



Environment Environnement
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Your File: NWB1LUP00008

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RE: Submission of 2005 Final Abandonment and Restoration Plan – Lupin Mine

Thank-you for the opportunity to provide input to the Nunavut Water Board (NWB) regarding the proposed process for the review of Kinross Gold Corp.'s abandonment and reclamation (A&R) plan for the Lupin Gold Mine. Kinross Gold Corp. submitted an A&R Plan for the Lupin Gold Mine to both the NWB and Indian and Northern Affairs Canada (INAC) on February 28, 2005. Kinross Gold Corp. describes the A&R Plan as conceptual, stating that it will be finalized following an environmental site assessment this summer, and once plans for the potential transfer of the facilities to the Kitikmeot Corporation are finalized.

On April 21, 2005, Kinross Gold Corp. submitted a letter to the NWB and INAC requesting that the remediation plan for the tailings containment area (TCA) be reviewed separate from the remainder of the A&R Plan. Environment Canada (EC) has reviewed this request and has no major concerns with reviewing the TCA Closure Plan in advance of the remainder of the A&R Plan. Given that discussions are on-going regarding the fate of the infrastructure on site, EC feels that it is prudent of Kinross Gold Corp. to begin reclamation work on those aspects of the mine site which are no longer required and would not be a component of any potential memorandum of understanding with the Kitikmeot Corporation. Further, given that progressive reclamation of the TCA has been ongoing since 1988, EC has no real concerns with continuing the reclamation of the TCA in advance of the remainder of the mine site. However, if the TCA is closed and reclaimed in advance of the rest of the mine site, Kinross Gold Corp. should note they will not be able to place any other components of the mine site into the tailings area during the full reclamation of the site.

If the NWB accepts Kinross Gold Corp.'s proposal, EC will review the TCA Closure Plan when circulated for comment and provide input relating to EC's mandated responsibilities for enforcement of Section 36(3) of the *Fisheries Act*, the *Canadian Environmental Protection Act*, the *Migratory Bird Convention Act* and Regulations, and the *Species at Risk Act*. Kinross Gold Corp. is encouraged to ensure that the TCA Closure Plan is a complete and stand alone document, addresses areas such as short and long-term monitoring, climate change considerations, spill/emergency response, and includes any infrastructure directly associated with the TCA such as pipelines.

Environment Canada looks forward to working with the NWB and INAC to ensure that the closure and reclamation of the Lupin Mine site proceeds in an environmentally responsible manner. Please do not hesitate to contact me with any questions or comments with regards to the foregoing at (867) 975-4639 or by email at colette.spagnuolo@ec.gc.ca.



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Yours truly,

Original signed by

Colette Spagnuolo
Environmental Assessment / Contaminated Sites Specialist

cc: (Stephen Harbicht, Head, Assessment and Monitoring, Environment Canada, Yellowknife)