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Environmental Protection and Waste Management Division

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GMOB Review of proposed updates to the GNWT Environmental Guideline for Contaminated Sites Remediation

The Giant Mine Oversight Board has reviewed the proposed updates to the Environmental Guideline for Contaminated Sites Remediation. The Board understands that these amendments are to reflect the GNWT's expanded scope of responsibility post devolution, includes current methodologies for contaminated site remediation, and updated remediation criteria for certain parameters. However, as it concerns the Giant Mine site which currently is at the beginning of its remediation stage and will remain a liability to be monitored under a perpetual care plan, there are a number of important questions to be considered.

- 1. What was the basis for revising the remediation soil quality guideline for arsenic in the Yellowknife area?
- 2. What are the implications of the lower numbers in terms of reducing risks to human and ecological health?
- 3. Will proponents be required to apply these new criteria to future land use planning and development of remediated lands completed under the current criteria?
- 4. Would renewal of a Water Licence automatically trigger the application of the new Guidelines?

5. Specific to the Giant Mine Site, which standards will be applied by the GNWT as a potential landowner when it comes to future land uses (residential or industrial) and perpetual care planning and implementation?

GMOB thanks you for the opportunity to comments on the draft guidelines and looks forward to your response to our questions in this regard.

Sincerely,

David Livingstone

Chair, Giant Mine Oversight Board