

Giant Mine Remediation Project Environmental Assessment Opening Remarks



Alternatives North

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Presentation Outline

- **Background on Alternatives North**
- **General Subjects Reviewed**
- **Unusual Aspects of this EA**
- **Unresolved Issues**
- **Summary**
- **Conclusions**
- **Next Steps**



Alternatives North

- **based in Yellowknife with supporters in communities**
- **began in 1992**
- **social justice group with representatives of churches, labour unions, environmental organizations, women and family groups, seniors, and anti-poverty interests**

Alternatives North

- **Goal: seek best possible mine closure that includes the interests of future generations**
- **worked closely with the Yellowknives Dene First Nation and City of Yellowknife**
- **acknowledge participant funding from AANDC and financial support from the Western Mining Action Network and the Abandoned Mines Program (Memorial University)**

General Subjects Reviewed

Main focus on two issues

- **Independent Oversight**
 - Government has too many roles and responsibilities on Giant Mine remediation
 - No meaningful public involvement in the project to date
- **Perpetual Care**
 - Need to maintain and monitor the frozen blocks at Giant Mine forever

General Subjects Reviewed

Concerns on other issues:

- Impact on ice in Back Bay,
- Impact on water quality in Back and Yellowknife bays,
- Impact on air quality,
- Risk assessment and management, and
- Other issues identified in our Technical Report

Unusual Aspects of this EA

- Most EAs deal with private sector developments
- Most EAs deal with new developments at a site

This EA is different

- This EA deals with a development after-the-fact, remediation to reduce or eliminate risk and impacts
- Development that requires humans to monitor and manage forever
- Many aspects of this project are still conceptual

Unresolved Issues

PUBLIC CONCERN

- **Development referred for an EA based on public concern, basically a lack of trust**
- **Little progress on the issue of trust during the course of the EA**
 - **Developer has caused delays during this EA at least 9 times for a total of more than 200 days**
 - **Site Stabilization Plan developed and approved in secret, designed to avoid EA and split the project**
 - **No consent or support from the City of Yellowknife or YKDFN for this project to proceed**
- **No “Social Licence”**

Unresolved Issues

PUBLIC CONCERN

- **Support the call for an apology and compensation as made by the YKDFN Elders to begin to build trust**
- **Need to learn from Giant Mine and prevent more perpetual care sites by improving the mining reclamation regime**
- **Significant public concern remains**

Unresolved Issues

ICE THINNING

- Issue of ice thinning has been raised for over two years
- Developer has not done the modelling or field work to show how much thinning of ice will happen on Back Bay
- Will Back Bay be safe for winter travel?
- Source of significant public concern

Unresolved Issues

WATER QUALITY (YELLOWKNIFE AND BACK BAY)

- Issue of water quality has been raised for almost two years
- Developer has not done the modelling to show what the changes in water quality will be
- Developer will not commit to pay for any increased costs for water treatment in the case of accidents or malfunctions
- Potential for significant adverse environmental impacts

Unresolved Issues

TAILINGS COVER AND PERFORMANCE

- **No clear objectives, design or performance criteria**
- **Two of four test pads under water and of no practical use**
- **Potential for significant adverse environmental impacts**

Unresolved Issues

ENVIRONMENTAL MANAGEMENT PLANS

- **AANDC resisted following its own Mine Site Reclamation Guidelines**
- **Need for clear plans based on mine components**
 - **closure objectives**
 - **measurable performance or closure criteria (how to measure success)**
 - **monitoring systems to track performance**
 - **triggers or thresholds for specific actions (a plan when things go wrong)**
 - **where there is uncertainty, research and design work and a schedule to fill gaps**

Unresolved Issues

ENVIRONMENTAL MANAGEMENT PLANS

- **Working Group established at suggestion of AN and YKDFN**
- **Good step but limited progress to date**
- **Potential for significant adverse environmental impacts**

