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April 30th, 2005

Ms. Stephanie Briscoe
Executive Director
Nunavut Impact Review Board
P.O. Box 2379
Cambridge Bay, Nunavut
X0B 0C0

BY FAX and e-Mail

Dear Ms. Briscoe:

RE: Meadowbank Gold Project Conformity Submission

On April 8th, the Nunavut Impact Review Board (NIRB) provided its conformity ruling and instruction in respect of the Technical Meeting and Prehearing Conference for the Meadowbank Gold Project (Meadowbank). In that letter, NIRB listed seven conditions to upon which its conformity ruling was dependent. Cumberland responds to each of those conditions below.

1. **Respond to the Yellow Highlighted Cells in the Conformity Table Attached to the NIRB March 21, 2005 Letter:**

That response document is attached.

2. **Clarify the Status and Development of Cumberland's "Monitoring and Follow Up Plan"**

More information on monitoring and follow up is contained in the yellow highlighted cell attachment section 4.26.1.

3. **The effect of Further Feasibility Studies on Project Design**

Cumberland is not planning to conduct another feasibility study.

4. **Cumberland Commits to a Timeline for Completion of Guideline 4.10.1.10 for Borrow Pits**

Following completion of the geotechnical investigation and determination of the final access road alignment, Cumberland Resources Ltd will provide to NIRB a drawing of the proposed road indicating borrow pits, quarries and bridges. Estimated quantities to be procured from each borrow pit or quarry as well as the proposed access to the borrow areas will be included. Pit and quarry management plans will also be provided. Cumberland will satisfy this Guideline requirement in the FEIS.

5. Program to Monitor Contaminants and Loading

The environmental health studies will be initiated in the summer of 2005 with the collection of baseline samples from various stations within and adjacent to the Meadowbank Camp. Cumberland will not be sampling wildlife tissues in order to monitor contaminant levels in wildlife. The environmental health program will simply involve analysis of various plants and soils, and will use a risk assessment procedure to predict contaminant levels in receptors such as voles, raptors and caribou. Cumberland is not aware of any special permits that are required for the collection of small amounts of soil and vegetative matter other than the Nunavut Research Institute Certificate.

6. A Communication Strategy as in Guidelines 4.24.1 for the Communities of Chesterfield Inlet and Rankin Inlet

Cumberland has already filed a Public Involvement Framework Report in response to NIRB's request for a Plan for Public Involvement. The requirement for a "communication strategy" is included within the 4.24.1 and more detail on the requirement is provided in 4.24.3.4 of the Guidelines.

Section 3 of the Cumberland Public Involvement Framework Report outlines a series of mechanisms through which communication aimed at involvement of the public and residents of affected communities can be ensured. The mechanism used to address a particular issue will depend on the nature, importance and urgency of the issue being addressed and how many of the communities are affected. Cumberland will, however, commit to ensuring that interested parties, residents and organizations in Chesterfield Inlet and Rankin Inlet are informed and involved in any distribution of information about the Meadowbank project and that they are involved in an appropriate fashion when matters related to the project affect their communities.

Although negotiation of the Inuit Impact and Benefits Agreement (IIBA) between Cumberland and the Kivalliq Inuit Association (KIA) is at an early stage, Cumberland also expects that the IIBA may include mechanisms to encourage the involvement of Inuit residents and Kivalliq communities affected by the project.

7. Involvement of Hamlets outside the IIBA

The KIA represents the Inuit of the Kivalliq Region for purposes of negotiating an IIBA. This means that the KIA represents a significant majority of Kivalliq residents in all communities in these negotiations. The requirement for an IIBA is based in Article 26 of the Nunavut Land Claims Agreement (NLCA) and is mandatory.

Hamlets as local governments are established by territorial legislation and may or may not be affected by the project depending on the effects of the project on their community.

Cumberland has an extensive history of involvement with the Hamlet of Baker Lake and our DEIS has identified Baker Lake as an affected community. Cumberland will negotiate land requirements and other matters related to the project with the Hamlet of Baker Lake consistent with its jurisdiction under territorial law. We have already undertaken such discussions with Baker Lake and will bring these negotiations to a conclusion as the project develops.

It is Cumberland's view, set out in the DEIS, that the impacts of the Meadowbank Project in other Kivalliq communities will be minimal or non-existent. Consequently, negotiations of special arrangements with other hamlets are not contemplated at this time.

We trust that the information provided in this submission will satisfy the conditions set out by NIRB for the termination of the conformity phase of the Meadowbank proceeding. Cumberland is eager to move on to addressing any technical issues and concerns which may be raised by reviewers of the DEIS.

Yours truly,

Craig Goodings

Yellow Yes Responses

3.1 Presentation of EIS

NIRB's Comment:
Maps, other than those used for orientation and context, shall be contained in a separate volume. Provide maps in a separate volume.

Cumberland's Response:
We felt that all the maps included in the DEIS were required for orientation and context. We will separate them in the final EIS.

3.4 Format

Concordance table

NIRB's Comment:
Provide a corrected Concordance table that references supporting documentation.

Cumberland's Response:
The concordance table does contain references to the supporting documents (see pgs ii-v on the concordance table). We will make it more detailed in the final EIS.

4.1 The Proponent

NIRB's Comment:
It shall specify the mechanisms used to ensure that corporate policies are respected. Provide a discussion of mechanisms to ensure that policies are respected.

Cumberland's Response:
Cumberland has established a formal Code of Business Conduct and Ethics Policy (hereinafter, "Business Conduct Policy") that all directors, employees and consultants must adhere to. This Business Conduct Policy covers all aspects of Cumberland's business, including accounting, environmental health and safety and human resources. Each director, officer and employee of the Company is accountable for complying with the Business Conduct Policy. Failure to comply will be subject to disciplinary action. The Business Conduct Policy, which is posted on the Company's website, also specifies procedures for anonymously reporting violations within the Company."

4.3 Baseline Data Collection

NIRB's Comment:
Provide evaluation of the adequacy and confidence levels of the baseline data

Cumberland's Response:
To ensure the adequacy and confidence of the baseline data collected, qualified specialists were hired to collect and interpret the data and qualified labs used to analyze the data. In addition, all reports were sent out to external experts for review before being included in the DEIS.

4.4 Traditional Knowledge

NIRB's Comment:
Provide detail on plans to pursue the collection and integration of Traditional Knowledge into phases of the project.

