

Administrative Update to Project Certificate No. 003 Appendices

The following table provides an overview of TMAC Resource Inc. (TMAC) suggested administrative updates to the appendices of Project Certificate No. 3 (the Project Certificate), for consideration by the Nunavut Impact Review Board. The commitments as described in the table below have been addressed through the development of the Doris North Mine and implemented in KIA agreements, plans, regulatory requirements and project authorizations issued to date. In some instances, TMAC has suggested removal of commitments that are no longer relevant to the mine as amended. TMAC has also suggested some changes to reporting intended to reduce duplication with other reporting requirements.

Description of Appendix		TMAC Suggested Revision	Comments/ Rationale
Appendix A – List of Commitments			
Air Quality	1. Use of an aggressive fuel conservation effort; 2. Use of a brine solution for dust suppression in the underground mine; 3. Use of coarse rock in roads, airstrip, building pads and laydown areas to minimize dust during construction; 4. Driving at designated speeds on site roads; 5. Application of water to roadways to reduce dust from ore and waste rock haulage and grading to a minimum; 6. Installation of dust covers, sonic sprays, etc. to suppress dust generation from equipment in the crushing facility; 7. Installation of a dust scrubber on the smelting off-gas stream; 8. Submerged release of tailings deposition to avoid tailings dust emissions; 9. Installation of a waste oil burner unit equipped with a settling tank and filter system for particulate removal from the waste oil;	Remove	Suggest removal of items 1-12 as the Air Quality Management Plan is in place and addresses all of the relevant commitments. With respect to item 7, there is no smelting associated with the Doris mine. With respect to item 8, due to the change to sub-aerial tailings this commitment is no longer appropriate to the project design as approved by the most recent amendment.

	10. Regular servicing of all mobile and stationary engines to maintain efficiency; 11. Proper equipment maintenance; and 12. Adherence to all permits, authorizations and approvals.		
Noise	1. Buildings, structures and material stockpiles will act as physical barriers to noise particularly for outdoor exposed equipment; 2. Most powered equipment will be enclosed in insulated buildings; 3. Proper equipment maintenance; 4. There will be noise monitoring in the mill for occupational health and safety; 5. The on-site Environmental Manager will also conduct routine inspections of the Project operations and look for possible mitigation opportunities. 6. Adherence to all permits, authorizations and approvals.	Remove	Suggest removal of items 1-6 as the Noise Abatement Plan, developed in accordance with PC Condition 29, is in place and addresses all of these commitments.
Water Quality	<p>TSS:</p> 1. Installing silt curtains in localized areas of permafrost degradation; and 2. Applying geo-textile materials or rip rap to areas where slumping is observed to stabilize the shoreline. <p>Runoff:</p> 3. Identifying and using quarry rock that has a low acid generation and metal leaching potential; 4. Implementing industry best practice methods for explosives use, which will limit residual nitrite and nitrate present in quarried and waste rock;	Remove	Suggest removal of items 1-6 as these commitments are addressed in approved plans or are superceded by the amended water licence 2AM-DOH1323: <ul style="list-style-type: none"> • TIA OMS Manual; • Quarry A, B and D Management and Monitoring Plan; • Water Management Plan; • Waste Rock and Ore Management Plan; • Part D Item 2 of 2AM-

	<p>5. Completing winter construction of the roads and building pads, which will mitigate the risk of sediment release during construction; and</p> <p>6. Implementing industry best practices for sediment control and storm water management during and after construction to collect surface runoff, and discharging runoff to the tailings containment area, where the sediments would have the opportunity to settle out.</p>		<p>DOH1323;</p> <ul style="list-style-type: none"> Part D Item 4 of 2AM-DOH1323
<u>Permafrost</u>	<p>1. Additional thermistors will be installed during construction.</p> <p>2. Reading of these thermistors will be included in routine site monitoring programs to ensure that the condition of the permafrost in close proximity to the key mine activity centres is being monitored to ensure that the permafrost integrity is being maintained through the planned design and mitigation strategies.</p>	Remove	<p>Suggest removal of items 1-2 as these commitments are addressed in the amended water licence 2AM-DOH1323: Thermal Monitoring Program required under Part J Item 13.</p>
<u>Vegetation</u>	<p>1. Avoiding, or reducing, impacts to vegetation units during project planning by reusing previously disturbed areas, where possible;</p> <p>2. Avoiding, or reducing, impacts to rare species;</p> <p>3. Implement dust suppression methods (<i>i.e.</i>, spraying with water) on the airstrip and roads during the snow/ice free period;</p> <p>4. Apply water to roadways to reduce dust from ore and waste rock haulage and minimizing grading;</p> <p>5. Install dust covers and sonic sprays to suppress dust generation from equipment in the crushing facility;</p> <p>6. Install a dust scrubber on the smelting off-gas stream;</p> <p>7. Re-contouring closure landforms and placing materials to ensure that the final topography and site</p>	Remove	<p>Suggest removal of items 1- 2 as vegetation units and rare species were identified in both the FEIS and the Amendment Application. Subsequently, the project footprint/development area was approved through issuance of the Project Certificate and Amendment. Accordingly no new impacts to vegetation units and rare plants are anticipated.</p> <p>Suggest removal of items 3-5 and 7-9 as these commitments are addressed in approved plans or are superceded by</p>

	<p>conditions are similar to other vegetation units of the same type in the region;</p> <p>8. Allow areas to revegetate during operations (<i>e.g.</i>, progressive) and promoting natural vegetation regeneration throughout the mine life; and,</p> <p>9. Using adaptive management approaches to ensure that advances in revegetation research are included in final closure planning efforts.</p>		<p>the amended water licence 2AM-DOH1323:</p> <ul style="list-style-type: none"> • Air Quality Management Plan; • Interim Closure and Reclamation Plan (developed in accordance with PC Condition 31); • Part L Items 14, 15, 17, 19. <p>Suggest removal of item 6 as a dust scrubber has been installed, and vents to the inside of the mill building, not to the outdoors.</p>
<u>Jetty</u>	<p>1. Constructing the jetty of clean, crushed rock that has been certified as having low acid generation potential and low metal leaching potential; and</p> <p>2. Use of silt curtains, as required to reduce suspended sediment to a level to meet the federal CCME (1999) water quality guidelines.</p> <p>3. The construction will be timed (<i>i.e.</i>, early July) to avoid the spawning migrations of capelin during the end of July (Supporting Document F4); and</p> <p>4. Monitoring measures are outlined in Chapter 6 of the Technical Report.</p> <p>Construction activities will be monitored on terms and conditions of permits and approvals.</p>	Remove	<p>Suggest removal of items 1-4 as the commitments have been fulfilled. The jetty has been constructed in accordance with these commitments, and is being monitored according to the legal requirements of the <i>Fisheries Act</i> Authorization.</p>
<u>Caribou</u>	<p>1. Integration of <i>Inuit Qaujimajatuqangit</i> into monitoring programs;</p>	Remove	<p>Suggest removal of items 1-9, 11-13 and 15-21 as these commitments are</p>

