar Shop • 155 Main Office and Extension • 1087 Shed • 128 Pipe Rack
39	4.3 SUMMARY OF FISCAL YEAR 2021-2022 EXPENDITURES Table 2 Planned Versus Actual Expenditures	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.	The GMRP appreciates that the term could be defined more clearly and will do so in future reports. The amount cited includes funding to Alternatives North, the City of Yellowknife and Indigenous partners. Moving forward, the heading will be adjusted to "Engagement and Consultation", and Table 2 will include footnotes to describe terms.
41	Spills and Environmental Training	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.	Reportable spills are defined by the GNWT based on substance and reportable quantity. Additional information can be found at the following GNWT link: https://www.ecc.gov.nt.ca/en/services/report-spill . Future reports will more clearly reference what constitutes a reportable spill.

43	Section 5.2.3 - GHG Emissions Reporting Period	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.	The GMRP does not consider a revision of the calculation necessary but will report the GHG calculations rounded to two significant digits moving forward.
43	Section 5.2.3 – GHG Emissions Reporting Period	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 2021 to March 2022.	GMOB recommends the GMRP review and update the date range if appropriate.	The GMRP is appreciative of GMOB’s attention to detail in their review and will work to avoid these errors in future reports.
44	Footnote	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.	The GMRP is appreciative of GMOB’s attention to detail in their review and will work to avoid these errors in future reports.
47	Table 4: Annual Water Quality Monitoring 2021-2022: Groundwater	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.	The GMRP thanks GMOB for the feedback and recommendation.
66	Key Stakeholder Concerns: Dust Management	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.	The GMRP thanks GMOB for the feedback and recommendation.
66	Key Stakeholder Concerns: Arsenic	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.	The GMRP thanks GMOB for the feedback and continued support with regards to risk communication initiatives. The GMRP is open to exploring any suggestions from GMOB to other ways to share information.
73	Modify Procurement Tools to maximize local and Indigenous participation	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.	An updated version of the designed document was provided on April 21, 2023, to address this error among other additional data errors. An additional 0 was added to indicate \$100,000.
74	2021-22 Employment Results and Results	GMOB notes that Employee Type reporting does not include on separate lines those who are employed by the Project Team (CIRNAC	GMOB recommends that the GMRP and the MCM report separately their own	Parsons already reports on staff that work on this Project and this is identified in the “Parsons and its subcontractors” category in the report.

	Compared to Target Ranges	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.	employment associated with the Project and that these be defined also between a Yellowknife office and non-NWT staff.	The Project team does not currently have an internal mechanism to track its own employees but will consider using one once Matilda has been established. Matilda is an online portal that will be the Project's internal repository for socio-economic statistics and contracting information. It is currently being developed in two phases: (1) contracting and (2) socio-economic statistics. While the timeline for phase 1 is to-be-determined, phase 2 is estimated to be completed by the end of 2023-2024 fiscal year.
74	Table 8. Total Number of Persons and Total Person Hours and target ranges (Parsons + CIRNAC and their contractors) for 2021-22, by Category	GMOB notes that the explanation of employment results remains confusing. The information is all there, but so many statistics are being reported together. - For example, it is not clear in Table 8 whether IOC employees is a subset of Northern Indigenous. - 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. - 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.	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.	The Project team will attempt to simplify the reporting by clearly identifying which categories are sub-sets and which are primary in future reports. As for the examples GMOB has highlighted, please see the explanations below: <ul style="list-style-type: none"> Indigenous Opportunity Considerations (IOC) is a subset of Northern Indigenous since Northern Indigenous incorporates all three Territories and IOC is a geographic area around the Great Slave Lake within the Northwest Territory. Table 8 does not exclude Southern employees as a separate line item; it only notes that Southern Indigenous and Northern Indigenous persons constitute the general Indigenous category – due to this being a federal project and its mandate spanning across Canada. The Project team does track how many Southern employees are working for this Project, as this is a mandatory indicator that the GMRP is required to track. The GMRP agrees that the total number of persons can be misleading without context, which is why the Project team reports on person hours in addition to number of persons for all categories. Additionally, Project targets are based on person hours and not number of people.
77	Table 11: Employment - total number of persons and person-hours, by Northern sub-category (Parsons and their contractors), in 2021-22	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.	An updated version of the designed document was provided on April 21, 2023, to address this error among other additional data errors. The total Northern employment are now reported as the following: <ul style="list-style-type: none"> Total # of persons: 638 Total Northern person hours: 258,830
77	Data Availability	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.	While the same template is provided to both Parsons and CIRNAC contractors at the same time, whenever changes are made to it (example being the addition of NWT residential status), CIRNAC contractors continued to use the original template that dates back to 2018. Efforts have been made to request the use of the updated version (the same that Parsons uses), but there have been concerns brought forward from the contractors regarding individuals' privacy. The Project team continues to work with CIRNAC contractors to try to mitigate the issue without impacting the quality of data.

78	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).	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.	The Project team agrees that overall changes need to be made on the number of tables and how they are reported, including noting sub-sets. Changes will be made in future reports. Northern incorporates all three Territories; NWT resident is only exclusive to the Northwest Territories.
79	Table 14. Total Number of Suppliers and Total Value of Contracts (Combined Parsons + CIRNAC and its contractors), in 2021-22, by Category	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.	Table 14 does include contracts for the engineering and consulting firms. Those firms are further reported on in Table 16 under the "Southern suppliers" category. The definition of a "Supplier" is: any business that provides goods and services. Table 2 provides a further breakdown of the different types of expenditures.
81	Table 16: Total Number of Suppliers and Total Value of Contracts (CIRNAC contractors), in 2021-22, by Category	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.	An updated version of the designed document was provided on April 21, 2023, to address this error among other additional data errors. The error is in the "Northern suppliers" category. The following changes have been made in the updated report: <ul style="list-style-type: none"> • \$ value is now correctly reports as \$1,368,232.30 • % of total \$ spent is now correctly reported as 7%.
82	7.2.2.2. Major Procurements	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.	The Project reports on the total spent on professional services under the "CIRNAC contractors" category. In the recently announced Project cost estimate, the total estimate for the life of the Project for these services is also included. As previously noted, the NWT resident category is being asked of those contractors but is not yet being consistently reported on due to privacy concerns. The Project team continues to work with those contractors to mitigate the gap without impacting quality of data.
83	7.2.2.3. Additional Procurement Key Performance Indicators: Table 18: Procurement accounted for by Northern Indigenous and Northern Non-	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	GMOB recommends the GMRP review and report on the trends in contracting regarding IOC commitments.	The 2021 – 2022 fiscal year was the first time the Project reported on bonuses and penalties issued. The Project team is committed to continuing to report on these amounts.

	Indigenous suppliers (Total number, \$ spent and % of total value spent) (Parsons + CIRNAC) for 2021-22	expenditure. Does the Project track these bonus and deduction trends and report on them?		
84	Next Steps: Employment and Procurement: Employment: Enhance apprenticeship / trainee uptake	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.	The Project's target for apprentices is 1 apprentice at minimum. The Project team continues to work with GNWT's department of Employment, Culture and Education and training institutions to stay current on the availability of apprentices in the Territory. Parsons continues to review the most current information available and make calculated recommendations on the inclusion of apprentices in upcoming contracts. This is the method in which Parsons approaches every contract.
87	2021-22 Training Results	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 training. Do these statistics account for career training by the MCM or the Contractors?	GMOB recommends the GMRP review, adjust and account for training statistics as they apply to all aspects of the Project.	The significant contributor to the upward trend in Northern and Indigenous training is due to the inclusion of Dechita Nawo in the training statistics and this is noted in the report on page 69. The statistics relating to career training are reported in the overall training hours. As noted on page 87, in the past the Project team excluded mandatory training but added it in 2019 – 2020 report and onwards. The Project team will consider making the distinction between mandatory and other training in future reports.
91	7.2.4 Social & Cross-cutting Actions and Deliverables	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.	The GMRP has updated its SE Strategy with additional activity areas relating to social impacts. Future reports will reflect efforts being made to enhance this section.
102	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.	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.	At shallow groundwater well MW00-02, located near the Northwest Pond, water levels increased from 2018 to 2020 in conjunction with a corresponding increase in water levels in the Northwest Pond. In 2022, water levels decreased in MW00-02 despite high water levels in the Northwest Pond. The cause of the changing water levels in MW00-02 between 2017 and 2022 is unclear but may be a combination of site factors (water levels in the Northwest Pond) and climate (2021 and 2022 were relative dry years).

102	<p>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.</p>	<p>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.</p>	<p>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.</p>	<p>Each year, the Project team reviews what data is being tracked on via its Key Performance Indicators and how this data is being reported on to maintain trends and quality.</p> <p>Unlike a typical private sector mine-site, the Project does not employ those working on the site, as they are employed by individual contractors. Therefore, tracking and reporting on individual career development and job retention is not feasible. If GMOB has suggestions on how this can be achieved, please provide them to the GMRP.</p>
110	<p>Risk Profile Summary</p>	<p>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.</p>	<p>GMOB recommends the GMRP clarify what each of the total risk issues are for subsequent Annual Reports.</p>	<p>The GMRP's risk register is an internal document used to identify and mitigate risks on the site. As the Annual Report is intended to be a high-level overview, the GMRP does not feel it's appropriate to go into further detail on the risk section. However, the GMRP also understands that further clarification could be beneficial to GMOB and will consider how this could be included in future reports. Issues are those risks that have been realized or occurred, and sometimes remain in the register and tracked to ensure mitigation is acceptable, in the same way other risks are tracked. In general, however, risk registers are not designed to reflect or enable the management of issues.</p>
111	<p>Figure 16: Active Risks by Level</p>	<p>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.</p>	<p>GMOB recommends the GMRP confirm the data in this section.</p>	<p>In the breakdown the register typically creates a report on the legacy and activity risks which excludes any risks that have been designated as "issues".</p> <p>In this case, the total sum should have been listed as 113 (not 112) with the breakdown as follows:</p> <ul style="list-style-type: none"> • 89 legacy risks; • 21 activity risks; and • 3 issues <p>As noted in previous responses, this is meant to be a high-level overview and not a detailed accounting of the Project's risk register.</p>
121	<p>Appendix D Table 24: Giant Mine Environmental Assessment Suggestions Tracking Table (as of April 2022) Suggestion #2</p>	<p>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.</p>	<p>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.</p>	<p>The GMRP will engage with parties affected by Giant Mine on the details of the monument, or other perpetual care considerations and communications and support them in the inclusion of other information if requested.</p>

130	APPENDIX G – PLAIN LANGUAGE SUMMARY	GMOB notes that the Plain Language Summary is for the most part well done and asks if this would it be worthwhile having as a standalone 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.	<p>The GMRP appreciates that the Plain Language Summary may be less effective as an Appendix. The Project is open to moving the PLS to the beginning of future reports, but not as a stand-alone document. The GMRP believes that there is merit in having it remain as part of the report to reduce the chance for it to be disconnected from the main report (e.g., lost or not having the data that justifies some activities on site).</p> <p>The purpose of the Plain Language Summary is to summarize the content of the report, and the report does not address social impact issues. Therefore, GMRP does not agree that social impact issues should be included in the Plain Language Summary.</p>
139	Summary Table	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.	An updated version of the designed document was provided on April 21, 2023, to address this error among other additional data errors.