

SECTION	TOPIC	COMMENT
6.4	kimberlite toxicity	NSMA is not aware of any studies which prove that revegetated kimberlite is "safe" for all wildlife, including caribou, waterfowl, rabbits, and ptarmigan. The water which will inevitably pond, and the vegetation which will inevitably grow, needs to be shown to be safe for at least a reasonable cross section of species to ingest. The definition of "safety" is not just a very low risk of traumatic accidents, but should also include freedom from chronic and sublethal negative effects. The studies needed to answer these questions should be well underway. In the 1995 EIS, BHP committed to covering the beach and slurry with a layer of waste rock, and coarse tailings, trucked from the plant.
6.4	before and after comparison	Before and after aerial photography or high resolution satellite imagery should be used, and should include overlaid outlines, north arrows, scale bars, and descriptive legends. The images should clearly illustrate the boundaries of vegetation, rock, water (including direction of flow) and mine component footprints.
6.4	Water Quality	CCME guidelines for protection of aquatic life and other sensitive organisms should be added to Table 53 (pg. 197). Water licence 2003I2-0008 requires a description of the post-closure treatment potentially required for any water discharge that is not consistent with CCME freshwater life guidelines.
6.4.2.1	Phase 1 Containment Facility	What research and monitoring is being done on this mine component, and how is the information being used to inform the closure plan?
6.4.2.2	fig. 63	It is unclear what the East dam and spillway dam are for?
6.4.4.1	Phase 1 Containment Facility	If closure of this mine component is scheduled for 2008, there should be much more information included in this plan.
6.4.4.1	Waste rock cover	Where is the research that confirms these plans are feasible and effective?
6.4.4.1	Ponds and EFPK	Where is the information on reclamation of the extra fine PK, and the saline mine water? Will every cell of the LLCF be safe for people and wildlife? Will the ponds have dark colored saline water that magnifies the effects of climate change? How deep will the water be? Will permafrost be affected?
6.4.4.2	Salt (mineral) lick at LLCF	Where are the studies to investigate the risks in case the LLCF is used as a salt (mineral) lick by wildlife, either by ingesting salty water, soil, or vegetation? How is Traditional Knowledge incorporated?
6.4.4.3	Revegetation	There needs to be significant efforts to consult Aboriginal People and incorporate TK before adopting this closure objective, and there needs to be much more detail provided. BHP has committed to return affective areas to a state where negative effects on the use of the land is minimised, considering aesthetics, economics, ecosystem productivity, and use. (Environmental Agreement). Also, in the 1995 EIS, BHP committed to re-establish pre-existing productive conditions of land.
6.4.4.3	Wildlife safety	If the area is safe to use, then why would access be restricted? Access should only be restricted if the area is unsafe.
6.4.4.4.	exploration sites	Mark's camp, culvert camp, and boxcar camp have been closed, so NSMA would like to see before and after pictures, and aerial photos.
6.4.4.5	fish barrier	If the area is safe to use, then why would access be restricted? Access should only be restricted if the area is unsafe.
6.4.7	Designing for closure	Where is the information to support the claim that the mine is designed for closure? What about EFPK, and saline water?
6.4.8	risk assessment and contingency plan	This risk assessment is biased towards BHP's interests, incomplete, misleading, and was not done in consultation with the land owners - the aboriginal peoples. It must be redone, incorporating TK and community values for the risks and contingencies, and the adaptive management plan.
6.5.4.1	Panda Diversion Dam	What are the long-term plans for Panda Diversion Dam, and what are the consequences of failure?
6.5.4.3	settling facilities	What are the long-term plans for Two Rock Lake, and King Pond sediments?
6.6.4.1	Buildings and Infrastructure	NSMA would like to know in detail all potential landfill locations, sizes, and contents. We should be consulted regarding opportunities for re-use and recycling. BHP is required to return affective areas to a state where negative effects on the use of the land is minimised, considering aesthetics, economics, ecosystem productivity, and use (Environmental Agreement).
6.6.4.9.	Roads	NSMA should be consulted on the best way to reclaim each specific segment of road, and TK should be incorporated. The EA (2000) states that roads will be left in as-built condition, except that the berms will be knocked down, recontoured, and covered with rip-rap to prevent erosion. Negative effects on the use of the land must be minimised, considering aesthetics, economics, ecosystem productivity, and use (Environmental Agreement). According to the EA (2000) BHP must re-establish land use and protect water resources. Re-establish pre-existing productive conditions of land (EIS 1995).