APPLICATION OF RISK MANAGEMENT TO NORTHERN AFFAIRS CONTAMINATED SITES

> NATO/CEMS PILOT STUDY 2005

Chris DaSilva Indian and Northern Affairs Canada

> June 13, 2005 Ottawa, Canada





# INDIAN & NORTHERN AFFAIRS CANADA CONTAMINATED SITES PROGRAM

#### • 1825 sites

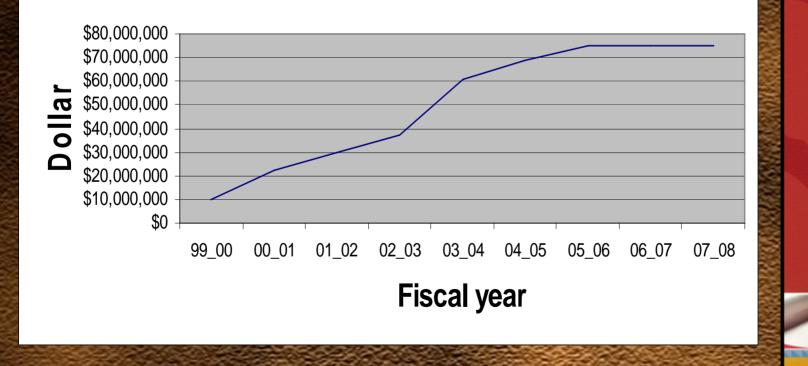
- 976 have been assessed and either no further action is required or remediation is complete;
- 825 sites require assessment/may require action;
- 63 known sites representing \$754 million in liability;
- 35 of these sites are known to have human and environmental hazards and legal obligations (NCS 1) including abandoned mines (14) and former military installations (21)





# RAPID GROWTH IN FUNDING

# Past Expenditures and Budget Forecast 1999-2008





## PROGRAM CHALLENGES

- Management "new" program responsibility that requires a consistent approach to ensure delivery of a successful and fully accountable program
- Capacity northern capacity to participate and benefit from the clean-up of these sites including integration of traditional knowledge into decision-making
- Technical/operational technically and logistically challenging program
- Legacy there is a lack of trust that must be addressed







## MANAGING RISK

- Increase in complexity and scale of sites
- Very significant risk exposure requirement to manage
- Current tools are not sufficient
  - National Classification System (CCME)
  - Northern Environmental Risk Assessment Strategy (INAC)
- Look to private sector best practice
- Piloted risk management approach at Faro/Anvil Range and Giant Mine Projects
- Decision made to develop Risk Management Procedure to be in place for all sites by end of FY 2004/05





# OBJECTIVES

#### To provide:

 A consistent methodology for developing an inventory and evaluating the many different types of risks at contaminated sites;

2. A process to ensure that no high risk items are "falling through the cracks"; and

3. A basis for prioritizing risk mitigation or control activities within and among sites.





# BUILDING BLOCKS

- Treasury Board (TB) policies and guidance on departmental risk assessment and management frameworks
- INAC Contaminated Sites Management Policy (August 2002)
- Canadian Standards Association Standard, CAN/CSA-850-97 (Reaffirmed 2002) Risk Management Guideline for Decision Makers.





# RISK MANAGEMENT STEPS

- 1. Initiation: Establish the process, identify risk tolerances of organization and develop definitions accordingly
- 2. Preliminary Analysis: What could go wrong? Develop a broad range of risk scenarios (events) for all aspects of the project.
- **3. Risk Rating**: What are the consequences of these events and how likely are they to occur?
- Risk Evaluation: Is the risk acceptable? Ties in to step 1 identifying risk tolerances. ALARP principle (As Low as Reasonably Practicable).
- Control/Action: Each level of risk triggers predetermined levels of action (low risk → monitor, very high risk → mitigate immediately)
- Monitoring and Review: Monitor process to ensure high risk items are acted upon. Roll-up results regionally and nationally to identify priorities.





## RISK MATRIX

- Consider an Event: e.g. 'Public access to open pits leads to a fatality'
- Risk = Consequence Severity x Likelihood

Likelihood	Consequence Severity					
Likeimoou	Low	Minor	Moderate	Major	Critical	
Almost Certain	Moderate	Moderately High	High	Very High	Very High	
Likely	Moderate	Moderate	Moderately High	High	Very High	
Possible	Low	Moderate	Moderately High	High	High	
Unlikely —	Low	Low	Moderate	Moderately High	Moderately High	
Very Unlikely	Low	Low	Low	Moderate	Moderately High	

Cana

# DEFINITIONS OF Consequence Severity

 Consequence types and definitions developed by project team based on departmental and federal policies and on pilot tests.

