

## Memo

<b>To:</b> Jane Amphlett, AANDC, Erika Nyssonen, GNWT	<b>Client:</b> AANDC
<b>From:</b> Daryl Hockley	<b>Project No:</b> 1CA030.009
<b>Cc:</b> Katherine Ross, AANDC	<b>Date:</b> November 26, 2014
<b>Subject:</b> Engagement Process for Giant Mine Surface Remediation – DRAFT FOR DISCUSSION	

This memorandum describes the proposed approach for engaging stakeholders in the assessment of surface remediation options for Giant Mine.

### 1 Objectives

The primary objective will be to engage stakeholder groups in planning remediation of the Giant Mine surface, including:

- Identifying remediation objectives and potential options
- Evaluating the potential options against the objectives.

### 2 Outcomes

The minimum outcome will be a report documenting the objectives, potential options, and the resulting evaluations by stakeholder groups.

The expected first user of the report will be the Giant Mine Remediation Project Team (GMRPT) as it prepares a Water Licence Application. The Mackenzie Valley Land and Water Board may refer to the report for evidence of stakeholder support or opposition to elements of the GMPT plan, as might the Minister in his subsequent deliberations.

If the process goes well, it can also provide other favourable outcomes:

- Stakeholder groups will may come up with ideas that would not occur to the project team, and some of these could significantly improve the final remediation plan.
- Stakeholder groups will become better informed about the site and its future potential, which should lead to ongoing support for detailed planning, implementation and long-term oversight.

**Commented [AM1]:** I understand that the language is very generic in this document to make it more accessible. Therefore, I will make some general comments and some specific comments for clarification.

**Commented [L2]:** As a general comment, will this process be to select an option that will be implemented or will this be a process to which the outcome will be a proposed option for AANDC and/or GMRPT to consider and approve its implementation. This needs to be clearly defined upfront so that this Stakeholder Engagement Process management Expectations up-front.

Another general comment is that consideration should be given to allow for Stakeholder Groups to go back to their respective groups for further consultation before decisions are made as some participants may not have the authority to make decisions without further consultations. In addition some stakeholders may not like to participate in a workshop type forum and instead prefer the personal one-on-one type meeting in which case some time to meet during the workshop with such groups may be beneficial to the process.

**Commented [LL3]:** Should an objective not be to get Stakeholder support for any options discussed and evaluated. I think "Stakeholder Buy-In" needs to be a key objective otherwise, what is the purpose of engaging? Further there needs to be some type of commitment by the Government (AANDC) to take remediation objectives and potentially remedial options presented and discussed by the Stakeholders very seriously in order to further strengthen support by Stakeholders and increase trust between the ... [1]

**Commented [AM4]:** Just wondering whether it would be appropriate at this time to expand on this a little bit? For ... [2]

**Commented [LL5]:** I had a similar thought, that AANDC may want to outline their objectives (some of which may be risk based, other financially driven etc...) however, this ... [3]

**Commented [AM6]:** Rather than simply saying this, should they provide some recommendations on how to evaluate?

**Commented [LL7]:** This is an objective, further details should be provided in the text, in later sections of this document.

**Commented [AM8]:** Resulting evaluations by stakeholder groups based on what?

**Commented [LL9]:** If support is being sought then this should be part of the objectives...If support from some ... [4]

**Commented [AM10]:** Clarification is required for these types of vague comments! If the process is dynamic in ... [5]

**Commented [LL11]:** I agree, such language can undermine the process as it implies if things do not go well, then th ... [6]

**Commented [LL12]:** As noted above, this should be an objective.

**Commented [AM13]:** Site and future potential? Assuming that it includes areas other than the "industrial footprint" ... [7]

**Commented [LL14]:** Again if support is being sought (or more appropriate "buy-in" then this should be an objective not a benefit by chance.

- Enthusiasm for the project will increase (i.e. buy-in), especially if the resulting plans are able to convert liabilities into areas the communities can see as opportunities or assets.
- Even where the final plan does not reflect a group's first choices for all options, there will at least be an understanding of the many other perspectives that needed to be considered.

