PUBLIC HEARING FOR THE RENEWAL OF THE JERICHO PROJECT TYPE "A" WATER LICENCE 2AM-JER0410

TABLE OF TECHNICAL SUBMISSIONS AND SHEAR'S RESPONSES AND COMMITMENTS

NOVEMBER 30 - DECEMBER 1, 2011

shear diamonds

Author/agency	Report Section	Query/Comment	Response	Commitment	Date
PKCA MANAGEMENT PLAN					
AANDC		Shear to get back to AANDC re: chronic toxicity (testing) of flocculants	Maxxam has performed due diligence product tests on various flocing agents to determine potential toxicity dosing limits. This entailed performing multiple-dilution rainbow trout tests on untreated mine site water or in-houses trout culture water. These tests resulted in site-specific dosing limits and/or confirmed toxicity data of the MSDS.	Shear will work with Maxxam Lab to undertake due diligence tests on floccing agents to determine toxicity dosing limits.	
AANDC		Shear to check peak flow events – ensure water balance includes considerations (i.e. 2006 event) - addressed via SWMP		The hydrology and peak flow events will be addressed in the revised Site Water Management Plan to be submitted by end of year 2012.	
PIT DEWATERING ADDENDUM					
AANDC		Shear to reassess Water Quality Dilution modeling after production	Shear will reassess the Pit Water Quality Dilution model for pit water following two full years of mining operations. This will enable Shear to use actual pit water quality data for the model. Two years will provide the best understanding as the first year of mining operations will not be typical of full operations.	Shear will reassess the pit water quality dilution modeling following two full years of mining operations.	
AANDC		Shear to include in mine plan, or AEMP testing for mineralization of pit water	Shear requires clarification on what is meant by mineralization of pit water.		
SITE WATER MANAGEMENT PLAN					
AANDC		design of berms (retention ponds) – conceptual design of ponds will be included in revised SWMP (not in advance of hearings)	Shear conducted a Seepage Survey in September of 2011. Copies of the report are being provided. Based on the results of the seepage survey Shear will implement a more detailed seepage survey program in 2012 that includes seasonal sampling and establishing sampling stations in Carat and C1 lakes. Shear will conduct a surface water dispersion model in Carat Lake.	In 2012, Shear will implement a detailed seepage survey program with seasonal sampling and will establish sampling stations within Carat Lake and Lake C1. Shear will conduct a surface water dispersion model in Carat Lake. The data and information from these programs will help to assess the need for collection ponds and if needed will assist in the design.	
GENERAL MONITORING PLAN					
AANDC		3rd party geotech. Review required (5 years since construction and change of ownership)	The dams are categorized as high consequence structures which require a 3rd party dam safety review after 7 years. Shear will comply with the CDA Guidelines.	Shear will comply with the CDA Guidelines and conduct a 3rd party dam safety review in 2013.	
	P4/Sect4.2/Pgh8/Operational Geotechnical Inspections	Recommend annual training program for site staff for the monitoring program.	Shear will include a description of the training programs for site staff in the next iteration of the GMP.	The revised GMP will be issued by June 29, 2012.	
AANDC		Shear to include HWTA in future geotech reviews	The HWTA was inspected as part of the 2011 annual geotechnical inpsection.	The HWTA will be included in the annual geotechnical inspections.	
AANDC	P4/Sect 3.0/Pgh2/ Data Management	Data Management: Updated GMP will provide more detail on data management and implementation	This will be addressed in the next update of this plan.	The revised GMP will be issued by June 29, 2012.	
AANDC	P10/Sect6.3.1/pgh2/Weekly Seepage Inspection	Suggest field parameters such as conductivity and pH and visual estimate of turbidity also be recorded where visible flow is observed.	This was done during the 2011 seepage survey. The next version of the plan will include wording that indicates that this will be done.	The revised GMP will be issued by June 29, 2012.	
AANDC	P10/Sect6.3.1/pgh2/Weekly Seepage Inspection	Seepage flows at Dam: Shear to clarify in plan that if seepage flows are visible, portential mitigation is to collect and divert seepage back to PKCA - this is dependant on the amount of threshold (mitigation is threshold dependant)	Part G, Item 2c states that "the licensee shall collect and return seepage from the PKCA and corrective measures shall be implemented."	This will be clearly identified in the revised GMP. The revised GMP will be issued by June 29, 2012.	
