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Our file - Notre référence
GCDOCS# 138615432

June 16, 2025

Industry and Public Stakeholders – Via uploads to both the Northwest Territories Online Review System and Nunavut Water Board Public Registry

Re: Crown-Indigenous Relations and Northern Affairs Canada's (CIRNAC) and Government of Northwest Territories' (GNWT) summary of feedback received by May 30, 2025, revised RECLAIM 8.0 tool and associated User Manual, and invitation for further engagement

Dear Parties,

Background

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) is currently undertaking an update of the RECLAIM 7.0 Model (update to RECLAIM 8.0) and associated User Manual. The Government of the Northwest Territories (GNWT) is collaborating with CIRNAC on this update, as it is the current version also used in the NWT. The purpose of the update is to more accurately reflect the actual costs and site specific activities as they relate to environmental liability estimates.

On January 23, 2025, an in-person and virtual engagement session, including a presentation on the potential updates to RECLAIM 8.0, was held in Vancouver at the Association for Mineral Exploration Conference. Working copies of the RECLAIM 8.0 Model, associated User Manual, and a summary report highlighting proposed changes, including rationale, were uploaded to both the Northwest Territories Online Review System and Nunavut Water Board Public Registry for public review on that date.

RECLAIM 8.0 public engagement and commenting periods

Nineteen written submissions, totaling 203 comments, were received by CIRNAC and the GNWT by the March 31, 2025 RECLAIM 8.0 public engagement and commenting period deadline. Comments pertained to the general themes of unit rates, policy, indirects, user manual, net present value, and contingency. CIRNAC and the GNWT heard in the January



23, 2025 engagement session the usefulness to hear other's public feedback and have the opportunity to augment their public feedback accordingly. CIRNAC and the GNWT summarized the first written feedback received in the first RECLAIM 8.0 public engagement and commenting period by April 9, 2025 and posted it on both public online review systems for further feedback. By May 30, 2025, CIRNAC and the GNWT received 4 additional written submissions, totalling 112 additional comments. These comments pertain to the general themes of unit rates, policy, user manual, and net present value.

The second summary of written feedback including responses from CIRNAC and the GNWT, revised working copies of the RECLAIM 8.0 Model, associated User Manual, and a summary report highlighting June 16, 2025 proposed changes (Appendix A) including rationale, were uploaded to both the Northwest Territories Online Review System and Nunavut Water Board Public Registry for public review on that date. CIRNAC and the GNWT request further public feedback on the update to RECLAIM 8.0 and the associated User Manual be submitted **by August 15, 2025** via the Northwest Territories Online Review System or Nunavut Water Board Public Registry. Written feedback received by August 15, 2025 will inform the October 6 – 10, 2025 workshop agenda.

Further in-person engagement on the updates to RECLAIM 8.0 and associated User Manual

CIRNAC and the GNWT committed to two additional in-person and virtual engagement sessions, including one in Iqaluit, Nunavut, and one in Yellowknife, NWT. The 2025 Nunavut Mining Symposium is hosted by the Nunavut Mining Society in Iqaluit, Nunavut from April 7 – 10, 2025. CIRNAC presented a summary of the public feedback received to both online review systems thus far. CIRNAC also had one-on-one meetings to further engage on the RECLAIM update. The GNWT, with CIRNAC, hosted a one day RECLAIM update workshop in Yellowknife, NWT on May 14, 2025. One-on-one meetings were also held to further engage on the update during the week of May 12 – 16, 2025, in Yellowknife, NWT.

CIRNAC and the GNWT received requests for continued engagement in a workshop format on topics such as Unit Rates, Direct and Indirect costs, and the User Manual. In consultation with stakeholders, the 5 consecutive days of **October 6 – 10, 2025** were selected (location to be determined) for CIRNAC and the GNWT to host the workshop. The agenda for the workshop will be based on the public written feedback received by August 15, 2025.

Conclusion

CIRNAC and the GNWT would like to thank all who have engaged in and/or provided feedback on the RECLAIM tool update thus far. As always, our door remains open to productive engagement and new or innovative ideas in the shaping of the RECLAIM tool. If there are any questions or concerns, please contact Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca or Bill Pain at (867) 767-9234 ext. 53117 or Bill_Pain@gov.nt.ca.



Respectfully,

Andrew Keim

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Spencer Dewar, A/Regional Director General -CIRNAC

Bill Pain, Manager, Water Regulatory, Regulatory and Permitting Division, GNWT-ECC



SCHEDULE

Engagement on the updates to RECLAIM 8.0 and associated User Manual

Important Dates: (Dates included here are tentative and subject to change)

Roll out of updated RECLAIM 8.0 tool for public engagement (Completed)	January 23, 2025
Initial public engagement and commenting period deadline 2025(Completed)	March 3,
Revised public engagement and commenting period deadline (Completed)	March 31, 2025
CIRNAC and GNWT feedback to public and further engagement (Completed)	April 7-10, 2025 Iqaluit, Nunavut
CIRNAC and the GNWT (first summary of feedback to date) ¹ (Completed)	April 22, 2025
GNWT and CIRNAC feedback to public and further engagement (Completed)	May 12-16, 2025 Yellowknife, NWT
Second round of public feedback commenting deadline (Completed)	May 30, 2025
CIRNAC and the GNWT (second summary of feedback to date)* *Includes comment responses from CIRNAC and the GNWT, and revised RECLAIM 8.0 tool and associated User Manual. (Completed)	June 16, 2025
Third round of public feedback commenting deadline²	August 15, 2025
Public Engagement Workshop	October 6 – 10, 2025 Location TBD
CIRNAC and GNWT present the revised RECLAIM tool	November TBD, 2025

¹ CIRNAC and the GNWT heard in the January 23, 2025 engagement session the usefulness to hear other's public feedback and have the opportunity to augment their public feedback accordingly. A summary of the written feedback received to date was uploaded to the Nunavut Water Board public registry and Northwest Territories online review system on April 11 and 14, 2025, respectively.

² Public written commenting feedback received will inform the upcoming workshop agenda.



Appendix A: Summary report highlighting June 16, 2025 proposed changes to RECLAIM 8.0 and associated User Manual

The RECLAIM Model is a financial tool used in the Northwest Territories and Nunavut to estimate the environmental liability cost of mine closure and reclamation if a mine were to become abandoned or defaults into government or land owner care. The posted financial security for mines is a separate process that is informed by the RECLAIM Model and the policy of the applicable jurisdiction.

The intent of the RECLAIM Model is to:

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

CIRNAC and the GNWT commissioned Brodie Consulting Ltd. and AtkinsRéalis to conduct a review of stakeholder feedback and assess for additional changes to the RECLAIM v 8.0 (working draft). A summary of changes made to the June 16, 2025 RECLAIM Model following stakeholder engagement is summarized in the table below.

Table A: General Stakeholder comments and response from the Working Group

#	General Comment Received from Stakeholders	Change made to June 16, 2025 RECLAIM 8.0 and User Manual
1	Mobilization costs should be an indirect cost and not a direct cost.	Mobilization was moved back to an indirect cost.
2	Not enough items for reclamation of open pits including backfilling of pits.	Added in line items for backfilling of pits and additional space for reclamation activities which may not have been included in Version 7 or the original update.
3	Maintenance of roadways and airstrips during ICM and Post Closure are not factored.	Added in line items for maintenance of roadways and airstrips to ICM and Post Closure pages.
4	Default of only 2 years of ICM is insufficient and should be set to 5 years.	ICM default duration set to 5 years but can be varied as circumstances dictate as per version 7.
5	Lack of line items provided for Quarry and Borrow pit development.	Additional items were added under Quarries and Borrows under open pit to include more development and reclamation activities.



6	Owners representative percentage too high at 8% and should be additional information on how to apply this percentage.	Owners representative default set to 5%. Discussion on applying a scale based percentage in RECLAIM V8 or if this will be a separate cost set during review is to be determined.
7	Development of Health and Safety Plans should not be included as a closure costs.	Reference to Health and Safety Plans was removed from indirects as these costs will be covered under contingency amounts. Or removed based on inclusion of these plans and costs as account for in the ICR plan or FCP for each site.
8	Project management percentage was too high.	Reduced default project management percentage to 8%.
9	Engineering percentage was too high and should be scaled to phase of project.	Default percentage was reduced to 5%. Additional discussion needed on criteria for applying a scale based percentage within RECLAIM V8.
10	Construction of passive treatment systems did not include line items for other passive treatment systems.	Expanded line items and made it clearer that construction of passive treatment systems is not limited to wetlands but includes any passive treatment system.
11	Maintenance of passive treatment systems other than wetlands not included under Post-Closure Monitoring and Maintenance.	Added additional line items and modified the title to make it clear that maintenance requirements cover any passive treatment system not just constructed wetlands.
12	Need additional line items under Post-Closure to cover maintenance activities related to dams and tailings.	Added in additional lines to cover off maintenance of dams and tailings facilities under the previously line item which included only spillway management.
13	Removed legacy hidden sheets.	Several sheets were hidden and not needed and removed for clarity including "UR-Short list_New" and "Monitoring Template".
14	Corrected unit rate escalation formula.	The formula reference to the manual CPI entry was not locked resulting in it referencing the wrong cell. The formula was corrected to reference the correct cell



		and the reference was locked to avoid future issues.
15	Added in additional table for tailings water treatment.	Both Tailings and Water Management tabs referenced the same cell under Water Treatment. An additional table was created under Water Treatment so the tabs could reference separate tables and avoid any potential duplication.

Conclusion

Based on feedback from stakeholders revisions were made to the working copy of RECLAIM V8, primarily related to indirect percentages and additional clarification on maintenance items. Some additional discussion was identified to clarify application of some of the indirect percentages within RECLAIM and how these can be integrated into the tool or included as a separate item. Outstanding public written feedback comments from the March 2025 and May 2025 commenting periods, and upcoming August 15, 2025 commenting period deadline, will be reviewed and considered for inclusion in the RECLAIM Model. The results and feedback from the October 6-10, 2025 workshop will also be considered for inclusion in the final version of RECLAIM 8.0.