

Wildlife, Lands and Environment Department

Lutsel K'e Dene First Nation P.O. Box 28 Lutsel Ké, N.T. X0E 1A0 Telephone: (867) 370-3197 Fax: (867) 370-3143

December 21st, 2012

Chuck Hubert Mackenzie Valley Environmental Impact Review Board Box 938 Yellowknife, NT X1A 2N7

Dear Mr. Hubert,

Re: De Beers Gahcho Kue Closing Comments

The Lutsel K'e Dene First Nation (LKDFN) would like to submit the enclosed document as the closing comments for file EIR0607-001, De Beers' proposed Gahcho Kue project, which is located in the heart of the Akaitcho Dene Territory.

The LKDFN has reviewed the documents, held a public meeting, and has stated clearly through the community and technical hearings that we cannot support the proposed project at this time. The community has voiced our concerns regarding the significant environmental and public impacts that will not be mitigated through the current efforts of the proponent. LKDFN believes that the proponent can learn how to mitigate some of these effects, but this would require truly understanding the impacts at a community level, which the company has not done.

A De Beers representative in the technical hearings stated that with 200 million dollars invested in the project to date, and shareholders expecting the project to go forward, there is no benefit to delaying the project. The community of Lutsel K'e respectfully and emphatically disagrees. In fact, there are great benefits to delaying this project such as understanding the status of the Bathurst caribou over a longer term and identifying the impact of mining developments on the herd, taking time to focus and improve performance at Snap Lake, and working towards understanding and mitigating social impacts at the community level. Further, the dollar figure of investment to date is the cost of doing business, and the cost to ensure sustainability and minimized impacts of the project. At this time, we believe that this project is not environmentally or socially sustainable, and De Beers shareholders' expectations have no place in the Environmental Impact Review Board Panel's decision-making on the sustainability issue.

These closing remarks are focused on 4 of the most important topics to the Lutsel K'e Dene that are reasons to delay this project until a more suitable time. For the LKDFN, a 'more suitable' time would include when the Bathurst caribou herd population restores sustainable numbers, when De Beers' Snap Lake mine comes into compliance with all regulations and commitments, and when De Beers sits down with the LKDFN and asks us how they can contribute to the long term viability of our community.

The Lutsel K'e Dene have well established connections and a livelihood that stems from the relationship with the land, water and wildlife in our traditional territory. Slowly we are losing parts of our territory to industry and contamination, both of which have ripple effects that stretch far beyond the mine footprint, and all the way into the community and into the homes of the Lutsel K'e Dene. We trust that our perspective holds a special merit as rightful owners and keepers of the land, and a more cultural and spiritual weight, as we cannot truly assess or mitigate the impacts to the Lutsel K'e Dene culture with this development.

The Lutsel K'e Dene Band must trust the developers that come to exploit the land, and this trust has not developed with De Beers. As far as we are concerned, the diamonds are not going anywhere, there is no rush to extract them right now and risk environmental and social degradation. We are hopeful that the Panel acknowledges our position and respects the wishes of the owners and protectors of this land.

Marsi cho for your consideration.

Sincerely,

Chief, Lutsel K'e Dene First Nation

Introduction

The Lutsel K'e Dene First Nation (LKDFN) has a connection to the land, water and wildlife that is unlikely to be understood by the scientific minded employees of the mining industry. The 2006 Ontario Supreme Court of Justice ruling on Platinex vs. Kitchenuhmaykoosib Inninuwug (KI) First Nation states this very clearly:

"[80] It is critical to consider the nature of the potential loss from an Aboriginal perspective. From that perspective, the relationship that Aboriginal peoples have with the land cannot be understated. The land is the very essence of their being. It is their very heart and soul. No amount of money can compensate for its loss. Aboriginal identity, spirituality laws, traditions, culture, and rights are connected to and arise from this relationship to the land. This is a perspective that is foreign to and often difficult to understand from a non-Aboriginal viewpoint."

Beyond the arguments described herein, the fundamental divider remains constant, that no amount of money can compensate for the loss of land, therefore there is no benefit that can outweigh the impact. LKDFN is certain that other aboriginal people in the territory feel the same, but as the environmental impacts will be relatively localized, the people in the local area, the Lutsel K'e Dene, are the ones to be most detrimentally impacted.