Cumberland's Response:
Cumberland will continue to gathered traditional knowledge throughout the life of the project by targeted interviews, elder meetings, public meetings, Hamlet meetings, Inuit employees working on the environmental monitoring programs, interaction with the HTO and the community lands and resource committee (CLARC).

4.5 Public Consultation

NIRB's Comment:
Provide clarification on how public consultation was used to determine mitigation measures.

Cumberland's Response:
Cumberland has gathered public input to determine mitigation measures since 1996 through numerous and on going public meetings, targeted interviews, and a three day impact workshop in 2003 as detailed on table 4.3 pg 31- 35 volume 1 DEIS. Questions asked during interviews of the elders included: Are you worried about the mine development on the land and water? Are you worried about the effect mine development will have on the fish? Can you suggest ways to ensure the protection of wildlife at the project? What kinds of input and participation would you like to have in planning and monitoring the project? Are there any aspects of the project that you need further explanation about or have concerns about? The three day impact workshop held in Baker Lake in 2003 included representatives' from the Hamlet council, elders, CLARC, HTO, youth and members of the general public. At that meeting, a translated impact matrix was used and each VEC and VSEC was discussed with expected impacts from the various mine components as well as the proposed mitigation and monitoring plans.

4.5 Public Consultation

NIRB's Comment:
Provide clarification on how public consultation was used to determine monitoring activities.

Cumberland's Response:
Cumberland has gathered public input to determine monitoring activities since 1996 through numerous and on going public meetings, targeted interviews, and a three day impact workshop in 2003 as detailed on table 4.3 pg 31- 35 volume 1 DEIS. Questions asked during interviews of the elders included: Are you worried about the mine development on the land and water? Are you worried about the effect mine development will have on the fish? Can you suggest ways to ensure the protection of wildlife at the project? What kinds of input and participation would you like to have in planning and monitoring the project? Are there any aspects of the project that you need further explanation about or have concerns about? The three day impact workshop held in Baker Lake in 2003 included representatives' from the Hamlet council, elders, CLARC, HTO, youth and members of the general public. At that meeting, a translated impact matrix was used and each VEC and VSEC was discussed with expected impacts from the various mine components as well as the proposed mitigation and monitoring plans.

4.7 Regulatory Regime

NIRB's Comment:
Provide discussion on relevant regulations guidelines and policies and how they relate to the project. In particular the MMER with respect to tailings impoundment area, the proposed new Wildlife Act, GN regulations and various guidelines, INAC's Reclamation Policy.

Cumberland's Response:

MMER

The three main requirements of the Metal Mining Effluent Regulations (MMER) are: routine effluent monitoring (i.e., chemical analyses and toxicity of effluent, volume, flow and loading); an emergency response plan; and environmental effects monitoring (EEM), which includes water quality monitoring and biological monitoring (benthic invertebrate and fish survey) of the receiving environment. Cumberland Resources has prepared a detailed framework for the application of MMER for the Meadowbank project (see supporting document MMER, 2004). This document outlines the specific implementation procedures, approach, methodology, data analysis and quality control/quality assurance procedures to conduct all aspects of MMER and EEM.

The northwest arm of Second Portage Lake will contain the majority of mine tailings and will not be designated as an official Tailings Impoundment Area under the MMER. The northwest arm of Second Portage Lake will be diked and fished out completely during draining of the impounded area. During the course of mine-life, the former lake will be completely filled with tailings and will no longer be considered fish habitat.

The area-weighted value of lake habitat destroyed has been determined as part of Cumberland Resources NNL (2004) framework document. Productive habitat area lost will be compensated for at post-closure under Canada Fisheries and Oceans No Net Loss of Habitat policy under the Fisheries Act. The NNL framework document prepared for the Meadowbank project presents a range of possible options to mitigate and compensate for impacts to fish habitat in the project lakes. If impacts cannot be fully mitigated and harmful alteration, disruption or destruction (HADD) of habitat is likely to occur, it is within the discretion of Fisheries and Oceans (FAO) to issue an authorization under Section 35(2) of the Fisheries Act, provided that full compensation of the HADD can be achieved, either through onsite and/or off-site measures to create or improve existing habitat. Thus compensation for lost habitat area in Second Portage Lake from the Tailings Disposal facility will be sought with FAO.

GN Regulations

The new Nunavut Wildlife Act (Chapter 26) came into effect on December 5th, 2003. The various sections that have some applicability to the Meadowbank project are as follows:

NUNAVUT WILDLIFE ACT

Section 1: Purpose of this Act

1.2.e The precautionary principle has governed development of Cumberland's Terrestrial Management Plan, which includes conservative mitigation and monitoring plans.

1.2.h: Protection of wildlife and their habitat is a key component of all of Cumberland's management plans. Cumberland recognizes the intrinsic value of all wildlife.

1.2.i Cumberland has undertaken a comprehensive impact assessment of its Meadowbank Gold Project and fully expects that the biological diversity of the Meadowbank area will be maintained.

1.2.j Cumberland recognizes the importance of wildlife such as caribou to the renewable resource economy, and has provided optimum protection for these resources.

1.2.k There are no wildlife or plant species in the Meadowbank area that are in danger of becoming extinct or being extirpated.

1.2.n Cumberland has communicated with the Baker Lake HTO on a regular basis. The HTO has conducted a Grizzly Bear Traditional Knowledge Study, partly funded by Cumberland, and provided traditional knowledge on other species. The HTO will likely be instrumental in participating in some of the wildlife monitoring initiatives, such as ongoing harvest studies and regular wildlife surveys along access roads.

Section 8: Guiding principles and concepts

Cumberland is in agreement and compliance with all of the guiding principles of Inuit Qaujimajatuqangit described in this section.

Section 19: Requirement for license

2.l Cumberland applies for and receives licenses and permits to conduct research in relation to wildlife and habitat.

Section 65: Habitat Protection

Cumberland does not substantially alter or damage or destroy any habitat with out the required permits and licenses.

Section 67: Littering

Cumberland disposes of all waste and litter in an approved manner.

Section 72: Bird's nests

Cumberland will ensure that active nests are not disturbed during exploration, construction and other development activities.

Section 74: Pursuit of wild animal

Helicopter pilots adhere to a strict code of conduct with respect to wildlife. Pilots must stay above a designated height, and chasing or harassment of wildlife is prohibited.

Section 90: Feeding wild animal

Cumberland prohibits the feeding of wild animals at its exploration camps and will do the same during the life of the mine. All attractants are disposed of by incineration.

Section 97: Defence of life or property

Although the Act permits the destruction of wildlife to preserve human life or a person's property, Cumberland has and will implement mitigation measures to ensure that wildlife is not attracted to the mine site.

Section 117: License required

Cumberland applies for and receives licenses for all wildlife research activities.

MIGRATORY BIRDS CONVENTION ACT

Birds and their nests are protected under the Migratory Bird Convention ACT, 1994. Cumberland will ensure that active nests are not disturbed during exploration, construction and other development activities.

SPECIES AT RISK ACT

Intensive wildlife surveys at Meadowbank have not identified any Schedule 1 listed wildlife species or their critical habitats.

INAC's Reclamation Policy.

The supporting document Reclamation and Closure submitted with the DEIS incorporates the latest reclamation policy from INAC.

4.7 Regulatory Regime

NIRB's Comment:
Address currently held water licences, land use permits and other authorizations currently in place including dates of issue and expiry

Cumberland's Response
Water Permit (NWB): NWB2MEA0204; application for renewal pending

KIA Commercial lease # KVCL303H305 - effective as of 1 January 2005, currently commercial lease valid for a five year period, until 31 December 2010

4.8 Land Tenure

NIRB's Comment:
Provide map showing land tenure for site access and for Baker Lake storage and marshalling area.

Cumberland's response:
Figure 2.4 Baker Lake Storage and Marshalling Area in the DEIS page 5 shows area of the proposed Baker Lake storage and marshalling area. The final location of land tenure is still being discussed with the Hamlet of Baker Lake and GN. The final land tenure area will be included in the final EIS.

4.8 Land Tenure

NIRB's Comment:
It shall further describe those areas by providing such information as file numbers, start and end dates, fees, name, provide information for site access and Baker Lake storage and marshalling area.

Cumberland's response:
We are still in discussions with the Hamlet and GN on the details of leasing land from the Hamlet. There are no details available on file numbers, start and end dates, or fees

4.10.1 Project Components and Activities

NIRB's Comment:
4.10.1 Says there are five deposits, but only names four.

Cumberland's Response:

That should read "Four deposits". It will be corrected in the final EIS.

4.10.1 Project Components and Activities: Roads and airfields

NIRB's Comment:
Provide information on all-weather road.

Cumberland's Response:
Information on the conventional access road was provided in the previous submission to NIRB.

4.10.1 Project Components and Activities

NIRB's Comment:
Provide details on marine traffic: Provide details of traffic types and frequencies.

Cumberland's Response:
It is estimated that between three to five trips will be required between Chesterfield Inlet and Baker Lake per annum. The annual resupply to Meadowbank will require the transport of 32,000 tonnes of fuel and 27,000 tonnes of dry freight. A fuel tanker will anchor at Chesterfield Inlet and transfer fuel to two 10,000 tonne barges pushed by a coastal tug to Baker Lake for transfer of fuel to onshore storage facilities. Dry cargo will arrive at Chesterfield Inlet by container ship for transfer to 10,000 tonne barges for furtherance to Baker Lake for offloading and placement in the Baker Lake laydown facility. Freight arriving at the Port of Churchill will be loaded directly onto barges for transport by coastal tug to Baker Lake.
Only experienced marine operators with a history of operations in the arctic will be considered for the provision of services for the Meadowbank Project. All vessels will comply with Canada Shipping Act regulations and possess certification of compliance for International Safety Management and International Ship and Port Security.

4.10.1 Project Components and Activities •Processing operations

NIRB's Comment:
Provide information on changes to processing operations.

Cumberland's Response:
There is no change in the processing operations from that discussed in the DEIS

4.10.1.1 Geology / Mineralogy of the Ore Deposit and Mining Methods

NIRB's Comment:
The Proponent shall specifically address the following in Mineralogy. Provide more detail on ore mineralogy

Cumberland's Response:
The Meadowbank gold deposits are hosted by an interbedded package of oxide facies iron formation and intermediate volcaniclastic rocks. The deposits located near Third Portage Lake: Goose Island and Portage are hosted by oxide iron formation with minor interbedded volcaniclastic units, while the Vault Deposit is hosted by volcaniclastic rocks with rare interbeds of the iron formation. Gold mineralization in both of the deposit areas is intimately associated with sulphide mineralization, dominantly pyrite and/or pyrrhotite.

Goose Island and Portage Deposits
In the main deposit area, near Third Portage Lake, ore zones are dominantly hosted by rocks of the oxide iron formation. These rocks consist of banded magnetite (Fe-oxide) and chert with lesser amounts of chlorite and grunerite as secondary minerals. Local beds of intermediate volcaniclastic rocks may be present, interbedded with the iron formations. These volcaniclastic units dominantly consist of feldspar and quartz with lesser amounts of sericite and/or chlorite as alteration products.

Gold mineralization in these deposits is intimately associated with varying amounts of pyrite and pyrrhotite, which occur in two main habits. The sulphide minerals dominantly occur as a replacement of magnetite in the oxide iron formations, where the sulphides tend to be concentrated along So//S1 planes and possibly S2 in fold limbs. Also important, at least locally, is sulphide mineralization occurring as fracture fill +/- silica and disseminations in both the iron formation and interbedded clastic units. Total sulphide content generally varies from 1 – 5%, but may be as high as 10-20% over short intervals. Sulphide content, the proportions of pyrrhotite versus pyrite, and the style (i.e. replacement vs fracture fill) can be variable. Gold grades generally increase with increasing sulphide content, however, there does not appear to be a specific correlation with either pyrrhotite or pyrite.

The bulk of the gold mineralization in the Goose Island and Portage Deposits is contained within the iron formations, with mineralization in the volcaniclastic units probably representing remobilization and secondary enrichment by gold bearing fluids. Gold mineralization in the volcaniclastic rocks is generally associated with moderate to strong sericite alteration.

Vault Deposit

The Vault Deposit, located approximately six kilometres to the north of Third Portage Lake, is dominantly hosted by volcaniclastic rocks. The oxide iron formations are still present locally in the Vault area but they tend to be wispy and discontinuous. The ore at Vault is dominantly hosted by intermediate to locally felsic volcaniclastic rocks. These volcaniclastic units consist of varying amounts of feldspar and quartz with lesser sericite and/or chlorite as alteration products.

At the Vault Deposit pyrite is the dominant gold bearing sulphide mineral. Gold mineralization tends to be concentrated in the volcaniclastic units, where pyrite occurs as moderate to strong disseminations and local fracture fill, with percentages ranging from 1% up to 10 – 15%. There is a strong correlation between sulphide content and sericite-silica alteration. The association between sericite alteration and gold is also prevalent in the mineralized clastic units of the other deposits at Meadowbank. In the Vault area, the iron formations tend to lack significant gold mineralization, this may be due in part, to their discontinuous and wispy nature.

4.10.1.1 Geology / Mineralogy of the Ore

NIRB's Comment:
Deposit and Mining Methods Provide average extraction rate, and the expected amount of ore to be extracted each year.

Cumberland's Response:
Approximately 7,500 to 5,500 tons of ore will be processed daily, up to 2.5 to 2.7 Mt per year.

4.10.1.1 Geology / Mineralogy of the Ore

NIRB Deposit and Mining Methods A mine management plan indicating the sequence of development of the open pits and underground mine Provide a mine management plan

Cumberland's Response:
The mine management plan involves mining three open pits on a schedule that optimizes the project cash flow. Mining begins in the Portage Pit which is the largest pit and closest to the process plant. The

highest grade Goose Island Pit is brought in year 2 to maximize the cash flow during the initial capital payback period. The Vault Pit is mined last, as it is the lowest grade and farthest from the process plant. The scheduling considers the required plant throughput rate, pit grades, strip ratios, required dyke and haul road construction and dewatering, among other things, to produce an economically optimized mine plan.

4.10.1.2 Ore Recovery Plant, Extraction and Concentration

NIRB's Comment:
Provide discussion on the different compounds emitted to the environment during ore processing, the related quantities, concentrations, and dispersion pathways.

Cumberland's Response:
No emissions will occur from the ore recovery plant due to two reasons: (1) the mill uses a wet process at normal temperature and no volatile substances are involved and (2) there will be an air filter of 99% efficiency which will eliminate any measurable emissions.

4.10.1.2 Ore Recovery Plant, Extraction and Concentration -

NIRB's Comment:
Provide location of the ore storage pads.

Cumberland's Response:
The location of the ore stockpile is shown in the DEIS Figure 2-5 as a green shaded area northwest of the plant site label, unfortunately it was not labeled as such. We will correctly label the site in the final EIS.

4.10.3 Processed Ore Containment (and Tailings Ponds)

NIRB's Comment:
Provide more detail in tailings characterization.

Cumberland's Response:
The tailings solids generated in the gold recovery process will have a particle size distribution with approximately 80 percent of the solids being finer than 60 microns. Approximately 7500 tonnes per day of solids will be disposed of into a submarine tailings impoundment, with a majority of the solids being held underwater.

The solids will settle to provide supernatant clarity in the range of 2 to 5 ppm suspended solids, the solution chemistry will be consistent with that of a cyanide leaching process. It is expected that tailings solutions will contain 1 to 2 mg/l total cyanide and by-products from the cyanide destruction process, namely sulphate, thiocyanate, ammonia and trace levels of metals.

The process solutions held in the tailings impoundment will be re-cycled to the process facility to operate the gold recovery process and minimize the requirement for fresh water utilization in the project.

Samples of tailings were obtained directly from the metallurgical program. Samples of ore from each deposit (Goose, Portage and Vault) were processed through two potential gold recovery circuits (laboratory scale) and a cyanide destruction circuit (again, laboratory scale). The two processing circuits differed in their pre-cyanidation step: the first option included a flotation of sulphide-poor tailings and cyanidation of a sulphide concentrate, while the second option excluded flotation and cyanidation was done on whole-ore tailings. Since both waste streams of the first processing option were to be recombined before discharge to the impoundment, both processing options are considered to generate chemically similar tailings as a whole. The second processing option (whole-ore cyanidation) was selected based on more favorable economics.

Tailing solids from both processing options were subjected to a static and kinetic testing program developed following the recommended methods for northern mine sites (INAC, 1992) and state-of-the-art testing protocols in independent laboratories. The objective of the testing program was to characterize the tailings in terms of their bulk chemical and mineralogical content and their weathering characteristics (potential to generate acid rock drainage and leach metals to the environment). The chemistry of tailing process water from all processing options was also evaluated. The following summarizes the results of tailing waste characterization:

Composition of tailings: In the Goose and Portage area, gold mineralization is hosted mainly in iron formation (IF) rock and in some intermediate volcanic (IV) rock, while in the Vault area located 5 km to the north, mineralization is hosted in IV rock only. Consequently, tailings will originate from IF and IV rock. The major rock forming minerals in IF tailings consist of quartz [SiO_2], chlorite (of the general formula: [$(Fe,Mg,Al)_6(Si,Al)_4O_{10}(OH)_8$]) and amphibole (of the general formula: [$Ca_2(Fe,Mg)_5Si_8O_{22}(OH)_2$]) with lesser magnetite [Fe_3O_4] and traces to no carbonate minerals (dolomite [$Ca,Mg(CO_3)_2$], calcite [$CaCO_3$], siderite [$FeCO_3$]; magnesium-calcium, calcium and iron carbonates respectively). IV tailing mineralogy consists mainly of quartz, muscovite, chlorite and carbonates (predominantly dolomite with minor calcite).

For all deposits, the main sulphide minerals include pyrite [FeS_2] and pyrrhotite [Fe1-xS], with some arsenopyrite [FeAsS], and trace amounts of chalcopyrite [$CuFeS_2$] in Goose and Portage deposits only. The proportion of pyrrhotite decreases from south to north: the Vault deposit has minor to trace amounts of pyrrhotite, while the Goose Island deposit has approximately equal proportions of pyrrhotite and pyrite.

Acid rock drainage potential: The bulk of the tailings are expected to be acid generating: “All concentrate and combined tailings (mix of 20% concentrate and 80% flotation tailings) [1] from each of the three deposits (Portage, Goose Island and Vault) along with Portage and Goose Island flotation tailings are PAG [potentially acid generating], whereas the Vault flotation tailings are non-PAG. Since all tailings will report to the same impoundment, the bulk tailing material is expected to be PAG”. At closure, any remaining tailing process water will be monitored and treated as required, and discharged, and the tailing solids will be covered with acid-buffering run-of-mine ultramafic waste rock. With time, the tailings facility is predicted to freeze, reducing the potential for acid generation.

Weathering characteristics: Tailings have been subjected to accelerated weathering tests (kinetic testing). All Goose and Third Portage tailing streams (concentrate, combined and flotation tailings) generated ARD within a relatively short period of time after initiation of kinetic testing. These tailings have a low buffering capacity which is provided mainly by alumino-silicate minerals compared to carbonate in Vault tailings, and have a larger proportion of the more reactive pyrrhotite than the Vault tailingsAll Vault tailing leachates remained alkaline during the (20 to 40 weeks) testing period. These tailings have ample buffering capacity provided by carbonate minerals (dolomite and some calcite) and can constitute a long-term source of alkalinity. Depletion calculations suggest that Vault tailings will eventually generate ARD, but after a slightly longer lag period than the current testing period (four to 15 years under accelerated weathering laboratory conditions, likely much longer under actual site conditions).”

Tailings have a potential to generate ARD and, should this potential be realized, may generate poor quality leachate. Consequently, the tailings management plan that has been developed includes freezing of the tailings with time, and covering of the tailings with a buffering waste rock

[1] The tailings described were generated from a laboratory-scale processing circuit that included flotation and cyanidation of a sulphide concentrate. The whole ore tailings are expected to have similar chemical and weathering characteristics as the combined tailings.

in which the active layer will develop. These management strategies will reduce the potential for ARD generation.

4.10.1.4 Overburden and Waste Rock Disposal The Proponent shall:

NIRB's Comment:
Provide a plan for overburden and waste rock handling, including the design and location of the storage sites, describing the options for each. The Proponent shall include a review of similar operations elsewhere, applicable modeling information, and the results of research on the long term thermal stability of the underlying permafrost and frozen materials; Table 4.7 : Decision Matrix for waste rock storage option is missing.

Cumberland's Response:

SITE SELECTION

The mine waste rock from the North Portage, Third Portage and Goose Island open pits will be stored in a storage facility located near to these pits (Portage Rock Storage Facility), to the north of Second Portage Lake, and tailings storage facility. Waste rock from the Vault open pit will be stored in separate storage facility adjacent to the Vault open pit (Vault Rock Storage Facility).

In developing the site selection criteria for the Portage Rock Storage Facility, a decision matrix was used to consider four possible options initially. The decision matrix is attached. Each option was assessed based on a set of key indicators which included consideration of environmental factors, operational factors, and economic factors.
Sub-indicators of the environmental factors included consideration of various issues, such as ARD and ML, groundwater seepage potential, geotechnical hazards, and other potential environmental impacts. A ranking system was then applied to the storage options, with the contribution by environmental factors accounting for 50% of the overall weighting of the various options, and with operational and cost contribution accounting for 30% and 20% respectively. The selected option, north from the Second Portage Lake, presented advantages in terms of a moderate potential for the generation of ARD and ML, a smaller footprint area, fewer impacted lakes, better conditions for water management and due to the facility's close proximity to the pit.

The selection of the location for the Vault Rock Storage Facility was primarily based on the physical restrictions of the proposed Vault open pit area. The presence of numerous lakes to the north-east, east, and south-west precluded the development of the Vault Rock Storage Facilities in these areas. Furthermore, the lack of significant topographical relief in the immediate area resulted in the decision to limit the height of the storage facility. Consequently, the location of the Vault Rock Storage Facility was selected on the land area directly to the west of the proposed open pit.

DESIGN CRITERIA

The Portage and Vault rock facilities have been designed to minimize the footprint area and limit impact on lake areas while meeting storage requirements for the facilities.

The storage facilities have been designed to have stable slopes under static and pseudostatic conditions for both short- and long-term scenarios; and to be stable under frozen, partially frozen and thawed foundation conditions. The stability assessment included the consideration of a maximum earthquake of 1 in 975 years.

Geothermal stability analysis by others indicates that foundation material will freeze back within 270 days of placement of the first lift of rockfill. Long term analysis with a climate warming trend indicates that the foundation will remain frozen.

CURRENT THERMAL CONDITIONS

Monitoring of the permafrost thermal regime at the project site began in 1996. Twenty-two thermistor cables have been installed at the site, ranging in vertical depth from 11 m to 191 mThe Meadowbank Project site is underlain by continuous permafrost to depths on the order of 550 m depending on proximity to lakes. Based on the current site thermistor instrumentation, the depth of the active layer in the project area ranges from about 1.3 m in areas of shallow overburden and away from the influence of lakes, up to 4.0 m adjacent to lakes, and up to 6.5 m beneath the stream connecting Third Portage and Second Portage Lakes. Taliks extending through the permafrost will exist beneath circular lakes having a minimum diameter of 570 m, and elongate lakes having a minimum width of 320 m. Based on this, Second Portage Lake and Third Portage Lake will have taliks extending through the permafrost. Much of Vault Lake freezes to the lake bottom; consequently the talik beneath Vault Lake is considered to be isolated.

The data collected from the thermistors installed at the site in 1996 (TP96-154 and TP96-155), and in 1997 (TP97-196), indicate there are no significant variations in the permafrost thermal regime recorded by these installations over the period of seven years for which data have been collected. Based on this information the permafrost thermal regime at the site exists in a steady state. However, on-going monitoring of the existing thermistors is planned, along with the installation of additional thermistors in, and around the proposed rock storage facilities for on-going comparison with the baseline data.

ABANDONMENT AND RESTORATION

The waste storage facilities will be progressively closed during mine operations. A dry cover of non-acid generating ultramafic rockfill will be placed over the Portage rock storage facility to confine the permafrost active layer within relatively inert materials. The Vault rock storage facility is not expected to require a cover. Each rock pile will be contoured to provide a shape consistent with the surrounding topography and to encourage runoff from the final surface to designated drainage paths.

A network of perimeter drainage ditches and sumps will be constructed during operations around each rock facility to collect surface water runoff. During runoff from each rock facility will be directed to an attenuation storage pond. After it has been demonstrated that runoff meets quality discharge criteria, runoff will be directed to existing lakes.

Monitoring, inspection and maintenance activities will be carried out during mine operations to progressively modify the abandonment and restoration place according to the monitoring and assessment results.

Table 4.7: Decision Matrix for waste rock storage option is included as an attachment with this letter.

4.10.1.6 Mine De-watering If applicable, the Proponent shall provide:

NIRB's Comment:
Provide mine inflow water quality to open pits.

Cumberland's Response:
Pit water quality predictions have been developed providing monthly average dissolved constituent concentrations over the duration mine life and post-closure. The quality of water that will accumulate in each open pit was predicted by mathematically mixing the various mine inflow components, taking into account their volumetric proportion. The water quality of each component was either obtained from data collected at the Meadowbank site (e.g.; groundwater and lake water quality) or from modeled data (e.g. run-off and drainage over pit wall, water infiltrated through dikes and runoff over dike material).