PRELIMINARY LANDFILL MANAGEMENT AND DESIGN PLANS					
AANDC		Wind dispersion of incinerated material (ash): Shear to develop SOP to address this issue		As stated at the technical meetings, all ash will be disposed of in covered drums. The covered drums will be placed in the landfill. Shear will develop an SOP that addresses ash diposal. This will be included in the revised Waste Management Plan to be filed by October 29, 2012.	
AANDC		Sludge management: will be addressed via revised GMP or technical memo by Shear	The sewage sludge will be buried and encapsulated within the wasterock pile. The sludge pit will be lined with a filter layer. The sludge will be located such that in the event that there is any leaching, the water will flow toward the pit.	This will be addressed in the revised GMP and the revised WMP.	
AADNC		Shear to consider previous comments by intervenors on Tahera plans	Previous comments were considered when Shear devleoped the landfill management plan.	In developing all future plans, Shear will review comments from intervenors on plans submitted by Tahera and on plans previously filed by Shear.	
AANDC		Shear to address how water licence Section G, Item 12 of licence is addressed by way of presentation at public hearing.	The landfill has been located so that contact water will be directed towards the pit.		
AANDC		General Comment: The Tahera designs and plans were not approved by the NWB. Previous comments from intervenors may help to guide Shear in the development of their plans.	Previous comments were considered when Shear developed the landfill design and management plan	In developing all future plans, Shear will review comments from intervenors on plans submitted by Tahera and on plans previously filed by Shear.	
PRELIMINARY LANDFARM MANAGEMENT AND DESIGN PLANS					
AANDC		Shear has sighted landfarm area	The proposed location of the landfarm was shown to AANDC during the August site visit. The location is being shown in the presentation at the public hearing.		
AANDC		General Comment: The Tahera designs and plans were not approved by the NWB. Previous comments from intervenors may help to guide Shear in the development of their plans.	Shear did review the comments that were provided on Tahera's designs. Shear filed a revised Preliminary Design Plan that incorporated the comments and concerns that were raised.	Shear is presenting the landfarm location at the public hearing and looks forward to receiving comments from the intervernors in order that this plan can be finalized and approved. The revised landfarm plans will be filed within 12 months of reissuance of the licence as recommended by Environment Canada.	
AANDC		General Comment: The Tahera designs and plans were not approved by the NWB. Previous comments from intervenors may help to guide Shear in the development of their plans.	Previous comments were considered when Shear developed the landfarm design and management plan	In developing all future plans, Shear will review comments from intervenors on plans submitted by Tahera and on plans previously filed by Shear.	
EC		EC recommends that a revised plan for the management and disposal of hydrocarbon contaminated materials be submitted within 12 months of licence issuance. The revised plan to address how birds will be deterred from landing on water ponded in the landfarm and the disposal of recovered hydrocarbons.	The revised landfarm plans will include the selected location and will address concerns and comments that have been provided by intervenors, including, but not limited to, how birds will be deterred from landing on water ponded in the landfarm, a detailed description of the sump, the treatment of the contaminated water and the disposal of recovered hydrocarbons.	As recommended, Shear will update the landfarm plans and will submit them to the NWB within 12 months of licence issuance or 60 days prior to construction and implementation, which ever date comes first.	
WASTEROCK MANAGEMENT PLAN					
AANDC		AANDC would like assurance that any results from ARD/ML testing be made available prior to the necessity for segregating the rock druing mining operations - Shear has conducted analysis, will confirm when results can be released.	Shear will begin conducting ARD/ML sampling in 2012. This will be ongoing and will continue throughout the life of the project. The results of the testing will be filed with the NWB when available.	The results of all ARD/ML testing will be filed with the NWB when available. The Waste Rock Management Plan will be revised and filed within one year of reissuance of the licence. The revised plan will include a description of rock placement and segregation.	
AANDC		Seepage Survey Results: Shear conducted survey, to confirm if results can be released	Report is complete and available.		
AANDC		Shear to clarify in SWMP that construction of retention pond A will be contingent on water quality	The revised SWMP will include wording that addresses the criteria that will be used to determine the construction of the collection ponds as well as the design.	The Site Water Management Plan will be revised and filed by end of year 2012.	
AANDC	Sec. 7.5	Shear to confirm that a geotechnical inspection of waste rock piles was conducted in 2011. Geotechnical inspection not conducted on Waste Rock Piles in 2010.	An inspection of the waste rock piles was completed as part of the 2011 annual geotechnical inspeciton. The Annual Geotechnical Report was filed on September 15, 2011.		
