



Giant Mine Remediation Project
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David Livingstone
Chair, Giant Mine Oversight Board
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Dear Mr. Livingstone:

Thank you for sending us the report *Giant Mine Remediation Project – Procurement and Contracting Northern Contractor’s Experiences and Perspectives: Interviews Summary Findings Report*, formally shared with the Project on October 9, 2023. The Giant Mine Remediation Project (GMRP) appreciates GMOB’s interests and recommendations in this area. We have structured our responses around the report’s recommendations.

Recommendation #1: Re-introduce an annual GMRP Procurement Day Re-introduce (from earlies [sic] days of the GMRP) an annual *GMRP Procurement Day* focusing on contracting opportunities (and more hands-on ‘training’ in the procurement process and tender bids process) with particular emphasis on planned/scheduled tenders in the next 1 to 3 years. This should be done at as detailed level as possible regarding what good and services (*and at what quantities and specifications criteria*) are anticipated to align with the GMRP phases. This type of event would enable additional connections for Northern firms to assess opportunities and decide if they want to position themselves (e.g., strengthen capacity, expertise, equipment etc.). This needs to be in the context of the de-bundling of contract concern noted above.

Response #1: GMRP hosted its first Industry Day in February 2016, followed by the second Industry Day in November 2018. The project made the decision to not hold Industry Day in 2019 due to an insufficient number of contracts that were ready to be presented to the public. However, since 2020 we have successfully held an annual Industry Day event that addresses the aforementioned information. Except for the virtual event held in 2020, due to the public advisories, these are in-person events held in Yellowknife that emphasize the planned and scheduled tenders over the near and longer term. The project will continue this practice of annual Industry Days until all of the construction work has been tendered.

Recommendation #2: Need for an increased role of the GNWT: The GNWT has not been adequately engaged and involved regarding promoting procurement opportunities for Northern companies from the GMRP. The contractor stated that there were challenges with more directly and intentionally Northern companies who are listed under the BIP Registry, but no additional



company information is accessible beyond broad business category (potentially due to privacy constraints). An example of potential options to address these types of limitations is to examine the federal government's on-line **Indigenous Business Registry** (IBR) as part of its *Procurement Strategy for Indigenous Business* (PSIB).

The **GNWT's BIP Registry** web link is: <https://www.iti.gov.nt.ca/en/services/businessincentive-program-bip/search-bip-registry?page=1>. Consideration needs to be given how the GNWT can facilitate bringing together 'buyers' (GMRP) and 'sellers' (Northern firms) by developing and participating in dedicated mechanisms (e.g., GMRP Procurement Day, web portal, advocacy via NWT chambers' of commerce).

Response #2: The GNWT is a co-proponent of the Giant Mine Remediation Project and is represented by the department of Environment and Climate Change (ECC). One of ECC's responsibilities as co-proponent is to be involved in socio-economic aspects of the Project. In addition to the internal participation, the GNWT is also involved in the Project's external socio-economic committees that are both working-level and senior (the Socio-Economic Working Group and Socio-Economic Advisory Body, respectively). Specifically, the following GNWT departments are part of these committees: Industry, Tourism and Investment and Education, Culture and Employment. In addition, though Health and Social Services is not part of either of the standing committees, the Project engages the department on as-needed basis.

Additional response from GNWT to #2: Regarding the recommendations and considerations for the BIP Registry, Industry Tourism and Investment notes that BIP staff would be interested to learn and discuss what specific information GMOB is requesting be listed on the registry that is not already listed there. Please reach out to ITI to further discuss this.

Recommendation #3: Process for joint ventures between Indigenous and Northern enterprises: Jointly with Indigenous companies, Northern contractors, GNWT and the GoC (and potentially the MCM) explore options for creating a process(es) that could encourage and support joint ventures between *Northern and Indigenous enterprises*, above and beyond joint ventures between southern companies and Indigenous groups.

Response #3: In the 2023/24 fiscal year, the Project team made an adjustment to the existing Federal Procurement Strategy for Indigenous Business (PSIB) by further focusing it on a geographic area in the North Slave Region; this is referred to as Area of the Contract (AOC) and is shown in Figure 1. This area is comprised of Tłı̨chų's land claim area called Mq̄whì Gogha Dè Nı̨tlèè and the Akaitcho Asserted Territory. This adjustment allows, if capacity permits, for the MCM to limit a contracting opportunity to Indigenous businesses located in the AOC – these contracts are allocated under a Regional PSIB procurement method. The decision for the adjustment was driven to further encourage participation amongst businesses located within close proximity to the Giant Mine site, including Northern Indigenous and Northern Non-Indigenous businesses. In terms of supporting joint ventures, the MCM always encourages and provides opportunities for networking at its annual Industry Day, as well as promoting an



open-door policy at its local office in Yellowknife for any entity interested in the joint venture process. In addition, with its strong network and knowledge of the business layout in the Area of the Contract, MCM regularly meets with perspective and existing sub-contractors to foster connections between businesses.