	<p>2. Restricting the mine surface footprint to a small and confined area of 53 ha;</p> <p>3. Minimizing the amount of clearing;</p> <p>4. Reduce noise by use of muffled exhaust systems;</p> <p>5. All diesel powered equipment will meet emission guidelines;</p> <p>6. Minimum flying altitude of 300 m above ground level for cargo and passenger aircraft outside of the Project area;</p> <p>7. Vehicles restricted to designated roads and prepared work areas (<i>i.e.</i>, recreational use of off-road vehicles is prohibited);</p> <p>8. Implement dust suppression methods (<i>i.e.</i>, spraying with water) on the airstrip and roads during the snow/ice free period (chemical dust suppressants will not be used);</p> <p>9. Install dust covers and sonic sprays to suppress dust generation from equipment in the crushing facility;</p> <p>10. Install a dust scrubber on the smelting off-gas stream;</p> <p>11. Conducting pre-project surveys to identify wildlife sensitive locations and protected areas for avoidance;</p> <p>12. Reclaiming areas during operations (<i>e.g.</i>, progressive) and promoting natural vegetation regeneration throughout the mine life;</p> <p>13. Wildlife awareness and sensitivity training for on-site personnel;</p> <p>14. Participation in the Bathurst Caribou Management Committee;</p> <p>15. Implement caribou crossing locations along the road based on local information from the Hunters and</p>		<p>addressed in approved plans or are superceded by the amended water licence 2AM-DOH1323:</p> <ul style="list-style-type: none"> • Wildlife Mitigation and Monitoring Program (developed in accordance with PC Condition 26, 32) ; • Air Quality Management Plan; • Interim Closure and Reclamation Plan; • Part L Item 14 of 2AM-DOH1323. <p>With respect to item 2, note that mine footprint was expanded with approval of the amendment and may be further revised over time as permitted by regulatory and Inuit authorities.</p> <p>Suggest removal of item 10 as a dust scrubber has been installed and vents to the inside of the mill building, not to the outdoors.</p> <p>With respect to item 14, note there is no Project interaction with this herd and so participation in the Bathurst Caribou Management Committee is not appropriate.</p>
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	<p>Trappers Associations and KIA, among others;</p> <p>16. Give caribou the right-of-way (<i>i.e.</i>, all vehicles must stop when wildlife are on the road or approaching);</p> <p>17. Allowing natural encroachment of vegetation on and near roads, airstrip and the active mine site;</p> <p>18. Use of Inukshuks or other initiatives determined through consultation with Elders to deter Caribou from site.</p> <p>19. Establishing and enforcing speed limits;</p> <p>20. Implementing procedures for the safe removal of caribou from hazardous areas (<i>e.g.</i>, roads and airstrip);</p> <p>21. Warning drivers when caribou are moving through the area.</p>		
<u>Grizzly Bear</u>	<p>1. Integrate <i>Inuit Qaujimajatuqangit</i> into education, monitoring and response programs;</p> <p>2. Education and reinforcement of proper waste management practices to all workers and visitors to the site;</p> <p>3. Implement appropriate waste management protocols, including burning all food wastes in an oilfired incinerator;</p> <p>4. Eliminate attractants (<i>e.g.</i> food waste, oil products) at the landfill site;</p> <p>5. Separation of food waste and non-food waste at source;</p> <p>6. Appropriate fencing around the landfill area;</p> <p>7. Burn waste oil in waste-oil furnaces or taken off-site for recycling;</p> <p>8. Designate contained areas for worker lunch and coffee breaks;</p>	Remove	<p>Suggest removal of items 1-5 and 7-10 as these commitments are addressed in approved plans or are superceded by the amended water licence 2AM-DOH1323:</p> <ul style="list-style-type: none"> • Wildlife Mitigation and Monitoring Program; • Incinerator Management Plan; • Part G Item 7 of 2AM-DOH1323; <p>With respect to item 6, note that fencing is no longer recommended as the landfill is for non-hazardous waste only: attractants will be minimized by design. Access management will be presented in the Landfill Management</p>

	9. Educate people on the risk associated with feeding wildlife and careless disposal of food garbage; and, 10. Ongoing review of the efficacy of the waste management program and adaptive improvement.		Plan. Therefore, suggest removal of Item 6.
<u>Breeding Birds and Waterfowl</u>	1. Conduct land clearing for site infrastructure (e.g., building pad construction and roads) outside of the breeding season; 2. Prevent nesting on mine infrastructure and man-made structures; 3. If a nest site is established and eggs are present, avoid the nest as much as possible and monitor for nest success.	Remove	Suggest removal of items 1-3 as these are addressed in the Wildlife Mitigation and Monitoring Plan and in the applicable regulatory requirements.
<u>Raptors</u>	1. Incorporate <i>Inuit Qaujimajatuqangit</i> into operations and monitoring programs; 2. Prevent raptors from nesting on mine infrastructure; 3. If a nest is established within the mine footprint and eggs are present, avoid the nest as much as possible and monitor for nest success. 4. Establishing and enforcing speed limits; 5. Reporting all accidental deaths or injury to raptors as a result of vehicle or aircraft collisions, so that mitigation can be adaptively managed.	Remove	Suggest removal of items 1-5 as these are addressed in the Wildlife Mitigation and Monitoring Plan.
<u>Archaeology</u>	1. All construction activity in the vicinity of the remains will cease immediately. 2. The project archaeologist and Territorial Archaeologist will be contacted. Then the potential significance of the remains will be assessed; and mitigative options will be identified. 3. If the significance of the remains is judged to be	Remove	Suggest removal as these commitments are superseded by the applicable regulatory requirements and the IIBA. TMAC wishes to avoid any potential for inconsistency with applicable regulatory requirements and with the commitments under the IIBA.

	<p>sufficient to warrant further action and they cannot be avoided, the project archaeologist in consultation with the Territorial Archaeologist, will determine the appropriate course of action.</p> <p>4. In the case of human remains, the RCMP will be contacted. In addition, a Coroner and/or physical anthropologist may be involved, if necessary. If the remains are determined to be archaeological, representative of local communities as well as the Inuit Heritage Trust will be consulted to determine how to handle the remains.</p> <p>5. An education program will ensure that all personnel involved in exploration and development activities are aware that heritage resources are protected by law and that if any archaeological, historic or human remains are uncovered during any such activities, these remains must be reported and disturbance must cease until the remains are dealt with appropriately. The Territorial Archaeologist of the Government of Nunavut will be notified and a qualified archaeologist will assess the incident.</p>		<p>Further, TMAC has a Standard Operating Procedure (HB-ENV-SOP-100) pertaining to encounters with archaeological sites, and TMAC also retains an archaeologist to provide on site support and training when needed.</p>
<u>Health Services</u>	<p>1. All employees will undergo a pre-employment medical. This will ensure that the site medical staff are able to provide the best care and treatment to employees as the site is remote from full medical services;</p> <p>2. Qualified medical personnel will be available at site twenty-four hours a day and seven days a week. They will be able to treat minor illnesses. As employees will spend half of their time at site, this should relieve some</p>	Remove	<p>Suggest removal of items 1, 3-4, 6-11 as these commitments are addressed in plans developed in accordance with PC Condition 32, or are superceded by the current IIBA:</p> <ul style="list-style-type: none"> • Human Resources Management Plan; • Emergency Response Plan; • Health and Safety Plan;

	<p>burden from the local health facilities;</p> <p>3. Emergency response and contingency plans are in place for medical evacuation if required;</p> <p>4. Alcohol and drug education will be provided to all employees and the site will continue to be an alcohol and drug free operation;</p> <p>5. Proponent will continue to follow health guidelines, procedures and protocols for camp food. Waste handling and storage will meet all appropriate territorial regulations and standards to avoid any health concerns for employees;</p> <p>6. Communication and cooperation processes have been put in place with medical personnel in the camps, the Nunavut HSS, the Yellowknife hospital, appropriate monitors and inspectors, and regional health authorities. The new health Centre that opened in Cambridge Bay in 2005 will also provide a higher level of service;</p> <p>7. All Project contractors and subcontractors are bound to the guidelines, procedures and protocols developed by Miramar;</p> <p>8. Miramar will provide government inspected country food periodically at the mine site. During operations the medical staff will be able to provide information on diet and nutrition;</p> <p>9. To avoid employee injury, Miramar will ensure that safety is the highest priority for the Project;</p> <p>10. Miramar will ensure transportation equipment is regularly inspected for safety; and</p> <p>11. Miramar will take safety into account when planning contractor delivery schedules.</p>		<p>Under the <i>Mines Health and Safety Act and Regulations</i> (NU), TMAC is required to maintain qualified medical personnel on site (item 2). Under the <i>Public Health Act</i>, TMAC is required to handle food safely (item 5). Accordingly, there is no need for standalone commitments of this nature and so suggest removal of these items.</p>
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<u>Safety and Protection Services</u>	<ol style="list-style-type: none"> 1. Proponent will liaise with the RCMP and produce regular updates on project activities and plans that could influence RCMP workloads, communications between camp management and RCMP, and efficiency of RCMP response to calls for service from the camps and from project-related community calls; and 2. Proponent will conduct criminal record checks prior to hiring employees to screen out those convicted of crimes of violence such as sexual assault. 3. Proponent will provide counselling and life skills training workshops. 	Remove	Suggest removal of items 1-3 as these are addressed in the Human Resources Plan and/or are superceded by the current IIBA.
<u>Social Services</u>	<ol style="list-style-type: none"> 1. In order to support the emotional health of employees and avoid burden on community facilities, Miramar will make available a number of methods of communications for workers with their families such as telephone and Internet. 2. Miramar plans to keep family groups or community groups of workers together for support while away from home; 3. Miramar will conduct an extensive orientation program to ensure that all workers are given full training, understand Miramar policies and procedures and have support to adjust to camp life; includes full safety training; 4. Miramar will provide a workplace where individuals are treated in a fair, equitable and respectful manner to attract and retain good workers and reduce stress on employees; 5. Miramar will provide an issues resolution process for employees to be able to resolve any grievances and 	Remove	Suggest removal of items 1-8 as these are addressed in the Human Resources Plan and under the IIBA.

	<p>issues to avoid undue stress and pressure;</p> <p>6. As much as possible, Miramar will encourage opportunities for Inuit to speak and maintain their own language while at the same time operating in the language of the camp as long as safety of the employee, others or job performance are not compromised;</p> <p>7. Alcohol and drug education will be provided to all employees and the site will continue to be an alcohol and drug free operation; and</p> <p>8. Miramar will provide to all employees a free and confidential Employee and Family Assistance Program (EFAP) that will provide emotional, psychological and mental health counseling for employees and their immediate families for work stress, marital and family issues.</p>		
<u>Employment</u>	<p>1. Provide the support of a Manager, Community Relations to support community liaison and facilitate workers integration into the work force;</p> <p>2. Provide a workplace where individuals are treated in a fair, equitable and respectful manner in order to attract and retain workers;</p> <p>3. Provide free flights to mine employees travelling to and from work between the four key communities and the mine site. The flights will not go through Yellowknife. MHBL will consider flights to other communities as appropriate to attract and retain Inuit workers;</p> <p>4. Raise the level of understanding about the type of employment opportunities in the mining industry so that the key communities can make informed choices and</p>	Remove	<p>Suggest removal of items 1-18 as these are addressed in the Human Resources Plan, under the IIBA and in PC Conditions 45 and 46.</p> <p>Note that five key communities are acknowledged in the IIBA.</p>

	<p>about employment and career opportunities;</p> <p>5. Provide hamlets, and education and training institutions within the four key communities with list of potential jobs, education/training requirements and certificates and transferable skills to other jobs for which individuals might be qualified;</p> <p>6. Work with hamlets and training institutions to develop skills assessment and community databases of potential mine site trainees and workers, taking into consideration privacy and other applicable legislation;</p> <p>7. Work with employment personnel in the key communities to develop a strategy that helps each hamlet retain sufficient skilled individuals to effectively manage the Hamlets;</p> <p>8. Miramar will strictly enforce the Harassment Policy that states that harassment of any kind is not tolerated, will be investigated and discipline may include termination;</p> <p>9. Miramar will provide an issues resolution process to ensure the employees grievances and issues are dealt with in a timely and appropriate manner so they do not consider leaving the company;</p> <p>10. Provide ongoing support for employees of the four key communities and other northern hires that recognize cultural differences at the worksite;</p> <p>11. Identify and communicate project employment opportunities early in project development;</p> <p>12. Raise the level of understanding about the type of employment opportunities in the mining industry so that the key communities can make informed choices and about employment and career opportunities;</p>		
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	<p>13. Communicate employment opportunities and skill requirements to interested organizations, government agencies and communities, in an open, transparent and timely fashion in cooperation with each hamlet, the KIA, and the appropriate government departments and agencies by postings in public places, on the Internet, and in local and government agencies and departments;</p> <p>14. With KIA collaboration, design and implement an Inuit recruitment strategy to ensure that every effort is being made to recruit employees from Nunavut and particularly the four key communities;</p> <p>15. Require contractors and subcontractors to structure Inuit and northern employment policies and plans, complete with reporting and monitoring systems, to comply with the Miramar's benefits plans and agreements, and their commitments to employ workers from the four key communities and other northern communities;</p> <p>16. Establish on-the-job support systems and resources to help develop worksite and life skills;</p> <p>17. Require employees to be age 18 for employment during construction and operations (except specific student programs). This is governed by Miramar employment policies and the Mines Act with regard to underground mining. This will deter youth from leaving school to work on the Project; and</p> <p>18. Work proactively with contractors, unions, communities, educational institutions and government agencies to develop and recruit qualified workers.</p>		
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<u>Economy</u>	1. A commitment has been made to facilitate workshops for workers and their families regarding money management, budgeting and retirement planning so that workers can make informed choices about how they spend their money.	Remove	Suggest removal as this is addressed in the Human Resources Plan.
<u>Education and Training</u>	<p>1. Work with employment personnel in the four key Hamlets to develop a strategy that helps each Hamlet retain sufficient skilled individuals to manage the Hamlet effectively;</p> <p>2. Establish on-the-job support systems and resources to help develop worksite and life skills;</p> <p>3. Before construction, continue to promote awareness among residents and secondary school students in the four employment impact communities about employment and career opportunities, and also the education and qualifications needed to access these opportunities;</p> <p>4. Work with school organizations, elementary and secondary schools, and students within the four key communities in the environmental assessment area to promote employment and career opportunities associated with the project, while emphasizing the need to complete high school to qualify for these and other postsecondary learning and career opportunities;</p> <p>5. Work with training institutions, school organizations and government agencies to share industry-specific needs to allow them to develop appropriate <i>curricula</i>, if required;</p> <p>6. Continue annual Summer Camp for students to the Kimberlite Career and Technical Centre in Yellowknife to</p>	Remove	<p>Suggest removal of items 1-12 as these are addressed in the Human Resources Plan, under the IIBA and in PC Conditions 45 and 46.</p> <p>Note that five key communities are identified in the IIBA.</p>

	<p>get exposure to trades and technology options;</p> <p>7. Provide youth within the four key communities in the environmental assessment area with exposure to the mining industry through periodic classroom visits by mine personnel as well as providing summer employment and job shadowing for students;</p> <p>8. Waive formal educational requirements, where appropriate, to reduce barriers for potential Inuit employees;</p> <p>9. Support some trades training on-site where appropriate with the short life of mine;</p> <p>10. Continue to provide scholarships in each of the key communities to encourage further education;</p> <p>11. Ensure on-the-job training manuals take into account cultural differences and language skills, perhaps through a greater use of pictures and diagrams to encourage Inuit workers into the mine; and</p> <p>12. Work with KIA, Department of Education (who are piloting the Nunavut Community Skills Database), hamlets and training institutions to develop skills assessment and community databases of potential mine site trainees and workers, taking into consideration privacy and other applicable legislation.</p>		
<u>Business Opportunities</u>	<p>1. Provide an annual business opportunities forecast to local businesses to identify foreseeable procurement requirements;</p> <p>2. Where possible, provide lead time, and identify project components of the construction and operations phases for the four key communities and other northern businesses to help them develop the ability to qualify</p>	Remove	The IIBA as agreed between TMAC and KIA in March 2015 includes detailed contracting requirements at Schedule F which updates and clarifies these commitments. The IIBA includes various dispute resolution mechanisms should any future disagreements arise.

	<p>and effectively compete for contracted work;</p> <p>3. Endeavour to pre-qualify the four key communities, and offer feedback and assistance in understanding how to fill gaps in their qualifications;</p> <p>4. Provide information on bidding procedures, subcontracting and joint venture opportunities, to help the four key communities and other northern businesses effectively pursue business opportunities;</p> <p>5. Facilitate northern sourcing by structuring work packages and sub-packages, where appropriate, to better align with the capacities of qualified northern businesses (e.g., bid packages of varying sizes or broken down sufficiently so as to encourage Inuit participation);</p> <p>6. Require bidders on major contracts to submit, as part of their bid, a local content plan that specifies how they will optimize the participation of the four key communities and other northern businesses in executing their work;</p> <p>7. Give particular emphasis to local content plans when evaluating bids, and subsequently awarding work and supply packages for the Project;</p> <p>8. Ensure that awarded contracts are monitored by the IIBA Implementation Committee and actual contract awards are reviewed to track Inuit content;</p> <p>9. Monitor implementation of local content plans to ensure that procurement contractor commitments are met, and adhere to terms in the benefits and access agreements;</p> <p>10. For Inuit owned businesses, waive bonding until a successful contractor is selected;</p> <p>11. Continue open communications with the four key</p>		<p>The current language in the project certificate is based on the previous IIBA and as such is out of date; suggest removal of itmes 1-13.</p> <p>Note that five key communities are identified in the IIBA.</p>
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	<p>communities and other northern businesses about Project requirements, including timing, and specification of goods and services required by the Project;</p> <p>12. Supply information about the four key communities and other northern businesses to potential contractors, in support of local content plans; and</p> <p>13. Provide feedback to unsuccessful bidders from the four key communities and other northern communities to help them bid more successfully in the future.</p>		
<u>Appendix A Addendum</u>			
<u>Fish</u>	<p>1. Implement a No Net Loss Plan that meets the requirements of the DFO to ensure that the alteration or loss of fish habitat due to the Project is fully mitigated and compensated.</p> <p>2. Implement a follow-up monitoring plan that meets the requirements of the DFO to monitor the effectiveness of the No Net Loss Plan compensation measures and adapt the compensation measures as required to meet the compensation objectives established in the No Net Loss Plan.</p> <p>3. Conduct the Total Suspended Sediment Monitoring program during the construction of the jetty in Roberts Bay.</p> <p>4. Where possible, hire Inuit to participate in the monitoring and follow-up programs.</p>	Remove	<p>Suggest removal of items 1-4 as this commitment has been fulfilled- and incorporated within the existing DFO Authorizations.</p> <p>Any new effects to fish that may arise due to project activities are address in PC Condition 36 and the Aquatic Effects Monitoring Program.</p> <p>Regarding item 3, jetty construction has already occurred.</p> <p>Regarding item 4, Inuit hiring practices are addressed in the IIBA as well as in the Human Resources Plan.</p>
<u>Water Withdrawal</u>	5. Design all water intake structures to meet DFO Freshwater Intake End-Of Pipe fish screen guidelines to	Remove	Suggest removal of item as this commitment is addressed in Part E Item

<u>in Doris Lake</u>	prevent fish entrainment and impingement.		5 of 2AM-DOH1323;
<u>Water Course Crossings</u>	6. Install culverts to provide cross drainage along roadways to provide continued flow following the current drainage system as necessary to allow fish passage. Following mine closure, breach the culverts and re-establish natural drainage areas and flow direction. 7. Construct the single span bridge crossing the Doris Outflow at the north end of Doris Lake in the winter when the stream is frozen to the bottom.	Remove	Suggest removal of items 6-7 as these commitments are addressed in approved plans or are superceded by the amended water licence 2AM-DOH1323: <ul style="list-style-type: none"> • Interim Closure and Reclamation Plan; • Part F Item 2 of 2AM-DOH1323; • Part L Item 16 of 2AM-DOH1323 <p>With respect to commitment 7, the bridge has been constructed- in accordance with the commitment.</p>
<u>Blasting</u>	8. Follow the federal blasting guidelines of Wright and Hopky (1998) and the more restrictive guidelines for blasting in the Arctic as required by DFO.		Suggest removal of item 8 as this commitment is addressed under Schedule D Item 1a of 2AM-DOH1323.
<u>Reduced Water Quality</u>	9. Conduct the removal of fish from Tail Lake in accordance with the DFO General Fish-Out Protocol for Lakes to be Lost Due to Mining Developments, and in a manner that accords with the <i>Inuit Qaujimajatuqangit</i> key tenet of respect for fish.	Remove.	Suggest removal of item 9 as the fish out has been completed in accordance with this commitment.
<u>Tailings pond discharge</u>	10. Water quality in Tail Lake will be monitored prior to release, and the release of decant water into the Doris Outflow will meet the requirements of the federal <i>Metal Mining Effluent Regulations</i> (MMER).	Remove	Suggest removal of items 10-11 as these commitments are addressed in the Project Certificate or are superceded by the amended water

	11. Water quality will be monitored at the discharge release into the Doris Outflow and downstream of the waterfall, and will meet the requirements of the Canadian Council of Ministers of the Environment (CCME).		licence 2AM-DOH1323: <ul style="list-style-type: none"> • Part G Item 29, 30, 31, 32, 33 of 2AM-DOH1323; • Conditions 13, 15 and 16 of the Project Certificate.
<u>Fish Harvesting Activity</u>	A no-angling policy will be implemented.	Remove.	Suggest removal of item as the policy is in place.
Appendix A Additional Commitments			
<u>DFO</u>	<ul style="list-style-type: none"> • Miramar will commit to place as much tailings as feasible underground as backfill. To assist in achieving that objective, Miramar will conduct a mine and process engineering study, and from that study will develop protocols for prioritizing the types of materials to be placed underground, and for determining the quantities of the various types of materials that will be placed underground. In determining the feasibility of placing tailings underground, and in prioritizing the types of materials and determining the quantities of materials to be placed underground, Miramar will give considerable weight to the need to minimize the impact of tailings on fish habitat. • Miramar will monitor stage and discharge in Doris Outflow both upstream and downstream of the decant discharge point to provide 	Remove	<p>These items are either no longer applicable following the Amendment or have been satisfied as follows:</p> <ul style="list-style-type: none"> • Placement of detoxified tailings underground as per the Waste Rock and Ore Management Plan; • Doris Outflow monitoring as per Schedule J Table 2 pf 2AM-DOH1323; • The jetty has been constructed; • Baseline data for Doris Lake fisheries has been collected; • The No Net Loss Plan has been implemented; • Jetty monitoring is complete

	<p>information that can be used in assessing the accuracy of the impact predictions relating to fish habitat downstream.</p> <ul style="list-style-type: none"> • Miramar commits to reassessing the length of the jetty, at the regulatory phase and prior to construction, to determine if it can be shortened while reaching sufficient water depths. Miramar will do this re-assessment after conducting more detailed bathymetry as part of the final design. • To confirm that the nine spine stickleback habitat associated with the wetland along the shoreline where Tail Outflow enters Doris lake is not adversely affected by the project, Miramar will undertake a detailed survey of the willow habitat along this section of shoreline prior to construction. This will provide a basis for comparison with monitoring to be conducted during operation and closure phases of the project. If unforeseen effects on the shoreline habitat of Doris Lake in this area are identified, additional mitigation or compensation measures will be identified and discussed with DFO, prior to implementation. • Miramar will consider, as part of the No Net Loss Plan, fish passage in the design of the wier proposed in Doris outflow to ensure that fish passage is not impeded. • Miramar commits to monitor the jetty for a two-year period after lowering to assess the stability, effects of changes in current patterns, and fish use of the area. 		
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<u>DFO/EC</u>	<ul style="list-style-type: none"> Miramar commits to preparing a single comprehensive summary of the tailings alternatives assessment, in consultation with DFO and EC, to be used in the regulatory phase for scheduling under MMER. 	Remove	<p>Suggest removal of this item as the TIA has already been scheduled under the MMER.</p> <p>The TIA OMS Manual associated with the current tailings facility and management strategy has been approved.</p> <p>Further PC Conditions 5 and 6 address notification and reporting of alternatives to Tail Lake</p>
<u>EC</u>	<ul style="list-style-type: none"> Miramar has committed to monitoring of permafrost in the vicinity of the North and South dams, monitoring thermistors as long as they are operational and monitoring seepage conditions to ensure design criteria are met. These monitoring measures will be further defined in the regulatory phase. Miramar will update the modelling of water quality and water management prior to start-up as further defined in the regulatory phase, and in particular under the Water Licence. Miramar commits to consultation with EC about further development of the WMMP for songbirds, shorebirds, sea ducks, and water fowl, particularly with respect to assessing the validity of the impact predictions in the FEIS, and to take into account, in consultation with EC, the recommendations contained in the Environment 	Remove	<p>These items are either no longer applicable following the Amendment or have already been satisfied as follows:</p> <ul style="list-style-type: none"> The thermal monitoring program is presented in Schedule J Table 3 of 2AM-DOH1323; The Water and Load Balance Model has been revised and submitted to the NIRB and the NWB; An approved Oil Pollution Emergency Plan/Oil Pollution Prevention Plan is in place and on file with Transport Canada, which addresses include protection and mitigation measures for sea birds;

	<p>Canada written submission of January 28, 2006.</p> <ul style="list-style-type: none"> • Miramar commits to collecting further baseline data on the sea ducks that occur in Roberts Bay area and on waterfowl in consultation with EC. • Miramar commits to the collection of further baseline data on migratory birds (sea ducks, shorebirds, waterfowl and other water birds) in Roberts Bay, including the location of spring staging areas (June) and moulting areas (August). MHBL has committed to collecting these data in 2006. • EC recommends that for point to point flying a minimum elevation of 610 M be used when flying over areas with a high likelihood of concentrations of migratory birds or species at risk, and 1,000 m vertical and 1.5 km horizontal distance from any observed concentrations of migratory birds or species at risk. Miramar is willing to document (outline on a map and post in camp) known concentration areas of migratory birds or species at risk during each year of monitoring and follow these guidelines, when logistically and practically reasonable. • Miramar will provide a tool or table that shows the correlation between the land classification cover types in the Local Study Area and the land cover types in the Regional Study Area. • Miramar will include protection and mitigation measures for sea birds in the spill contingency emergency response plan. • Miramar will include monitoring and mitigation 		<ul style="list-style-type: none"> • Baseline data collection is complete; • An approved Wildlife Mitigation and Monitoring Plan is in place; • IQ has been collected. <p>With respect to the bullet “Miramar will provide a tool or table that shows the correlation between the land classification cover types in the Local Study Area and the land cover types in the Regional Study Area”: The Northwest Territories Department of Resources, Wildlife, and Economic Development (RWED) Ecological Land Classification (ELC) for the Slave Geological Province (Matthews, Epp, and Smith 2001) is used for the purposes of land classification for the Doris Project local study area (LSA) and regional study area (RSA). In years of footprint expansion, Project footprint is overlaid on both the RSA and LSA to calculate habitat-specific area lost based on the RWED ELC as well as ecological relevance (based on published habitat suitabilities) to the various Values Ecosystem Component species monitored under the Wildlife Mitigation and Monitoring Program</p>
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	<p>measures specific for short-eared owls (a species of special concern).</p> <ul style="list-style-type: none"> • Miramar will address the potential issue of nest predators (e.g. foxes) using mine infrastructure as potential den sites, in the WMMP, and propose mitigation to limit predators from using mine infrastructure as den locations. • Miramar will acknowledge the biodiversity potential of the Hope Bay Belt in the WMMP. • Miramar will contribute information regarding project-related effects obtained from the WMMP to the appropriate regional authorities so that the information can be added to the knowledge base regarding mine-related effects and can be used in regional land use planning (related to INAC comments and annual submission recommendations from GN, DOE and EC). • Miramar will gather assistance from community elders to determine appropriate locations of caribou crossings along the proposed roads (incorporate IQ). 		(WMMP). This information is presented in the annual WMMP reports and provides a direct measure of habitat impact to the RSA and LSA, which is preferred over a correlative approach.
<u>EC/INAC</u>	<ul style="list-style-type: none"> • Miramar will commit to review internal aspects of the water quality model relating to source release rates prior to the regulatory phase, to verify predictions and correct as necessary. 	Remove.	Suggest removal of this item as the water quality model has been updated and ongoing model calibration is addressed in 2AM-DOH1323 Part F Item 1 a and the Water Management Plan Addendum.
<u>GN</u>	<ul style="list-style-type: none"> • Miramar will update the Hazardous Materials Management Plan as part of its water license 	Remove	Suggest removal of this commitment as the following approved plans are in

	<p>application to further clarify issues, such as design and operation of the landfarm to remediate any hydrocarbon contaminated soils, the treatment of collected snowmelt and precipitation runoff collected within the diesel fuel tank containment berm to remove any oil prior to release.</p> <ul style="list-style-type: none"> • GN DOE made 10 recommendations regarding the methods and design of different components in the WMMP. MHL will consult with the GN DOE, as well as EC, in determining the most appropriate methods and measured variables for monitoring during construction, operation and closure prior to final submission of the WMMP. • Miramar will monitor re-vegetation success post closure. Miramar will develop a monitoring method that is linked to other post-closure monitoring. • Miramar has committed to collecting caribou calf: cow ratio information during both aerial surveys and ground-based surveys. • Miramar will work with the GN DOE as well as EC on further consideration of the timing and frequency of the caribou aerial surveys in the WMMP. • Miramar will discuss further with the GN DOE the merits of conducting an initial population estimate for wolverine using hair snagging techniques and DNA analysis. 		<p>place and address these commitments:</p> <ul style="list-style-type: none"> • Landfarm Management Plan addresses hydrocarbon remediation and snowmelt; • Water Management Plan addresses site wide water management including run-off; • Wildlife Mitigation and Monitoring Plan addresses wildlife monitoring during construction, operation and closure; • Interim Closure and Reclamation Plan addresses post-closure monitoring. <p>Further, in consultation with the GN and the KIA, the carnivore and caribou monitoring programs have been modified. TMAC also supports the regional caribou collaring program and has an MOU in place.</p>
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<u>Health Canada</u>	<ul style="list-style-type: none"> • Miramar commits to the collection and analyses of fish tissue samples for precautionary testing to confirm that the fish are edible by humans, immediately prior to and during the fish out of Tail Lake. 	Remove	Suggest removal of this item as the fish out has been completed.
<u>INAC</u>	<ul style="list-style-type: none"> • Miramar commits to do all necessary site studies, thermal modelling and sensitivity analyses to ensure dam safety and stability, during the regulatory phase and prior to construction. • Miramar commits to developing a detailed Water Quality Data Analysis and Management Plan to include procedures for: initial start-up and ongoing calibration of analytical equipment; collection, preservation, storage and handling of samples; analytical procedures (e.g. standard methods); checking for outliers; internal reporting and accountability for analytical data and follow up cations. • Miramar commits to continue collecting baseline water quality data and considering the additional data in confirmation of the proposed water management strategy as part of the regulatory phase (in particular, the Water License application). • Miramar commits to continue to develop the adaptive management plan to prevent and mitigate shoreline erosion as part of the regulatory (water license) process. • Once the Doris North Mine is in operation 	Remove	<p>Suggest removal of these items as they are addressed in approved plans:</p> <ul style="list-style-type: none"> • TIA OMS Manual; • QA/QC Plan; • Water Management Plan. <p>Baseline data collection is complete.</p> <p>Static and kinetic testing were document in the Amendment Application. Ongoing monitoring of tailings geochemistry is addressed in the TIA OMS Manual Addendum.</p>

	Miramar will initiate additional kinetic and static test work to further characterize the acid generating- metal leaching potential of mine rock and tailings with the objective of providing additional data for adaptive management should conditions change or the mine life be extended.		
<u>INAC/Hatch Acres</u>	<ul style="list-style-type: none"> Miramar will carry out additional work prior to the start of construction to verify that the quarried rock to be used for construction will be non-acid generating. QA/QC procedures will be in place during construction to verify that the rock used is geochemically stable. 	Remove.	Suggest removal of item as this is addressed in Part G Item 15 of 2AM-DOH1323.
<u>KIA</u>	<ul style="list-style-type: none"> Miramar will commit to revisit the TSS calculations and reassess as necessary. 	Remove.	<p>Suggest removal of this item as this is addressed in 2AM-DOH1323.</p> <ul style="list-style-type: none"> Part G Item 4b; Part G Item 23a; Part G Item 23c; Part G Item 23e; Part G Item 29; Part G Item 31; Schedule J.
<u>NRCan</u>	<ul style="list-style-type: none"> Miramar will commit that spill containment 	Remove the first three	Suggest removal as the following

	<p>measures will be put in place to prevent ammonium nitrate spilled during handling from being lost to groundwater or surface water runoff.</p> <ul style="list-style-type: none"> • Miramar will consider doing additional shoreline characterization of shoreline materials around Tail Lake, including possibly drilling, test pitting, observations or geophysical testing to be determined necessary to complete the final detailed designs. • Miramar is committed to do all necessary and reasonable monitoring after closure to ensure compliance to regulatory permits. • Miramar will consider doing additional dam foundation characterization including possibly drilling, test pitting, observations or geophysical testing as determined necessary to complete the final detailed designs. 	<p>commitments.</p> <p><u>The Proponent</u> will consider doing additional dam foundation characterization including possibly drilling, test pitting, observations or geophysical testing as determined necessary to complete the final detailed designs.</p>	<p>approved plans address these items:</p> <ul style="list-style-type: none"> • Groundwater Management Plan; • TIA OMS Manual; • Interim Closure and Reclamation Plan.
Appendix A Socio-Economic Commitments			
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> • Request that the Human Resource Plan be finalized. <p>Company response:</p> <ul style="list-style-type: none"> • Commit to have a further developed plan in place prior to construction including an issues resolution process for employees. 	Remove	Suggest removal as this Plan is in place.
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> • Request that the Occupational Health and Safety Plan be finalized. 	Remove	Suggest removal as this Plan is already in place. Under the <i>Mines Health and Safety Act and Regulations</i> (NU), TMAC

	<p>Company Response:</p> <ul style="list-style-type: none"> This plan is already well advanced as guided by the WCB. Will make further improvements to specific procedures related to the work site prior to commencement of operations. 		is required to maintain an Occupational Health and Safety Plan. Accordingly, there is no need for a standalone commitment of this nature.
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> Request that the Inuit Employment Plan be finalized. <p>Company Response:</p> <ul style="list-style-type: none"> Inuit Employment Plan is in a draft form; more work will evolve with the KIA through and during operations. 	Remove	Suggest removal as Inuit employment is addressed in the Human Resources Plan and the IIBA.
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> Request that the Community Relations Plan be finalized. <p>Company Response:</p> <ul style="list-style-type: none"> CRP is a draft. We commit to further develop the plan in consultation with communities. MHBL will include a community issues resolution procedure by the end of 2006. 	Remove	Suggest removal as this Plan is in place.
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> Request that the Employee and Family Assistance Program be finalized. <p>Company Response:</p> <ul style="list-style-type: none"> EFAP will be tendered and contracted prior to the start of construction. 	Remove	Suggest removal as the EFAP is in place and is reflected in Human Resources Plan.
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> Request that the Education and Orientation Plan 	Remove	Suggest removal as education and orientation is addressed in the Human

	<p>be finalized.</p> <p>Company Response:</p> <ul style="list-style-type: none"> This plan focusses on preparing potential employees and their families for employment at DN. This will be further developed and in place for major recruitment prior to construction. Workshops will be designed and delivered in the communities. 		Resources Plan which is in place.
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> Request that the Drug and Alcohol Policy be finalized. <p>Company Response:</p> <ul style="list-style-type: none"> Drug and Alcohol Policy is currently begin implemented at Windy Lake Exploration Camp and Vancouver corporate office. It will be implemented for the Doris North project as the first employee/contractor is hired. 	Remove	Suggest removal as the Drug and Alcohol Policy has been finalized and is reflected in the Human Resources Plan.
<u>NIRB</u>	<p>Party request:</p> <ul style="list-style-type: none"> Request that the Wellness Strategy be finalized. <p>Company Response:</p> <ul style="list-style-type: none"> Wellness strategy is in draft form. It has been vetted through impacted communities that possess a Community Wellness Coordinator. It will continue to be developed with community service providers prior to construction and through the life of the mine. 	Remove	Suggest removals as wellness is addressed in the Human Resources Plan which is-in place.
<u>Health Canada (HC)</u>	<p>Party request:</p> <ul style="list-style-type: none"> Would prefer to see more S/E VECs. <p>Company Response:</p>	Remove	Suggest removal as per the company's original response: the VECs are adequate.

	<ul style="list-style-type: none"> The 2 S/E VECs are adequate as sub categories within the VECs have also been established. 		
<u>Indian and Northern Affairs Canada (INAC)</u>	<p>Party request:</p> <ul style="list-style-type: none"> Start compiling targeted collection of specific baseline data <p>Company Response:</p> <ul style="list-style-type: none"> Function of Socio-Economic Monitoring Committee agreed to on public record and in FEIS. 	Remove	Suggest removal as the SEMC is in place. Related documents are publicly available on www.nunavutsemc.com
<u>INAC</u>	<p>Party request:</p> <ul style="list-style-type: none"> SEMC will identify and track key indicators, address the lack of baseline data, allow for the analysis of trends and input this into the adaptive management process, and be used as a template for consistent future environmental assessment. <p>Company Response:</p> <ul style="list-style-type: none"> Point 1 – SEMC will track key indicators, Point 2, SEMC may not be able to address the lack of baseline data, this is conditional on other agencies. Point 3&4 given and agreed. 	Remove	Suggest removal as the SEMC is in place. Terms of Reference have been revised to reflect the Amendment scope in accordance with PC Condition 40.
<u>INAC</u>	<p>Party request:</p> <ul style="list-style-type: none"> Develop a local business incentive policy and communicate it prior to construction. <p>Company Response:</p> <ul style="list-style-type: none"> The IIBA contains provisions related to contracting preference. These preferences include some consideration for businesses within the impacted communities that are not 	Remove	Suggest removal as the new IIBA addresses contracting.

	specifically Inuit owned. MHBL essentially has a local BIP in place. Bidding procedures will be communicated to businesses prior to the commencement of operations per existing commitments within the FEIS.		
<u>Kitikmeot Inuit Association (KIA)</u>	<p>Party request:</p> <ul style="list-style-type: none"> The development of an Integrated Employment and Training Strategy be attached as a condition of a project certificate. <p>Company Response:</p> <ul style="list-style-type: none"> An integrated Employment and Training Plan, to be effective, would require the approval and support of a number of agencies probably including but not limited to: Department of Education, Kitikmeot Economic Development Commission, IIBA Implementation Committee, and possibly a number of program deliverers including Nunavut Arctic college. To make such approval and agreement as a condition of a project certificate would in effect, give any of these agencies a veto on the development of the Doris North Project, which is not acceptable. Moreover, a Nunavut Mine Training Initiative and the creation of a Kitikmeot Mine Training Centre, both of which MHBL is involved. The initiation of either of these would have a dramatic impact on the delivery of mine related training within the impacted communities. If an Integrated Employment and Training plan were to be required, in effect, we will be required to 	Remove	Suggest removal as employment and training is addressed in the existing Human Resources Plan, as well in the new IIBA.

	double plan. We would rather commit to providing reasonable and appropriate support to both a comprehensive Nunavut Mine Training Initiative and a potential Kitikmeot Mine Training School up to and including the use of Boston Camp as a work practicum area.		
GN	<p>Party request:</p> <ul style="list-style-type: none"> Proponent along with the KIA, affected communities and the GN develop a Terms of Reference for SEMC. <p>Company Response:</p> <ul style="list-style-type: none"> This will be a job for the committee once formed. 	Remove	Suggest removal as the SEMC is in place. Terms of Reference have been revised to reflect the Amendment scope in accordance with PC Condition 40.
GN	<p>Party request:</p> <ul style="list-style-type: none"> Terms of Reference include the structure of the committee and its membership. <p>Company Response:</p> <ul style="list-style-type: none"> As above. 	Remove	See above
GN	<p>Party request:</p> <ul style="list-style-type: none"> Terms of Reference include the key indicators to be monitored by the committee. <p>Company Response:</p> <ul style="list-style-type: none"> As above. 	Remove	See above
GN	<p>Party request:</p> <ul style="list-style-type: none"> Terms of Reference include the reporting requirements of the committee on an annual basis. <p>Company Response:</p>	Remove	See above

	<ul style="list-style-type: none"> As above. 		
GN	<p>Party request:</p> <ul style="list-style-type: none"> Terms of Reference include the methodology of collecting the data. <p>Company Response:</p> <ul style="list-style-type: none"> This will be a job for the communities once formed. 	Remove	See above
GN	<p>Party request:</p> <ul style="list-style-type: none"> Develop a policy on how local businesses will be considered in the bid process. The policy must be clearly communicated to the communities prior to construction. The Proponent as part of this policy should be required to provide feedback to unsuccessful local bidders to indicate where they were unsuccessful to allow them to learn and adjust future bidding. <p>Company Response:</p> <ul style="list-style-type: none"> Miramar has committed to do this. We have internal experts in procurement and bid preparation. Details of the preferential treatment of regional and Inuit business etc. are already in place through the IIBA. 	Remove	Suggest removal as these matters are fully addressed by Schedule F of the IIBA and TMAC wishes to limit potential for confusion or inconsistencies between the Project Certificate and the IIBA.
GN	<p>Party request:</p> <ul style="list-style-type: none"> It is recommended that the Proponent prepare the Wellness Strategy in greater detail prior to construction. <p>Company Response:</p> <ul style="list-style-type: none"> Agreed it will be on-going document up to and including the operations. 	Remove	Suggest removal as wellness is addressed in the existing Human Resources Plan.

GN	<p>Party request:</p> <ul style="list-style-type: none"> The Wellness Strategy should include the specific action to be taken, including how specific programs under the Strategy will be communicated to and made available to employees and their family members. <p>Company Response:</p> <ul style="list-style-type: none"> This will be part of the further development as the Project nears construction. 	remove	Suggest removal as wellness is addressed in the existing Human Resources Plan.
GN	<p>Party request:</p> <ul style="list-style-type: none"> The Wellness Strategy should include what indicators will be used to measure the impact of the Strategy including defining the actual measurements. <p>Company Response:</p> <ul style="list-style-type: none"> Indicators have already been suggested; measurements will be provided as data are gathered. 	remove	Suggest removal as wellness is addressed in the existing Human Resources Plan. Monitoring against indicators is addressed by the SEMC.
GN	<p>Party request:</p> <ul style="list-style-type: none"> The Wellness Strategy should include how the data will be collected and applied to the evaluation of the Strategy. <p>Company Response:</p> <ul style="list-style-type: none"> Data will be collected through internal measures and employee feedback. 	remove	Suggest removal as wellness is addressed in the existing Human Resources Plan. Monitoring against indicators is addressed by the SEMC.
GN	<p>Party request:</p> <ul style="list-style-type: none"> The Wellness Strategy should include linkages between the Wellness Strategy and other initiatives such as socio-economic monitoring. 	remove	Suggest removal as wellness and connection to monitoring is addressed in the existing Human Resources Plan.

	<p>Company Response:</p> <ul style="list-style-type: none"> Some data collected from the Wellness Strategy will feed into the socio-economic monitoring measurements. 		
Appendix B		Remove	The list of applicable legislation and required authorizations is out of date. Suggest removal as this list would otherwise continually require updating as legislation is revised. TMAC reports on the status of its authorizations annually in its report to NIRB.
Appendix C		Remove	This Appendix restates the content of Appendix A and so is redundant and inconsistent with the format of other current Project Certificates.
Appendix D – Monitoring Program			
1	<p>Ensure that a comprehensive post-environmental assessment monitoring program (PEAMP) is developed for the project, in accordance with commitments made in the Final Environmental Impact Statement (FEIS) and/or the Final Hearing. The objective of the PEAMP shall be to:</p> <p>a. Measure the relevant effects of the project on the ecosystemic and socioeconomic environment</p> <p>b. Assess the accuracy of the predictions made within the FEIS.</p> <p>The PEAMP must utilize, to the extent possible, the various monitoring plans developed by MHBL, as</p>	<p>Ensure that a comprehensive post-environmental assessment monitoring program (PEAMP) is developed for the project, in accordance with commitments made in the Final Environmental Impact Statement (FEIS) and/or the Final Hearing. The objective of the PEAMP shall be to:</p> <p>a. Measure the relevant</p>	<p>Revised to reflect current document titles and Plans listed in PC Condition 32.</p> <p>Suggest removing reference to the Environmental Protection Plan. It is also referred to as the Environmental Health and Safety Management System, and is considered to be the complete set of management plans that have been developed for Doris North, including those listed in Appendix D Item 1.d.1..</p>

