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Your file - Votre référence  
2AM-LUP0008  
Our file - Notre référence  
IQA-N 9545-1-2LUPS

June 19th, 2006

Phyllis Beaulieu  
Licensing Administrator  
Nunavut Water Board  
P.O. Box 119  
Gjoa Haven, NU, X0A 1J0

**Re: Kinross Gold Corporation - Lupin Operations - Spill Contingency Plan -  
2AM-LUP0008**

On behalf of the Department of Indian Affairs and Northern Development (DIAND), I have reviewed the Spill Contingency Plan submitted by Kinross Gold Corporation.

Section 1.5, Kinross Gold Corporation Environmental Policy highlights several activities Kinross will carry out, two activities require commentary. The first activity requires managers of all projects and operations to adhere to the Company Environmental Policy and to identify, evaluate and minimize risks to the environment. The second activity is to educate employees in environmental matters and responsibilities relating to performance of their assigned tasks. The activity goes on to state, "Kinross will entrust all employees to maintain necessary environmental performance for their activities". DIAND suggests the Nunavut Water Board require that these activities will also be applied to contractors and subcontractors located at the Lupin Mine.

Section 2.1, Initial Reporting/Action, speaks to immediate reporting of a failure within any of the disposal system or a petroleum/ chemical spill. The procedure requires that information flow directly to the Loss Control Manager or Reclamation Manager. Section 2.3, External Reporting, identifies these managers to be Wanye Grudzinski, Loss Control Manager (Lupin) and Mike Tansey Reclamation Manager (Lupin). Kinross should verify that these individuals have spill response training and identify the scope and nature of their training within the spill contingency plan. Furthermore, Kinross should identify possible alternates and the qualifications they possess.

Section 2.2, Internal Reporting, states the immediate reporting of the spill to the N.W.T. Spill Line (867) 920-8130. The Water Resources Inspector in Iqaluit, (867) 975-4298, should also be included as a immediate reporting contact. Also, the proponent should update their Spill Contingency Plan to include Mr. Peter Kusugak, (867) 975-4295 as the INAC contact.

Section 2.3, External Reporting, states several government departments are available with expert advice to assist in decision making where there are environmental concerns. The proponent has the responsibility to develop a complete spill response plan to address any and all spills, including adequate in-house expertise. Although, in emergency situations regulatory agencies may provide prescriptive advice, these agencies should not be considered routine advisors. It is the role of regulatory agencies to ensure the proponent fulfills their legal obligations with respect to environmental protection.

Should you have any questions or comments, please do not hesitate to contact me at (867) 975-4548 or by email at [BathoryS@ainc-ianc.gc.ca](mailto:BathoryS@ainc-ianc.gc.ca).

Sincerely,

*Original Signed By*

Stephen Bathory  
Regional Coordinator

cc- P. Kusugak