AANDC		Geotechnical inspection of waste rock piles should be undertaken yearly.	The waste rock piles will be included as part of the annual geotechnical inspection	The waste rock piles will be inspected annually as part of the geotechnical inspection.	

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AANDC	Sec.11.3.1	Shear to clarify what the target layer thickness is of the granitic pad and CPK - to maintain the foundation in a frozen state	The waste rock layer will be a minimum of 4 m thick, similar to the cover layer thickness on the frozen core dams. The depth will be confirmed on the basis of ground temperature cables to be installed in the waste rock areas.		
AQUATIC EFFECTS MONITORING PROGRAM					
AANDC		The AEMP should be updated for Operations. Shear to submit prior to, or in conjunction with production	Shear will file a revised AEMP in 2012. Shear is seeking to file the AEMP for approval prior to commencing the August sampling program so that comments can be addressed and incorporated and the plan can be finalized before sampling.	The revised AEMP will be filed for approval prior to commencement of the August 2012 sampling program.	
AANDC		Shear to investigate selection of control lake upgradient of site. Athena Lake is presently downgradient, though distal	Shear will select a control lake in 2012 that is upgradient of the site.	Shear will select a control lake in 2012 that is upgradient of the site.	
AANDC		Monitoring Frequency: Updated AEMP to ensure sampling frequency is consistent throughout report. Consolidate sampling into one table.	This will be addressed in the revised plan.	The revised AEMP will be filed for approval prior to commencement of the August 2012 sampling program.	
AANDC		Suggest amplification/justification as to why only a few specified places to sample for dioxins and furans were chosen	Shear implemented an air quality monitoring program in 2011. The information and data from this program will be used to identify appropriate sampling locations for dioxins and furans prior to resuming operations.	Shear will review the data from the air quality monitoring program after mine operations resume and will reassess appropriate sampling locations for dioxins and furans.	
AANDC		Shear to provide justification as to why no control sampling locations for benthic invertebrates have been chosen	This was addressed in the AEMP. Shear had identified an additional control lake but it was downgradient of the mine site. Refer to Section 7.5.4	Shear will identify control sampling locations for benthic invertebrates that are upgradient of the mine site.	
AANDC		Actual water quality criteria to be met should be included in the Plan (not just reference to guidelines)	This will be addressed in the revised plan.	This will be addressed in the revised plan.	
AANDC		The updated plan should include details on actions to be taken if exceedences are observed (i.e. decision tree)	This will be addressed in the revised plan.	This will be addressed in the revised plan.	
EC		EC recommends that Shear conduct sampling and reference site investigations as proposed, with the goal to refine the AEMP and submit a revised study design document within two years of licence isuance.	Shear will file a revised AEMP in 2012 with the goal of refining the AEMP.	The revised AEMP will be filed for approval prior to commencement of the August 2012 sampling program.	
EC		EC recommends Shear provide transparent accounting of how outliers were handled when reporting on AEM results.	This will be addressed in the revised plan.		
EC		EC recommends that plume delineation study be done late in the discharge season, which examines the extent and behaviour of the plume in 3 dimensions. Water quality objectives hould be stated, and comparisons drawn for where they arae expected to be met in Lake C3 (based on tracer concentrations)	Shear will conduct a plume delineation study late in the discharge season of the second year following resuming mining operations.	Shear will conduct a plume delineation study late in the discharge season of the second year following resuming mining operations.	
EC		The question of sediment data comparability is still outstanding, and should be addressed.	This will be addressed in the annual report that will be submitted by March 31, 2012 as required in the water licence.	This will be addressed in the annual report that will be submitted by March 31, 2012 as required in the water licence.	
INTERIM CLOSURE AND RECLAMATION PLAN					
AANDC	P26/Sect7.1/Pgh1	Licenced requirement to produce final A&R 60 days after issuance of licence: Final plan should address: how permafrost aggredation impacts the use of waste rock material for reclamation; and, possibility of impacts of potential talik at bottom of open pit after mining, and hydraulic connection to carat lake.	The current water licence, Section M, Item 5, requires a Final Closure and Reclamation Plan at the time of licence renewal. Shear requests that the NWB consider providing a term of three years for the submission of the Proposed Final Closure and Reclamation Plan in order that Shear may undertake the work required to address the conditions of the water licence.	Shear proposes filing a revised Interim Closure and Reclamation Plan within one year of the date of renewal of the water licence.	
