

## Review Comment Table

<b>Board:</b>	MVLWB
<b>Review Item:</b>	DIAND-GIANT - Management Plans Group 1 (Standard) â€™ MV2019X0007 and MV2007L8-0031 (3 of 7)
<b>File(s):</b>	<a href="#">MV2007L8-0031</a> <a href="#">MV2019X0007</a>
<b>Proponent:</b>	DIAND - GIANT
<b>Document(s):</b>	<a href="#">Spill Contingency Plan</a> (7.63 MB) <a href="#">Waste Management and Monitoring Plan</a> (5.13 MB) <a href="#">Engagement Plan, Log and Summaries</a> (11.08 MB) <a href="#">Technical Session Presentations</a> (20 MB) <a href="#">Technical Session Agenda</a> (5 MB) <a href="#">Technical Session Agenda Update</a> (5 MB)
<b>Item For Review Distributed On:</b>	Apr 10 at 13:33 <a href="#">Distribution List</a>
<b>Reviewer Comments Due By:</b>	May 30, 2019
<b>Proponent Responses Due By:</b>	June 25, 2019
<b>Item Description:</b>	<p>This is Review item number 3 of 7 associated with the Giant Mine Remediation Project. On April 8, 2019, an e-mail was distributed to the Giant Mine distribution list which provided a detailed explanation of the Online Review System (ORS) plan for the Giant Mine Remediation Project. If you did not receive an e-mail or require additional information, please contact Board staff identified below.</p> <p><b>Instructions</b> The Giant Mine Remediation Team (GMRT) submitted Version 1.0 of the following plans: Waste Management and Monitoring Plan, Spill Contingency Plan, Engagement Plan as well as the Engagement</p>

Log and Summaries (1997-2015), Engagement Log and Summaries (2016-2018), and Response to Pre-Engagement Reviewer Comments as part of its Post-EA Information Package on April 1, 2019.

Reviewers are invited to submit comments, and recommendations using the Online Review System (ORS) by the review comment deadline specified below. If reviewers seek clarification on the submission, they are encouraged to correspond directly with the proponent prior to submitting comments and recommendations.

Reviewers may also wish to consider providing an overarching recommendation regarding whether the Board should approve the submission, to provide context for the comments and recommendations and assist the Board with its decision.

Please provide comments and recommendations on the following components of the Post-EA Information Package including:

- Waste Management and Monitoring Plan;
- Spill Contingency Plan;
- Engagement Plan;
- Engagement Log and Summaries (2016-2018); and
- Engagement Log (1997-2015).

When providing comments on a specific Plan, Program, or Report, please identify the document and the Section (if applicable) in the 'Topic' line.

Board staff would also like to note that further supporting documentation can be found in ORS reviews:

- DIAND-GIANT - Land Use Permit Application – MV2019X0007 (1 of 7)
- DIAND-GIANT - Water Licence Post-EA Information Package – MV2007L8-0031 (2 of 7)
- DIAND-GIANT - Preliminary Screening Information – MV2019X0007 and MV2007L8-0031 (4 of 7)
- DIAND-GIANT - Closure and Reclamation Plan – MV2019X0007 and MV2007L8-0031 (5 of 7)
- DIAND-GIANT - Management Plans Group 2 (Water) – MV2019X0007 and MV2007L8-0031 (6 of 7)
- DIAND-GIANT - Management Plans Group 3 (Other) – MV2019X0007 and MV2007L8-0031 (7 of 7)

	<p>The documents that have been uploaded to this review are also available on our public Registry.</p> <p>If you have any questions or comments about the ORS or this review, please contact Board staff identified below:  Shannon Allerston 867-766-7465 sallerston@mvlwb.com  Tyree Mullaney 867-766-7464 tyree@mvlwb.com  Kimberley Murray 867-766-7458 kmurray@mvlwb.com</p>
<b>General Reviewer Information:</b>	<p>The following organization has received this review by fax:</p> <p>NWT Metis Nation  Tim Heron NWTMN IMA Coordinator (867) 872-3586</p>
<b>Contact Information:</b>	<p>Kim Murray (867) 766-7458  Shannon Allerston 867-766-7465  Tyree Mullaney 867-766-7464</p>

## Comment Summary

DIAND - GIANT (Proponent)				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General File	<p><b>Comment</b> (<a href="#">doc</a>) ORS 3 - Attachment 1 - Letter from the City of Yellowknife - Municipal Services</p> <p><b>Recommendation</b></p>		
2	General File	<p><b>Comment</b> (<a href="#">doc</a>) ORS 3 - Attachment 2 - Revised Engagement Log - 1997 - 2015</p> <p><b>Recommendation</b></p>		
City of Yellowknife: Kerry Penney				

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Spill Contingency Plan - General	<p><b>Comment</b> Given the project location relative to the water supply, the City of Yellowknife is particularly sensitive to any upset conditions on the north end of the project, especially the Shot Lake watershed.</p> <p><b>Recommendation</b> The project should include source water protection as a priority, ensuring that the risks associated with activities and storage in this area are thoroughly considered and minimized to the degree possible.</p>	<p><b>June 25:</b> It is not clear to the GMRP if the City of Yellowknife has completed a source water assessment (SWA) as per the GNWT guidance or if the City of Yellowknife has a Source Water Protection Plan (SWPP). The GMRP would be willing to participate in an SWA exercise should the City choose to undertake one. If the City has already developed a SWPP, it would be helpful for the City of share that with the GMRP so that the GMRP can include any necessary considerations in future versions of management plans.</p>	
2	Spill Contingency Plan - Section 1.4.4	<p><b>Comment</b> Project does not discuss any emergency procedures for medical incidents beyond first aid level responses.</p> <p><b>Recommendation</b> Clarification on this is required (perhaps in a compiled Emergency Response Plan).</p>	<p><b>June 25:</b> The GMRP has a separate Emergency Response Plan.</p>	
3	Spill Contingency Plan - Section 1.4.5	<p><b>Comment</b> The Board should be aware that Fire Response beyond extinguisher and local resources is not yet resolved. Attempting to resolve this has been a matter of focus for the City of Yellowknife.</p> <p><b>Recommendation</b> At present, there is no service agreement</p>	<p><b>June 25:</b> The GMRP has been attempting to resolve this issue with the City of Yellowknife since 2014, and it has been a priority of the GMRP. Due to lack of progress, the GMRP has asked the MCM, Parsons Inc, to negotiate an Emergency Services Agreement with the City, on behalf of the GMRP. The GMRP does not agree that the absence of a service agreement</p>	

		between the project and the City of Yellowknife to provide Emergency Services. The project must make resolving this gap a priority - the absence of effective emergency response puts the citizens of Yellowknife, Ndilo and Dettah at considerable risk.	puts the citizens at considerable risk. Currently, the Underground Care and Maintenance contractor is responsible for all mine rescue operation. Emergency response on site includes a 24/7 mine rescue team. The site currently has 12 people with mine rescue certification. There is a full-time medic on site (12 hours per day, 7 days per week and goes to 24/7 when a contractor requires a night shift). There is also an EMS vehicle on site along with 24/7 site security.	
4	Spill Contingency Plan - Table 3-1, Section 3.1.2 - Incident Teams/Emergency Management Teams	<b>Comment</b> Clarification on staff employer and location. <b>Recommendation</b> For each of the members of these teams, please make the employer (e.g. Parson's, CIRNAC, GNWT, etc.) explicit as well as their location of employment (e.g. Ottawa, Edmonton, Yellowknife). Perhaps more than in other cases where this same comment will be made, it is critical that responders have sufficient discretion and authority to act as necessary.	<b>June 25:</b> The GMRP has identified the individuals best suited to respond to incident and emergency response situations. The Spill Contingency Plan will be updated to include the employer and whether they have an on-site or off-site presence.	
5	Spill Contingency Plan - Section 4.1.3 - Petroleum Product Monitoring	<b>Comment</b> It is important to ensure that drip trays and secondary containment structures are (to the degree possible) clear of ice and snow to minimize contaminated materials and preserve volumes. This should be noted as part of the	<b>June 25:</b> An inspection schedule will be added to the Spill Contingency Plan to preserve volumes within secondary containment.	

		<p>standard practices.</p> <p><b>Recommendation</b> Amend document, include as inspection item.</p>		
6	<p>Waste Management Plan - Pit Disposal 4.2.4 (p53)</p>	<p><b>Comment</b> "All contaminated materials placed in pits will be covered with a cap."</p> <p><b>Recommendation</b> Can the project confirm what level of contamination is being addressed here? For the disposal of materials not 'highly' contaminated, should caps be put in place? Please provide information that provides context, noting the AN response comment #23 on the draft report that a cap will not be used but also the statements that contaminated soils will be placed in A1 and B2 pits (p13 of updated Preliminary Screening Document). What is the maximum level of acceptable contamination for material to be placed in A1 and B2 pits?</p>	<p><b>June 25:</b> Please refer to Table 5.4-1: Summary of Contaminated Material Types, Volumes, and Disposal Locations in the CRP, which states that contaminated granular fill will be disposed in the A1 and B1 Pits, and potentially the B2 Pit. The concentration of arsenic in this material ranges from 340 mg/kg (160 mg/kg in the Townsite/Marina) to a maximum concentration of 4,500 mg/kg. Miscommunication seems to arise from the terms cap versus engineered cover. A cap is synonymous for engineered cover, or implies less engineering than the engineered cover. An engineered cover is a system that may include layers of granular materials such as soil, clay, rockfill, topsoil or geosynthetics designed to achieve objectives that may include: control dust, flow of air and/or water, maintain physical stability or to support the growth of vegetation. All contaminated material placed in pits will be covered with a cap consisting of clean granular fill. Pit closure design is underway and engineered covers are being assessed on a pit-by-pit basis.</p>	
7	<p>Waste Management Plan - 4.1.3</p>	<p><b>Comment</b> "Excavation and transport of contaminated soils and sediments will be undertaken with care."</p> <p><b>Recommendation</b> Please explain</p>	<p><b>June 25:</b> Please refer to the GMRP Dust Management and Monitoring Plan, under section 4.3.3: Earthworks. Contaminated soils and sediments soil will be wetted down prior to, during and after excavation, as required, to</p>	

		how this translates into operational criteria? (e.g. moisture content, weather, tarping/covering etc.)	prevent wind erosion. Soil excavation may be suspended in high winds, tarps or tackifier will be used when transporting loads. Machinery will be appropriately sized for level of effort to minimize soil disruption, as much as possible.	
8	Waste Contingency Plan - New Section	<p><b>Comment</b> Both the Lessons Learned appendix and the CRP have shown that the amount of contaminated materials needing to be disposed have grown significantly - from approximately 4x the soil in DAR or an order of magnitude as described in the Lessons Learned. There are already signs within the documents that the project is seeking to limit the amount of material being addressed. Is this a cost saving/best practice issue, or is this because there is little contingency available within the framework of the current remediation plan?</p> <p><b>Recommendation</b> How confident in the materials balance is the project currently and what degree of contingency have they identified for each waste stream at present?</p>	<p><b>June 25:</b> The GMRP is confident that the volumes are more representative of the amount of contaminated soil to be remediated with standard contingencies calculated for this type of remediation effort. The GMRP disagrees with the claim that the Project is seeking to limit the amount of material being addressed. The tailings containment area has sufficient capacity to accommodate the increase in calculated volumes. The GMRP is investigating remedial technologies to reduce the arsenic concentration in a portion of the 52,000 cubic meters of heavily contaminated granular fill. The expected result would be a reduction in overall arsenic concentration within the contaminated granular fill, not a reduction in remediation effort.</p>	
<b>Giant Mine Oversight Board: GMOB Giant Mine Oversight Board</b>				
<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>

1	General File	<b>Comment</b> ( <a href="#">doc</a> ) GMOB Comments Cover Letter <b>Recommendation</b>		
2	WMMP - Section 3.3 - Landfill Seepage Inspection	<b>Comment</b> This section identifies that the MCM will inspect waste storage areas periodically. If seepage water is identified, water samples will be collected and analyzed to ensure that it remains in compliance with all regulatory requirements. The inspection frequency is not identified specifically. The plan also does not identify what the analytical results will be compared against in order to assess compliance. <b>Recommendation</b> GMOB recommends the plan should include a more detailed discussion of the monitoring frequency and any standards or guidelines that will be used for assessing compliance.	<b>June 25:</b> The temporary storage of any hazardous waste onsite will meet the requirements of the GNWT Guideline for Hazardous Waste Management. Inspections of all storage areas will be completed on a monthly schedule. In the event seepage water is identified, water samples will be collected and analyzed for parameters that are consistent with the materials stored. Analytical data will be compared to Territorial, CCME, and any other standards listed in the Water Licence. The GMRP will include the above information in the next version of the Waste Management Plan. Any seepage water will be conveyed for treatment.	
3	WMMP - Section 4.1.4.1 - Spent Process Residuals	<b>Comment</b> In this section and at other locations in this plan, the GMRP suggests that residuals from the new WTP (sludge, spent resins, etc.) will be suitable for disposal as non-hazardous waste. The GMRP also identifies that further testing is being conducted to verify this assumption. The plan	<b>June 25:</b> Investigations in 2012 and 2019 have been completed to predict WTP waste residual disposal characteristics. Based on the testing completed, both the waste sludge and waste ion exchange media streams will be classified as non-hazardous waste. The classification is based on the comparison of analytical waste classification data to NWT waste disposal standards. The waste classification sampling	