The Lutsel K'e Dene have expressed their concerns surrounding water flow supported by traditional knowledge, around caribou health and sustainability supported by tradition knowledge and science, around the performance of Snap Lake, and around the community level impacts from a social perspective. These concerns run deep at a cultural level and are expressed keeping in mind that sustainable land use now, means that the Denesoline can survive into the future.

Like the term 'significant,' sustainable is subjective and should not be limited to its scientific definition, but rather when the elders and land users of the First Nations deem the land capable of sustaining the needs of the people in the future, then the project will be considered sustainable. We wish to express that we are not against development entirely, we are supporters of sustainable development which, given the assessment of this project, we are not convinced of at this time.

Caribou

The importance of caribou to the Denesoline is well established. Caribou have always been central to the social, cultural and health well-being of the Dene dating back many generations. It is this close relationship that has allowed the Dene to have a welldeveloped understanding of the herds, as well as be highly sensitive to activities that may threaten the sustainability of the herds.

There is strong evidence from oral histories documented in the community about caribou avoidance of mining sites. This knowledge came from the caribou experts residing in Lutsel K'e in the past, and has since been verified by science, for example, collar data, which suggests the situation may be more detrimental than originally predicted. Environmental assessments in the past (Ekati, Diavik, Snap Lake) predicted impacts to caribou movement would be noise, structural barriers, and degradation of habitat from dust deposition. The cumulative effect of these impacts is avoidance of mining sites as well as a series of other kinds of changes to migration, population and health.

These points illustrate the impacts that will be suffered by the herds that no monitoring or management plan will address. Caribou avoiding mine sites, and further, caribou avoiding dust deposition regions, are clear indicators of development's impacts on the herds, and there is no reason to believe that this development will impact the herds in any other way. Dr. Brenda Parlee has conducted much research in the community documenting traditional knowledge on industrial impacts to caribou. She was asked to write her perspective on the proposed development, and her letter is attached in Appendix A.

The LKDFN is working to try to ensure that caribou are abundant for all time, and this includes developing a monitoring program with ENR, and reporting accurate harvesting numbers for the Beverly and Ahiak herds. These are steps that the community is taking to better track the population levels of the caribou, and to avoid dangerously low caribou populations. But what happens when the caribou reach these low levels, as they have with the Bathurst caribou herd? The corrective actions to take *early* on in the decline is to slow whatever it is that is causing the rapid decline; to slow industrial development, monitor more effectively, and educate the community on conservation; however, once the herd reaches critical levels and are in danger of being lost, radical approaches must be considered. Considerations such as the approach that lead to the implementation of a no-hunting zone, or restricted hunting zone, for people with constitutionally protected harvesting rights. If decisions are going to be made focusing solely on restricting harvesting and not taking into account other factors affecting the caribou, then the results of calving ground surveys and aerial photography will continue to be discouraging. A restricted hunting zone alone will not lead to caribou reaching sustainable numbers again; there is a bigger factor encouraging the decline in the herd numbers. Late Pierre Catholique said,

No matter what you do, caribou will be affected by these mines and roads. The only way to not affect the caribou is to have no mines and roads. If there is a mine, there will be roads. And if you have a road, there will be trucks on it. If they put it through, you can't stop everything for the caribou. But maybe that is what the caribou need. (Pierre Catholique, 11 July 2001)

Throughout this review the proponent has stated repeatedly that they intend on meaningfully incorporating traditional knowledge into their programs, and has been asking the First Nations how we wish our TK to be used. We have submitted the full TK report to the Panel for review and will release an abbreviated version for the public registry shortly. We are urging the company and the Panel to take this traditional knowledge into account and make decisions based on it. Caribou have been, are, and will continue to be negatively impacted by mining operations and the development of a 4th mine on this herd's range is eliminating parts of the range from use, altering main migration routes, and effectively putting one more obstacle in the road to recovery of the Bathurst caribou. With the recent estimates of the Bathurst caribou herd, there is an insignificant increase in the population from last year that must not be misinterpreted. The herd is not yet in recovery mode and the fact is a herd that was once over 400,000 still dwindles around 30-35,000 animals.