AANDC	P26/Sect7.1/Pgh1	Shear to provide figure in final A&R plan that illustrates the wall of the pit that will remain exposed (i.e., the south side of the pit).	This will be included in the revised ICRP.	A revised ICRP will be filed within one year of the date of reissuance of the water licence.	
AANDC	P26/Sect7.1/Pgh3	Shear to model long term pit water quality for the projected time the pit will take to fill.	Shear will model the long term pit water quality for the projected time the pit will take to fill and will include this in the Final Closure and Reclamation Plan.	Shear will model the long term pit water quality for the projected time the pit will take to fill and will include this in the Final Closure and Reclamation Plan.	
AANDC	P26/Sect7.1/Pgh3	Shear to include contingency measures in updated A&R to facilitate filling of the pit if it is not found to be filling to schedule.	Shear will include contingency measures that will facilitate pit filling in the Final Closure and Reclamation Plan.	A revised ICRP will be filed within one year of the date of reissuance of the water licence.	
AANDC	P26/Sect 7.1	Shear to consider if inert debris proposed to be deposited at the bottom of the pit will be encased in overburden.	The interim closure plan currently states that large volume non-salvageable inert demolition debris that is placed in the pit will be covered with waste rock. An intermediate layer of coarse PK or overburden will placed on the debris to act as a filter layer.	This will be clearly stated in the revised ICRP.	
AANDC	P29/Sect7.4.2/pgh4	Reference throughout the plan to organic material should be changed to till	This correction will be made in the ICRP update.		
AANDC	P11/Sect 3.2/pgh 1	The mean annual temperature is -11.8˚C: It would be helpful if the source of this value was described here. Based on data from what location and over what time period;	This reference will be included in the ICRP update.		
AANDC	P12/Sect 3.2/pgh 3	Some additional information should be provided on the derivation of these values. Based on data from what location and over what time period. Note that the mean annual temperature in pgh 1 (-11.8 ˚C) is inconsistent with the value in this list (-11.1˚C).	This will be addressed in the ICRP update.		
AANDC	P15/Sect 4.3.1/pgh4	water accumulation in pit during care and maintenance and potential to cause pit wall instability: Shear to conduct a detailed pitwall inspection after dewatering /a prior to mining.	This is a Mine's Act Requirement. Shear will conduct a detailed pitwall inspection upon completion of dewatering and prior to mining operations resuming.	Shear will contract a geotechnical engineer and will conduct a detailed pitwall inspection after dewatering and prior to mining.	
AANDC	P16/Sect 4.6/pgh3	Shear to Provide clarification on proposed water transfer from Cells A to B to C	A description of the PKCA and water transfer within the facility is presented in the PKCA Management Plan. Fine PK is deposited in Cells A and B. Bleed water from the Fine PK flows through Divider Dykes A and B. Armoured overflow channels across the dykes will be constructed at mine closure. A channel will be cut into the West Dam at mine closure. Water will flow from Cell C directly into Stream C3.		
AANDC	P24/Sect6.1/pgh2	Shear should discuss and consider availability of overburden for reclamation due to freezeback of material in dump.		This will be considered in the ICRP.	
AANDC	P25/Sect7.0	the reclamation plan should address how openings to underground mining works will be dealt with - if underground mining remains in mine plan (update mine plan at such a time as UG works become an option)	The Proposed Final Closure and Reclamation Plan will address the underground mining works.	The Proposed Final Closure and Reclamation Plan will be filed three years from the date of reissuance of the water licence.	
AANDC	P26/Sect7.1/Pgh1	Updated plan should consider placing boulders at widely spaced intervals on top of perimeter berm to make more visible/distinguishable during snow cover conditions. Placement of perimeter berm should also consider slope stability of upper portion of pit walls during development of set back distances.	Shear will place boulders at widely spaced intervals on top of the perimeter berm at closure. This will be reflected in the Final Closure and Reclamation Plan.	Shear will include the placement of boulders in the Final Closure and Reclamation Plan. Shear is requesting that the Final Closure and Reclamation Plan be filed three years from the date of renewal of the water licence.	
AANDC	P27/Sect7.2.2/pgh1	Final regrading of slopes will be to attain an average slope of approximately 19˚ by pushing material down onto benches: this practice has had challenges elsewhere - precedent should be checked	Shear will review the practices at other sites.	Regrading of slopes will be addressed in the Final Closure and Reclamation Plan.	
AANDC	P27/Sect7.2.2/pgh3	Remove bullet	This correction will be made in the ICRP update.		