**Commented [LL15]:** If Not, then what are the consequences? Which brings up the point of how will it be determined if Stakeholders are in "favour" of remediation option selected?

**Commented [AM16]:** Again, is this an issue of residential-industrial interface? Risk assessment would need to be refined to deal with these types of exposure mitigation and remediation issues.

**Commented [LL17]:** Suggesting they agree to some extent on the selected option/approach/outcome? Again there needs to be a link to AANDCs commitment to endeavour to take the stakeholders options seriously.

### 3 Proposed Steps

#### Step 1: Engagement Process Preparation by AANDC (or GMRPT)

Three things are needed as preparation:

- Identify the groups to be engaged
- Meet with them (as needed) to review the process
- Meet with each group to get initial inputs.

**Commented [AM18]:** Things? Bullet (a), (b) and (c) are activities needed as a first step to prepare this process! "Tasks" or "Activities". It would be useful for the stakeholders to understand this is a collaborative process that requires collaborative engagement and shared thought processes and access to information.

**Commented [LL19]:** Who determines when all groups have been identified?

Thoughts and a question about item (a) are included in Section 5 below.

Some of the groups may want more information or examples about the proposed process and remediation planning in general, or have suggestions for changes. These would be addressed under item (b) through a meeting or series of meetings.

Item (c) would require a meeting with each stakeholder. The initial inputs from each group are:

- Overall objectives for the Giant Mine surface.
- Expectations for future uses of the site.

The objectives and future uses should be stated as broadly as possible, rather than referring to specific remediation actions. For example, "protect fish" is an objective, but "remove contaminated sediments" is an action. And "picking berries" is a future use, but "clean up the soil so the berries are good to eat" is a remediation action.

**Commented [AM20]:** As commented above, this will bring issues related to residential-industrial interface issues. From a human health risk assessment perspective, various parameters need to be considered to deal with this expectation! How picking berries is a future use? This is an activity pattern that will refine a risk assessment. Is the writer of this document referring to a potential urban garden type of use where picking berries can be considered as a future land use? Not within Giant Mine Industrial footprint but in surrounding lands/traditional lands?

**Commented [AM21]:** Picking berries is a future land use? Picking berries is an activity. Traditional Land use is a "land use"

#### Step 2: Options Definition Workshop

Next it is necessary to define a number of "representative options" to represent the range of possible surface remediation plans. We normally prefer each option to be a complete package of remediation actions, covering the entire mine site. That's because considering site wide plans forces us to correctly assess interactions and overall effects. But there are also ways to do this process one component at a time. Section 5 below asks people to consider both approaches.

**Commented [AM22]:** "representative options" to represent? Or Potential viable options to represent? Or all possible options to represent the range of possible surface remediation plans? The way it is written, it seems that the author is proposing to start off with a limited number of options to deal with a range of possible surface remediation plans? Does not sound accurate.

In some projects the options are defined entirely by the engineering team, and the stakeholder groups only get involved in the assessment. In this case, however, there would be benefits in having broader input. First, several of the stakeholder groups have been thinking about the site for a long time and are likely to have very good ideas. Second, reducing the large number of

**Commented [AM23]:** Can you elaborate on this? Interactions and overall effects? What interactions and what effects? And what's the outcome of these potential interactions and effects?

possible combinations to a small number of representative options involves several compromises and it is helpful to have buy-in to those steps. Third, involvement in defining the options allows people to have greater trust in the final evaluations.

For these reasons we recommend that the options be defined in a workshop attended by representatives from each stakeholder group. They would go through a five-step process: brainstorming of all possible remediation methods; classification of the methods into groups with similar effects; preliminary development of complete options; initial review of the preliminary options; and development of recommendations for the options to be carried through additional steps. In previous projects a two or three day workshop has been enough for these steps, however site complexities and specific stakeholder issues and concerns will dictate the what sufficient time is needed to evaluate and select a viable option for consideration.

### Step 3: Option(s) Development

The representative options then need to be further developed to allow full evaluation. The minimum requirements are, for each option:

- A scoping level description supported by sketches
- Identification of technical risks and uncertainties
- Assessment of the effect on site wide human health and ecological risks
- Scoping level cost estimates.