Six Consequence Types:

- i. Environmental Impact
- ii. Human Health and Safety
- iii. Legal Obligations
- iv. Consequence Costs
- v. Community/Media/Reputation
- vi. Special Considerations (Impact to traditional lands and lifestyle)





#### **Consequence Severity Definitions** Consequence Moderate Major Critical Low Minor Categories Environmental Impact No impact. Minor localized or short-Significant impact on Significant impact on Serious long-term valued ecosystem valued ecosystem impairment of ecosystem term impacts. component. component and mediumfunction. term impairment of ecosystem function. Special Some disturbance but no Minor or perceived impact Some mitigatable impact to Significant temporary Significant permanent impact to traditional land to traditional land use. traditional land use. impact to traditional land impact on traditional land Considerations use. use. use. Legal and other No non-compliance but Technical/Administrative Breach of regulations, Major breach of regulation Substantive breach of Obligations lack of conformance with non-compliance with permits, or approvals (e.g. regulations, permits or willful violation. permit, approval or 1 day violation of discharge approvals (e.g. multi-day departmental policy requirement. regulatory requirement. limits). violation of discharge limits). Informal advice from a Warning letter issued. Order or direction issued. Prosecution. Court order issued. regulatory agency. No land claim or other agreement requires the agreement requires the agreement requires the agreement requires the agreement. Crown to satisfy Crown to respond, but no Crown to exercise its Crown to exercise its administrative obligations time frame is specified. obligations within a obligations within a (e.g. notification). specified time frame (i.e. 2specified short time frame 5 years) (i.e. 1-2 years) < \$100,000 \$500,000 - \$2.5 million \$2.5 – \$10 million **Consequence** Costs \$100,000 - \$500,000 >\$10 Million Community/ Local concerns, but no Public concern restricted to Heightened concern by Significant adverse Serious public Media/Reputation local complaints or local complaints or local local community, criticism national public, NGO or outcry/demonstrations or adverse press coverage. adverse press coverage. by NGOs or adverse local media attention. adverse International NGO /regional media attention. attention or media coverage. Human Health and Low-level short-term Objective but reversible Moderate irreversible Single fatality and /or Multiple fatalities. Safety subjective symptoms. No disability/impairment and disability or impairment to severe irreversible measurable physical effect. /or medical treatment one or more people. disability or impairment to injuries requiring one or more people. No medical treatment.

hospitalization.

Likelihood De	efinitions		
Assigned Likelihood	Descriptive	Health Events Only	Frequency of Occurrence for Other Events
Almost Certain	Happens often	1 case / 100 person-years	High frequency (more than once per year)
Likely	Could easily happen	1 case / 1,000 person-years	Event does occur, has a history, once every 1-10 years
Possible	Could happen and has happened elsewhere	1 case / 10,000 person- years	Occurs once very 10-100 years
Unlikely	Hasn't happened yet but could	1 case / 100,000 person- years	Occurs once every 100-1000 years
Very Unlikely	Conceivable, but only in extreme circumstances	1 case / 1,000,000 person- years	Occurs once every 1000- 10,000 years

#### Combining the tables for Environmental Risk ...

			Cc	onsequence Seve	rity	
		Low	Minor	Moderate	Major	Critical
Likeli	ihood	No impact.	Minor localized or short term impacts.	Significant impact on valued ecosystem component.	Significant impact on valued ecosystem component and medium-term impairment of ecosystem function.	Serious long-term impairment of ecosystem function.
Almost Certain	Happens often	Moderate	Moderately High	High	Very High	Very High
Likely	Could easily happen	Moderate	Moderate	Moderately High	High	Very High
Possible	Could happen and has happened elsewhere	Low	Moderate	Moderately High	High	High
Unlikely	Hasn't happened yet but could	Low	Low	Moderate	Moderately High	Moderately High
Very Unlikely	Conceivable, but only in extreme circumstances	Low	Low	Low	Moderate	Moderately High

## CONSIDERATION - RISK EVALUATION

(A) Intolerable region.		Risk cannot be justified on any grounds.
(B) As Low As Reasonably Achievable (ALARA)*. Risk is acceptable only if a compensating benefit is available.	Total risk	Tolerable only if risk reduction is impractical or if its costs are grossly disproportionate to the benefits gained. Tolerable if cost of reduction would exceed benefits gained.
(C) Broadly acceptable region. No need for detailed work to demonstrate ALARA.	$\bigvee$	Negligible risk.

\*Another term which is often used is ALARP — as low as is reasonably <u>practical</u>. ALARP and ALARA are similar in concept and application.