	<p>described in the FEIS, Final Hearing, and this Project Certificate as well as all monitoring plans required by applicable Authorizing Agencies.</p> <p>As part of the PEAMP, MHL is required to forward to NIRB all monitoring and mitigation plans upon completion or as amended or updated.</p> <p>These include, but are not limited to:</p> <ol style="list-style-type: none"> 1. The Environmental, Health and Safety Management Plan, comprising of: <ol style="list-style-type: none"> a. Wildlife Mitigation and Monitoring Plan b. Environmental Protection Plan c. Emergency Response and Spill Contingency Plan d. Occupational Health and Safety Plan e. Reclamation Plan f. Education and Orientation Plan g. Human Resources Plan h. Inuit Involvement Plan i. Community Relations Plan j. Monitoring and Follow-up Plan k. Auditing and Continuous Improvement Plan 2. Noise Abatement Plan 3. All Compliance Monitoring Plans or Programs, such as those associated with: <ol style="list-style-type: none"> a. Metal Mining Effluents Regulations and associated Listing of the Tailings Facility b. Fisheries Act and associated Authorizations c. Nunavut Water Board Class A License 	<p>effects of the project on the ecosystemic and socioeconomic environment</p> <p>b. Assess the accuracy of the predictions made within the FEIS.</p> <p>The PEAMP must utilize, to the extent possible, the various monitoring plans developed by MHL <u>the Proponent</u>, as described in the FEIS, Final Hearing, and this Project Certificate as well as all monitoring plans required by applicable Authorizing Agencies.</p> <p>As part of the PEAMP, MHL <u>the Proponent</u> is required to forward to NIRB all monitoring and mitigation plans upon completion or as amended or updated.</p> <p>These include, but are not limited to:</p> <ol style="list-style-type: none"> 1. The Environmental, Health and Safety Management Plan, comprising of: <ol style="list-style-type: none"> a. Wildlife Mitigation and Monitoring Plan b. Environmental Protection Plan 	<p>Inclusion as a separate plan is redundant, as there is already a rigorous and voluminous system for managing management plans.</p> <p>Revision to reflect that the listing of the Tailings Impoundment Area under the MMER has already occurred.</p>
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		<p>c. Emergency Response <u>Plan</u> d. and Spill Contingency Plan d.e. Occupational Health and Safety Plan e.f. Reclamation Plan f. Education and Orientation Plan g. Human Resources Plan h. Inuit Involvement Plan i-h. Community Relations Plan j. i. Monitoring and Follow-up Plan k-j. <u>Quality Assurance/Quality Control Plan Auditing and Continuous Improvement Plan</u> 2. Noise Abatement Plan 3. All Compliance Monitoring Plans or Programs, such as those associated with: a. Metal Mining Effluents Regulations and associated Listing of the Tailings Facility b. Fisheries Act and associated Authorizations c. Nunavut Water Board Class <u>Type A Licence</u></p>	
2	2. Submit an annual report to NIRB by April 30th of each year the project is in operation until the post-closure	2. No change	Regarding 2a and 2b, to avoid duplication, TMAC proposes that the

	<p>phase. The report must contain, but is not limited to, the following information:</p> <ul style="list-style-type: none"> a. A summary of evidence indicating how MHBL has carried out the project in relation to the terms and conditions contained within the Project Certificate. b. A summary of the results from the PEAMP including: <ul style="list-style-type: none"> i. An analysis regarding whether or not the project is operating in accordance with the predicted impacts identified in the FEIS or at the Final Hearing. This analysis should include: <ul style="list-style-type: none"> a) All relevant data (baseline and monitoring) to support impact predictions and effects conclusions b) An analysis of the effectiveness of mitigation measures and discussion regarding any necessary adaptive mitigation strategies employed c) Explicit conclusions related to whether or not the project is operating in accordance the predicted impacts identified in the FEIS or at the Final Hearing. ii. An analysis of the impact of the project upon the biophysical and socioeconomic environment iii. Any modifications made to the PEAMP c. Compliance status with all authorizations and applicable regulations and guidelines associated with the project; d. Identification of all authorizations obtained to date for the project, including any requested renewals, updates, amendments or extensions to existing 	<ul style="list-style-type: none"> a. A summary of evidence indicating how MHBL <u>the Proponent</u> has carried out the project in relation to the terms and conditions contained within the Project Certificate. b. A summary of the results from the <u>components of the PEAMP not reported elsewhere under separate cover</u>, including: <ul style="list-style-type: none"> c. – g. No change 	<p>the summarization requested here be removed, as it pertains to wildlife, air quality and socio-economic monitoring that is otherwise reported.</p> <p>As required by the terms and conditions of the Project Certificate, TMAC provides full reports of air quality, wildlife and socio-economic monitoring to the NIRB and these reports include executive summaries outlining relevant results related to compliance, mitigation, and environmental or socio-economic impact.</p> <p>TMAC refers to these reports in the annual report provided by April 30 of each year.</p>
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	<p>authorizations;</p> <p>e. A summary of activities undertaken for the year, including any progressive reclamation work undertaken, and a work plan for the activities occurring in the following year – site photos should be provided where relevant;</p> <p>f. A summary of community consultations undertaken and the results; and</p> <p>g. A summary of site-visits by inspectors with results and follow-up actions.</p>		
3	3. Report to NIRB by January 1 of each calendar year on MHBL's development plan for future phases of the Hope Bay Belt, including identifying development plans that may affect the selection of Tail Lake as the preferred alternative for tailings management.	Remove	Suggest removal as this is a duplication of PC Condition 5.
4	Commencing July 30th, report to NIRB on a quarterly basis (July 30th, October 30th, January 30th, and December 30th) as per condition 25. The fourth quarter report must be comprised of an Updated Wildlife Mitigation and Monitoring Plan, and this is to be included in the Annual Report.	Remove	These specific reporting requirements are addressed in the updated condition 25 of the PC
5	Forward to NIRB copies of all authorizations obtained and required for the project on an as-received basis.	No change	
NIRB Monitoring Officer's responsibility	<p>1. Advise MHL of the obligation to prepare and submit an annual report, due April 30th of each calendar year.</p> <p>2. Obtain, compile and review information collected and submitted by MHL and applicable Authorizing Agencies</p>	<p>1. Advise MHL <u>the Proponent</u> of the obligation to prepare and submit an annual report, due April 30th</p>	

<p>es related to this Monitoring Program:</p>	<p>and expert Departments. 3. Report annually to the Board with respect to the Monitoring Program as per Section 12.7.3(c) of the NLCA. 4. Provide recommendations to the Board on follow-up action related to the Monitoring Program. 5. Ensure that any recommendations made by the Board regarding the Monitoring Program are provided to MHBL in a timely manner.</p>	<p>of each calendar year. 2. Obtain, compile and review information collected and submitted by MHBL <u>the Proponent</u> and applicable Authorizing Agencies and expert Departments. 3. Report annually to the Board with respect to the Monitoring Program as per Section 12.7.3(c) of the NLCA <u>Nunavut Agreement</u>. 4. No change 5. Ensure that any recommendations made by the Board regarding the Monitoring Program are provided to MHBL <u>the Proponent</u> in a timely manner.</p>	
<p>Authorizing Agencies' (Government) responsibilities related to this Monitoring Program:</p>	<p>1. Provide any compliance monitoring reports to NIRB's Monitoring Officer by April 30th of each year. Any compliance monitoring report must contain, but is not limited to, the following information: a. How each Authorizing Agency has incorporated the terms and conditions from the Project Certificate into their authorizations; b. Whether any inspections have been conducted, and the results of those inspections; and</p>	<p>1. No change a.-b. No change c. Whether MHBL <u>the Proponent</u> is in compliance with any authorizations that have been issued.</p>	

	c. Whether MHBL is in compliance with any authorizations that have been issued.		
Appendix E		Remove	The list of government contacts is currently out of date, and will easily fall out of date if this is included.