There is a clear need for research in terms of cumulative effects analysis, the sheer number of times the idea was brought up in the hearings alone should be an indicator that cumulative impacts must factor into the Panel's decision. To avoid further strains on the herd numbers while incorporating TK on an equal footing with science, a decision must be made that reflects the sustainability of the caribou herds, one that allows no further development until the herds are given the opportunity to replenish. The benefits provided to the community from this development cannot possibly be weighed against the survival of the Bathurst caribou, or of the Beverly and Ahiak herds that pass through the area.

Socio-Economic

When the health and well-being of the Denesoline suffers, there is no amount of money that can compensate. The projected billions to be generated from this project in mining investment has a negligible impact to the community of Lutsel K'e. All diamond mines will boast of their contributions to the communities they impact, but again we must ask, are the impacts balanced by the benefits? Positive health and social wellness are not matters that can be offset by providing impact benefit agreements (IBA) and commitments of employment, and the notion of another development and another IBA is only exacerbating the difficulties faced every day by families in Lutsel K'e. Employment is negated by criminal records, and when employment is achieved, members express concerns of racism and prejudice at the mine site. Employment may lead to members having a higher income, but when there is no infrastructure to support

responsible saving and spending in the community, the money ends up spent on drugs and alcohol, disappearing almost immediately.

The protocol in the past has involved IBAs and consultation about the development, but after 16 years of seeing what IBAs and consultation about the mine actually provide to the community, we need to step back and look at this approach in a different light. The big picture shows imperceptible changes to the well-being of community members, and the increasing difficulties of families to prosper. The discussions centre around what De Beers can provide to the community in terms of funding and capacity building, but De Beers discussions should be focused on how De Beers fits in to the social wellness plan of the community. De Beers Canada has a priority to contribute to the sustainability of impacted communities, but they plan to do this through employment opportunities which are part of the reason why this approach is failing. The discussion has to happen in the community with the Health and Social Services Department to investigate what the community really needs in order to contribute to improved health and well-being of the Lutsel K'e Dene. Attached to this document (Appendix B) is the assessment of the proposed project from the perspective of the Health and Social Services Department. The conclusion is that this development carries with it significant public concern for the long term well-being of the community of Lutsel K'e. In order to avoid the cyclical nature of mineral rushes, a new approach must be adopted that plans for longer term sustainability. LKDFN is concerned about the path the community has been set on with the diamond developments, and before it goes any further, the proponent must work on improving the current situation, instead of working to continue it.

Past Performance

As a period of time has elapsed since the rapid development of the first three diamond mines on the traditional territory, the community has had a chance to evaluate the true benefits of the mining industry for the community, and realize what has not worked, as well as what needs improvement. The Snap Lake mine needs improvement. Of the 126 recorded spills on the Mackenzie Valley Land and Water Board website, approximately 80% of them were technical failures, and the remaining percentage was split between human error and extreme weather conditions. De Beers must understand the environment they are conducting business in, as they have more than double the spills to the receiving environment than the other two diamond mines at Lac de Gras. If other companies working in similar regions can conduct business without repeated technical failures and spills, we expect the same standard for De Beers, and from the perspective of the LKDFN, how can we possibly allow the worse environmental stewards of the diamond mining companies in the north to open a second mine?

If De Beers were running an efficient diamond mine, one with mitigated environmental impacts and with promises and commitments to the community being upheld, LKDFN might be able to consider this proposal and work to try and mitigate the environmental/social impacts. As it stands we are dealing with a company who has chronically been out of compliance with their water license (Inspector's Direction –

Chronic Exceedance of EQC, MVLWB), has worked to amend a license instead of mitigating the source of the issue (SLEMA Community Presentation, Nov. 2012), and has failed to live up to commitments made to Lutsel K'e in their socio-economic and impact benefit agreement (in terms of reporting, employment, and various other commitments).

The notion of passing another De Beers development through at this time is unacceptable to the LKDFN. Water licenses are in place for a reason, and attached to them more and more are other commitments that are also included so that they may be enforceable. De Beers is continually out of compliance with their existing mine, yet they have not slowed production, instead, the inspector is assisting them in trying to come back into compliance; this is not an issue at the other diamond mining operations. The bottom line is that we cannot put our faith in this company, even if the water license had strict water and effluent criteria to follow, among other commitments, we cannot trust the company to comply.