Open Pit Water Quality Input Parameters and Modeling Assumptions

The open pits are considered to act as sumps for drainage contacting exposed rock on the pit walls and immediate surroundings. Chemical loads to the pit include:

- Infiltration through the blasting-induced fracture zone on pit walls and runoff over pit walls;
- Runoff and infiltrated drainage over the exposed, downstream portions of the water retention dikes;
- Seepage of lake water through the dikes, carrying a mass load from the lake and from water contacting the dike material;
- Groundwater seepage from pit walls in the Goose Island and Portage pits where taliks are intersected. No talik is intercepted by the Vault pit.

Pit waters are expected to be pumped to the Vault and Portage attenuation ponds.

Table 4.2: Water Quality Assumptions – Open Pits

Property	Comment/Assumptions	
All Pits		
Surface Areas and Footprints	Linear growth of surface area and footprint using a monthly time step until full footprint and surface area are reached at year 10 (Vault, Goose) or 11 (Portage).	
Damaged Rock Zone	The reactive thickness contributing chemical loads to pit wall infiltration is assumed to be 1 m.	
Proportion of Exposed Lithologies	Provided by cross-sections through final pit shell. Same lithological proportions assumed throughout pit life	
Explosives	No residual explosives remaining in rock walls or pit floor after blasting.	
Temperature Effect on Leaching Rates	F_{temp}: Leaching rates halved for every 10°C decrease from 25ºC, for: Ca, Mg, Na, K, Si, Fe, SO_4, Cl, NO_3, and alkalinity. For trace metals, no such correction is applied.	
	F_{ice}: Leaching rate is assumed to be 1e-10 mg/kg/wk when ambient air is at or below 0ºC in D_a. All accumulated reaction products are released during June spring flush;	
	Temperature gradient within active layer (D_a): ambient temperature at pit wall surface (monthly average temperature) to 0°C at D_a bottom, in five layers (Z).	
Chemical Controls	None imposed on pit waters. This is a conservative assumption in that full constituent loads are transferred to respective attenuation ponds.	
	pH value assigned to pit waters based on relative proportion of pit wall drainage, groundwater infiltration and direct runoff in each pit. (see Table 4.5).	
Goose Island, Third and North Portage		

Property	Comment/Assumptions	
Pit Inflows	Direct precipitation, runoff, groundwater inflow, dike seepage and runoff all collect in the pit and are transferred to the storm/attenuation pond	
Groundwater seepage	Chemical load from groundwater seepage is proportioned according to the lithological distribution in the final pit outline.	
Onset of ARD	Portage Rock Storage: PAG rock assumed to start generating ARD as soon as it is deposited; no allowance made for delay to onset of ARD. This is a conservative assumption since kinetic testing indicates delay of ARD onset for some PAG IV and IF rock.	

Property	Comment/Assumptions	
Vault		
Pit Inflows	Direct precipitation and runoff only (no dike seepage, frozen groundwater). Waters collect in pits then are pumped to attenuation pond.	
Onset of ARD	Overall pit rock not expected to generate ARD considering the bulk properties of Vault IV rock.	
Water Retention Dikes		
Configuration of Dikes Around Southern Pits	Double dikes with low-permeability soil-bentonite seepage cutoff between the two halves.	
Construction Material	Upstream half (submerged) to consist of IF material, downstream half (dry until closure) to consist of IV, all from Portage pit.	
Leaching Rates	Dike seepage: based on "initial flush" kinetic test results for IF rock (upstream, submerged half of dike). These rates are assumed to be sustained throughout mine life and after closure. This is a conservative assumption as no consideration is given to depletion of leachable constituents	
	Rainwater infiltration and runoff over exposed IV rock on downstream half of dike. Leaching rate of Goose/Portage IV rock (see Table 3.1) with same leaching rate factors as rock storage piles.	
Chemical Controls	No solubility controls imposed on dike seepage water. Full constituent loads transferred to pit waters	

Vault Pit Water Quality
The pH of Vault pit water is expected to remain neutral and chemical loading of pit waters are predicted to increase with time as the pit surface area increases, until the end of mine life. At the end of mine life, the flooded Vault pit water merges with that of the Vault area attenuation pond to become one water body, in the location of the former Vault Lake. Vault pit water quality is predicted to consistently meet Canadian Metal Mine Effluent Regulations (MMER) quality during operation and post closure.

Portages and Goose Island Pit Water Quality
The lithology of pit walls is such that drainage from each pit is conservatively predicted to become acidic, reaching pH values between 4.7 (Goose Island) and 5.0 (Third and North Portage) should ARD conditions develop in these pits in the first year. This may not occur immediately considering the slow reaction kinetics of some of the potentially acid generating rock that will be present on portions of pit walls. During operation, the concentrations of the majority of constituents rise continually until pit closure. Portage and Goose Island pit waters are predicted to exceed MMER levels for pH (all three pits) and zinc (Goose Island pit only) during operation and as such, may require treatment before discharge. The current mine plan proposes to carry out pit water quality monitoring and pH adjustment during operation, if required, to control pit water quality before discharge. At closure, pits are predicted to flood within a period of approximately four summer seasons, after which the fully flooded pits will form one large pit lake. The dikes separating the pit lake from Third Portage Lake will be breached after the pit Lake water quality becomes acceptable.

4.10.1.8 Airport Facilities
NIRB's Comment:
The Proponent shall describe: Airport facilities at the mine site. Verify length of airstrip. Provide frequency of use.

Cumberland's Response:
The airstrip to be constructed at Meadowbank will have a runway surface 1,100 meters in length, and 61 meters in width, 30.5 meters on each side of the centreline and be capable of handling Hawker Siddely HS-748 size aircraft. The runway surface will be compacted crushed rock and will be treated with a dust suppressant. A short apron and taxiway will be provided for parking aircraft during loading and unloading operations. The airstrip will be provided with runway lighting and be equipped with a non directional beacon (NDB) for navigation. It is expected that up to 3 flights per week will be scheduled.

4.10.1.8 Airport Facilities

NIRB's Comment:
The Proponent shall describe: Provide deicing and containment system.

Cumberland's Response:
A dedicated deicing plant and equipment will not be provided at the Meadowbank airstrip. Aircraft will carry the required application equipment and the appropriate deicing agent. Overspray and runoff will report to the airstrip drainage system and be directed to the tailings impoundment. Quantities will be minimal.