SRK believes there is enough information in the project files to serve as a basis for most of the above. In fact we think it is important not to let this step go too far into additional engineering. Any outstanding engineering or cost questions can be tracked as "risks and uncertainties"

There is likely to be a need for additional work on the risk evaluations, but it should be possible to refer to the earlier Level II risk results rather than completing a full assessment for each option. If we can make use of SENES prior experience on the site, it should be possible to just indicate the likely extent to which each option would affect risks.

### Step 4: Option Risk Rating Meeting

In several previous projects, it was useful to bring representatives of each group together to carry out a joint risk review of the options. That requires a multi-day meeting where each developed option is presented and the meeting participants "poke holes in it" using a formalized risk rating process. The AANDC process is suggested as a basis but this could be modified if needed.

Where the identified risks can easily be mitigated, the options are modified. Risks that cannot be dealt with in that manner remain as "residual risks" that are inherent in the option, and need to be considered in the evaluation.

**Commented [LL24]:** This is a very good point, but who determines how such reductions will occur. Presumably it will be AANDC or the GMRPT in either case this needs to be stated clearly as part of the process.

**Commented [LL25]:** Should be an objective.

**Commented [LL26]:** Also "trust" in the process and AANDC.

**Commented [AM27]:** After the grouping and clustering? How do we compare? Some sort of indexing/weight/score? Just trying to visualize how to group and what sort of similarity index one would use for effective comparison of different methods? Or is the process is purely judgemental and qualitative?

**Commented [L28]:** It was addressed during their presentation to the working group back in November. But good point to have them define the process of evaluating/scoring options and how they would arrive at an option for AANDC or GMRPT consideration.

**Commented [L29]:** Process still needs to be flexible enough to ensure sufficient time has been provided. Thus if workshop is scaled in time then potentially more time will need to be dedicated to individual consultation with stakeholders.

**Commented [L30]:** May have multiple options for consideration by AANDC (or GMRPT) or a combination of options.

**Commented [AM31]:** Site Wide human health risks? Can you elaborate on "Site Wide"?

Also, the HH components and Eco components are intertwined here! Some thoughts should be given to those interactions. For example, if a specific approach would be protective of eco risks, can human health risks be adequately protected?

**Commented [AM32]:** Is this based on SRK's qualitative and/or quantitative review of existing materials? Reports, etc. Also, clarification is required for the second part of the sentence. "Serve as the basis for the most of the above?" "MOST" but not "ALL"?

**Commented [L33]:** Statement too general and gives the impression risks to HH and eco are well understood, when in fact HHRA and ECO Risk Assessment (RA) being done. RA is much more complicated.

**Commented [L34]:** This is contrary to the EA which requires a more detailed quantitative RA. Such comments should not be included in the process as it could undermined the RA and/or give the impress that the AANDC is not really ... [8]

**Commented [AM35]:** I think the current discussion related to critical review of Tier II Risk Assessment report that was completed during 2004/2005 would add further insight into the gaps, uncertainties (lack of knowledge) in the risk ... [9]

**Commented [L36]:** A separate workshop? If so clearly indicate that this is beyond the scope of the Workshop. In which case workshop objectives and limits would need to be clearly articulated to all stakeholders.

**Commented [AM37]:** Clarification is required for this. What is a formalized risk rating process here? How it can be modified to suit the needs for this project? Again, is this a qualitative multi-criteria decision analytic process? Or ... [10]

**Commented [L38]:** Is this not the "evaluation" process of the workshop...seems redundant. This is a valuable process but I thought that would have been done during the ev ... [11]

The risk rating process also allows participant groups to become familiar with the details of each option, and to suggest last-minute improvements. The subsequent steps then focus on evaluation rather than continuing debate about the option definition.

**Commented [L39]:** Agreed. An important point that Stakeholders need to be familiar with the details, this will allow for managing expectation but it will be important to root out actual risks from perceived risks which can have significant influence on the options considered.

### Step 5: Options Evaluation Workshop

The options evaluation process will be a multi-day workshop where each of the participant groups/ Stakeholders completes its own evaluation of options against their own objectives and desired future land uses. The workshop setting allows results to be shared immediately with all other participant groups. The resulting discussions lead to consensus on many issues, and a clear understanding of any remaining disagreements..

