



Water Resources Division  
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Your file - Votre référence

Our file - Notre référence  
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**Re: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) and the Reclaim V8 Working Group's release of the RECLAIM V8 tool and User Manual.**

**Dear Partners,**

Over the past year, we have collectively undertaken a substantial and collaborative effort to update the RECLAIM tool and User Manual to their current finalized forms. This work has involved sustained engagement from industry, Indigenous organizations, stakeholders, and regulators, and it represents a significant shared achievement.

On behalf of the Working Group, we would like to extend our appreciation to all participants who contributed their time, expertise, and thoughtful feedback throughout this process. Your input has been instrumental in shaping this updated version of the tool. An apology also must be made as it was everyone's intention to have sent this out to all interested parties in January following the Association for Mineral Explorations conference at the end of January 2026 but that obviously did not occur.

To ensure transparency and to confirm that all comments have been accurately incorporated, we are initiating a 30-day Red-Flag review to ensure that none of the substantive changes have been missed follow our last engagement at the workshop in Edmonton.



Enclosed with this cover letter are the updated RECLAIM tool and User Manual, presented in their final forms. Following the 30-day review, and after considering any constructive comments received, these documents will be implemented for use in Nunavut.

To support an efficient and focused review, we have included a table summarizing all comments received and how each was addressed in the updated tool.

As a reminder, RECLAIM is a financial model used in both Nunavut and the Northwest Territories to estimate the environmental liability associated with mine closure and reclamation should a project be abandoned or default.

It is important to note that **posted financial security** is a separate process informed by RECLAIM and jurisdictional policy. RECLAIM provides the foundational estimate of Environmental Liabilities identified on site; the final security amount is determined through additional regulatory steps based on the jurisdiction and land ownership.

The intent of RECLAIM is to:

- Ensure adequate closure cost estimating so the public is not left with cleanup costs.
- Provide a standardized approach that promotes fair and consistent cost estimates.
- Account for long-term liabilities such as water treatment, monitoring, and tailings stabilization.

During the workshop and throughout this process, industry reaffirmed its support for the *Polluter Pays Principle*, which underpins the tool and the policies of the applicable jurisdictions.

Based on feedback received throughout the year and during the October Workshop, several updates were incorporated into Version 8 of the tool. A summary of these enhancements is provided below.

### Summary of Stakeholder Comments and Resulting Changes to RECLAIM V8

#	General Comment from Stakeholders	Change Made in RECLAIM V8
1	Mobilization costs should be indirect, not direct	Mobilization moved back to an indirect cost.
2	Insufficient items for open pit reclamation, including pit backfilling	Added line items for pit backfilling and additional space for other reclamation activities not captured in previous versions.
3	Maintenance of roads and airstrips during ICM and Post-Closure not factored	Added line items for roadway and airstrip maintenance on ICM and Post-Closure pages.
4	Default ICM duration of 2 years is insufficient; should be 5 years	Default set to 5 years, but adjustable based on project-specific circumstances (as in Version 7).



5	Insufficient items for quarry and borrow pit development	Added additional items for development and reclamation of quarries and borrow pits.
6	Owner's Representative percentage too high at 8%; clarification required	Default reduced to 5%. Further discussion ongoing regarding scale-based percentages.
7	Health and Safety Plan development should not be included as a closure cost	References removed; costs to be covered under contingency or accounted for in the ICRP/FCP.
8	Project management percentage too high	Reduced default to 8%.
9	Engineering percentage too high; should scale with project phase	Default reduced to 5%. Further discussion required regarding criteria for scale-based application.
10	Passive treatment system construction too narrowly defined	Expanded line items to clarify applicability to all passive systems, not only wetlands.
11	Post-Closure maintenance did not include passive systems other than wetlands	Added line items and broadened the title to cover all passive treatment systems.
12	Need additional Post-Closure items for dam and tailings maintenance	Added line items for maintenance of dams and tailings facilities beyond spillway management.

Should you have any questions or require clarification during your review, please do not hesitate to contact us.

We look forward to receiving any final comments and moving toward implementation.

If there are any questions or concerns, please contact me at (867) 975-4550 or [Andrew.Keim@rcaanc-cirnac.gc.ca](mailto:Andrew.Keim@rcaanc-cirnac.gc.ca).

Sincerely,

*Andrew Keim*

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CC.

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