

# ***NORTH SLAVE METIS ALLIANCE***

***PO Box 2301 Yellowknife, NT X1A 2P7***



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Chuck Hubert  
Environmental Assessment Officer  
Mackenzie Valley Review Board  
tel: 867-766-7052  
fax: 867-766-7074  
email: [chubert@reviewboard.ca](mailto:chubert@reviewboard.ca)  
web: [reviewboard.ca](http://reviewboard.ca)

## **Re: NSMA Information Requests, EIR 0607-001 Gahcho Kue Project, De Beers Canada**

Please accept the following information requests on behalf of the North Slave Métis Alliance.

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**IR Number:** NSMA-001

**Source:** North Slave Métis Alliance (NSMA)

**To:** De Beers

**Subject:** Development and Environment Description - Developer.

**Preamble:** TOR 3.1.1 requires a description of the organisational structure, ownership, policies, performance, etc. of the company proposing the development.

On November 4th, 2011, the wall Street Journal reported that the Oppenheimer family had sold most of its shares in De Beers to Anglo American, subject to regulatory approval, and scheduled for completion mid 2012. This brings Anglo American's stake in De Beers up to 85% (<http://online.wsj.com/article/BT-CO-20111104-711698.html>). According to Richard Wachman, of the Guardian (<http://www.guardian.co.uk/business/2011/nov/04/anglo-american-debeers-diamonds>), the government of Botswana owns the other 15% and has an option to increase that percentage to 25%. There is also speculation about Mountain Province's continued involvement in the project.

**Request:** EIS sections 1.1.2 and 1.1.3 should be updated to reflect the sale of the Oppenheimer family shares to Anglo American. How would a change in ownership of Mountain Province's "property" affect the project? Any other changes we should be aware of?

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**IR Number:** NSMA-002

**Source:** North Slave Métis Alliance (NSMA)

**To:** De Beers

**Subject:** Development and Environment Description - Rationale; Need for Development

**Preamble:** TOR 3.1.2 requires the proponent to discuss the need for development, including details of how the needs of specific potentially affected communities will be met.

EIS 1.1.5.4 states that De Beers has four existing Impact Benefit Agreements related to the Snap Lake Mine, and that additional agreements are anticipated for this Project.

EIS 1.2.1 states that the Project will benefit the North American Diamond Industry, the NWT workforce and consumers.

**Request:** Where in the EIS can we find a discussion of the specific needs, including capacity needs, for the North Slave Métis community, and how those needs will be met by this project as proposed?

Does the vague reference to existing and additional IBA's serve as a commitment to negotiate and sign a new Impact Benefit Agreement with the North Slave Métis Alliance, for the Gahcho Kue Project, as the means to ensure that some of the needs of the North Slave Métis community are met?

In what ways will the North Slave Métis population, specifically, benefit from this project, over and above whatever benefits they might receive, if any, as members of the NWT workforce or as consumers? In other words, why would the North Slave Métis want the diamond resources on their asserted ancestral lands to be developed now, in this way, rather than later, in a different way, perhaps by themselves in their own way?

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**IR Number:** NSMA-003

**Source:** North Slave Métis Alliance (NSMA)

**To:** De Beers

**Subject:** Existing Environment -Valued Components

**Preamble:** TOR 3.1.3. requires a description of the existing environment, including the current status and trends for all valued components in order to assess potential direct, indirect, and cumulative impacts from project. The existing physical environment includes among other things air quality, noise, water quality, vegetation and wildlife. The existing human environment includes socioeconomic conditions, historic and present land use, cultural and heritage resources.

TOR 3.2. requires a description of the methodology used to describes the existing environment, evaluate potential impacts and reach conclusions with documentation of analysis and participation.

EIS 12.3 discusses socioeconomic impact assessment methods.

EIS 12.6 discusses social, cultural and economic effects, family and community cohesion, and social disparity.

EIS 12.7 discusses culture, heritage, aboriginal rights, community engagement.

The MVEIRB Guidelines for conducting SEIA indicate that a comprehensive SEAI requires primary and secondary research, but it appears that De Beers has only looked at secondary sources, and only a limited selection at that. Essential elements of a SEIA include consideration of equity and disparity in populations, deal with concerns over resource use, poverty and human rights.

Throughout the preliminary screening, scoping and environmental assessment processes over the past six years, the NSMA has consistently identified such things as disputed property rights, equality of access to benefits, capacity building, depletion of non-renewable resources, equity, self-determination, housing affordability, brain drain, competition for scarce labour, cultural pride and identity, and political influence as issues of concern.

**Request:** Where in the EIS can we find a description of the existing socio-economic, cultural and heritage environment of the NSMA according to the valued components and indicators identified by the NSMA? What are the trends, and how has NSMA been involved in the research? Where is the description of the data collected by the NSMA for Gartner Lee?

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**IR Number:** NSMA-004

**Source:** North Slave Métis Alliance (NSMA)

**To:** De Beers

**Subject:** TOR 4.1.5 family and community cohesion .

**Preamble:** Métis in communities in Tlicho and Akaitcho regions are expected to suffer increased demands on community social fabric, absence of workers from family, absence of leaders from communities, change in participation traditional activities, etc. It is important that the EIS provide a separate analysis for each potentially affected community, and must address the vulnerability of each community, and describe how each community was involved in assessment. Indicators of cultural resilience include use of language, country food, cultural activities. After identifying existing vulnerabilities the proponent must determine how project might magnify them. Include consideration of housing, crime, increased social division, political and social development, cultural values, at the local level, sub populations, women disabled elderly youth, comparison of likely relative distribution of beneficial and adverse cultural and social impacts among the potentially affected communities

**Request:** Where in the EIS are the community specific (cultural communities, not places) baselines, trends, impact assessment and mitigation proposals?

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**IR Number:** NSMA-005

**Source:** North Slave Métis Alliance (NSMA)

**To:** De Beers

**Subject:** TOR 4.1.6 social disparity within and between communities. .

**Preamble:** There is supposed to be a discussion of vulnerable sub populations, such as elders, traditional land users, women, youth, with a consideration of certainty of benefits and comprehensive and detailed predictions.

**Request:** Where in the EIS can this information be found?

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Sincerely,

A handwritten signature in black ink, appearing to read 'Sheryl Grieve', with a stylized, cursive script.

Sheryl Grieve  
Manager, Environment Branch.  
[enviromgr@nsma.net](mailto:enviromgr@nsma.net)