



June 5th-6th, 2014

Mackenzie Valley Land and Water Board
De Beers – Snap Lake Total Dissolved Solids



History of Snap EA

1. Context
2. Mitigation
3. Operational History



Recommendations - History

- *The project should be required to prepare a concordance table that looks at the predictions made during the EA and complete a comparison of the monitoring data to identify areas of future concern and unpredicted impacts.*
- *The project should be required to complete a review for each measure, suggestion and commitment made and indicate how they succeeded in meeting the required action. If the task has not been completed, the project should identify how they*



Effluent Quality Criteria

1. 'Pollute Up To' approach
2. Moving the Goalposts
3. Traditional Use Guidelines



Recommendations – WEMP

- *YKDFN strongly reject the 'pollute up to' approach and recommend that a more objective approach be employed, setting the TDS limit at 500 mg/L. This level will limit the impacts to the environment while protecting the land users, ensuring that their perception of the area is not significantly changed and the minesite can be remediated with public confidence.*



Cultural & Socio-Economic Impacts

1. How has a generation of diamond mining impacted the community health, function and cultural strength?



Recommendations – Socio-Ec

- *Given the situation facing the community, we recommend that the project and industry be directed to undertake academic studies to consider the issues facing Ndilo and Dettah and issue recommendations aimed at promoting community health. With almost 20 years of data the study would no longer need to rely on predictions – what has happened can guide and inform public policy development*



Cumulative Effects

1. Protect the Lady of the Falls



Recommendations – CE

- The Board should put a measure in place to protect the Lady of the Falls. This measure should be clear that any alteration in water quality in this area is unacceptable, whether it be project specific or cumulative in origin.*



Consultation

1. Review the record
2. Respect Constitutional Rights
3. Remedies



Recommendations

- *YKDFN are frustrated with the companies approach to consultation and ask the Board to require the project to resubmit the engagement record with only relevant engagements, indicating what concerns they gathered from these processes and how they sought to mitigate them. This will ensure that companies do not try to paper the record to create large volumes.*