**Commented [AM40]:** Some clarity and explicit knowledge would be required to link different objectives to different land uses. For example, if the site is industrial, industrial criteria should be used. If surrounding sites are proposed to be residential, then residential criteria should be used. If surrounding areas are traditional land uses, then specific considerations should be given to ensure adequate protection of sensitive receptors. Future land uses will be linked to selection of risk based criteria and then dictate associated costs, if feasible.

Figure 1 is an example of results from an evaluation workshop in another project. It shows several groups' evaluation of a single option. It is easy to imagine how this information can lead to an immediate discussion about the areas of disagreement. It is also easy to see how this format provides very clear feedback to decision makers on the project team, review boards, and permitting authorities.

**Commented [L41]:** First time, "Decision Makers" is discussed in here in this document. Important to put this up-front in process, especially if Decision Makers are not in the Stakeholder Engagement process.

SRK has used this process on several recent projects with good success. The immediate sharing of perspectives often results in parties changing their assessments to come more into agreement. Even in cases where significant disagreements remain, participants have reported that they fully understand and appreciate the other perspectives.

**Commented [L42]:** Agreed that the figure allows for a quick view of the areas of divergence but does not give sense of how divergent the views are. Thus a sense of how important the divergence is would also be helpful.

Figure 2. Example results from options evaluation workshop, Beaverlodge Mine, Saskatchewan

Objective	Uranium City	EQC	Province	CNSC	Other Federal	Cameco
This option will protect the safety and health of local people	Neutral	Disagree	Neutral	Neutral	Neutral	Neutral
This option will protect fish and animals within the Beaverlodge mine area	Strongly Disagree	Disagree	Neutral	Neutral	Neutral	Agree
This option will improve water quality near the mine area	Disagree	Neutral	Agree	Agree	Agree	Agree
This option will improve recovery times of downstream water bodies	Disagree	Disagree	Agree	Agree	Disagree	Disagree
This option will allow traditional use of land & water in the area	Strongly Disagree	Disagree	Disagree			
This option will present good opportunities for local businesses and workers	Agree	Agree	Agree			Agree
This option will fit into the local landscape	Agree	Agree	Agree			Agree
This option's implementation risks and short-term impacts will be acceptable		Disagree	Agree		Disagree	Disagree
This option will be technically feasible		Neutral	Agree	Agree	Agree	Neutral
This option will be reliable over the long term		Agree	Agree	Agree	Agree	Agree
This option meets the standard of good mine closure practice elsewhere		Agree	Neutral	Neutral	Disagree	Neutral
This option will meet applicable provincial and federal regulations		Agree	Neutral	Neutral	Neutral	
This option will allow the site to be handed over to institutional control		Disagree	Neutral	Neutral		
This option will be a good use of public funds	Agree	Disagree	Disagree	Agree	Disagree	Disagree

**Step 6: Reporting**

After the options evaluation workshop is completed, SRK will prepare a brief report on the results. At a minimum the report will present the raw results from the risk rating and evaluation sessions. Where there is agreement on risk and evaluations, there will be little more to say. In the case of disagreements, SRK will provide suggestions for any changes or compromises that might broaden support for an option.

The draft report will then be circulated to the participant groups for comment prior to finalizing it. It might be efficient to convene a meeting to review comments, collate them, and where necessary discuss resolution to any conflicting comments.

SRK will finalize the report after receiving collated comments.

**4 Overlaps with Other Processes**

Some of the proposed steps will overlap with other processes that are already underway or in planning:

- The GMPT will need to prepare a detailed surface remediation plan as a basis for water licensing; the proposed process will provide input to the many decisions that need to be made in that planning.
- Some groups have already participated in the closure guidelines process; that work might be too detailed for Step 1c, but some of it will be very useful as a starting point.
- Other groups, like the Heritage Society, have also presented specific requests for the remediation plan; there is no harm in keeping the specifics but it will be helpful in Step 1c to also relate them to more broadly stated objectives.
- EA Measures 11 and 12 has defined at least one theme that will need to be included in Steps 2, i.e. re-routing of Baker Creek.
- If the schedule allows, the risk evaluations in Step 3 could be coordinated with the human health risk assessment work required by EA Measure 10, and those in Step 4 might mesh well with the risk assessment required under Measure 5.
- Tailings remediation options are likely to be of interests to many stakeholders and the results should inform work related to EA Measure 22, which requires a study of the tailings covers.
- The process as a whole will contribute to EA Measure 26, which requires consultation with the YKDFN and City of Yellowknife regarding suitable end uses of the site; with respect to the City of Yellowknife planning process, our results will define a “constraints map” needed as input for any more detailed municipal plans.

**Commented [AM43]:** Based on the above example, Would it be correct to assume that SRK is proposing a qualitative process to rate different options and their associated risks, not a quantitative decision analysis process?

**Commented [AM44]:** In other words, the conclusion that there is agreement on risks and evaluations will be based on a Weight of Evidence (WoE) based approach; correct?

The disagreement may come from conflicting information; and, there should be a way to resolve that conflict, either qualitatively or quantitatively. How do you propose to integrate conflicting information?  
Especially when it is a matter of option (e.g. As bioavailability should be 17%, 60% or 100%...all are valid scientifically, but depending on who you ask or based on site specific situations, a different value can be proposed)

**Commented [AM45]:** Would you be able to elaborate on what sort of suggestions on risk rating and evaluations and disagreements there in?

**Commented [L46]:** Would this not undermine the entire Engagement process? Again this links back to the objectives of the Stakeholder Engagement process and managing expectations... also need to clearly define roles and responsibilities and how this process feeds into the decision making process for Giant Mine surface remediation.

**Commented [L47]:** I do not think this is an option. This should be in the process and Conflict Resolution process should be clearly articulated to all Stakeholders. This will be very important to get “buy-in” from the on-set and will increase further trust in the process. Most of the time, people just want their concerns heard and know that whatever is done is going to address their concerns.

**Commented [L48]:** Do the Timelines line-up? When will the licence application be submitted and will the outcome of this process be available? Will this in part delays in the overall project which would incur increases in costs? Just some things to consider.

**Commented [L49]:** Why are they singled out? Gives impression their concerns are more important then others for consideration. I suggest removing them from this document (or the entire bullet as it adds no value to the process).

**Commented [L50]:** Re-routing Baker Creek was not assessed in the EA process except that AANDC would need to evaluate this option which itself may trigger an EA if the decision to re-direct Baker Creek is made.

**Commented [AM51]:** This shows that some sort of integration of different risk assessments (quantitative, human health, etc.) need to occur for the decision maker to facilitate decisions. How would you propose an integrated risk assessment exercise?  
Please clarify whether SRK is saying that findings of the HHRA will be integrated rather than having different RAs integrated. They need to be clear that they are not going to conduct an RA (HH and ECO) as this scope is already underway. Which then leads to another point of timing. This process should be in-line with other activities occurring and as such may need to happen after RA conclusions are reported or at least discuss remediation options after risks have been quantified.

To build on this, RA experts will need to participate in workshop given that all aspects of the options analysis will have inherit risks which would need to be understood ... [12]

**Commented [L52]:** Another Objective of the process.

## 5 Questions

The proposed process has been used on previous projects, but in all cases it was tailored to fit the needs of the local stakeholder groups. Here are some questions that need to be answered to move from this proposal to a specific plan.

### Who participates?

It is better to have a limited number of “groups”, to force each group to consider a range of viewpoints, and to keep the evaluation and discussion processes efficient. So it helps to identify individuals or organizations that could share a table in the evaluation workshop (Step 5) and be represented by the same individuals in Steps 2 and 4. Other groups might need to be represented by several sub-groups. For example, in a recent project in Alaska, the local First Nation had four sub-groups from each of two affected communities, plus an elders group, plus a corporate group. So, more specifically, *who are the stakeholders and how should they be grouped?*

**Commented [AM53]:** Health Canada Contaminated Sites remain committed to participate in the process whenever and wherever there is a requirement for Human Health Risk Assessment, Toxicology and other related Expertise. Based on the expertise of the HC representative, if other representatives within Health Canada needs to get involved, we will definitely try to draw such expertise from other groups. Of course, this is contingent upon specific requests from the custodian (AANDC and PWGSC).

