

LUTSEL K'E DENE FIRST NATION

**SUSTAINABLE DEVELOPMENT BASED ON DENESOLINE
BELIEFS AND TRADITIONS**

**Presentation to MVEIRB on EA 1314-02
DeBeers Canada Snap Lake WL Amendment**

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- Downstream Water Quality
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DOWNSTREAM WATER QUALITY

- Effluent plume already detectable up to 22km (2012)
- Same watershed – Lady of the Falls
- Original predictions inaccurate
- New predictions:
 - Snap Lake contaminants would not be detectable closer to Mackay Lake (Day 2 technical sessions)
 - New levels will not see harm to aquatic organisms (TDS Response Plan Report, 2013)



DOWNSTREAM WATER QUALITY: RECOMMENDATIONS

- 1) A measure from the Board that completely protects the Lady of the Falls from quality or quantity changes. No level of change is acceptable at this site, regardless of the source.
- 2) That the Board create a response framework where the high action level is if the effluent plume reaches the outflow of Mackay Lake



DOWNSTREAM WATER QUALITY: RECOMMENDATIONS

- 3) Wherever the Board sets the limits at, that they be hard limits, not to be exceeded, as public and environmental concern would be too great beyond these limits



CUMULATIVE EFFECTS AND CLOSURE IMPACTS

- Lockhart River Watershed
 - Gahcho Kue
 - Kennady Diamonds
- Significant increases from baseline water quality
- Traditional use compromised with proposed limits
 - Water
 - Fish
- Investment now decreases closure time for future



CUMULATIVE EFFECTS AND CLOSURE IMPACTS: RECOMMENDATIONS

- 1) The Board set the TDS limit no higher than Canadian Drinking Water Quality Guidelines of 500mg/L for the protection of the way of life of the aboriginal people of the north
- 2) The Board set the fluoride limit no higher than Canadian Drinking Water Quality Guidelines of 1.5mg/L for the protection of the way of life of the aboriginal people of the north



PERCEPTION

- Environmental Stewardship
- How this EA looks – Public concern
- Predictions – important ones, wrong
- Precautionary Approach vs. Economic Approach



PERCEPTION: RECOMMENDATIONS

- 1) The Board require the proponent to provide substantial information about the mitigating technologies and investigate various combinations of them in a cost benefit analysis
- 2) That improved treatment and source control be the priority in terms of approaches to the water quality issues, instead of raising the discharge limits



CLOSING

- Learning from the past
- Precautionary reinforcement
- Compromise
- Final words