## RISK MATRIX WITH ALARP REGIONS

Likelihood	Consequence Severity						
Likelinood	Low	Minor	Moderate	Major	Critical		
Almost Certain	Moderate	Moderately High	High	Very High Intole	Very High <b>rable</b>		
Likely	Moderate	e Moderately Moderately High Region ALARP High High		<b>jion</b> Very High			
Possible	Low	Reg Moderate	ion <sub>Moderately</sub> High	High	High		
Unlikely	Low Broa	Low	Moderate	Moderately High	Moderately High		
Very Unlikely	Accep <sup>Low</sup> Reg		Low	Moderate	Moderately High		

# POSSIBLE ACTION LIMITS

1. Intolerable Region

- Very High Priority to mitigate immediately
- High Priority to mitigate within 2 years

#### 2. ALARP Region

- Moderately High Risk Mitigate within 2 years subject to priority
- Moderate Risk Mitigate within 5 years subject to priority

3. Broadly Acceptable Region

Low Risk - Monitor over 10 years





# IMPLEMENTATION: RISK MANAGEMENT WORKSHOP

- Participants: project managers, consultants, and other site experts
- Facilitator introduces process and guides group through event identification and risk analysis
- Identification of events aided by use of common element lists for different classes of sites (e.g. for mine sites: dams, diversions, tailings, open pits, underground, waste rock, water treatment, infrastructure, buildings/tanks/structure, and site administration)
- Rapporteur records all events using a web-based risk management tool (also a database for risk management information)
- Results are also posted on a risk matrix poster in the workshop.





# ELEMENT CATEGORIES

### Mine Sites

- Dams
- Diversions
- Tailings and Sediments
- Open Pits
- Underground
- Waste Rock
- Water Treatment
- Infrastructure
- Buildings, Tanks, Structures
- Site Administration

