



Kitikmeot Inuit Association

Kitikmeot Inuit Katuyikatigit

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MEMO

To: Phyllis Beaulieu, NWB
From: Geoffrey Clark, Manager of Environment and Resource Development
Date: Nov 2, 2005
Re: **NWB1LUP0008 – Final Abandonment and Restoration Plan for the Lupin Mine Tailings Containment Area.**
CC: Jack Kaniak, Lands Manager

Dear Phyllis,

KIA has been short-staffed and we apologize for the delay in response for review from NWB titled “Final Abandonment and Restoration Plan for the Lupin Mine Tailings Containment Area”.

KIA represents the majority of the population in the Kitikmeot and represents the vast majority of people who use the area around Contwoyto Lake. Inuit have a special connection to the land in Nunavut and this has been recognized in the Nunavut Land Claims Agreement. KIA takes reclamation and clean-up of industrial sites seriously. As part of our efforts, KIA has developed it's own capacity to evaluate the suitability of reclamation plans based on Inuit Values. KIA's has four guiding principles that are applied to all reclamation projects on Inuit Owned Land and Crown land in the Kitikmeot. They are:

- 1) Protect the environment;
- 2) Safe for future use by people and wildlife
- 3) Restored for future use by people and wildlife, and;
- 4) No Perpetual Care

With the expectation that there will be a hearing on the closure plan where KIA will provide more detailed comments on the plan, our initial review has identified the following issues:

- 1) The rationale for not revegetating the esker cover of the Tailings Containment Area (TCA) requires more investigation. Descriptions of the surrounding vegetation as 'generous', 'plentiful' and 'diverse' are incongruent with findings that revegetation with native species is not possible. KIA is not convinced by the information provided that revegetation would be difficult or impossible on the TCA. Research from the Ekati Diamond Mine indicate that revegetation with seed from arctic species or from local seedlings is possible on processed kimberlite (See Ekati Diamond Mine Revegetation Research Results – 2004, March 2005).
- 2) Contamination of wildlife and water from the tailings at Lupin has been a historic and ongoing concern of Inuit. An ecological risk posed to local shorebirds and waterfowl is a concern to Inuit as it signals that there may be other Ecological Risks if the modeling assumptions are incorrect. KIA will require more time to review the Ecological Risk Assessment prepared by Golder Associates for the TCA.
- 3) The period of post-closure monitoring (5 years) is too short and the objectives of monitoring are unclear. Longer term monitoring should include water quality, wildlife use of the TCA including verification of the Ecological Risk Assessment, and revegetation of the TCA with local plant species. Inuit will want to know that long term effects of the TCA have been remediated and 5 years is not long enough.

Thank you,

Geoff C.

Geoffrey Clark, M.Sc., MBA
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