

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).

<p><u>TOPIC</u></p> <p><i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i></p>	<p><u>COMMENT</u></p> <p><i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i></p>	<p><u>RECOMMENDATION</u></p> <p><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></p>
<p>Part G, Item 4 Modifications to Waste Rock Storage Areas</p>	<p>Modifications to Waste Rock Storage Areas do not appear to require a design report stamped by a Professional Engineer as required for construction of the original work (see Part F, Item 6).</p>	<p>The WLWB should make the requirements for modifications to Waste Rock Storage Areas consistent with the requirements for construction of the original work, by adding in the following wording in Part G, Item 4: Prior to carrying out Modifications to Waste Rock Storage Areas, the Licensee shall submit an updated design report, stamped by a Professional Engineer, for the approval of the Board.</p>
<p>Part H, Item 15(a) Effluent Quality Criteria</p>	<p>There appears to be an error in the numbering of the Items listed in this section.</p>	<p>The WLWB should clarify the numbering of the Items listed in this section.</p>
<p>Part J, Items 1 and 6 AEMP, AEMP Re-Evaluation Report and Response Framework Linkages</p>	<p>There is no explicit linking of the AEMP, the AEMP Re-Evaluation Report and the Response Framework.</p>	<p>Add in a item e) to the objectives for the AEMP (Part J, Item 1) as follows: e) To provide an early warning system where the results of aquatic monitoring are used to prevent or avoid adverse environmental effects through a Response Framework and regular evaluation of the AEMP. Modify the objectives of AEMP Re-Evaluation Report Part J, Item 6 (c) as follows: To provide supporting evidence, if necessary for proposed revisions to the AEMP Design Plan including any changes that may arise from the Response Framework or Response Plan(s).</p>

Schedule 7, Part I, Item 1(b) Contingency Planning	There appears to be an error in the wording of this section (perhaps it should read Part I, Item 4?).	The WLWB should clarify the wording of this section.
Schedule 8, Part J, Item 1 (r) AEMP Response Framework	There is no explicit requirement for inclusion of biotic indicators or metrics (e.g. zooplankton density or contaminant concentrations in fish organs) as part of the Response Framework to ensure that early warning signs are developed for mine-related adverse environmental effects.	The wording of Schedule 8, Part J, Item 1(r)(a) should be changed to: "definitions, with rationale, for Significance Thresholds, and tiered Action Levels applicable to biotic and abiotic parameters monitored in the aquatic Receiving Environment of the Project; and"
Schedule 8, Part J, Item 5 Nitrogen Response Plan	The Nitrogen Response Plan requirements do not include any objectives or a sense of purpose. It is not clear whether there is any ongoing requirement for monitoring of source reduction or audits beyond the effort needed to put together an initial Plan.	There should be a clear objective or purpose of the Nitrogen Response Plan spelled out (i.e. waste minimization). Add item (d) description of ongoing activities and efforts to minimize nitrogen losses caused during mining operations and how this will be monitored and audited.
Management Plans and Other Water Licence Requirements as found in Part E, Item 1 (Dewatering Plans); Part H, Item 1 (Waste Management Plan); Part H, Item 2(b) (Wastewater and Processed Kimberlite Management Plan for Sable and Pigeon); Part H, Item 3(b) (Waste Rock and Ore Storage Management Plan for Sable and Pigeon); Part I, Item 1 (Contingency Plan); Part I, Item 4 (Hydrocarbon -Contaminated Materials Management Plan); Part J, Item 8 (Response Framework); Part J, Item 11 (Nitrogen Response Framework); Part K, Item 5 (Final Closure and Reclamation Plan)	The draft water licence sets out several different approaches dealing with what may happen if a management plan is not accepted by the WLWB. Some of the items are silent about what happens, others require resubmission within a specified timeframe, while others require revisions according to WLWB direction and then resubmission for WLWB approval.	It would be clearer and more consistent to set out what happens if these plans or water licence requirements are not approved by the WLWB. To better reflect the WLWB's authority and to set out a consistent process where a management plan or requirement is not approved, the WLWB should indicate that the plan(s) should be revised according to the Board's direction and resubmitted for Board approval (see wording in Part I, Item 5).