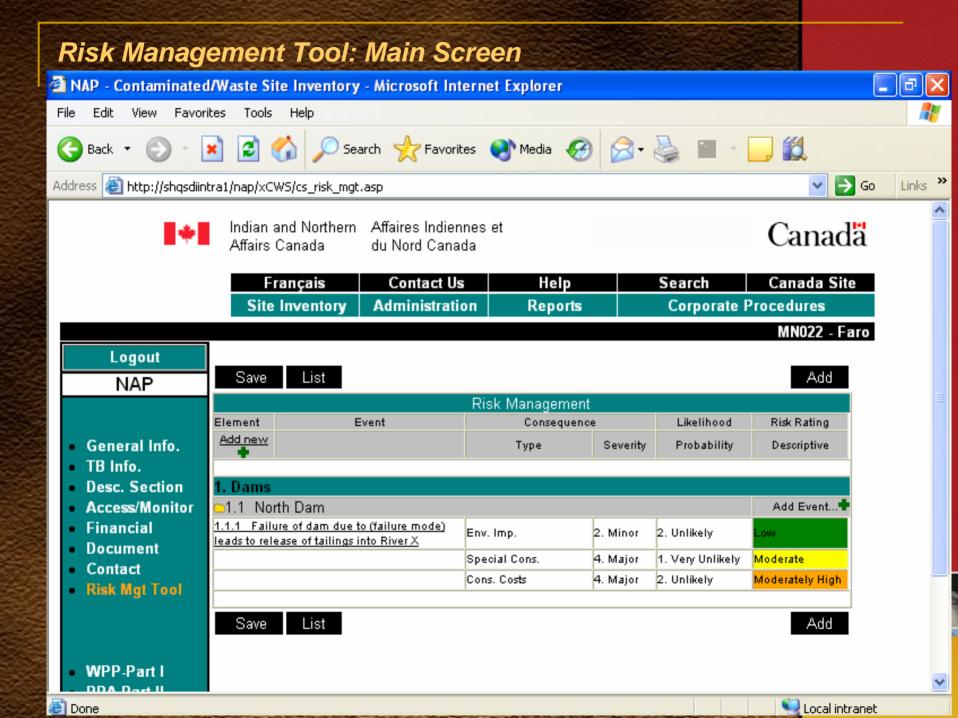
#### Military and Other Sites

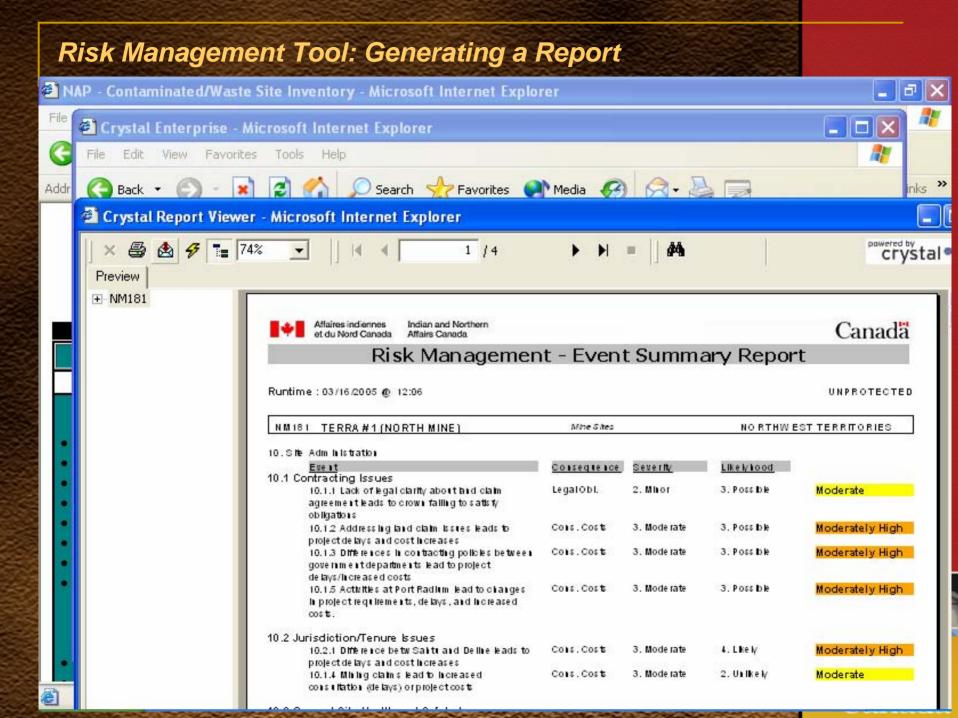
- Buildings and Structures
- Dumps
- Barrels and Site Debris
- Fuel Tanks
- Contaminated Soil
- Site Administration





http://shqsdiintra1/r	nap/xCWS/addev	ents.asp?ElementNum=34	7&Action=N&ControlNi	um=0&Cont 🔳 🛙	
		Event Details			<b>^</b>
Event Description:	Failure of dam	due to (failure mode) leads	s to release of tailings in	to ri∨er X	
Event Number:	1.1.1				
	Check applicable consequence	Consequence Severity	Likelihood	Risk	
Env. Imp.:		2. Minor 💌	2. Unlikely 🛛 👻	Low	
Special Cons.:	~	4. Major 🛛 👻	*		
Legal Obl.:		~	1. Very Unlikely		
Cons. Costs:		~	2. Unlikely 3. Possible		]
Com/Media/Rep:		~	4. Likely 5. Almost Certain		
Hum. Health & Saf.:		~	••••••••••••••••••••••••••••••••••••••		]
Controls:					]
		Save Exit			





#### Risk Management Tool: Risk Matrix Report Each number references an event • One column for each consequence type in each risk level Matrix provides visual representation of trends • **Consequence Severity** Likelihood LOW MINOR MODERATE MAJOR CRITICAL LO CC CMR HHS CMR HHS LO CC CMR HHS SC LO CC LO CC CMR HHS LO CC CMR HHS EI SC EL EL SC EL SC EL SC 3.6.2 5.1.2 3.1.1 3.1.1 3.1.1 3.6.3 3.6.1 3.5.3 ALMOST 3.5.2 3.3.1 10.4.1 CERTAIN 10.4.1 3.1.2 10.3.3 LO CC CMR HHS LO CC CMR HHS CC CMR HHS EI SC EI SC EL SC LO EL SC LO CC CMR HHS EI SC LO CC CMR HHS 8.3.3 9.2.2 8.3.1 3.5.1 10.4.2 10.3.3 LIKELY LO CC CMR HHS LO CC CMR HHS CC CMR HHS CC CMR HHS LO CC CMR HHS ΕI SC EL SC EL SC LO EI SC EI SC 8.3.2 5.3.1 9.1.2 10.1.4 3.1.210.1.2 POSSIBLE 10.1.1 EI SC LO CC CMR HHS EI LO CC CMR HHS CC CMR HHS EI CC CMR HHS EI LO CC CMR HHS SC EL SC 10 SC 10 SC 3.5.2 3.3.2 3.1.3 10.2.1 9.1.1 10.1.31.1.1 3.1.4 1.1.1 3.1.1 UNLIKELY CMR HHS EI SC LO CC CMR HHS EI SC LO CC CMR HHS LO CC LO CC CMR HHS EI SC LO CC CMR HHS EI SC E١ 3.4.2 1.1.1 3.4.1 9.2.1 8.1.1 5.2.1 9.4.2 VERY 5.1.1 UNLIKELY 10.3.2 10.3.1 9.4.1 Legend E **Environmental Impact Special Considerations** Legal Obligations SC

**Consequence** Costs

CC

CMR **Community Media Reputation** 

Human Health and Safety HHS

## FOR FURTHER INFORMATION

Michael Nahir, P.Eng. M.Eng **Technical Advisor Contaminated Sites Program** Natural Resources and Environment Indian and Northern Affairs Canada Les Terrasses de la Chaudiere Room 616 10 Wellington St. Gatineau, Quebec, K1A 0H4 ph: (819) 997-8413 fx: (819) 953-2590

nahirm@inac.gc.ca

