August 7, 2012

Alan Ehrlich, Mackenzie Valley Environmental Impact Review Board, 200 Scotia Centre, Box 938, 5102-50th Ave., Yellowknife, NT X1A 2N7

Dear Mr. Ehrlich:

Re: Giant Mine Remediation Project Environmental Assessment Hearings EA 0809-001

As a resident of Yellowknife, I wish to offer the following comments for consideration in the upcoming hearings.

The toxic and potentially devastating legacy of Giant Mine will be with us forever unless a safe, permanent, and management-free solution is found to neutralize the threat of the 237,000 tonnes of arsenic trioxide at the mine site. The current remediation project is based on the assertion that the frozen block method is the safest solution currently known, to mitigating the potential of the arsenic trioxide to harm the ecosystem. It is a solution that must be managed forever or as long as the arsenic trioxide exists in its current toxic form and location.

Since the Conservative Party became a majority in the House of Commons and the Senate, Canadians have witnessed a dramatic roll-back in environmental law and environmental management responsibilities. Environmental advocates and critics including lawyers and former federal ministers, liken the demise of environmental law and management responsibilities to Canada 50 years ago when ecosystem harm resulting from industrial development was not assessed, managed, or mitigated. In fact, it is this environmental lawlessness that created the toxic Giant Mine legacy in the first place.

Canadians, northerners, and Yellowknifers and Yellowknives Dene First Nation in particular, should be concerned both by the Giant Mine legacy and the era of environmental lawlessness we are entering. I am concerned and I trust that the MVEIRB is as well. In a very short time, environmental laws and regulations have been hollowed out and citizens and advocates alienated from environmental decision making and management processes. Within this environment (and even before environmental deregulation), the requirement to forever safely manage the arsenic trioxide at Giant Mine is beyond imagination. How could anyone or anybody forever ensure that the

toxic arsenic trioxide never harms the ecosystem? As we witness the political will and fiscal commitment to responsible environmental assessment and management unravelling at an incredible pace, I am even more concerned about the possibility of devastating harm from the arsenic trioxide at Giant.

The City of Yellowknife, Yellowknives Dene First Nation, and Alternatives North, particularly Kevin O'Reilly, have thoroughly considered the past, present, and future legacy of Giant Mine. Their considerations are tremendously instructive. I have had the good fortune to be present in some of these discussions. I agree with their advice and trust the MVEIRB will too, that:

- 1. The proponent be required to continue to look for a management-free, safe, and permanent solution to deal with the arsenic trioxide and that if such a permanent solution is found, be the subject of a rigorous environmental review.
- 2. An independent monitoring system be established and financially supported to ensure ecosystem safety and community engagement.
- 3. Ongoing and accurate public information be regularly provided to promote understanding and the ability to live safely with this toxic and potentially devastating site.
- 4. An apology be made and compensation awarded to members of the Yellowknives Dene First Nation for the losses and grief incurred as a result of Giant Mine.

Thank you for the opportunity to provide input.

Sincerely,

Lois Little, Box 1866,

Yellowknife, NWT X1A 2P4