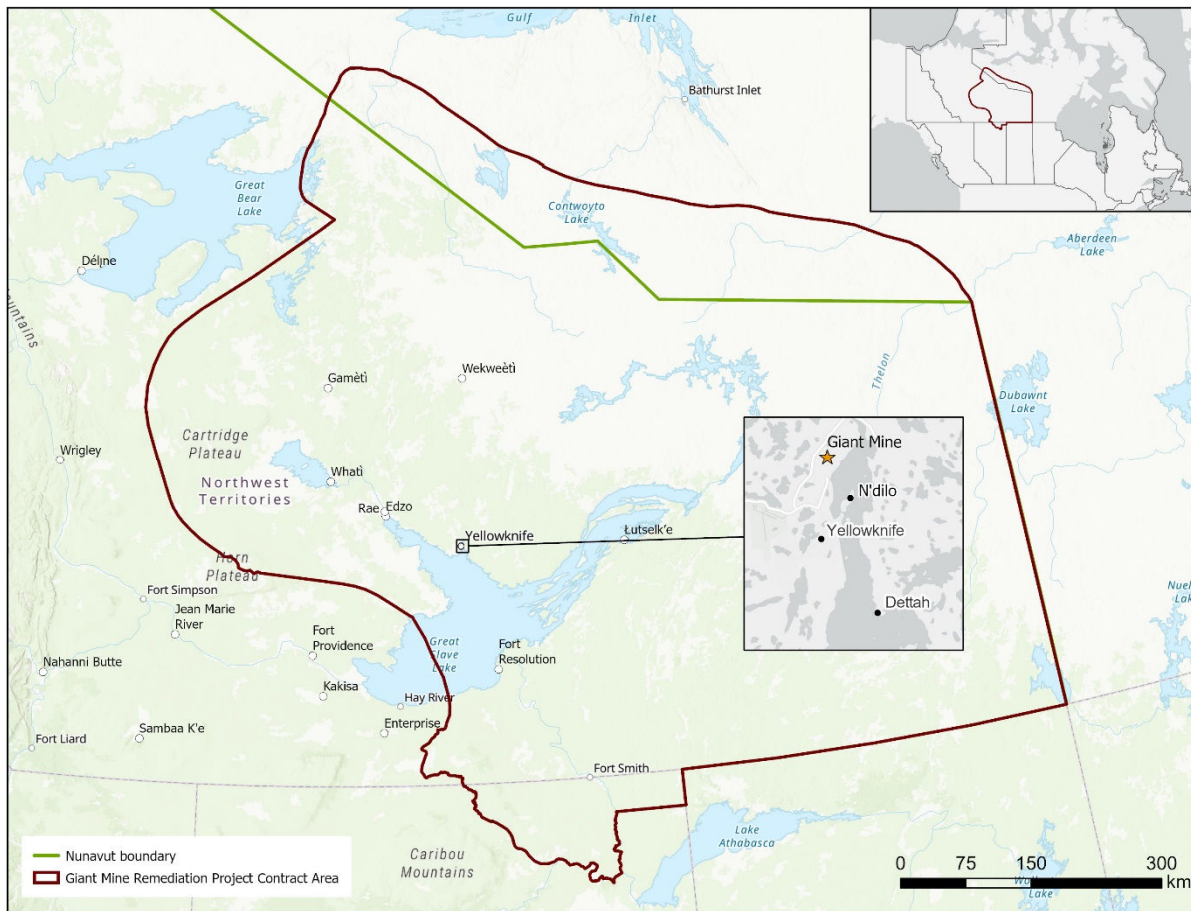


Figure 1: Giant Mine Remediation Project's Area of the Contract

Recommendation #4: GNWT needs to act on advancing the NWT restoration economy:

The GMRP should not be seen in isolation but rather in a broader context through recognition of a restoration economy (*given the number of contaminated sites in the NWT and elsewhere*) that NWT firms can/will be better positioned through the experience (expertise, capacity and equipment etc.) of completed contracts and strengthened capacity from the GMRP.