Water

The concerns for water are both environmental and uniquely cultural in scope. First, in connection with performance at Snap Lake, the Snap Lake Environmental Monitoring Agency has reported detection of contaminants 6km downstream from the Snap Lake mine site (SLEMA Community Presentation, Nov. 2012). If we look 6km downstream of Kennady Lake, in all directions that the water flows, this mine's footprint begins to drastically increase. As the proposed Thaidene Nene protected area's border is a mere 4km from the main camp, the pristine wilderness that Thaidene Nene is set up to protect is now compromised. The protected area has been called for by elders for decades, in order to protect the land and manage it how the LKDFN sees fit, which includes protecting the quality and quantity of water in its boundaries.

Also from a cultural perspective, there has never been a development of this magnitude in such close proximity to the Lady of the Falls. The water from the mine site will most certainly be the same water that eventually flows over the Lady of the Falls, down the Lockhart River. This concern was raised several times in the community hearing. De Beers has stated that the water quality or quantity will not be impacted that far downstream, but they have not properly investigated the possible linkages of water flow through Fletcher and Walmsley, as TK suggests, which would drastically decrease the total distance the water would have to travel to flow down the Lockhart River.

This site is believed to have a medicine woman who sits behind the falls. People come from all over to pay respect to Her, and to make offerings to Her for healing of all kinds. She once told the Dene people, that if the people protect the water and land, then she will protect the people. The notion of even considering an impact to this spiritual site signifies a risk that the Lutsel K'e Dene are not willing to take. Again, if De Beers can convince the community that they are capable of operating a mine in this territory to the promises they make at the start of the development, then this proposal can be considered, and again, at this time, we see no reason to support De Beers knowing the impacts that will be suffered.

Conclusion

The Lutsel K'e Dene have been promised much by mining companies with little real progress felt in the community. The proponent *knows* there will be environmental and social impacts, the Panel *knows* that these impacts must be equaled by the benefits provided, and Lutsel K'e residents know that the benefits to date are not even close to the impacts. Monetary gains cannot account for such blatant disregard for cultural and spiritual values; it cannot account for the total loss of the Gahcho Kue area for future generations, and it cannot account for the risks we take in allowing De Beers to operate another unsustainable mine.

We feel there is more than sufficient reason to suspend the project at this time. The caribou herds are essential to the livelihoods of Dene people, and must be treated in a way that does not involve additional risks to their survival. Each mine in isolation might have minimal or negligible impacts, but when the territory is riddled with mines and their associated roads and zones of influence, the cumulative impacts on caribou can be catastrophic.

Caribou sustainability and acceptable water quality and quantity are not just scientific performance indicators to be monitored, they hold cultural significance and are crucial to the well-being of the Denesoline. We trust the Panel will take these significant impacts into consideration when making recommendations to the minister.

De Beers has the opportunity to effectively learn how to minimize their ecological impacts and socio-economic shortcomings with Lutsel K'e with their existing diamond mine on the traditional territory. Until these lessons are learned and applied to their new project, the Lutsel K'e Dene First Nation will not support this proposal, and we are looking for the Panel to see our perspective and make their decisions accordingly.

Appendix A



UNIVERSITY OF ALBERTA

Dr. Brenda Parlee - Canada Research Chair 1-11 Pembina Hall Faculty of Native Studies Faculty of Agricultural, Life and Environmental Studies University of Alberta Edmonton AB T6G2H1 Tel: 780-492-6825 and Fax: 780-492-0526 bparlee@ualberta.ca

December 12, 2012

Chief Dora Enzoe Box 28 Łutsël K'e Dene First Nation, NT X0E1A0

Re: Traditional Knowledge related to Caribou Movements and Mine Sites

Dear Chief Enzoe,

Thank you for the request for expertise on the potential effects of the proposed Gah Cho Kué mine from previous Traditional Knowledge research in the region. Based on our work with Łutsël K'e Dene First Nation (1998-2010), there is strong evidence from Denésoline elders and active land users that the proposed mine at Gah Cho Kué, will negatively affect the Bathurst, Beverly, and Ahiak caribou herds. Their predictions and observations seem to be echoed in recent scientific research including analysis of caribou collars (Boulanger et al. 2011). Although there are some recommendations about how to mitigate the effects, the words of the late elder, Pierre Catholique, are clear in stating the effects cannot be mitigated and mining in the region must be stopped for "this is what the caribou need".

- 1. The importance of the caribou to the Denésoline is well established caribou and caribou harvesting have always been central to the social and cultural well-being of Denésoline communities, tying extended families together with the land in traditional activities that date back many generations. As a result of this close relationship, people have well developed understandings of many species in the region including barren ground caribou and are highly sensitive to potential ecological threats.
- 2. Much Traditional Knowledge was documented at the outset of the diamond mining rush in the Bathurst range and continued over the last ten years. This

large body of work speaks to mining effects on caribou in various themes including: contamination of caribou food, structural barriers (e.g. roads, pits) being created in key movement corridors, degradation of habitat from dust, stress from noise disturbance, and fragmentation of the caribou range. The cumulative effect of these impacts is avoidance of mining sites as well as a series of other kinds of changes to migration, population and health.

- 3. In addition to observations made during their own life times, elders and land users have drawn on the words of previous generations who predicted that caribou would begin to avoid habitat taken up by industrial activity. Ten years later, it would appear that their predictions have been realized as numbers of caribou have declined and the areas where people are more used to hunting have shifted.
- 4. During a 2010, study in the community aimed at documenting perspectives on changes in the health of caribou, over 70% of interviewees (n=37), reported being concerned or very concerned about caribou health. The biggest concern was (17 of 37 respondents) was changes in range which they attributed to mining activity with population, forest fire and hunting being of lesser concern. By way of explanation, harvesters noted a west-east shift in range. Where as the caribou used to be found west of Eda Cho Kué (Artillery Lake), they are now more commonly found east of this important hunting area. It is not a homogenous shift; as noted by active hunter Joseph Catholique, the caribou are also changing the way they move. "They are not in a big group anymore but are more scattered all over the place".

In early years, J.B. Rabseca highlighted his concerns about the contamination of caribou food at a meeting in 2004:

Caribou like to eat mud and if the tailings look like mud, they might eat it – especially if they've eaten there before. We need to put fencing around that area. There is a need for fencing. Anything that is dangerous for caribou requires a fence. It won't be only Diavik but all mines coming into the North. We worry about migration of caribou and other animals. I am really worried about caribou and wildlife at Diavik diamond mine (JB Rabesca in EMAB 2004: 27).

Noel Drybones suggested the mines have "changed the way caribou behave".

In the past you could see where the caribou have played when they've stopped, but now you do not see these signs of caribou playing. You only see the migration trails. After they put the mines up in the barrens the caribou have changed for me. The meat, however, still tastes the same. The way I hunt, I know how far the caribou are from my house. These days the caribou are much farther away than they used to be. In the past it was not like that. (Noel Drybones in Parlee et al. 2000)

The late Noel Drybones described, chronologically, his observations of changes in caribou movement since mining began in the Bathurst caribou range.

Not too long ago [approximately 1997] two big herds used to come around Lutsël K'e, and people came from all over to hunt the caribou. In the years following, the herd began coming towards us, but then turned away. Now that there are mines with roads and high snow drifts on the sides, the caribou won't cross and their migration route is disrupted (Noel Drybones in Parlee et al. 2000).

J.B. Rabesca also had significant concerns about the building of mine roads - if made too high, they become barriers to caribou movement.

Regarding the winter road, if you make a road, you cannot make it too high. It's too hard for the caribou to get over it. It should be lower. The caribou won't just pass through a little pathway you make, they go all over. The road needs to be fixed (JB Rabesca in Parlee et al. 2001).

The late Louis Abel predicted the caribou would be disturbed by the roads as well as by the noise associated with mining.

In a few years, the caribou will change their route again. They will go a different way; they will be disturbed by the winter road, planes, and blasting. You will see [these changes] in three to five years from now.(Louis Abel in Parlee et al. 2001).

The overall loss of habitat due to roads and mines was also a key concern to other elders.

There are roads and mines and all activities where all the caribou pass, I mean - that block the caribou...elders said that when something like that happens, caribou don't go there again.

