

From: [Tyree Mullaney](#)
To: [Permits](#)
Subject: FW: Alternatives North Response to Aug 18 INAC Letter
Date: September 22, 2017 1:58:32 PM

MV2007L8-0031 – AANDC – CARD – Alternatives North Response to August 18, 2017 letter from AANDC

Reports and Studies
Operations and Notifications

Thanks

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From: Todd Slack [mailto:nerds@northwestel.net]
Sent: September 21, 2017 3:41 PM
To: Rebecca Chouinard <rchouinard@mvlwb.com>
Cc: 'Gordon Hamre' <gordon.hamre@gmail.com>; 'Natalie Plato' <Natalie.Plato@aandc-aadnc.gc.ca>; Tyree Mullaney <tyree@mvlwb.com>
Subject: Alternatives North Response to Aug 18 INAC Letter

Hi Rebecca.

Alternatives North has reviewed the letter submitted to the board on August 18th and have a few comments to make.

1. First and foremost, AN does not consider measure 6 complete. Indeed, we believe the effort has only just begun – the initial report provided by the project was rather narrow in scope, failing to address the material matters put forward by the Review Board . The last Giant Mine Working Group meeting identified an overall deficiency with the effort to date – with all of the members of the working group agreeing that more was needed. At this point, our belief is more aligned with the table provided with Annex A – that future action is required.

We thought that the parties and the developers were in accord on the need for major revisions before this report could be accepted – after the last working group meeting the project committed to a major revision of the report in collaboration with the working group members (the meeting notes and minutes are not yet available from the discussion, but the parties seemed to echo many of the same concerns).

AN is committed to working with the project as we believe that this matter is critical for the long term success of the project. The revision effort features an aggressive timeline, with a (perhaps optimistic) deadline prior to 2018, with the first of a series of focused discussions on improvements scheduled for next week. We are hopeful that this effort can advance the state of knowledge towards a decision point, as the Review Board directed.

We want to be clear: In its current state, this report does not meet the requirements of the Review Board. It fails to address many of the points laid out in the Board's Report of Environmental Assessment. As we have already noted with the project this Measure was intended to avoid likely significant impacts – failing to meaningfully address the heart of the issue introduces unnecessary long term risk to the residents of Yellowknife, Ndilo and Dettah.

2. It has not been a matter of focus at the Working Group, but I am not aware of a Tailings Monitoring and Management Plan (Measure 23). It was possible that it happened when I stepped away from the project for a few years, but I don't see anything on the Board registry.... Lastly, Annex A notes that the status is 'future action required' with the plan to be submitted as part of the full water license package in 2017. As with Measure 6, it seems that this shouldn't be included within the 'completed' works on the first page of the letter. As it's in the 'in progress' section of page 1 as well, perhaps this is a typo?
3. We can speak to Measure 6 in particular as it has been a matter of focus in recent months. AN has not sought to complete a comprehensive review for the measures and suggestions – the project is planning a working session in the near future to review the work associated with Measures to date. It's clear that the thinking behind the current project is advancing at a significant pace – to a point where there are significant differences than what's proposed in the DAR. If the Board has any questions on the
4. Please feel free to add this to the registry.

We're sending this note in an effort to let the board know that there's still work to be done here... that, while we're happy with the progress in recent years, when it comes to Measure 6 – there's just a long way to go before we get to completing the MVEIRB recommendation.

Any questions, we're happy to help.

Cheers,
Todd Slack
for Alternatives North

