



September 29, 2026

EA2526-01

Draft Process to Develop a Closure Environmental Assessment Framework

The Review Board's proposed process to collaboratively develop a Framework for the environmental assessment of the Closure and Reclamation of Imperial's Norman Wells Facilities (EA2526-01)

1. Document Overview

The Mackenzie Valley Environmental Impact Review Board (Review Board) is proposing a process to collaboratively develop a Closure Environmental Assessment Framework (Closure EA Framework or Framework) for the environmental assessment (EA) of Imperial Oil's proposed closure and reclamation of the Norman Wells facilities.

This document describes the proposed process for developing the Framework. It is not the Framework itself.

The Review Board will first seek comments on the proposed process. It will consider those comments and finalize the process document before developing the Framework itself.

The first step to develop the Framework will be a Closure Vision and Framework Goals Workshop, followed by additional engagement, workshops and ORS reviews as needed.

Imperial's closure planning can continue throughout. Development of the Framework does not require Imperial to pause or restart its work on the Closure Plan.

For this document, successful closure means closure that contributes to desired future environmental, cultural, social and land-use conditions in the areas affected by the Norman Wells Operations.

2. What is a Closure EA Framework?

The Framework will connect the relevant regional and long-term context for closure to the project-specific assessment of Imperial's proposed closure. It will help the Review Board, Imperial, Indigenous Governments, communities and other parties move toward a shared



understanding of what successful closure should support and the issues the EA may need to examine.

Existing regional land-use planning, Indigenous Knowledge, community priorities and other regional information will provide important context. The Framework will not create a new regional vision or land-use plan. Its purpose is to identify what the relevant regional and long-term context means for the closure of the Norman Wells Operations.

The Framework is intended to:

- translate relevant regional and long-term context into a closure-specific EA context;
- develop a Closure Vision, Desired Future Conditions, Framework Goals, and Framework Outcomes that can inform consideration of closure options;
- identify Indicators and Initial Assessment Questions that can support later scoping and development of the Terms of Reference; and
- inform Imperial as it develops its Closure Plan.

3. Why develop a Closure EA Framework?

The Framework acts as a bridge between broader regional context and project-specific closure planning. It uses a broader and longer-term perspective, similar to strategic assessment thinking, while remaining focused on the development before the Review Board.

The Framework will keep three distinct scales clear:

Regional planning and context - provides the broader setting and direction within which the Norman Wells Operations exist and closure will occur.

Closure EA Framework - considers what the relevant regional and long-term context means for successful closure of the Norman Wells Operations.

Imperial's Closure Plan - sets out the site-specific closure goals, objectives, options and activities that Imperial proposes.

The Framework is an analytical and procedural tool for the EA. It will provide a transparent basis for considering Imperial's proposed closure without approving a Closure Plan, establishing final regulatory criteria or predetermining the Review Board's environmental assessment. The Review Board may refine how the Framework is applied if relevant new information emerges as the EA progresses.

4. What will the Closure EA Framework do?

4.1 Connect the regional and long-term context to the proposed closure

The EA is focused on Imperial's proposed closure. The Framework will draw on relevant regional and long-term information, including existing land-use planning, Indigenous Knowledge, community perspectives, and environmental, cultural, social and stewardship



considerations, to help define what successful closure should support and how closure-related effects should be understood and assessed during the EA.

This is a scaling exercise, not a regional planning exercise. The Framework will not reconsider how the Sahtú should develop in the future. Instead, it will identify which aspects of the broader regional context are relevant to the development being assessed and bring them to the scale of closure.

4.2 Provide a common basis for considering closure options

Imperial remains responsible for developing, comparing and justifying its closure options. The Framework will provide a common evaluative context by identifying what successful closure should support or contribute toward before individual options are considered in detail.

The Framework can then help Imperial and parties understand how different options respond to important future conditions and outcomes without selecting a preferred closure option or prescribing a particular closure method.

4.3 Support scoping and the Terms of Reference

When Imperial provides its Closure Plan to the Review Board, the Review Board will have both the Framework - which identifies the broader context and closure-related outcomes that matter - and Imperial's proposal - which describes what Imperial proposes to do. These two documents, along with the rest of the EA record, will support scoping and the development of the Terms of Reference for Part Two of this EA.

4.4 Help clarify responsibilities

The Framework can also help distinguish matters that Imperial can reasonably address through closure planning, mitigation, monitoring and long-term management from matters that may depend on governments, Indigenous Governments and organizations, resource co-management boards, the Canada Energy Regulator or other regulators.

This complements the Review Board's jurisdictional work: the Framework helps identify what needs to be addressed in relation to successful closure, while the jurisdictional analysis helps clarify who has the authority or responsibility to address it.

5. The Framework will be developed collaboratively and progressively

Once the process is finalized, the Framework will be developed progressively with parties. The Review Board proposes that the Framework will include:

- **Closure Vision:** describes the future that successful closure should help support. The Closure Vision is a vision for successful closure of the Norman Wells Operations within the broader future of the region - not a vision for the future of the Sahtú as a whole.
- **Desired Future Conditions:** make that future more tangible.



- **Framework Goals and Framework Outcomes:** describe increasingly specific contributions toward that future.
- **Indicators:** help understand and evaluate those outcomes. Indigenous Knowledge, community observations, scientific studies, environmental monitoring and social, cultural or economic information can be important sources of information used to identify, describe or evaluate Indicators. They are not automatically Indicators themselves, and Framework Indicators do not automatically become regulatory closure criteria.
- **Initial Assessment Questions:** carry the Framework forward into later scoping and assessment.

These Framework components will be developed sequentially and through engagement with the public, Indigenous Governments and communities, Traditional Knowledge holders, land users and other interested parties. The progression is intentional. Regional and long-term context is an input to the Framework.