### What options are on the table?

The process works best if it is as open as possible to options identified by participants. But some limits on scope are always needed. The property limits defined the geographic scope of the EA and are probably a good limitation here. Limiting the discussion to surface remediation also seems reasonable, given that there is agreement on the broad components of the underground remediation, and EA measures to resolve the remaining details. That leaves many topics for discussion, including Baker Creek and other streams, the tailings and sludge areas, pits, contaminated soils, buildings, roadways, and post-closure water treatment. *Anything else?*

**Commented [AM54]:** However, the stakeholder groups are formed; we should not lose one specific aspect of the project is that there are different components interacting with one another.

### How do we bundle options?

Step 2 above proposes that all options be combinations covering the entire site. An alternative approach is to consider areas of the site separately, for example tailings options first, pit options second, etc. *Are there strong preferences on this or would people be happy trying the site-wide approach and seeing if it is able to capture enough of the key choices?*

**Commented [L55]:** Agreed. Although some suggestions could help the process or examples of how different remediation options worked on other sites...essentially a track record of technologies being considered (e.g. Tried and True vs new technologies/approaches, or novel uses of existing technologies/approached).

**Commented [L56]:** Not necessarily the case given that the EA notes that the freezing of the tailings is a temporary solution until a more permanent or other agreed upon solution to deal with the arsenic trioxide is developed. This should be acknowledged in the process and keep all focused on surface remediation activities.

### When?

Realistically the entire process will take at least six months, possibly nine or even twelve. There is a benefit in keeping the process moving, because long periods away from it cause people to forget the previous steps. On the other hand, rushing groups through decisions results in a lack of comfort with the outcomes. *If we estimate six to twelve months, when is the best time to get started?*

**Commented [AM57]:** In addition to soils, should dust, sediment, traditional food, etc need to be considered?

**Commented [AM58]:** Again, Due to close proximity of the site to different sensitive land uses, the human health risk assessment components would look at not only remediation worker exposure scenarios but also other sensitive receptors in addition to the receptors identified by CCME. When it comes to exposure assumptions, there may need to overlap in some discussions between surface and underground components.

**Commented [AM59]:** Entire site? Industrial foot print of the site? Or, Industrial Site + surrounding areas that are non-industrial?

**Commented [L60]:** Another option could include integration of a few options, essentially picking all preferred sub-options for the various component. Can also be a viable method for getting consensus on diverging views.

### Other support?

In other projects, the project team has prepared support materials ranging from posters to multi-language DVD's to allow representatives of each group to communicate options to their

**Commented [L61]:** Agreed, the process take time, but important not given impression of rushing the process, while still balancing timeline for the process.

**Commented [AM62]:** I would agree. There is a benefit in keeping the process moving. If we have some handle on some of the baseline datasets, then one can definitely start the process within the time frame.

communities. In one project, a group of professional experts was invited to the evaluation workshop and made available to all parties for answering questions or helping understand technical issues. In other projects, groups have requested technical support or peer reviewers of their own choosing. *In broader terms, what help do groups need to be full participants in the proposed process?*

**Commented [AM63]:** A general comment : If there are areas that the custodian feel that HC can contribute knowledge, please bring forward those issues as early as possible. We will try our best to provide guidance and information resources related to Human Health Risk Assessment and Toxicology and other related areas of expertise on health.