Unresolved Issues

INDEPENDENT OVERSIGHT

- **AANDC acknowledges conflicting roles of developer, inspector, enforcer, duty to Aboriginal peoples**
- **No written guidance for employees to avoid conflicts, clear example of inspector being overridden at Giant**
- **Dramatic shift in project management away from Yellowknife to Ottawa and Edmonton**

Unresolved Issues

INDEPENDENT OVERSIGHT

- **AANDC has supported and signed agreements for oversight for northern diamond mines**
- **Oversight Working Group set up 6 months ago**
 - **11 meetings, 6 drafts of a discussion paper, 7 drafts of an environmental agreement**
 - **AANDC will not commit to independent oversight, wants “further discussions”**
- **Source of significant public concern**

Unresolved Issues

ONGOING RESEARCH AND DEVELOPMENT

- **AANDC has approached the frozen block method as the full and final solution**
- **Onus on future generations to come up with a solution**
- **AANDC will not commit to proactive research and development of a better solution, only a ten-year technology review**

Unresolved Issues

ONGOING RESEARCH AND DEVELOPMENT

- **Research and development is an investment and can reduce perpetual care costs and requirements**
- **Frozen block unacceptable without a proactive research and development program**
- **Source of significant public concern**

Unresolved Issues

PERPETUAL CARE

- **Perpetual care required at Giant no matter what is done with the site**
- **Developer has not minimized perpetual care requirements, “risk management” approach used**
- **Lack of a federal policy framework for perpetual care of remediated sites**

Unresolved Issues

PERPETUAL CARE

- **Remediation Plan does not adopt best practices learned from other perpetual care sites**
- **No firm commitment to develop a perpetual care plan, only vague commitment to discuss**
- **Source of significant public concern**

Unresolved Issues

GIANT MINE ENVIRONMENTAL AGREEMENT

- **Legally binding agreement needed to start to build better relationships and to firm up commitments**
- **Agreement is the way to:**
 - **build independent oversight**
 - **ensure ongoing research and development**
 - **spell out environmental management and monitoring**
 - **set out perpetual care planning and management requirements**

Unresolved Issues

GIANT MINE ENVIRONMENTAL AGREEMENT

- **Oversight Working Group has made limited progress**
 - **AANDC will not commit to an agreement**
- **An agreement is the best way to mitigate and reduce significant public concern**
- **An agreement is a “social contract”, just like the contracts necessary to carry out the physical work of the project**

Summary

- **Many technical issues still unresolved**
- **Little progress on “social licence” or “social contract”**
- **AANDC/GNWT accepted 1 of 11 recommended measures from Alternatives North**
- **Significant public concern remains around the Giant Mine Remediation Plan**
- **Potential for significant adverse environmental impacts caused by the development**

Summary

Engineering

Physical Works and Management

Active/Passive Freezing System

Baker Creek Enhancements

New Water Treatment Plan

Environmental Management System

Independent Peer Review Panel

Contracted Project Management

**REDUNDANCIES and
EXTRA PRECAUTIONS**

Giant Mine
Remediation
Project

Human and Social Aspects Community Engagement

Apology and Compensation ✗

Local Political Support for Project ✗

Ongoing Research and Development ✗

Independent Oversight ✗

Long-Term Funding Arrangements ✗

Full Disclosure of Information and Records ✗

Site Designation and Land Use Controls ✗

Comprehensive Perpetual Care Plan ✗

Environmental Agreement ✗

NO "SOCIAL LICENCE" OR CONTRACT

Conclusions

- **AN finds that the development can proceed but only if recommended measures are implemented as a complete package**
- **AN still requests binding measures even if the Developer has made similar commitments (personnel and priorities change)**

Next Steps

- **Concern that AANDC and GNWT will make further unilateral exemptions of parts of the Remediation Plan from EA**
- **Concern that AANDC and GNWT will “accept the intent” of Review Board measures or try to significantly modify measures recommended by the Review Board**