The late Pierre Catholique did not look at the issues in a fragmented or mechanistic sense but offered a perspective more in keeping with cumulative effects theory. He was emphatic in saying no matter what you do the caribou will be affected; what is needed is to "stop everything for the caribou". No matter what you do, caribou will be affected by these mines and roads. The only way to not affect the caribou is to have no mines and roads. If there is a mine, there will be roads. And if you have a road, there will be trucks on it. If they put it through, you can't stop everything for the caribou. But maybe that is what the caribou need. (Pierre Catholique in Parlee et al. 2001)

This statement suggests there is significant danger now as a result of too many mines in the range of the Bathurst, Beverly and Ahiak herds. The dangers and worries articulated by Pierre Catholique over ten years ago are now even more acute given Bathurst and Beverly caribou populations are reportedly hovering at dangerously low numbers.

Although many of the elders who have spoken clearly about their concerns about mining have now passed on, their words are still relevant and must be respected for the sake of future generations. With that in mind I would suggest that the decision of the Panel on the proposed mine at Gah Cho Kué may well be a tipping point. A decision not to approve this project would be in keeping with the Traditional Knowledge of Łutsël K'e Dene elders and would also signal the Panel's / public government's support of the recovery of the caribou herds and their continued health. The Panel's approval of the mine would be a decision in conflict with the community's position. In addition to being disrespectful and in disregard of the Traditional Knowledge of the Dene/Denésoline community located closest to Gah Cho Kue, an approval of the proposed project would implicate (potentially incriminate) the Panel / government in the declining health and population of northern caribou populations. Finally, the Panel should be aware there may be legal implications. Given, the breadth of evidence about low caribou numbers, growing evidence about the risks of diamond mining in the Bathurst caribou range, and recognized importance of caribou to the health, economy and culture of the Łutsël K'e Dene, a decision to approve the project at Gah Cho Kué may also be in breach of the government's fiduciary obligations to the community and in conflict with "Aboriginal rights" defined by the Canadian Constitution and in Treaty #8.

Please let me know if you require additional information. The references for the quotes and data found in this letter can be found in the Łutsël K'e Dene First Nation Wildlife, Lands and Environment Committee Office or can be attained by contacting me at <u>bparlee@ualberta.ca</u>

Sincerely,

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Dr. Brenda Parlee c. Mike Tollis

Appendix B

Impacts of proposed Gahcho Kue Mine From the perspective of Health & Social Services workers

A new diamond mine is being proposed in our traditional Denesoline territory. With new mining development come the promises of increased employment, economic development opportunities and increased cash flow for our community of Lutsel K'e. These promises need to be carefully examined. Will the cumulative impacts of the Gahcho Kue Project really benefit our community or will the negative effects outweigh the benefits?

Lutsel K'e was impacted and continues to be impacted by development of diamond mines in the areas of health, wellness and cultural and traditional wellbeing. After development of the first diamond mine BHP and the first Impact Benefit Agreement (IBA)-16 years ago, three diamond mines later and three's IBA later, Lutsel K'e has not realized benefits in terms of employment, training and businesses as agreed to in the IBA's. Even with three mines currently operating in our traditional territories, we only have a handful of community members with steady jobs at these mines. The statistics in terms of **employment** are not very encouraging. There are a number of reasons for this trend:

- The idea of "mining the land" is philosophically against the cultural values of Dene people. It is seen as disrespectful to the land and animals, it devalues community members' sense of self, and limits personal and cultural growth. Yes, we do need employment opportunities, but we need meaningful, fulfilling employment opportunities and development in sustainable areas. One such area for example could be Eco-Tourism, but the prospects of being successful in a business venture in that area are being greatly diminished by the impacts of mining development on the land and animals.
- We are living in a family-oriented community and culture. The work cycle of 2 weeks in / 2 weeks out contributes to the deterioration of family structures and creates single parent homes
- Presently we have a large number of employable community members that are unable to secure jobs at a mine site due to the barriers created by criminal records.
- We have also had reports of community members feeling that they are being discriminated against when working at the mine sites. Both male and female workers felt that the southern workers were prejudiced against aboriginal workers.

Regardless of employment statistics, with the opening of a new mine, there will be an increased cash flow coming into the community even without steady jobs for our community members. This could be from casual, short-term employment opportunities or from IBA's. We do have a need for improved infrastructure and have serious housing issues that need to be addressed. If the funds flowing into the community would be from royalties, then ideally the community would be able to develop long-term plans as to how these funds should be invested to benefit the community at large. Mining royalties could provide more opportunities to create productive employment and develop programs while

getting away from being dependent on government programs and being forced to operate within their policies.