4.10.1.8 Airport Facilities

NIRB's Comment:
The Proponent shall describe construction methods; Provide quantities and sources of material for construction and maintenance

Cumberland's Response:
Construction of the Meadowbank airstrip will be conventional cut and fill operations, using material cut from the airstrip alignment elevations above grade and placed in areas below the design grade. Additional fill materials will be sourced from the pre stripping operations in the open pits. Surfacing of the airstrip will be crushed rock procured from the mine prestripping operations.
The airstrip will require 44,600 m3 of cut and 57,000 m3 of fill to achieve the design grade.

4.10.1.9 Fuel and Explosives Storage Sites:

NIRB's Comment:
Provide quantities of explosives to be stored.

Cumberland's Response:
The annual consumption of explosives at the Meadowbank site will be 11,164 tonnes, comprised of 11,095 tonnes of ANFO (ammonium nitrate / fuel oil) and 69 tonnes of detonators. It is to be noted that ammonium nitrate is not an explosive by itself and only becomes an explosive after on site mixing with fuel oil. ANFO is produced on site as required for immediate loading into the drilled boreholes and detonation. It is not stored for future use but is produced on a daily basis. The quantity of explosives stored on site therefore is 69 tonnes, which are the detonators. Storage of explosives is governed by federal regulations and requires certified and registered storage facilities and monitoring by Mines Inspectors.

4.14 Description of Socio-Economic Environment

NIRB's Comment:
Present baseline data on a community-by-community basis on such components as:
Provide number of children under care of the state/ territory. Neither the Government of Nunavut nor the Government of Canada are publicly reporting on the number of children under care in Nunavut.

Cumberland's Response:
In 2003, the National Children's Alliance commissioned the Child Welfare League of Canada to prepare a status report on children in care in Canada[2] however the League was unable to obtain numbers of children in care for Nunavut.

The most recent public numbers are from the Government of the Northwest Territories. The number of children in care, in Nunavut specifically, for the fiscal years 1996-1999 are provided in the Annual Report of the Director of Child and Family Services[3]. There were between 280 and 300 children in care over this three-year period, with no trend discernible.

4.16 Temporal Boundaries

NIRB's Comment:
Provide temporal boundaries for socioeconomic impacts

Cumberland's Response:
The socioeconomic assessment noted impacts that were expected to continue to be experienced beyond the close of the project. There is normally no "end" date for many socio-economic effects including those such as job experience gained as a result of employment or improved educational status as a result of education and training opportunities.

4.21 Impact Assessment

NIRB's Comment:
Provide a description of any changes to project impact assessment resulting from project design changes identified in Cumberland's letter dated March 8, 2005 regarding Feasibility Study Results on the Meadowbank Gold Project. Provide assessment of impacts for temporary closure.

Cumberland's Response:
There is no change in the design of the mine from that discussed in the DEIS. Temporary closure impacts are dealt with as part of the impacts during operations as most activities that have impacts will continue during temporary closure e.g., truck traffic, noise, and water use.

4.21.1.2 Processed Ore Containment (and Tailings Ponds)

NIRB's Comment:
Anticipated volume of tailings in relation to the storage capacity of the lake. Update required

Cumberland's Response:
There is no change in the anticipated volume of tailings from that discussed in the DEIS.

4.21.1.3 Waste Rock, Ore and Overburden Storage

NIRB's Comment:
Provide information for ore stockpiles

[2] See http://www.nationalchildrensalliance.com/nca/pubs/2003/Children_in_Care_March_2003.pdf

[3] See http://www.hlthss.gov.nt.ca/content/publications/reports/directors_report/directorsreport98_99.pdf

Cumberland's Response:
The location of the ore stockpile is shown in the DEIS Figure 2-5 as a green shaded area northwest of the plant site label, unfortunately it was not labeled as such. We will correctly label the site in the final EIS.

4.21.1.6 Sewage and Solid Waste Management

NIRB's Comment:
Provide information of landfill segregation and leaching

Cumberland's Response:
Solid waste generated by mine, plant, and camp operations will be collected, segregated and treated as appropriate. Putrescibles will be incinerated and the ash placed in the waste rock dump for burial. Combustibles will be burned and the ash placed in the waste rock dump. Non combustibles will be collected and buried in the waste rock dump where appropriate or containerized and transported off site for disposal in an approved facility. Hazardous waste will be containerized and transported off site for disposal in an approved facility. Leachate from the waste rock dump will be directed to the tailings containment facility for treatment if required prior to discharge to the environment. Raw sewage will be directed to a treatment plant, either a rotating biological contactor (RBC) or a sequencing batch reactor (SBR). The effluent from the treatment plant will be injected into the tailings line for disposal in the tailings containment facility.

4.21.1.9 Air and Ground Traffic

NIRB's Comment:
The Proponent shall assess the potential impacts, including those resulting from interactions with wildlife, relating to air and road traffic, taking into account the type, frequency, and timing of traffic, particularly low-flying fixed- and rotary-wing aircraft, noise levels, and, in the case of road traffic, stream crossings. Update required

Cumberland's Response:
There is no change in the air traffic from that discussed in the DEIS. Impacts on road traffic are included in the DEIS and Supporting Documents and the previous letter submission to NIRB.

4.21.1.10 Borrow Pits and Quarry Sites

NIRB's Comment:
The Proponent shall assess the potential impacts of borrow pits and quarry sites, including noise and dust levels, slope stability, thawing of permafrost and ground ice, melt water runoff, habitat loss, and interactions with wildlife. Update required

Cumberland's Response:
Potential impacts of borrow pits and quarry sites are included in the DEIS and Supporting Documents and the previous letter submission to NIRB.

4.21.1.13 Accidents and Malfunctions

NIRB's Comment:
The Proponent shall assess the potential impacts, including those resulting from interactions with wildlife, of accidents and malfunctions, including worst-case scenarios, and shall evaluate their probability of occurrence. Provide worst case scenarios and probabilities of occurrence.

Cumberland's Response:
The probability of an accident or malfunction is extremely low. In the case of a major uncontained fuel spill, there may be potential toxic effects to bird species, particularly waterbirds that attempt to utilize the slick or contaminated water. However, as outlined in the impact matrices of the Draft EIS, all fuel storage areas will have containment berms, and daily on-site monitoring will ensure that all potentially detrimental interactions between mine activities and facilities are identified and mitigated immediately.