		<p>does not identify timelines for when this testing will be completed or contingencies that would be available in the event the WTP residuals cannot be treated as non-hazardous waste.</p> <p><b>Recommendation</b> GMOB recommends that the GMRP provide additional details regarding the timing of the WTP residuals testing as well as a discussion of contingencies for managing this material if the testing indicates it cannot be treated as non-hazardous.</p>	<p>included the determination of leachable metals using the toxicity characteristic leaching procedure (TCLP, SW-846 EPA test method 1311). This EPA test method is the standard procedure for determining the mobility of organic and inorganic parameters in liquid and solid waste. For arsenic, the limit set per the NWT Guideline for Hazardous Waste Management is 2.5 mg/L of leachate following the TCLP. Based on the analytical results the waste is deemed to be chemically stable and is not required to be disposed of in a hazardous waste disposal facility. Toxicity characteristic leaching procedure (TCLP) testing of samples of sludge from the ETP's settling pond conducted in 2012 yielded arsenic concentration results of 0.23 and &lt;0.20 mg/L. TCLP testing of samples of three brands of spent ion adsorption media from a pilot plant conducted in 2018 yielded arsenic concentration results of 0.355, 0.211 and 0.102 mg/L. Five additional samples of sludge were collected from the Settling Pond on March 16, 2019 and were subjected to TCLP tests. The tests yielded four non-detectable concentrations of arsenic (less than 0.20 mg/L) and one concentration of 0.37 mg/L. During the initial operations of the new WTP (in 2026) sludge and spent media samples will be collected and tested to confirm that these waste streams remain not leachable. During the initial operations of the new WTP (in 2026) sludge and spent media samples will be collected and tested to confirm that these water treatment residuals</p>	
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			<p>remain not leachable. Should future testing indicate that the WTP residuals cannot be treated as non-hazardous wastes, these will be disposed of off-site at an accredited hazardous waste disposal facility. While it is recognized that the tested samples are only surrogates given that the new WTP has not yet been designed/ constructed/ commissioned, all TCLP arsenic values are one order of magnitude inferior to the limit of 2.5 mg/L from the NWT Guideline for Hazardous Waste Management. The results from these surrogates support the premise that the residuals from the new WTP will also be non-leachable per the NWT Guideline and be acceptable for disposal in a non-hazardous waste landfill. Groundwater monitoring will be completed prior to landfill construction as well as during landfill operations. (Please reference Section 4.3 of the Waste Management and Monitoring Plan). Analytical data obtained from the monitoring will be evaluated to identify and monitor potential changes in groundwater quality. In the long-term, the WTP residuals cells of the non-hazardous waste landfill will be covered using an impervious membrane. This will limit infiltration of precipitation into the cells and will further prevent the formation of leachate. Post-closure monitoring and maintenance will be further developed at the GMRP nears the end of the Active Remediation and Adaptive Management Phase. (Please reference Section 5 of the Waste Management and Monitoring Plan). Analytical data from the</p>	
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			monitoring program will be evaluated to identify changes in groundwater quality.	
4	WMMP - Section 4.2.2.1 - Landfill Sump	<p><b>Comment</b> This section indicates that a collection sump will be included as part of the non-hazardous waste landfill infrastructure and that water that collects in this sump will be treated as required. The volume of water that is expected to collect in this sump and the level/type of treatment anticipated to be required is not described.</p> <p><b>Recommendation</b> GMOB recommends that the GMRP provide additional information on the volume of water that is expected to collect in the landfill sump as well as the type of treatment that is expected to be required.</p>	<p><b>June 25:</b> At any time during the active remediation phase, one non-hazardous waste cell and one WTP process residuals cell will be active. Preliminary estimated water volumes are approximately 1,400-2,600 m<sup>3</sup> collected per year. During the adaptive management and post closure phases, one WTP process residuals cell will be active at any one time, resulting in approximate water volumes of 700-1,300 m<sup>3</sup> collected per year. If the leachate does not meet runoff criteria this water will be treated to meet applicable effluent quality criteria (EQC) via the ETP until the new WTP is commissioned and via the new WTP thereafter. The EQC are summarized in Table 3.4-1 of the Water Management and Monitoring Plan.</p>	
5	SCP - Table 3-4	<p><b>Comment</b> This table identifies the type and location of spill kits located throughout the property. The table identifies that only one of the two security trucks is provided with an oil kit, and the MEG parking lot also does not have an oil kit. GMOB notes that spills occurring in the parking lot are likely to involve hydrocarbons, and the GMRP should consider</p>	<p><b>June 25:</b> The GMRP will work with the Main Construction Manager to identify the best location for the oil kits to minimize response time throughout the site.</p>	

		<p>placing an oil kit here as well. GMOB is uncertain why only one of the two security trucks would be equipped with an oil kit - having oil kits with both trucks would potentially reduce the time required to mobilize initial response supplies to a spill location.</p> <p><b>Recommendation</b> GMOB recommends the GMRP consider whether oil kits could be provided at the MEG parking lot and with the second security truck.</p>		
6	SCP - Section 3.2.7 - Off Site Spill Response Resources	<p><b>Comment</b> This section identifies local contractors that would be able to provide heavy equipment or other resources. GMOB is not certain how the GMRP would use this equipment, i.e. as part of an initial response, or as part of a post-spill clean-up. If the equipment would be used for initial response, the GMRP should describe whether there is an arrangement in place with any of these contractors that would provide access to their equipment on a priority basis.</p> <p><b>Recommendation</b> GMOB recommends the GMRP describe any contracting arrangements that might be in place for accessing off-</p>	<p><b>June 25:</b> Arrangements are currently in place with multiple off-site contractors throughout Yellowknife. These arrangements can be accessed through subcontracts under the Main Construction Manager. Multiple contractors allow us to be sure that there is equipment available in a timely manner.</p>	

		site resources in the event of a spill.		
7	SCP - General - MSDS Sheets	<p><b>Comment</b> MSDS sheets are not provided with this plan, but will be included in subsequent versions. GMOB agrees that MSDS sheets should be included with the Spill Contingency Plan.</p> <p><b>Recommendation</b> GMOB recommends that MSDS sheets should be included with the finalized version of the Spill Contingency Plan.</p>	<p><b>June 25:</b> The GMRP confirms that MSDS sheets will be included in the updated Spill Contingency Plan that will be submitted in the next version of the plan after the issuance of the Water Licence.</p>	
8	SCP - Errata - Section Numbering	<p><b>Comment</b> The section "Spill Resources" and "Spill Response Procedures" are both numbered 3.2. Section numbering should be confirmed and updated.</p> <p><b>Recommendation</b> GMOB recommends section numbering should be reviewed and corrected as necessary.</p>	<p><b>June 25:</b> The GMRP team acknowledges the mistake in the section numbering and will address this in the updated Spill Contingency Plan.</p>	
<b>INAC - NWT Inspectors: Tim Morton</b>				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Management Plans Group 1 - Spill Contingency Plan	<p><b>Comment</b> The list of relevant Health and Safety Legislation should be updated with all Federal and Territorial legislation, e.g. MVRMA, Territorial Lands Act, etc.</p>	<p><b>June 25:</b> The GMRP will ensure that the updated Waste Management and Monitoring Plan includes all applicable Federal and Territorial legislation.</p>	

		<b>Recommendation</b> Update the list of applicable legislation.&nbsp;		
2	Management Plans Group 1 â€ˆ Spill Contingency Plan Appendix B	<b>Comment</b> Add the Inspectors contact information (867) 669-2442 <b>Recommendation</b> Add the information above.	<b>June 25:</b> The GMRP will add the Inspector's contact information to Appendix B of the Spill Contingency Plan.	

