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Cambridge Bay
Ikaluktutiak
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Kugluktuk
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Bathurst Inlet
Kingaok
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Bay Chimo
Umingmaktok
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Gjoa Haven
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Taloyoak
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Kugaaruk
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Sent by e-mail: michelle.blade@rcaanc-cirnac.gc.ca;

August 15th, 2025

RE: Public Feedback on the update to RECLAIM 8.0

Dear Michelle Blade, the KIA did not have time to review the update to the RECLAIM 8.0 model but did review the correspondence received by CIRNAC from mining companies. The KIA agrees with much of what Agnico Eagle Mines Ltd. (AEM) and B2Gold Nunavut recommends in their review.

KIA considers reclamation work to be an operational activity of the mining company which can be done progressively while the mine is in operation or post-closure. The direct and indirect cost of reclamation work should be based on the actual direct and indirect costs while the mine is in operation.

Generally speaking, a mining operation can be composed of business units of Operations, Geology & Exploration, Engineering, Health, Safety & Environment, Supply Chain & Logistics, Human Resources Finance & Administration, IT & Systems, and Community & External Relations.

Operations typically consists of Drilling & Blasting, Loading & Hauling, Processing/Plant Operations, and Maintenance.

Engineering usually consists of Mine Planning, Surveying, and Geotechnical.

Health, Safety & Environment generally consists of Safety Management, Environmental Compliance, and Emergency Response.

Supply Chain & Logistics consists of Procurement, Inventory Management, and Transportation & Shipping.

IT & Systems consists of Operational Technology, Network & Infrastructure, and Data Management.



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Operational costs arising from loading & hauling and maintenance could serve as the basis for direct costs in remediation work performed by the mining company. While engineering, environmental compliance, transportation & shipping, and operational technology costs could form the basis of indirect costs.

In a workshop with industry representatives, CIRNAC will have to present the sources for the unit costs that are used in RECLAIM 8.0 as well as explain which indirect costs are used and the reasoning behind the level of contingency built into the model. This may involve explaining 'first principles' used for developing unit costs and indirect costs.

CIRNAC could ask industry representatives if they have historical cost information in the forementioned business units that would be applicable and appropriate for use in remediation work.

This could help resolve differences in direct unit costs and the type and amount of indirect costs for remediation of the mine site.

As stated by KIA at the January 2025 meeting in Vancouver, analysis of historical costs for operations and remediation work combined with some form of work measurement is the best basis for establishing appropriate unit costs and indirect costs.

The KIA suggest to CIRNAC to take this approach with the mining industry in Vancouver in October 2025, and other subsequent workshops as required to work through the issues that have been raised.

Thank you.

John Roesch, P.Eng.

Senior Hope Bay Project Officer
Kitikmeot Inuit Association, Department of Lands and Environment

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment