

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (i.e. the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (i.e. bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

<u>TOPIC</u>	<u>COMMENT</u>	<u>RECOMMENDATION</u>
<i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>

Item Number	Topic	Comment	Recommendation
1	Reliance on Use-Protection Approach	DDEC adopts the 'use-protection' approach as the focus of its Response Framework (pg. 1-2). The 2011 Mackenzie Valley Land and Water Board's Water and Effluent Quality Management Policy equally emphasizes waste minimization.	DDEC should clearly explain how waste minimization has been applied in the Response Framework and its water management at site.
2	Precautionary Principle	The company in several places in the document defers taking actions until there is scientific certainty (e.g., pg. 3-23 in discussing a low action level for community biological variables, and pg. 4-2 where high action level definitions are deferred). This is clearly not consistent with the Precautionary Principle.	DDEC should explain how it has applied the Precautionary Principle in these specific instances and in the Response Framework in general.

3	Lead Times for Action	Lead times in the Action Levels are not explicitly identified. One needs to set the Action Levels such that an adequate lead time can be provided to actually implement appropriate responses, which could include water treatment or other mitigation.	DDEC should explicitly identify lead times for each Action Level.
4	Table 1 Executive Summary; Table 3.4-3. Reporting schedule for Action Level Exceedance and Subsequent Response Plans	In these tables the period for 'Notification of Action Level Exceedance' appears to be 90 days for the April samples and 60 days for the August samples. Similarly, the period for 'Submission of Response Plan' appears to be 120 days and 90 days, for April and August respectively.	DDEC should explain the reason for these apparent discrepancies, in light of the requirement to provide notification of any exceedance within 60 days and a Response Plan within 90 days.
5	3.3.2 Thresholds	In explaining the application of the significance thresholds there is the statement "within the Koala Watershed several lakes (...) are monitored and the significance threshold applies to these lakes collectively rather than individually (i.e. the threshold would not be exceeded on a lake by lake basis)." It is unclear why this should be the case as it would appear to be important to know when the upstream lakes had exceeded the significance threshold rather than wait until all the lakes in a chain had exceeded the threshold.	DDEC should provide a more robust justification for applying the threshold collectively to several lakes within a watershed rather than on a lake by lake basis or, preferably, apply the threshold on a lake by lake basis.

6	3.2.3.2 Biological Action Levels: Fish	No medium action levels are defined for biota. Fish are only sampled every three or six years. If contaminants spiked for some reason in the intervening years, one could envision scenarios where Significance Thresholds requiring medium action measures are reached or surpassed between sampling periods.	DDEC should develop and present medium action levels for fish and other biota.
7	3.2.3.1 Biological Action Levels: Phytoplankton, Zooplankton and Benthos	Action levels on community composition are "Based on AEMP methods for determining mine effects for phytoplankton, zooplankton and benthos" (p. 3.23). It would have been helpful if DDEC had brought forward into this Response Framework document which community composition metrics the AEMP measures (e.g., percentage of phytoplankton biomass that is edible vs. inedible).	The Response Framework should report the biotic metrics upon which thresholds and action levels will be based as is done for abiotic measurements for which thresholds are developed.