AANDC	P28/Sect7.3.3/pgh2	Carry out appropriate editing	This correction will be made in the ICRP update.		
AANDC	P29/Sect7.4.2	General comment: Would be useful to include an illustration of reclamation of PKCA area to convey the various concepts.	This will be included in the ICRP update.		
AANDC	P29/Sect7.4.3.1/pgh1	Should be C3	This correction will be made in the ICRP update.		

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AANDC	P34/Sect7.9.1/pgh1	denote culvert removal in plan for clarification	This will be addressed in the ICRP update.		
AANDC	P35/Sect7.9.2/pgh1	reword as appropriate (re-recontouring)	This correction will be made in the ICRP update.		
AANDC	P36/Sect7.11.2/pgh1	wording to be clarified for consistency (re: facility to be used for disposal of demolition debris)	This will be addressed in the ICRP update.		
AANDC	P37/Sect7.11.2/ Non-Salvageable Structures	Non-Salvagable structures: Plan for permitting is to go in pit. Wording should reflect this.	This will be addressed in the ICRP update.		
AANDC	P37/Sect7.11.2/	Minimum burial depth of large volume demolition scrap needs to be specified.	This will be addressed in the ICRP update.		
AANDC	P38/Sect7.12.3/pgh1	F1-F4 hydrocarbon presence: Suggest deleting reference to background – inappropriate for this site.	This will be addressed in the ICRP update.		
AANDC	P41/Sect11.2/SPRM	reword for clarity (re: consecutive years of monitoring - phase trigger for reclamation)	This will be addressed in the ICRP update.		
AANDC	P41/Sect11.2/LPRM	reword to reflect more specific goals of stable reclamation	This will be addressed in the ICRP update.		
AANDC	P43/Sect11.4.2.3/pgh1	water quality monitoring frequency: consider revision to report	This will be addressed in the ICRP update.		
AANDC	P45/Sect11.5.2.3/pgh1	consider rewording for clarity (transition from annual monitoring frequency to once every five years - appears to abrupt).	This will be addressed in the ICRP update.		
AANDC	From cover letter	The final A&R plan should address how permafrost aggredation impacts the use of waste rock material for reclamation. Additionally, a final A&R Plan shoud address the possible impacts and the potential formations of a talk at the bottom of the open pit when mining concludes, and the potential hydraulic connection to Carat Lake.	This will be addressed in the Final Closure and Reclamation Plan.		
EC		EC acknowledges Shear's commitment to re-evaluate the pit fill rate by April 2012 and looks forward to reviewing the revised Plan and pit fill rate when available.	Shear is re-evaluating the pit infill rates and will provide a Technical Memo in April 2012 as committed. The Technical Memo will present scenarios and options for infilling. This information will also be included in the revised ICRP and Final Closure and Reclamation Plan.	Shear will file a Technical Memo in April 2012 that assesses pit infill rates.	
EC		EC recommends the Proponent consider the impacts of pit wall weathering and the introduction of blast residue and poor quality PKCA water when remodeling pit water quality.	These will be considered when undertaking the remodeling of the pit water quality. This information will be included in the updated SWMP and the ICRP.		
EC		If the remodeling identifies new contaminants of conern, EC recommends the Proponent revise their Closure Plan to include other treatment options for diminishing these contaminants.	This will be addressed in the ICRP update.		
EC		EC requests the Proponent commit to a timeline for delivering its pit water quality remodeling.	Shear will be able to understand pit water quality after resumption of mining operations. Shear proposes sampling and monitoring pit water quality for a period of two years at which time the company will update the pit water quality model. Shear is requesting two years because the first year of mining will not be representative of a typical operations year.	Shear will deliver a pit water quality model following two years of sampling during mining operations.	
EXPLOSIVES MANAGEMENT PLAN					
		No comments	No comment.		
MINE PLAN					
AANDC		AANDC looks forward to the results of the geochemical testing proposed by Shear on the granite rock paired with kimberlite	The geochemical testing results will be submitted to the NWB when available.		
AANDC		Structural mapping - Shear has a memo on why single benches were chosen - Shear will distribute.	Shear has not been able to locate a memo that addresses why Tahera chose single benches. Shear will re-evaluate the condition and design of the current pit prior to resuming mining operations.		
BORROW MANAGEMENT PLAN					
AANDC		General Comment: No records were kept by Tahera, but it appears that the borrow management plan was follwed for implementation	No comment required.		
AANDC		Shear to update plan: will include survey of borrow sites undertaken in 2011	Shear did not borrow any material in 2011.	Shear will update the Borrow Management Plan within 12 months of reissuance of the water licence.	
RECLAIM ESTIMATE					
AANDC		Shear had a reclaim estimate undertaken by Nuna Logistics. Shear has retained additional services to re-run the reclaim. AANDC and Shear will work together to resolve this issue prior to the Final Hearing	Shear is working with AANDC to resolve this issue.		
WASTEWATER TREATMENT PLAN					
		No comments.	No comment.		
OMS for PKCA					
AANDC	appendices	Editorial issue (appendices) Shear to update	This will be addressed in the next iteration of the PKMP.		
AANDC	Pg 9, Sec. 2.3, bullet 1.	include allowable discharge rates, rather than reference to PKMP	This will be addressed in the next iteration of the PKMP.		
AANDC	Pg. 11, Sec. 4.2.2	Weekly operational geotechnical inspections v.s daily visual inspections (referenced in PKCAMP). Edit for clarity	This will be addressed in the next iteration of the PKMP.		
QUALITY ASSURANCE/QUALITY CONTROL PLAN					
AANDC		General Comment: should add a reference to plans, that have reference to QA/QC that identifies hierarchy of applicability (i.e., if there are discrepancies between sections of other plans, and the QA/QC plan, the QA/QC plan shall take precedence	This will be addressed in the revised QA/QC Plan. Shear will submit a QA/QC Plan as committed on May 29, 2012.		
FUEL STORAGE CONTAINMENT FACILITIES					
AANDC	Sec. 4.5	The contractors construction plan should be reviewed by a qualified geotechnical engineer and his/her assessment should be sent to the NWB as an addendum to the Construction Drawings and Specifications	The contractors construction plan will be reviewed by a qualified geotechnical engineer.		
EMERGENCY PREPAREDNESS PLAN FOR DAM EMERGENCIES					
AANDC		General editorial comment: remove reference to specific company and person names. This document should be updated yearly.	This will be addressed in the next iteration of the plan.		
EFFLUENT QUALITY CRITERIA					
EC		EC recommends that lower limits be set for nitrate from the currently licenced limits of 56 mg/L (Grab) and 28 mg/L (MAC) to 40 mg/L (Grab) and 20 mg/L, respectively.	Shear proposes that nitrate limits remain at the currently licenced limits and that two years following the commencement of mining operations a Technical Meeting be held to review the water quality data and reassess nitrate limits.	Shear will convene a Technical Meeting following two years of sampling following the resumption of mining operations to reassess the nitrate limits.	
EC		EC recommends that lower limits be set for nitrite from the currently licenced limits of 5 mg/L (Grab) and 2.5 mg/L (MAC) to 2 mg/L (Grab) and 1 mg/L (MAC) respectively.	Shear accepts EC's recommendation.		
EC		EC recommends the addition of Total Extractable Hydrocarbons (TEH) and that the limit be 3 mg/L for maximum average concentration.	Shear accepts EC's recommendation for maximum average concentration TEH. Shear proposes that the maxium Grab concentration be 6 mg/L.		
EC		EC recommends the removal of TDS and Chloride as criteria. Instead these parameters should be monitored during the first part of the next licence term and water quality objectives set that are environmentally relevant and operationally appropriate.	Shear proposes that the current criteria remain in the licence while Shear works with EC to to consider these recommendations over the next 2 years.		

Author/agency	Report Section	Query/Comment	Response	Commitment	Date
EC		EC recommends that the water quality objectives for TDS and Chloride be used for adaptive management. This should be done within 24 months of resuming production.	Shear will work with EC over the next 2 years.		
EC		EC recommends chronic *Ceriodaphnia dubia* and algal testing be added as terms and conditions to Part G of the water licence.	With regard to the chronic toxicity testing being recommended using 100% strength effluent, Shear is prepared to accept this recommendation so long as it is clear that the results are only going to be used to track the potential for sublethal effects and not as a condition of approval to discharge to the receiving environment. Chronic test results take a minimum of 15 days turn around time. Shear requests that the term written in the licence state that Shear may begin discharging when lab results confirm the licenced parameters meet effluent quality criteria.	The condtion in Schedule L 4 (d)(iv) should remain in the water licence. Additionally, Shear will conduct chronic Ceriodaphnia dubia and algal testing using 100% strength effluent, once prior to discharge and once prior to completing discharge annually. This testing should be reflected in Schedule L of the licence and not Part G.	