

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

TOPIC

COMMENT

RECOMMENDATION

Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.

Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.

Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.

Climate change	To what extent will future climate uncertainty affect the long-term performance of the closure and reclamation plan? Have contingencies been built into the plan to address this uncertainty?	
Timing for the resolution of critical uncertainties	The ICRP identifies a number of uncertainties that are included in the Reclamation Research Plan (RRP). While the RRP presents a high level schedule of activities, it does not specify when critical uncertainties will be sufficiently resolved to make final closure decisions. When will those uncertainties be resolved and how much flexibility will remain to modify the closure plan at that time? Specifically, will any of the contingencies described in Section 5.2.9 of the ICRP no longer be viable at a particular point in time?	
Fine PK Facility Closure	What are the anticipated challenges associated with constructing permanent covers on the fine PK (e.g., physical access)? How are those challenges being managed?	

Post-Closure Risk Assessment	<p>The ICRP indicates that a human-health and ecological risk assessment will be conducted to quantify post-closure risks. The findings of such an assessment would serve as valuable input to the decision-making process for the ICRP. Towards this end, what is the earliest date the post-closure assessment could be completed, assuming currently available information is used (as opposed to waiting for the output of reclamation research)?</p>	
Acid Rock Drainage and Metal Leaching	<p>What are the predicted water quality concentrations in Kennady Lake under a reasonable worst case ARD and metal leaching scenario?</p>	
Management of PAG	<p>The current ICRP anticipates that some PAG mine rock will be encapsulated in the waste rock piles, above the water line, with granular cover. The volume of PAG rock that would be managed in this fashion is approximately 1% of the total mine rock volume. Has the proponent considered alternative closure plans for this portion of the PAG rock? For example, could it be stockpiled during mine operations and then transferred to the Tuzo pit during closure, thereby providing a water cover? Would this be justified based on the reasonable worst case ARD and metal leaching scenario?</p>	
Meromictic Conditions	<p>If stable meromictic conditions are not achieved, what are the anticipated impacts on water quality and aquatic receptors under a reasonable worst case scenario (i.e., if water in the Tuzo pit were to turnover)?</p>	
Requirements for Active Care	<p>Are there any scenarios in which active, long-term management of the site may be required (e.g., on-going physical isolation of a pit and active water treatment)?</p>	