**INAC - Yellowknife: Dinah Elliott**

<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
1	Spill Contingency Plan	<b>Comment</b> <table border="0" cellpadding="0" cellspacing="0" style="width:393px"> <tbody> <tr> <td style="height:67px; width:393px">CO2 /N and Dynalene in section 3.2.3 is indicated as removed in 2020</td> </tr> </tbody> </table> <b>Recommendation</b> <table border="0" cellpadding="0" cellspacing="0" style="width:320px"> <tbody> <tr> <td style="height:67px; width:320px">Suggest changing to planned removal in 2020</td> </tr> </tbody> </table>	<b>June 25:</b> Dynalene is planned to be removed in 2020. The GMRP will update this information in the next version of the Spill Contingency Plan.	

**MVLWB: Shannon Allerston**

<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
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1	Waste Management Plan - General	<p><b>Comment</b> With the various authorizations currently administered by the Mackenzie Valley Land and Water Board, it is noted that the Waste Management Plans differ relating to the authorization/activity.</p> <p><b>Recommendation</b> Please ensure that all activities are covered under one Waste Management Plan when submitting the updated Plan.</p>	<p><b>June 25:</b> The GMRP will ensure that all activities on site are covered under one Waste Management Plan. The updated plan will be submitted to the board 90 days after the issuance of the Water Licence.</p>	
2	Waste Management Plan - Authorization from the City of Yellowknife	<p><b>Comment</b> In the Waste Management Plan it is noted that waste will be deposited at the City of Yellowknife Solid Waste Disposal Facility.</p> <p><b>Recommendation</b> Please provide confirmation that the City of Yellowknife is accepting the waste outlined in the Waste Management Plan for all phases of the project including sewage.</p>	<p><b>June 25:</b> The City of Yellowknife has agreed to accept both sanitary sewage and municipal solid waste from the Giant Mine Remediation Project. Please refer to the attached letter from the City of Yellowknife: ORS 3 - Attachment 1 - Letter From the City of Yellowknife- Municipal Services.</p>	
3	Waste Management Plan - Used Hazardous Materials - Solvents and Antifreeze	<p><b>Comment</b> In the Waste Management Plan it is noted that various types of waste are stored in appropriate containers prior to final off-site disposal.</p> <p><b>Recommendation</b> Please clarify if the waste solvents and antifreeze will be transported off-site for disposal. If not transported off-site</p>	<p><b>June 25:</b> All non-arsenic contaminated Hazardous Waste will be transported off site to a designated licensed facility in Yellowknife. The temporary storage location of this waste stream is currently being evaluated and discussed. This location will be included in the next version of the Waste Management and Monitoring Plan.</p>	

		where will the final waste be stored or disposed of.		
4	Waste Management Plan - Non Hazardous Infrastructure Waste Cell and Non Hazardous Landfill	<p><b>Comment</b> It is noted in Waste Management Plan that there will be both a non hazardous infrastructure waste cell and non hazardous landfill.</p> <p><b>Recommendation</b> During the Environmental Assessment process were there any specific dimensions placed on the establishment of the cell or landfill such as height and area</p>	<p><b>June 25:</b> There were no specific dimensions placed on the non-hazardous waste cell or the WTP process residuals cell.</p>	
5	Spill Contingency Plan - Incident (Spill) Response	<p><b>Comment</b> The Spill Contingency Plan indicates that all spills on site are recorded and documented and only the spills that are outlined in the GNWT Reportable Spill Quantities will be reported.</p> <p><b>Recommendation</b> Other than posting the information on the spills not reportable as identified in the GNWT Reportable Spill Quantities please clarify what is done with the information that is gathered and if it is shared with affected parties.</p>	<p><b>June 25:</b> All spills on site are documented and a log is kept onsite as per the applicable legislation. This spill log is available to be shared with the various regulators upon request.</p>	
6	Spill Contingency Plan - General	<p><b>Comment</b> With the various authorizations currently administered by the Mackenzie Valley Land and Water Board, it is noted that the Spill Contingency</p>	<p><b>June 25:</b> The GMRP confirms that all activities will be covered under one Spill Contingency Plan that will be updated in the next version of the Spill Contingency Plan.</p>	



		Plans differ relating to the authorization/activity. <b>Recommendation</b> Please ensure that all activities are covered under one Spill Contingency Plan when submitting the updated Plan.		
7	Spill Contingency Plan - Handling Hazardous Materials	<b>Comment</b> In the Spill Contingency Plan it indicated that MSDS binders are kept in various locations around the project site. <b>Recommendation</b> Please clarify if the Spill Contingency Plan will be available at the same locations as the MSDS binders.	<b>June 25:</b> It is the intent of the GMRP team to have the MSDS sheets attached to the spill contingency plan as appendices and available to all staff in all locations required by the various legislations.	
8	Spill Contingency Plan - Post Spill Monitoring	<b>Comment</b> After reviewing the Spill Contingency Plan it is noted that there is no post spill clean up monitoring. <b>Recommendation</b> Please clarify if there will be a process to ensure that the clean up of a spill has been adequately completed and what monitoring may be conducted.	<b>June 25:</b> Once a reportable spill is terminated and or contained, all impacted material will be removed and monitored on a regular basis and samples taken to verify that levels are below prescribed limits for all applicable legislation. The above information will be updated in the next version of the Spill Contingency Plan.	
9	Spill Contingency Plan - Appendix B - Environmental Health, Safety and Community Policy	<b>Comment</b> The current Environmental, Health, Safety and Community Policy is dated back in 2014. <b>Recommendation</b> Please clarify if this is the most up to day policy.	<b>June 25:</b> The GMRP Environment, Health, Safety and Community (EHSC) Policy was approved by senior management of the GMRP as well as within the Northern Contaminated Sites Program in 2014. The Main Construction Manager for the Giant Mine site, Parsons, also has a Corporate Safety, Health and Environment Policy Statement for its organization. Parsons has also elected to adopt the GMRP EHSC	

			policy to ensure the intent of the policy is carried throughout the management of environment, health, safety and community aspects for the duration of the Project.	
10	Engagement Log	<p><b>Comment</b> The enegagement log table (1997-2015) does not line up throughout most of the table (columns shifted)</p> <p><b>Recommendation</b> Please provide an updated engagement log with errors amended</p>	<p><b>June 25:</b> The GMRP recognizes that the table has errors. The table has now been updated and resubmitted with the ORS 3 reviewer comment responses. Please refer to ORS 3 - Attachment 2 - Revised Engagement Log 1997-2015.</p>	

**North Slave Metis Alliance: Jess Hurtubise**

<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
3	General File	<p><b>Comment</b> (<a href="#">doc</a>) NSMA comments refer to the analysis done by Slater Environmental (2019) - "Review of Post-EA Information Package Giant Mine Remediation Project"</p> <p><b>Recommendation</b></p>		
1	Engagement Plan - Section 5.2 Dispute Resolution	<p><b>Comment</b> Section 5.2 describes dispute resolution related to disputes between the GMRP and affected parties. The Engagement Plan proposes that the dispute resolution process in the Environmental Agreement can be used to address such disputes. It is not clear how this process could function in the context of the</p>	<p><b>June 25:</b> Section 5.2 of the Engagement Plan describes a step by step dispute resolution process that can be applied by all parties. In the event that the dispute reaches section (e) Dispute Escalation, the Dispute Resolution process outlined in the Environmental Agreement, Article 13, could be followed. It is a standard dispute resolution process. The GMRP understands that Article 13 is a process that can be invoked by any signatory of the</p>	