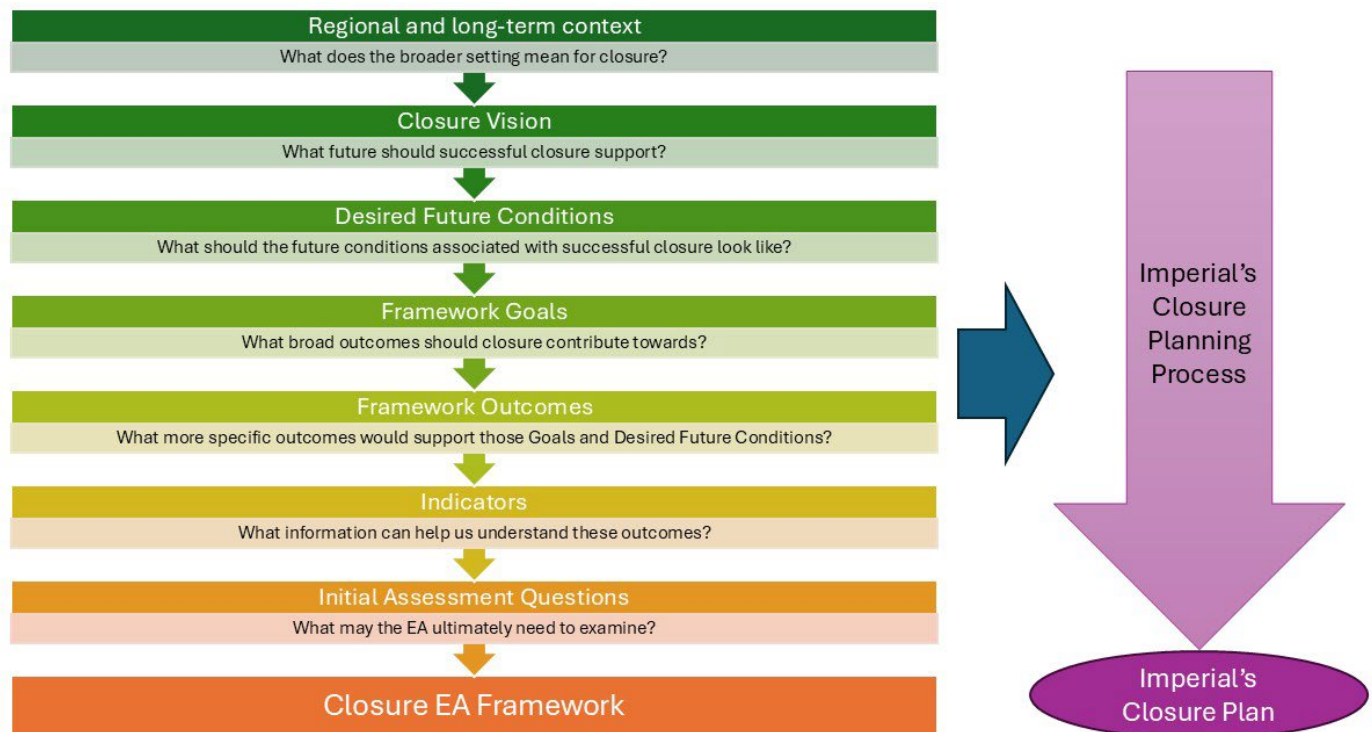


Figure 1. Progression from regional context through the Closure EA Framework to Imperial's project-specific closure planning. The Closure EA Framework should inform Imperial's Closure Planning process, but the timing of these two processes are not necessarily linked.



6. Relationship to Imperial's Closure Plan

Imperial's closure planning can proceed throughout development of the Framework. Imperial does not need to wait for the Review Board to complete any Framework step before continuing its own technical work, engagement, or development of closure goals, objectives and options.

The Framework and Imperial's Closure Plan serve different purposes. The Framework describes the broader closure-EA context and the outcomes that matter for assessment. Imperial remains responsible for translating that context, together with technical, regulatory, site-specific information and its own engagement, into the closure goals, objectives, options and proposed activities in its Closure Plan.

Imperial does not need to reproduce the Framework wording. Its Closure Plan may use different terminology, organize objectives differently, provide greater technical detail or identify additional objectives. **The important consideration is whether the proposed closure responds to the Framework as a whole** - particularly the Closure Vision, Desired Future Conditions, Framework Goals and Framework Outcomes - **and whether relevant differences are clearly explained.**

Some differences may reflect terminology, level of detail, technical refinement or new information. Where a difference may be important to potential impacts or desired future conditions, it can be identified through scoping and considered in the remainder of the EA.

The Framework approach preserves the distinct roles of participants: parties contribute Indigenous Knowledge, community knowledge, values, evidence and perspectives; the Review Board develops and applies the Framework for the EA; and Imperial develops and justifies its proposed closure.

7. How does developing the Closure EA Framework fit into the EA?

The Closure EA Framework does not create a new part or phase of the EA.

It provides additional structure for the collaborative work already described for Part One.

In its *EA Process and Next Steps* document ([PR47](#)), the Review Board described a two-part approach to this environmental assessment because Imperial is still developing the detailed closure proposal that will be assessed. Part One supports collaborative work while Imperial develops its proposal. Part Two will focus on the detailed assessment of Imperial's closure proposal once Imperial has developed it enough for the Review Board to scope and assess. The Review Board's June 9, 2026 Notice of Proceeding ([PR74](#)) provided further details about Part One, including work on future land use, vision setting and closure goals.

7.1 Establish the process then develop the Closure EA Framework

The Review Board proposes to carry out the work described in Part One, above, in two stages: 1) establish the process and 2) develop the Framework.



Stage 1 - Establish a process to develop the Framework development process

Step 1 - Release the draft process document for public review and comment (current step).

The Review Board is seeking comments on whether the proposed process is clear, appropriate and provides suitable opportunities for participation. The Review Board is not yet asking parties to determine the substantive content of the Framework.

Step 2 - Finalize the process document. The Review Board will consider the comments received, make any necessary changes and finalize the *Process to Develop a Closure Environmental Assessment Framework*.

