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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 and submitted comments to the Environmental Protection and Waste Management Division of the GNWT Department of Environment and Climate Change.

The Board understands that these amendments are to reflect the GNWT's expanded scope of responsibility post-devolution and includes current methodologies for contaminated site remediation and updated remediation criteria for certain parameters. After reviewing the amendments, the Board identified questions and concerns regarding the application of the updated criteria to the Giant Mine site, particularly with respect to arsenic contamination, both currently and into the future. These questions are set out below.

1. It seems to the Board that there would be advantages to the GMRP if the Project Team were to adopt and apply the new Guidelines. Among these benefits would be strengthened public confidence and the avoidance of potential issues with future Water Licence renewal and competing standards of remediation on the

site. What would be the implications for project schedule and cost if the new guidelines values were adopted and implemented during the current remediation program?

2. Presumably, the new guidelines have been developed in whole or in part to reduce risks to human and ecological health posed by arsenic contamination. Has the Project Team assessed the affect on human and ecological risk of adopting the new standards? Are there implications of the proposed guidelines for future residential areas, recreational uses, and remediation of areas currently not slated for remediation?
3. As potential future landowners of the Giant Mine site, how will the GNWT and the City of Yellowknife apply these new criteria to future land use planning and development of remediated lands?
4. Does the Project Team anticipate that the renewal of the current Water Licence will trigger application of the new Guidelines and if so, how does it plan to deal with that situation (refer to Point 1, above)?

The Board looks forward to your response to the questions and is available for in-person discussions, as appropriate.

Regards,

A handwritten signature in blue ink that reads "D Livingstone". The signature is written in a cursive, flowing style.

David Livingstone
Chair

cc. Parties to the Environmental Agreement