DRAFT

Page 1: [1] Commented	LUIGI LORUSSO	12/18/2014 2:11:00 PM
<p>Should an objective not be to get Stakeholder support for any options discussed and evaluated. I think "Stakeholder Buy-In" needs to be a key objective otherwise, what is the purpose of engaging? Further there needs to be some type of commitment by the Government (AANDC) to take remediation objectives and potentially remedial options presented and discussed by the Stakeholders very seriously in order to further strengthen support by Stakeholders and increase trust between the Government and other Stakeholders. Also another KEY objective is "transparency" in the options analysis, selection and implementation processes... Want to eliminate surprises and manage stakeholder expectations.</p>		
Page 1: [2] Commented	Asish Mohapatra	12/17/2014 5:53:00 PM
<p>Just wondering whether it would be appropriate at this time to expand on this a little bit? For example, instead of saying remediation objectives, can you say "risk-based remediation objectives"?</p>		
Page 1: [3] Commented	LUIGI LORUSSO	12/18/2014 2:21:00 PM
<p>I had a similar thought, that AANDC may want to outline their objectives (some of which may be risk based, other financially driven etc...) however, this may lead the Stakeholders in that they would only focus on those presented by the AANDC and/or they would feel the process is closed such that the custodian is not open to new ideas. This goes back to AANDC's credibility and commitment to address and/or consider all comments that come from the Stakeholders.</p>		
Page 1: [4] Commented	LUIGI LORUSSO	12/18/2014 2:16:00 PM
<p>If support is being sought then this should be part of the objectives...If support from some or all stakeholders is not obtained, will this impact progression of project? This raises the point about "buy-in".</p>		
Page 1: [5] Commented	Asish Mohapatra	12/18/2014 3:04:00 PM
<p>Clarification is required for these types of vague comments! If the process is dynamic in nature, then it will go through a corrective measure and ultimately, the process should work and must work.</p>		
Page 1: [6] Commented	LUIGI LORUSSO	12/18/2014 2:21:00 PM
<p>I agree, such language can undermine the process as it implies if things do not go well, then the whole exercise is dismissed. Which again goes to AANDC's commitment for success of this Stakeholder engagement.</p>		
Page 1: [7] Commented	Asish Mohapatra	12/18/2014 3:03:00 PM
<p>Site and future potential? Assuming that it includes areas other than the "industrial footprint" of the Giant Mine Surface area. So, it would include Industrial-Residential Interface issues,</p>		
Page 3: [8] Commented	LLORUSSO	12/17/2014 5:53:00 PM
<p>This is contrary to the EA which requires a more detailed quantitative RA. Such comments should not be included in the process as it could undermine the RA and/or give the impression that the AANDC is not really concerned with the RA which is a critical concern for all Stakeholders.</p>		
Page 3: [9] Commented	Asish Mohapatra	12/18/2014 2:32:00 PM
<p>I think the current discussion related to critical review of Tier II Risk Assessment report that was completed during 2004/2005 would add further insight into the gaps, uncertainties (lack of knowledge) in the risk assessment. In addition to Tier II, the critical review of Tier II, 2010 letter memo, and previous comments from different Expert Support and other stakeholders should be considered.</p>		
Page 3: [10] Commented	Asish Mohapatra	12/18/2014 2:33:00 PM
<p>Clarification is required for this. What is a formalized risk rating process here? How it can be modified to suit the needs for this project? Again, is this a qualitative multi-criteria decision analytic process? Or some sort of quantitative evaluations of different criteria will be carried out?</p>		
Page 3: [11] Commented	LLORUSSO	12/18/2014 2:34:00 PM
<p>Is this not the "evaluation" process of the workshop...seems redundant. This is a valuable process but I thought that would have been done during the evaluation at the workshop. I suggest including this as part of the workshop which is multi-day in any case.</p>		

Also I agree, what is this rating process; qualitative or semi-quantitative, or quantitative? Important to make distinction so as not to give impression some special measurement were used when in-fact these are "value" parameters most of which are subjective and not measurable.

This shows that some sort of integration of different risk assessments (quantitative, human health, etc.) need to occur for the decision maker to facilitate decisions. How would you propose an integrated risk assessment exercise?

Please clarify whether SRK is saying that findings of the HHRA will be integrated rather than having different RAs integrated. They need to be clear that they are not going to conduct an RA (HH and ECO) as this scope is already underway. Which then leads to another point of timing. This process should be in-line with other activities occurring and as such may need to happen after RA conclusions are reported or at least discuss remediation options after risks have been quantified.

To build on this, RA experts will need to participate in workshop given that all aspects of the options analysis will have inherent risks which would need to be understood and articulated to all so there is a clear understanding of what the limitation may be for each option.