However, at the present time we **lack the infrastructure** to even deal with this **influx of money.**

- The lack of banking services is a big problem. Workers come out of the mines with sizeable cheques and nowhere to spend it. There are no banking facilities in Lutsel K'e and the Co-op store is the only place to go shopping. Unless people have bank accounts for direct deposits and good credit ratings to be able to have Credit Cards they end up with a lot of cash in their hands with nothing to spend it on but booze, drugs and gambling. Alternatively people can go to Yellowknife and do their banking there or cash their cheques there. Either way, in most cases we don't see a benefit to the families.
- With the increased cash flow from the Diamond Mines, we have witnessed more expensive and addictive drugs coming into Yellowknife and from there into the communities. These highly addictive drugs such as crack / cocaine also bring along increased criminal activity. Families in the community have been impacted by these drugs. Alcohol use/ abuse, bootlegging and drug trafficking is on the rise in Lutsel Kè, affecting everyone that lives in community and creating a rippling effect on all aspects of wellbeing of community members, including elder abuse and child protection issues.
- The history of any sudden influx of money, such as for example IBA pay-outs to community members in the past, has directly resulted in increased activity at the health centre due to increased drinking and drugging activities whenever the pay-outs are being made. We live in a community with a high rate of Post-Traumatic-Stress-Disorders (PTSD) stemming from issues such as sexual abuse and residential school experiences. These traumatic experiences have resulted in high rates of mental health issues, addiction, suicide attempts and high risk families. More money in the community without the gradual increase in infrastructure and a way to deal with the core of the problems will only make matters worse.

In terms of **culture and traditional lifestyle** of the community, the cumulative effects of the three diamond mines have adversely impacted the caribou migration and the development of a new mine will only increase this trend. The caribou no longer frequent the area around or near the community. A family that is used to having caribou meat as a staple food is no longer able to and hunters have to travel many kilometres from the community to bring meat home.

- Families are struggling on a daily basis due to high cost of living and cannot depend solely on groceries purchased at the local Co-op. Store-bought groceries here are expensive and often the healthier choices are not available. A decrease in traditional foods will result in increased health problems such as diabetes and obesity for our population.
- With the proposed mine, the people will no longer be able to use the proposed Gahcho Kue land area for traditional pursuits such as camping, hunting, trapping and as travel routes. In fact, the proposed development effectively nullifies nearby trap lines – both by chasing away the animals and by interrupting the line itself. Traditional land use and activities are major proponents of good physical and mental health. With the impacts on the caribou herds, we have to seriously be

concerned with the eventual loss of a lifestyle and how this loss will impact the community in every facet of mental, physical and spiritual wellbeing.

- The erosion of caribou habitat will also further decrease the ability of the Denesoline people to be self-sustaining and increase dependence on government programs
- We understand that the proposed development will impact the Lockhart River and potentially cause contamination of the waters in that area. DeBeers has a long history of not complying with environmental regulations and not caring for the land upon which the mine sits this particular history is a significant concern as any chemical run off/contaminates in the water system will flow through the Lockhart River, where the sacred spiritual site the "Lady of the Falls" is located. The people of Lutsel K'e make a pilgrimage to this site every year to ask for healing. The potential of contaminated water flowing through such an important ancestral and spiritual site is a significant concern for the mental and spiritual health of the community and is simply unacceptable

In conclusion, learning from past experiences we have seen that with little or no meaningful employment from the diamond mines the development of the mines have not changed the community for betterment and wellbeing, but in reality it has caused hardship and heartaches. In fact, the developments of the diamond mines have contributed to social problems within the community of Lutsel Kè; social problems that come along with resource development such increased availability of hard drugs and by extension increased criminal activity. The people here call themselves the "Denesoline", meaning the "Original People of this Land". The Denesoline have an innate connection with the land and it's this connection that is being threatened by the increased mining activities on the land.

It is said that all decision being made today should take into consideration the effects of the decision on the seventh generation yet to come. In seven generations, the mines and the jobs will be long gone, but the effects of this development on our families, community, land and animals will still be felt. From a mental, physical and spiritual health and well-being perspective we see no other choice than to oppose the proposed Gahcho Kue Mine in its entirety.