		<p>Engagement Plan because the dispute resolution can only be initiated by the GMOB, except with respect to GMOB funding, where a signatory of the agreement might be able to initiate it. There is limited scope for the process defined in the environmental agreement and it appears to have little relevance for engagement-related disputes (Slater Environmental, 2019).</p> <p><b>Recommendation</b> NSMA recommends review of the proposed dispute resolution process.</p>	<p>Environmental Agreement and not solely restricted to GMOB.</p>	
2	<p>Engagement Plan - Section 4.3.3 Socio Economic</p>	<p><b>Comment</b> Section 4.3.3 references a Socio-Economic Approach to guide the Project's decisions and actions related to socio-economic benefits. The information described in the Post-EA Information Package is focused on economic benefits and does not address social legacies or conditions (Slater Environmental, 2019).</p> <p><b>Recommendation</b> NSMA recommends that the scope should be expanded to more directly address social issues and to include a comprehensive monitoring</p>	<p><b>June 25:</b> GMRP considers this topic to lie outside the scope of the GMRP Water Licence application. The GMRP can report that In April of 2019, in partnership with stakeholders, the GMRP developed Key Performance Indicators (KPI) that are currently being tracked by the MCM for the 2019-20 fiscal year. These KPIs will be analyzed and presented to stakeholders going forward as well as in the GMRP's Annual Report. GMRP is tracking input from stakeholders and will be updating them based on feedback in the following fiscal year. The GMRP is updating and preparing to release in 2019, to the public, the Socio-economic Strategy. The Strategy will provide direction to the GMRP for delivering socio-economic benefits two ways: (1) directly by aligning</p>	

		program for socio-economic conditions and outcomes.	contracting approaches with local capacity and needs; (2) and, indirectly through capacity building activities and impact mitigation. In addition, in November of 2018, GMRP established a Socio-economic Advisory Body (SEAB) consisting of federal, territorial, Indigenous, and municipal partners and its purpose is to provide advice and input to GMRP on socio-economic activities of the project and raising potential barriers to implementation.	
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**Slater Environmental Consulting: Bill Slater**

<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
1	1. Engagement Plan	<b>Comment</b> Table 7-1 of the Engagement Plan summarizes the proposed engagement triggers and methods, including engagement related to Water Board processes, licences and permits. The Proposed Type A Water Licence provides specific details about proposed requirements for submissions including Updated CRPs, Annual Water Licence Reports, Design and Construction Plans (DCPs) for each Engineered Component, Construction Completion Reports for each Engineered Component, Performance Assessment Reports for each Engineered Component, Updated Management and	<b>June 25:</b> The GMRP notes that no response is required.	

		<p>Monitoring Plans (MMPs) to incorporate requirements from other plans, various management plans, and a Final Closure and Reclamation Report. Overall, the proposed submissions seem consistent with other projects that SEC is familiar with in NWT. These types of submissions would also be common in other jurisdictions, but the processes are often quite different, so the level of review required would also be quite different.</p> <p><b>Recommendation</b> See Recommendation for Comment 2.</p>		
2	2. Engagement Plan	<p><b>Comment</b> The proposed approach appears to provide ample opportunities for interested parties to provide input about the design and implementation of the CRP given the current situation where there is limited detail about planning and design for many elements. The review of these submissions will require a significant effort from reviewers at some stages of the project, especially as the designs are completed/submitted for many of the closure components. However, some of the information already provided as part of the Post-EA</p>	<p><b>June 25:</b> The description of the approach provided is consistent with the process proposed.</p>	

		<p>Information Package should help to reduce the level of effort required for completing the subsequent reviews, including: - The CRP includes closure criteria that reflect the current understanding of the proposed designs for closure components. In some cases, the designs are advanced far enough to include closure criteria that quantify the expected performance (e.g., T4-2 Cover meets minimum 0.5% grade for site drainage; L2-3 Design base of cell to minimum 0.75% grade to facilitate contact water collection during operations). In other cases, the CRP identifies specific types of closure criteria that need to be defined as the designs advance (e.g., P2-4 Settlement and erosion of fill in pit/cap occurs within standard parameters [appropriate numbers to be determined differential settlement of 1% of fill height pending further engineering work]). The identification of specific types of criteria provides the designers with guidance about the specific factors they need to address as they develop the designs, but still leaves an opportunity for reviewers to</p>		
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		<p>consider whether the criteria proposed in the designs are sufficient to achieve the closure objectives. This further consideration of specific criteria would likely happen during review of the DCPs for each closure component. Because the current CRP identifies the specific types of criteria that are needed, this should allow future reviews to focus on the specific thresholds for the criteria. The level of detail available in designs during review of the DCPs should allow a more focused discussion, and the GMRP will be in a better position to consider whether proposed criteria are achievable. - The Post-EA Information Package includes some overarching management plans that define the general approaches that will be applied during implementation of the CRP. For example, the Erosion and Sediment MMP "acts as a guide and provides a framework for the user to implement in selecting appropriate mitigations and the requirements for associated monitoring, in developing the Design and Construction Plan for the implementation of each closure</p>		
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		<p>activity" (Erosion and Sediment MMP, Section 4).</p> <p><b>Recommendation</b> With this approach, the future DCPs will provide specific details about how the approaches and methods described in the Erosion and Sediment MMP will be applied for each closure component. The Waste MMP provides similar overarching information that is to be refined for individual components. This approach should allow more efficient future reviews of the DCPs.</p>		
3	3. Engagement Plan	<p><b>Comment</b> The Proposed Type A Water Licence appears to envision a single Performance Assessment Report for each engineered component. This may be effective for some components where completion of the physical work can demonstrate achievement of the associated closure criteria and objectives (e.g., building demolition). In other cases, demonstration of satisfactory performance will not be a one-time event, but will require evidence over an extended period of time. For example, tailings covers could be subject to differential settlement, erosion or other</p>	<p><b>June 25:</b> The GMRP agrees that depending on the observed performance, multiple performance assessment reports may be needed over time.</p>	



		<p>instability. These conditions may develop over time.</p> <p><b>Recommendation</b> The GMRP does propose monitoring to address these types of changes, but there may also be a need to provide additional performance reports to confirm continued achievement of closure criteria and objectives.</p>		
4	4. Engagement Plan	<p><b>Comment</b> The activities carried out in accordance with the Engagement Plan need to set the foundation for establishing the communities' long-term understandings of the risks at the site.</p> <p><b>Recommendation</b> One of the goals of the Engagement Plan should be that future generations understand the risks at the site.</p>	<p><b>June 25:</b> The GMRP notes that Section 2.4 of the Engagement Plan notes that "Communications and engagement help affected parties to understand the risks associated with the GMRP". In future revisions to the Engagement Plan the wording will be revised to include "in the short term and long term" or similar. As the Perpetual Care Plan is developed linkages will be made to ensure the engagement plan captures any long-term management requirements from an engagement standpoint.</p>	
5	5. Engagement Plan	<p><b>Comment</b> One of the objectives of the Engagement Plan is for internal parties (e.g., the project team) to be well-informed about the project.</p> <p><b>Recommendation</b> The objective should be expanded to address the need for internal parties to understand the issues and concerns of the public and interested parties.</p>	<p><b>June 25:</b> This will be taken into consideration in future updates to the Engagement Plan.</p>	
6	6. Engagement Plan	<p><b>Comment</b> Section 4.1 describes the expected communication</p>	<p><b>June 25:</b> Section 4 of the Engagement Plan describes the various forms of communication</p>	