Stage 2 - Develop the Closure EA Framework

Step 1 - Closure Vision and Framework Goals Workshop. The first substantive workshop will consider the regional and long-term context relevant to closure and what that context means for successful closure of the Norman Wells Operations. The workshop will begin development of the Closure Vision, Desired Future Conditions and Framework Goals; it will not be expected to finalize them.

Step 2 - Further workshops, engagement and ORS reviews. Additional engagement will progressively develop and refine the Framework, including Framework Outcomes, Indicators and Initial Assessment Questions. The Review Board will determine the sequencing of these activities based on what it hears, the progress of Imperial's closure planning and the information needed.

Step 3 - Issue the Closure EA Framework. After sufficient engagement and public review, the Review Board will consider the record and issue the Framework for use in the remainder of the EA.

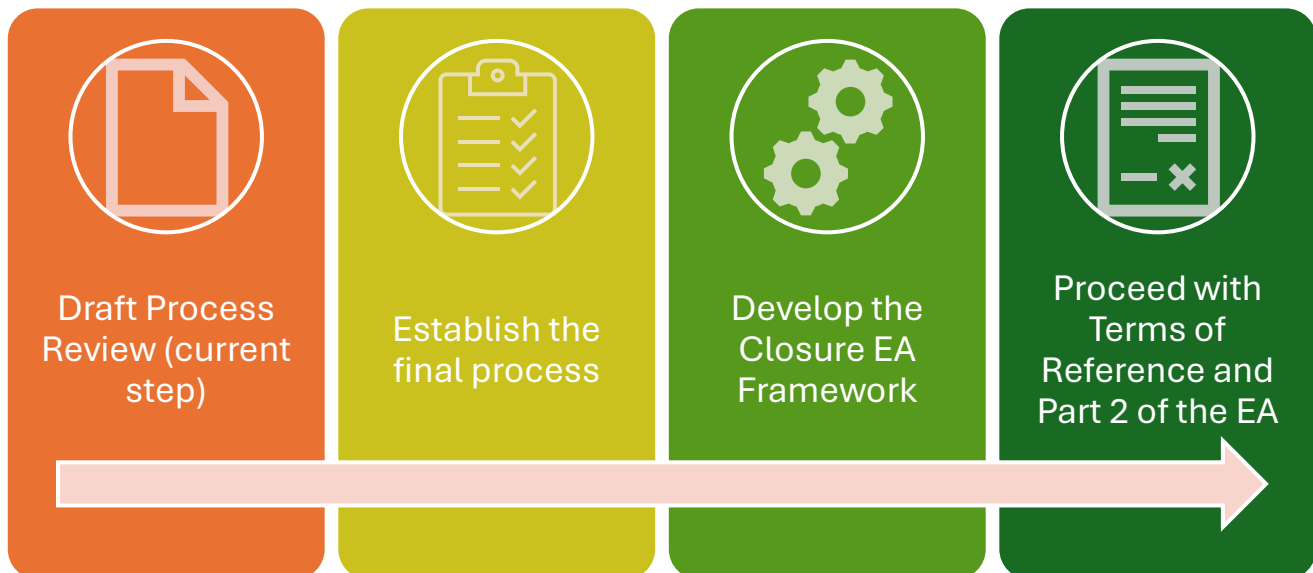


Figure 2. Developing the Closure EA Framework fits into the overall EA process



8. Relationship with closure planning and regulatory processes

The Framework complements applicable *Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories* and other regulatory requirements. The processes described in those guidance documents provide the objectives-based and technical structure for Imperial's site-specific closure planning, including closure goals, objectives, options, criteria, monitoring and implementation. The Framework adds the broader, future-focused and evaluative context needed for the environmental assessment.

The Review Board is not the regulator approving Imperial's Closure Plan through development of the Framework. The Sahtu Land and Water Board, the Canada Energy Regulator and other regulatory authorities retain their respective statutory responsibilities.

Once Imperial has provided the Review Board with its Closure Plan, the Review Board will use the Framework, the Closure Plan and the broader EA record to support scoping. The resulting Terms of Reference will then identify the information needed for Part Two, where the proposed closure will be assessed in detail.