Potential spills of cyanide granules during transportation to the Meadowbank Camp, if not cleaned-up immediately, may result in exposure of birds, small mammals and other wildlife that inadvertently ingest the cyanide granules. Waterfowl, such as geese, may be particularly susceptible to poisoning because of their ingestion of gravel-type substances. However, all transporting of cyanide will be according to established protocols and guidelines, and any spills will be cleaned up immediately (see Spill Contingency, Hazardous Materials, and Emergency Response plans – Draft EIS).

4.21.4 Social, Economic and Cultural Components

NIRB's Comment:
Provide project contribution to increased levels of contaminants in traditional foods

Cumberland's Response:
The Meadowbank area is currently only used incidentally for hunting and the gathering of traditional foods. Nevertheless, the potential for elevated levels of contaminants in traditional food plants through dust and emissions is considered to be very low. To ensure that Cumberland's prediction of "no impact to traditional foods' is accurate, a comprehensive environmental health monitoring program will be established that regularly samples and analyses soils and vegetation.
Fish comprises a small but important and nutritious component of the diet of community members of Baker Lake. Baseline metals and mercury concentrations in domestically captured fish species (i.e., lake trout, Arctic char, round whitefish) from project and regional lakes have been determined in baseline studies. All metals for which there are health-based guidelines (i.e., arsenic, antimony, mercury) are well below threshold concentrations for all lakes and species. Although the EEM program does not require that metal or mercury concentrations in fish be measured, tissue samples will be measured for all metals during each three-year fish survey cycle. In addition, Cumberland Resources integrated Aquatic Effects Monitoring Program (AEMP, 2004) stipulates annual monitoring of fish tissue for metals and mercury to ensure that increased tissue concentrations do not go undetected. Reporting of tissue metals concentrations will be made to the appropriate regulatory agency on an annual basis.

4.21.4 Social, Economic and Cultural Components

NIRB's Comment:
Provide Appendix B of Socioeconomic and Archaeology Impact Assessment

Cumberland's Response:

Appendix B has been sent to all parties.

4.24.1 Overview

NIRB's Comment:
Provide location of hazardous waste landfarm.

Cumberland's Response:
Hazardous waste will be handled and conveyed in compliance with federal and territorial regulations. Containerized waste including contaminated soil will be stored at an on site temporary storage area prior to removal off site to a permitted disposal facility. It will be located adjacent to the airstrip on the

north side, between the airstrip and the tailings containment area, as indicated in figure 2.5 Proposed Mine Site Layout. Runoff from the landfarm area will be directed to the tailings area.

4.26.1 Overview

NIRB's Comment:
The Proponent shall present a Monitoring and Follow-Up Plan that includes compliance, biophysical and socioeconomic monitoring programmes, and a follow-up programme to integrate the monitoring results into a coherent programme of action and to evaluate the effectiveness of mitigation measures during operation and after the final closure of the Project. (Compliance monitoring refers to verifying the Proponent's conformity with regulatory standards. Biophysical monitoring involves the monitoring of such biophysical components as air, water, and land. Socioeconomic monitoring involves the monitoring of socioeconomic parameters, for example employment of Nunavummiut and other northerners and the purchase of goods and services in the Region.) In every case, the Proponent shall explain what is to be monitored, why it needs to be monitored, and how it will be monitored.

Cumberland's Response:
As discussed in the previous submission, monitoring and following plans where submitted with DEIS. Each document explains why, how and what is to be monitored. For example the AEMP (2004) document describes the rationale, framework, strategy, methodology and scope of management plans to be implemented during mine construction, operation and post-closure. Management consists of a range of activities, including mitigation and environmental monitoring. Monitoring is designed to detect potential adverse effects on aquatic valued ecosystem components in order that (further) mitigation can be applied as necessary to eliminate or reduce adverse effects. The AEMP is a dynamic, practical guide that identifies the source of physical and chemical stressors to the receiving environment, pathways of potential exposure, the ecological receptors at potential risk, mitigation measures, and the specific parameters to be monitored, and their frequency, geographic location, and duration. The AEMP takes an integrated, ecosystem-based approach that links mitigation and monitoring of physical/chemical effects on key ecological receptors in the receiving environment. At its core, this AEMP will address key issues, water quality, fish habitat, and fish populations.
The core program of the AEMP is a general strategy to monitor water and sediment quality, periphyton, benthic invertebrates, and fish, based on major mine construction, operation, and infrastructure components such as dykes, effluents, stream crossings, and roads. This general design will be implemented prior to and during construction and operation of the mine and will be conducted each year, until closure. Note that requirements under the Metal Mining Effluent Regulations (MMER) are considered part of the foundation to core studies pertaining specifically to mine effluent sources. The AEMP also describes specific targeted studies that typically have narrower temporal or spatial bounds or are designed to address specific questions related to particular components of mine development during construction or operation. These are integrated with, and complementary to, the core monitoring design.

Compliance Monitoring documents (Compliance monitoring refers to verifying the Proponent's conformity with regulatory standards) include the AEMP, MMER, NNL, and Reclamation and Closure Plan.

Biophysical Monitoring documents (Biophysical monitoring involves the monitoring of such biophysical components as air, water, and land.) include Terrestrial Management Plan, Air Quality and Noise Management Plan, AEMP, NNL and MMER.

Socioeconomic Monitoring documents (Socioeconomic monitoring involves the monitoring of socioeconomic parameters, for example employment of Nunavummiut and other northerners and the purchase of goods and services in the Region.) include the Socioeconomic and Archeology Management Plan, Human Resource Management Plan and the future negotiated IIBA.

We expect that all these plans will be altered as a result of the upcoming NIRB technical review, licensing stages (e.g. water license) and IIBA negotiations.

4.26.2 Community Liason Committees

NIRB's Comment:
Provide confirmation that the provisions under section 4.26.2 will be met through the IIBA.

Cumberland's Response:
Given that the IIBA will be a negotiated document, Cumberland intents to meet the provisions of section 4.26.2.

4.28 Closure and Reclamation

NIRB's Comment:
It shall also discuss how the Closure and Reclamation Plan would be updated periodically by, for example, incorporating ongoing research and technological advances. Provide discussion on how research and on-going technological advances will be incorporated into updates of the Reclamation and Closure plan.

Cumberland's Response:
Reclamation at the mine site will be on going over many years. Efforts that are achieving the desired results will be continued and those that aren't will be changed or altered. All specialists will keep abreast of the latest information available on reclamation efforts in the arctic.