		<p>methods. Communities have identified the need for a memorial and museum as a key method for long-term communication about the project, its legacies and its risks. Section 7.14, Long-Term Risk Communication and Perpetual Care, also does not identify the memorial and museum. Section 5.9.5.7 of the CRP refers to a commemorative plaque, monument or educational memorial. The concept of a plaque likely under-represents the SDE Process participants' vision for a memorial/museum.</p> <p><b>Recommendation</b> Long-term communication through a memorial/museum should be identified as part of the Engagement Plan and addressed as part of the project.</p>	<p>options carried out by the GMRP. The development of the Engagement Plan and subsequent communication considerations were carried out in consultation with the affected parties. No one form of communication will suit all parties so numerous types are planned. Considerations for specific residual risk communications (e.g. signs, murals, land administration controls) will be developed together with affected parties during the development of the Perpetual Care Plan beginning June 2019. The memorial or museum would form part of those discussions.</p>	
7	7. Engagement Plan	<p><b>Comment</b> Section 4.2 lists committees that are relevant for engagement activities, including a Socio-Economic Advisory Body and a Socio-Economic Working Group. The membership in these groups appears to remain uncertain.</p> <p><b>Recommendation</b> It will be important to ensure effective participation from communities</p>	<p><b>June 25:</b> The GMRP established a Socio-economic Advisory Body (SEAB) in November 2018 consisting of federal, territorial and municipal partners. The purpose of the advisory body is to provide advice and input to the GMRP on socio-economic activities of the Project and addressing potential barriers to implementation. In February of 2019, the Giant Mine Oversight Board in a letter to GMRP made a recommendation to extend SEAB's membership to include all signatories to the</p>	

		that have been and will be affected by the Giant Mine project.	Environmental Agreement; this included the addition of YKDFN, NSMA and Alternatives North. In March of 2019, SEAB agreed to extend its membership and formal invitations were sent out to the above-mentioned organizations in April of 2019. All three organizations have confirmed their participation.	
8	8. Engagement Plan	<p><b>Comment</b> Section 4.3.3 references a Socio-Economic Approach to guide the Project's decisions and actions related to socio-economic benefits. The information described in the Post-EA Information Package is focused on economic benefits and does not address social legacies or conditions.</p> <p><b>Recommendation</b> The scope of the Socio-Economic Approach should be expanded to more directly address social issues and to include a comprehensive monitoring program for socio-economic conditions and outcomes.</p>	<p><b>June 25:</b> GMRP considers this topic to lie outside the scope of the GMRP Water Licence application. In April of 2019, in partnership with stakeholders, GMRP developed Key Performance Indicators (KPI) that are currently being tracked by the MCM for the 2019-20 fiscal year. These KPIs will be analyzed and presented to stakeholders going forward as well as in the GMRP's Annual Report. GMRP is tracking input from stakeholders and will be updating them based on feedback in the following fiscal year. The GMRP is updating and preparing to release in 2019, to the public, the Socio-economic Strategy. The Strategy will provide direction to the GMRP for delivering socio-economic benefits two ways: (1) directly by aligning contracting approaches with local capacity and needs; (2) and, indirectly through capacity building activities and impact mitigation. In addition, in November of 2018, GMRP established a Socio-economic Advisory Body (SEAB) consisting of federal, territorial, Indigenous, and municipal partners and its purpose is to provide advice and input to GMRP</p>	

			on socio-economic activities of the project and raising potential barriers to implementation.	
9	10. Engagement Plan	<p><b>Comment</b> Section 5.2 describes dispute resolution related to disputes between the GMRP and affected parties. The Engagement Plan proposes that the dispute resolution process in the Environmental Agreement can be used to address such disputes. It is not clear how this process could function in the context of the Engagement Plan because the dispute resolution can only be initiated by the GMOB, except with respect to GMOB funding, where a signatory of the agreement might be able to initiate it. There is limited scope for the process defined in the environmental agreement and it appears to have little relevance for engagement-related disputes</p> <p><b>Recommendation</b> The Engagement Plan should provide additional details about how the proposed dispute resolution process could work for broader purposes described, or identify an alternative method for addressing disputes.</p>	<p><b>June 25:</b> Section 5.2 of the Engagement Plan describes a step by step dispute resolution process that can be applied by all parties. In the event that the dispute reaches section (e) Dispute Escalation, the Dispute Resolution process outlined in the Environmental Agreement, Article 13, would be followed. It is a standard dispute resolution process. The GMRP understands that Article 13 is a process that can be invoked by any signatory of the Environmental Agreement and not solely restricted to GMOB.</p>	

10	11. Engagement Plan	<p><b>Comment</b> Table 7-1 describes engagement triggers and methods. For some updates to Management Plans and Programs, and for Design and Construction Plans (DCPs) there may be benefits of pre-submission engagement.</p> <p><b>Recommendation</b> Consider whether pre-submission engagement may be warranted for some Management Plans and Programs and for DCPs.</p>	<p><b>June 25:</b> The GMRP continually assesses where engagement is required, warranted, and appropriate, and will continue to do so.</p>	
11	12. Engagement Plan	<p><b>Comment</b> Table 7-1 states: "Construction Completion Report will be submitted to the Board prior to commencement of construction/remediation of components in the Closure Plan."</p> <p><b>Recommendation</b> Timing should be clarified because completion reports cannot be submitted prior to construction.</p>	<p><b>June 25:</b> This is an error; "Construction Completion Reports" will be removed from the table in the next version of the Engagement Plan.</p>	
<b>Yellowknives Dene First Nation: Machel Thomas</b>				
<b>ID</b>	<b>Topic</b>	<b>Reviewer Comment/Recommendation</b>	<b>Proponent Response</b>	<b>Board Staff Response</b>
1	General File	<p><b>Comment</b> (<a href="#">doc</a>) YKDFN Cover letter in response to Giant Mine Remediation Project water License application (MV2007L8-0031)</p> <p><b>Recommendation</b></p>		

