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## Avatiligiyyit

Department of Environment

Ministère de l'Environnement

File: NWB1LUP0008

April 27, 2006

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Nunavut Water Board

Via Email to:  
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## RE: Abandonment and Restoration, Lupin Mine Tailings Containment Area

The Government of Nunavut Department of Environment (DOE) thanks Nunavut Water Board (NWB) for the opportunity to provide comments on the Abandonment and Restoration of the Lupin mine tailings containment area (TCA).

In our letters dated May 03 and October 05 2005, we stated that we agreed with Kinross' proposal to proceed with the Abandonment and Restoration of the TCA separate from the rest of the site and a change in the license from a type A to type B based on certain conditions. This support was conditional on the A&R plan for the TCA being a stand alone document, with specific assurances that this staged process can be managed successfully and the environmental liabilities are appropriately addressed.

Kinross' response dated March 31 2006 answered many of DOE's concerns however the following issues remain outstanding;

Stand Alone Document:

As this was one of the conditions upon which DOE lent its support, the proponent should produce a document that includes all relevant materials including historical data and all of the referenced documents. The proponent has not as of yet produced such a document. The following are some of the documents mentioned in Kinross' response dated March 31 2006;

- Proposed Post Closure Monitoring Program

- Seepage and Water Quality For Reclaimed Tailings Containment Area (Vol. 1-3)
- Timeline for reclamation and monitoring activities
- 2003 Historical report of EEM for fish and fish habitat

As Kinross' response included several of these documents and refers to several others, DOE recommend that an updated A&R plan include summaries of the relevant findings of any referenced documents.

#### Reclamation Activities:

The A&R plan should provide a list of all intended outcomes, tied to their regulatory requirements and / or recognized standards, and ensure a schedule is outlined for their attainment. This will ensure that progress on reclamation activities can be monitored and is easily measurable, allowing INAC and NWB to refund appropriate amounts of security deposit to the proponent as objectives are satisfactorily met.

#### Post Closure Monitoring:

##### *Water Quality:*

DOE acknowledges that the proponent has submitted a post-closure monitoring program to the NWB. However, the proponent has not outlined any contingency measures in the event that monitoring indicates that predictions are incorrect and water quality requirements are not being met.

Furthermore, Kinross has noted that a study is being done to demonstrate that the groundwater seepage will only minimally impact the resulting TCA water quality and that this water can be released. DOE asks that this study be included in the A&R plan.

##### *Re-establish Natural Vegetation:*

Kinross have indicated that visual observation of the Lupin tailings cover completed in the 1980's shows that the largest concentration of vegetation has developed in areas with thinner cover, thus showing one of the benefits of the proposed sand/ gravel cover. DOE believes that this research if properly documented could contribute to the existing body of knowledge concerning re-vegetation in permafrost regions. DOE asks that the proponent contribute these findings in a report to substantiate these claims, and act as a future resource.

##### *Monitoring Period:*

DOE acknowledge that it is the intention of the proponent to monitor the performance of the saturated granular cover and earth buttress for 5years. We also recognize that the concept of the saturated granular cover is relatively new in the north. DOE recommend that after 5 years, the NWB will re-evaluate the need for further monitoring by the proponent.

Once again the GN Department of Environment thanks the Nunavut Water Board for the opportunity to comment on this project.

Sincerely,

Michael Mifflin  
Coordinator, Land Use Planning