

Interview Questions for BHP ICRP Working Group

Part 1: How well did the process work?

The process used for the writing and review of BHP's ICRP is summarized in the attached flowchart. Not shown on the flowchart is the set-up of the Working Group. Essentially, the process was made up of several rounds of a cycle that began with submission of a draft document (first the Terms of Reference, then the draft ICRP etc.) followed by its review by the working group, response to review comments by the company, discussion at a working group meeting, verification of which issues were resolved, and, finally, an decision by the Board on any issues remaining unresolved.

1. What, in your opinion, were the greatest strengths of this process?
2. What, in your opinion, were the greatest weaknesses of this process?
3. Do you think that this process could be used to evaluate Closure and Reclamation Plans for other water licence holders in the Mackenzie Valley?
 - a. If not, why? Can you identify an alternative process that might be applied more generally?
 - b. If yes to the above question, can you identify improvements to the existing process that would be beneficial?
4. Can you comment on any overall principles the MVLWB should keep in mind when defining a process for the review of Closure and Reclamation Plans in the future?
5. Any other comments?

Part 2: Is it possible to define a generic template for Closure and Reclamation Plans?

The MVLWB is interested in providing more detailed guidance to proponents as to what is expected in a Closure and Reclamation Plan. Specifically, is it possible to define a generic template or annotated table of contents for a plan that proponents can use to prepare their plans for submission? In the BHP ICRP process, the Wek'eezhii Land and Water Board approved a "Terms of Reference" for the ICRP that was originally written by BHP but then reviewed by the Working Group. Attached is the table of contents for the BHP ICRP for reference.

1. What, in your experience as a participant in the BHP process, was the most difficult part of the ICRP to come to consensus on and why? *(this will help us understand which section to define more clearly next time)*
2. Do you think that the BHP Terms of Reference were fully compatible with INAC's Mine Site Reclamation Guidelines?

3. Putting aside the obvious differences between mine components, is the format and content of the BHP ICRP adaptable for use at other mines in the Mackenzie Valley?
 - a. If yes, are there sections of the ICRP could use more clarification or definition? Should any sections be deleted?
 - b. If no, do you think it impossible to have a generic template for all mines or that we would need to start from scratch?
 - c. If no, are there any sections from the current ICRP format that could be directly applied to another development's Closure and Reclamation Plan? (e.g., the "Reclamation Goal, Closure Objectives and Criteria Framework" or the format of tables in the appendices for Closure Objectives/Criteria or Reclamation Research)
4. Do you have any suggestions as to how best to prepare a generic Closure and Reclamation Plan template for proponents in the Mackenzie Valley?
5. Any other comments on the required content of a Closure and Reclamation Plan?

Table of Contents for the Interim Closure and Reclamation Plan (based on the BHP ICRP Terms of Reference)

1. Executive Summary

2. Introduction

- a. Closure Plan Requirements
 - i. Regulatory Requirements
 - ii. Regulatory Conformance
 - iii. Company Closure Standards

3. Scope

- a. Terms and Definitions
- b. Community
 - i. Community Strategy and Consultation
 - ii. Social and Economic Benefits

4. Project Background

- a. General
- b. Location and Access
- c. Climate
 - i. Terrestrial Environment
 - ii. Aquatic, Flora and Fauna Environment
- d. Land Use
- e. Lessons Learned

5. Mine Overview

- a. Mine Components
- b. Mining
- c. Ore Processing
- d. Facilities and Infrastructure
- e. Materials/Waste Management
- f. Life of Mine Plan
- g. Organization Structure

6. Summary of Closure Requirements: The following sections are necessary for each mine Component (i.e., Open Pits; Underground Mines; Waste Rock Storage Areas; Tailings Containment Areas; Dams, Dykes and Channels; Buildings and Infrastructure etc.):

- a. Pre-Disturbance Conditions
- b. Development Status
- c. Projected Development and Final Landscape
- d. Closure Objectives and Criteria
- e. Engineering and Environment Work
- f. Identified Risks and Contingencies
- g. Reclamation Research
- h. Post-Closure Monitoring

- i. Cost Estimate

7. Temporary Closure Measures

- a. Temporary Closure Measures
- b. Safety, Security, Access

8. Environmental Assessment

- a. Overview
- b. Predictive Water Quality Modeling
- c. Aquatic Resources
- d. Terrestrial Resources
- e. Other Resource Users
- f. Environmental Impacts

9. Progressive Reclamation

- a. Progressive Reclamation Completed
- b. Progressive Reclamation Planning

10. Literature Cited

11. Appendices:

- a. Appendix A: Terms and Definitions
 - i. Acronyms and Definitions
 - ii. Aboriginal Terms Glossary
- b. Appendix B: Community Consultation
- c. Appendix C: Closure Objectives and Criteria
- d. Appendix D: Engineering Summary
- e. Appendix E: Risks and Contingencies
- f. Appendix F: Reclamation Research Plan
- g. Appendix G: Post Closure Monitoring
 - i. Inspections and Monitoring
 - ii. Reporting
- h. Appendix H: Expected Cost of Closure and Reclamation
 - i. Overview
 - ii. Cost Basis
 - iii. Cost Model
 - iv. Liability Reduction Schedule
- i. Appendix I: Plain Language Summary