2	<p>Engagement Plan: Section 4.2 &amp; Table 4-2 - Engagement Committees - Health Effects Monitoring Program Advisory Committee, and Table 6-1 - Key GMRP Engagement Activities in Closure Planning - Health Effects Monitoring Program. Health Effects Monitoring Program</p>	<p><b>Comment</b> YKDFN expects long-term studies and testing to monitor human health effects (including stress studies). These studies should be designed to check current state and then measure improvements to public health during the remediation and post-reclamation phases. YKDFN want to see timelines in place for these studies and a clear methodology for these studies including plan for measuring changes and trends. Within the HHERA it specifically states within the executive summary that "...the HHRA does not provide a direct assessment of cause and effect concerning current health problems or effects. Any link between exposure and actual health effects comes from epidemiological studies, which includes surveys of health problems in a community, and compares them to health problems in other cities and populations where the same type of exposure does not occur. The on-going Health Effects Monitoring Program is a component of these epidemiological studies...It is recommended that the results of the HHRA be used to inform the</p>	<p><b>June 25:</b> The GMRP does not agree that the Yellowknife Health Effects Monitoring Program (YKHEMP) should fall under CRP monitoring and management plan commitments. The Measure specifically indicates that this program should be conducted independently. The GMRP and its partners are very much committed to fulfilling the requirements as planned under this Program. The YKHEMP is implemented by a research team lead by Dr. Chan at the University of Ottawa. The GMRP participates in the program as a member of the Advisory Committee, along with the YKDFN and others. The GMRP is committed to ensuring that the Program is carried out for ongoing phases, which will include follow-up investigations in 2019, further reporting publicly in 2020, and additional sampling in 2022 for children and 2027 for adults. This sampling phase will take place during active remediation with a subsequent phase will occur post remediation. On-going public and participant communications of the program and its results are a priority for the research team and Advisory Committee. An engagement and communications plan is in place for YKHEMP, including a community coordinator to ensure participants and future participants and community members are well informed of all aspects. The Northern Abandoned Mine Reclamation Program, announced in Budget 2019, will cover the full implementation cost for</p>	
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		<p>Health Effects Monitoring Program."</p> <p><b>Recommendation</b> YKDFN currently participates in the Health Effects Monitoring Program (HEMP) and will continue to be a part of it's development and execution. YKDFN expects the Health Effects Monitoring Program be part of the CRP monitoring and management plan commitments (YKDFN be involved/co-manage, not just engaged). YKDFN would like the Board to ensure that in additon to data collection and analysis, the co-proponents commit to ensuring the results of the HEMP are communicated to the community (communication plan) and details what the funding, support and follow up programs will be available for those that take part in these programs.</p>	<p>the Giant Mine Remediation Project, including the YKHEMP program.</p>	
3	<p>Engagement Plan: Section 4.3.3 Socio-Economics</p>	<p><b>Comment</b> YKDFN want to ensure maximum involvement for training and employment opportunities. Many opportunities are evident associated with the long-term monitoring programs outlined in Section 5.12 (Monitoring and Management) of the CRP and within the detailed Monitoring and</p>	<p><b>June 25:</b> The GMRP considers that this item is beyond the scope of this Water Licence proceeding. Although the Project does not plan to develop a Community Benefits Plan with the YKDFN, we have committed to many of the items listed. The GMRP has developed and is implementing a socio-economic strategy to ensure Northerners and Indigenous persons are positioned to benefit from opportunities that</p>	

		<p>Management Plans provided in Volume 4 of the Water Licence Application. These activities are to be conducted by private sector contractors procured through the Main Construction Manager (MCM) [Parsons Incorporated], who is managed by Public Services and Procurement Canada (PSPC). Section 4.3.3 (Socio-Economic) of the Engagement Plan states that the MCM is required to: - develop an Aboriginal Benefits Strategy during the implementation of the remediation project; - complete industry capacity studies; - structure work packages and sub-contracts to maximize opportunities for Indigenous and northern businesses; - use Aboriginal Opportunities Considerations (AOCs) in subcontractor tenders; and - use the Procurement Strategy for Aboriginal Businesses (PSAB), where competition is achievable in the market place.</p> <p><b>Recommendation</b> The Board not issue a water licence until the co-proponents have concluded a Community Benefits Plan (CBP) with YKDFN. The agreement</p>	<p>result from the remediation of the Giant Mine site. A summary of the strategy was shared with partners and stakeholders in December 2018. The Project team intends to make the strategy publicly available in 2019 and will work with the Socio-Economic Working Group to start developing the Action Plan to implement the strategy. The GMRP would like to highlight that this strategy includes measures to support successful participation in the Project and reduce and limit barriers that might prevent Indigenous and Northern persons, including those living in the Môwhì Gogha De Niitlee claim area and Akaitcho Asserted Territory, from benefitting from employment opportunities that arise out of the Giant Mine site's remediation. It also looks at ways to support and build capacity in the North, such as access to relevant training to support work required at the site. As part of implementing the Strategy, the GMRP has: 1.) Completed an update in 2018 to the Labour Resource Study Report. This report assessed local employment and procurement capacity and assessed against the needs of the Project. It was not a thorough comprehensive community assessment. It also described training programs that can address identified gaps. 2.) Funded the Yellowknives Dene First Nation Dechita Naowo environmental monitoring training program. 3.) Funded three full time positions at the Yellowknives Dene First Nation, including a Giant-designated Economic Development Officer. 4.) Established</p>	
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		<p>would include, but will not be limited to: - procurement process - training - capacity building - compensation - legacy - funding for government to government discussions.</p>	<p>the Socio-Economic Advisory Body, a senior level committee responsible for coordinating regional socio-economic programs and maximizing opportunities from remediation activities on the Giant Mine site. It consists of senior management representatives from federal, territorial, municipal and Indigenous partners. The Advisory Body's purpose is to provide the Project with strategic advice and input on socio-economic aspects of the project, to brief their respective organizations on Project's approaches, and to raise potential organizational barriers to implementation so ways to address them can be explored. 5.) Held an Industry Day on November 26, 2018 in Yellowknife. Close to 100 participants attended. 6.) Developed a set of Key Performance Indicators for the Project. 7.) Worked with Parsons on developing an Indigenous Benefits Strategy, including a Skills Inventory to inform Parsons' recruitment and hiring of local staff. 8.) Established a working group between the Yellowknives Dene First Nation, Parsons (Main Construction Manager) and the Project team, whose purpose is to create an inventory of Yellowknives Dene First Nation members' labour and skill capacity, as well as identify potential barriers to employment and training. Parsons and CIRNAC plan to do a similar exercise with the NSMA and Tli?cho. The GMRP is providing funding for training to begin preparing community members to participate more fully as the Project moves</p>	
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		<p>closer to implementation. The Project team provided \$115,000 in 2017/18 and \$155,000 in 2018/19 to the Yellowknife Dene First Nation for the Dechita Naowo Program, as well as an additional \$5,800 in 2018/19 specific to professional development for the Yellowknives Dene First Nation's Giant Mine Community Liaison and Technical Advisor. The Project team funds annual proposals from the Yellowknives Dene First Nation, North Slave Métis Alliance, City of Yellowknife and Alternatives North for technical and administrative resources to participate in the Project. For example, based on the work proposed by the parties, the GMRP has provided the following funding to facilitate participation in the Project: approximately \$315,000 in 2016/17, \$309,000 in 2017/18, and \$582,000 in 2018/19 to the Yellowknives Dene First Nation, with \$520,000 in funding anticipated for 2019/20. This does not include the training funding for Dechita Naowo noted above, which was provided in addition to this funding. As detailed in the Engagement Plan, the GMRP will continue to support training and capacity building through yearly Contribution Agreements with the YKDFN. Legacy issues, including apology and compensation are led by the NWT Regional office of Crown-Indigenous Relations and Northern Affairs Canada, as they are outside the scope of the Giant Mine Remediation Project. The NWT Regional office has provided the following response: The</p>	
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			<p>Government of Canada recognizes this issue is of great importance to the Yellowknives Dene First Nation. Senior officials from CIRNAC's NWT Region have met with the Chiefs to discuss how best to engage the community, and especially the Elders. In October 2018, Minister Carolyn Bennett wrote to Chief Ernest Betsina and Chief Edward Sangris to advise that she instructed Matthew Spence, Regional Director General, CIRNAC NWT Region, to further engage with the Yellowknives Dene First Nation on this matter. The reason for the engagement is to better understand the nature of the Yellowknives Dene First Nation's concerns and how Canada can meaningfully address them in the interests of reconciliation and strengthen our nation-to-nation relationship with them. The Department is currently reviewing and assessing the historical record so Canada can respond to the Yellowknives Dene First Nation in a meaningful way. This process is ongoing, and the findings will be shared with the First Nation. Canada is committed to working with the Yellowknives Dene First Nation in support of our commitment towards reconciliation and is working closely with them on next steps. CIRNAC would like to note that, in the last quarter of 2018-2019, the Department, via the Regional office, provided the YKDFN with \$197,000 in funding to cover the costs associated with their research. This includes their review of historical documents and traditional knowledge.</p>	
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4	Engagement Plan: Section 6.2.2 Community Based Monitoring Program	<p><b>Comment</b> Section 6.2.2 (Community Based Monitoring Program) of the Engagement Plan has documented concerns from YKDFN and NSMA with respect to re-contamination of sediment in Baker Creek and that the Project has heard the desire from YKDFN to participate in on-going, long-term monitoring on Site, in all areas, to ensure risks are communicated, and monitoring results are disseminated to their communities. A community-based monitoring program is said to be under development collaboratively with affected parties and that more information will be made public on CBMP, when it becomes available.</p> <p><b>Recommendation</b> The Board require that the co-proponents provide updates and clarify commitments.</p>	<p><b>June 25:</b> The GMRP will provide updates through regular communication and engagement avenues, as presented in the Engagement Plan and documented in our engagement log. The GMRP has committed to co-developing a Community Based Monitoring Program with stakeholders. Given engagement demands on stakeholders in 2018 and anticipated in 2019, the Project has not advanced the CBM planning to-date. The GMRP has provided funding to YKDFN, to engage their consultant Trailmark, to provide initial guidance and direction on developing considerations in the design of a Community Based Monitoring Program. Preliminary meetings have occurred with YKDFN and their consultant Trailmark, with future meetings intended.</p>	
5	Engagement Plan: Section 7.1.4 Long-term Risk Communication and Perpetual Care	<p><b>Comment</b> YKDFN have concerns about the legacy of Giant Mine. The YKDFN have concerns that there is no formal plan in place for ensuring the communication of the legacy of the mine.</p> <p><b>Recommendation</b> The Board require that the co-proponents provide updates and clarify commitments. The YKDFN</p>	<p><b>June 25:</b> Section 4 of the Engagement Plan describes the various forms of communication options carried out by the GMRP. The development of the Engagement Plan and subsequent communication considerations were carried out in consultation with the affected parties. No one form of communication will suit all parties so numerous types are planned. Considerations for specific residual risk communications (e.g. signs, murals, land</p>	