Response #4: In 2021, CIRNAC's NWT Regional office led the development of an application to the Strategic Partnerships Initiative, a federal funding initiative to increase Indigenous participation in economic opportunities and to help fill funding and program gaps. The application was focused around building capacity through remediation opportunities in the NWT. Following approval, the Remediation Coordination Committee (RCC) was established to advance the initiative. Committee members include Federal and Territorial departments. The Project team is not directly involved in this committee



because the initiative is not focused on GMRP but rather encompasses the NWT as a whole.

Additional response from GNWT to #4: The RCC is currently working on multiple initiatives to prepare NWT residents for opportunities provided by the GMRP. CIRNAC, a partner on the RCC, was approached by Aurora College to develop two programs—the Northern Technician Program and Northern Remediation Monitoring Program—in anticipation of forecasted opportunities presented on remediation projects. The RCC also plans to expand outreach and engagement activities with leadership in Indigenous communities and with economic development corporations in the GMRP region to discuss mentorship and technical support opportunities with Catalyste+, a contractor that specializes in business development. This work will be part of the Strategic Partnership Initiative that accesses federal government funds. These initiatives are not intended exclusively to prepare NWT residents for GMRP opportunities, but rather for Remediation Economy opportunities across the Northwest Territories. Still, the RCC recognizes that more than two-thirds of employment and procurement opportunities for the NWT’s Remediation Economy will occur through GMRP.

Recommendation #5: GMRP worker accommodation facility: This would involve the establishment and management of an accommodation ‘facility’ (i.e., camp) in Yellowknife to house workers for the GMRP and potentially other Northern Indigenous workers from across the North for the GMRP, that could then be available for other different projects on other remediation sites. The City of Yellowknife would need to be involved in the process (as noted below).

Response #5: During the Environmental Assessment Process and subsequently at a GMRP Socio-Economic Advisory Body meeting in 2018, the City of Yellowknife asked GMRP not to build a camp to support remediation activities. To date, GMRP has respected this request and does not have a worker accommodation facility. It is up to the contractors to determine if and how their workers are housed.

Recommendation #6: Establish regular post-contract review meetings: MCM to expand the use of post-contract review meeting with contractors to assess ‘lessons learned’.

Response #6: As a standard practice, if an unsuccessful contractor requests to have a debrief following an unsuccessful tender process, then the MCM will provide one. In addition, at the end of each contract, Parsons and PSPC hold a formal lessons learned process with the subcontractor.

Recommendation #7: Confirm potential risks of arsenic trioxide impregnation into steel structures/components: The GMRP management to carry out testing (if necessary) to confirm and/or determine if there are potential risks of arsenic trioxide impregnation into steel structures/components on the GMRP site? If yes, what measures can be taken to mitigate the risk?

Response #7: The Project has defined off-site disposal criteria in its Waste Management and Monitoring Plan. The Project has tested materials for the presence of arsenic and



other hazardous substances and shared that information with subcontractors (e.g., True North Environmental for the Legacy Debris Piles). The Project will continue to share this information with other subcontractors for future work packages (e.g., Core Industrial Area). However, the criteria for recyclable materials, such as metals, are dependent on the waste receiver and it is the responsibility of the subcontractors to perform additional testing to meet the waste receiver's recycling criteria. To date, steel and other metals have met the acceptance criteria and have been accepted at off-site recycling facilities.

Recommendation #8: Confirm or develop a multi-year recycling plan for the GMRP site:

The GMRP to consider setting out a longer-term recycling and commit 1% of the annual budget for recycling. This will enable planning and additional Northern based equipment/facilities investment for recycling of GMRP materials.

Response #8: The GMRP has developed a Project-wide Waste Management and Monitoring Plan that it shares with subcontractors to guide them in developing their H&S practices and to financially estimate the cost of the work. However, it is the responsibility of subcontractors to determine what materials can be recycled and it is in the subcontractor's best interest to recycle as much as possible. For the Legacy Debris Piles contract, over half of the materials were sent off-site for recycling; this was primarily steel but copper as well as other materials were recycled. Since the responsibility of recycling lies with the subcontractor, it is difficult to commit to a specific financial target. In terms of a long-term recycling program, prolonging this work will delay other activities, such as remediation of contaminated soils; therefore, the Project prioritizes removal of buildings and debris from the site.

The team looks forward to continuing to work with GMOB to improve GMRP's socio-economic approaches and are open to additional suggestions going forward.

Sincerely,

Natalie Plato
Deputy Director, Giant Mine Remediation Project