		<p>appreciate that the GMRP is working on legacy planning and providing support to the YKDFN to be a part of the planning and execution of these activities. One of which will be the development of a Central Repository of Information on Giant Mine. The YKDFN would like to continue being a part of the development and execution of engagement surrounding Long-term Risk Communication and Perpetual Care of Giant Mine. YKDFN would like the Board to direct the roponent to continue to solicit and incorporate input from YLDFN when capturing and describing the legacy of the Giant Mine including, but not limited to: 1. Stories as part of the education on the history of Giant Mine to not only educate locals, but to visitors to the area. 2. Establish roadside pullout information panels 3. Erect signage for areas with known high concentrations of contaminants warning people of the dangers of eating wild berries, etc.</p>	<p>administration controls) will be developed with affected parties during the development of the Perpetual Care Plan (PCP) beginning June 2019. The PCP is a requirement of the Environmental Agreement. The GMRP fully intends to work closely with the YKDFN on these initiatives. The GMRP acknowledges that the legacy issues, road side pullout and health advisories are beyond the scope of this Water Licence proceeding, but can confirm the following: GNWT-ENR is still committed to support the work required to develop educational signage from the YKDFN perspective for a road side pull out near the Site and anticipates receiving further information from YKDFN and looks forward to working together to implement this project. The GNWT Chief Public Health Office is the responsible party ensuring public health advisories are issued. It is important to note that the Chief Public Health Office of the Department of Health and Social Services issued their first health advisory for residents and visitors about precautions they can take to avoid exposure to elevated arsenic levels found in some of the lakes/areas located around Yellowknife in 2016, with subsequent annual updates being informed by university research etc, in addition to including the results from the 2018 GMRP HHERA, which not only assessed risk on the Giant Mine Site, but to residents in general from Yellowknife, Ndilo and Dettah using and harvesting from the land around the Site. The advisory can be found at</p>	
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			<p><a href="https://www.hss.gov.nt.ca/en/newsroom/arsenic-lake-water-around-yellowknife">https://www.hss.gov.nt.ca/en/newsroom/arsenic-lake-water-around-yellowknife</a> Signage is one risk management consideration that can be applied to areas to communication on-going risks, and is always a consideration for use. Currently, there are a number of signs posted in the Yellowknife area communicating land use advisories.</p>	
6	<p>Engagement Plan: Engagement Triggers</p>	<p><b>Comment</b> YKDFN have concerns about change management for the GMRP. Given the scale and complexity of the project there are certain to be changes to various regulatory authorizations and processes engaged at the Giant Mine site. While YKDFN is active on many Giant Mine Oversight Board committees, we want to ensure that we are engaged in the decision making at the site as any other government would be. This includes the ability to make suggestions to improve processes or introduce new techniques/technology as well as to be informed as soon as practicable if a operational constraint arises in the project which request a change that may affect YKDFN rights and interests.</p> <p><b>Recommendation</b> YKDFN wants a process developed outlining potential changes to the overall</p>	<p><b>June 25:</b> The GMRP will continue to work with the YKDFN Chief and Council and its officials during the remediation project. The GMRP will be regularly updating the Chief and Council and members on the remediation project as outlined in the Engagement Plan submitted as part of the GMRP Water Licence Application package. The mandate to research and evaluate new technologies for the purpose of remediating the arsenic trioxide is the responsibility of the Giant Mine Oversight Board. They are required to provide annual public updates on the status of the research and subsequent recommendations to the GMRP.</p>	

		<p>remediation plan. For instance, what is the process by which application of new technology of arsenic management is communicated to the stakeholders? Will there be a change to the WL? Will stakeholders be consulted/accomodated on any changes to the program? The YKDFN does not want barriers to allowing the use of new technologies, we want to be informed and involved in those change process so we can support the project in a positive manner. The establishment of a process will provide the GMRP with a plan on how to act, when to involve stakeholders and to what degree of involvement by those stakeholders. The Board direct the co-proponents to ensure that adequate consultation and accomodation practices are in place to enable YKDFN to be engaged in a government - to - government capacity with the GMRP.</p>		
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