



## Smith's Landing First Nation

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September 17, 2021

**DELIVERY VIA EMAIL:** [chubert@reviewboard.ca](mailto:chubert@reviewboard.ca)

Chuck Hubert  
Sr. Environmental Assessment Officer  
Mackenzie Valley Environmental Impact Review Board  
2<sup>nd</sup> Floor, Scotia Building, 5102 50<sup>th</sup> Ave  
Yellowknife, NT X1A 2N7

**RE: Smith's Landing First Nation's Comments on draft Terms of Reference for Pine Point Mine Project – EA2021-01**

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I write on behalf of Smith's Landing First Nation in response to the Mackenzie Valley Environmental Impact Review Board's (the "Board") request for comments on the draft Terms of Reference ("TOR") for the Pine Point Mine Project (the "Project") proposed by Pine Point Mining Limited. As requested, we have attached our submission to this letter which has been vetted by SLFN members through the process outlined in SLFN's own *Guide for Impact Assessment within the Context of Dënë Ch'anie*, and below we briefly outline our expectations for consultation on the proposed Project.

SLFN provides its submission on the draft TOR to ensure that potential impacts of the Project on our Treaty rights and Dënë Ch'anie are meaningfully considered and assessed during the environmental assessment process. SLFN members exercise their Treaty rights extensively throughout the Northwest Territories ("NWT") as most of our territory (75%, over 317,000 km<sup>2</sup>) is within the NWT. Our members continue to rely on this territory to continue our Dënë Ch'anie way of life.

The Northwest Territories Supreme Court (the "Court") in *Re Paulette*, [1973] 6 WWR 97 ("Paulette") confirmed the Crown's constitutional obligations to protect the rights of SLFN, formally part of the Fitz/Smith Band, within the NWT. In *Paulette*, the Fitz/Smith Band, along with several other First Nations in the NWT, sought to safeguard its Aboriginal title to lands in the NWT by filing a caveat with the Registrar of Land Titles. The caveat asserted an interest in 400,000 square miles of land in the NWT over which the First Nations claimed Aboriginal title. The Registrar referred the question of the legal validity of the claimed interest to the Court, unsure of whether the caveat could be filed.

The Chief of the Fitz-Smith Band at the time, Francois Paulette, testified in court to support the Band's Aboriginal title. The trial judge ruled in favour of the Bands and, although the finding that the caveat could be filed was later overturned on appeal on a technical point, the appeal court did not disturb the trial judge's findings of fact on the strength of the Aboriginal title claim itself. Particularly, the trial judge concluded at pages 339 and 340:

1. I am satisfied that those who signed the caveat are present-day descendants of those distinct Indian groups who, organized in societies and using the land as their forefathers had done for centuries, have since time immemorial used the land embraced by the caveat as theirs.
2. I am satisfied that those same Indigenous people as mentioned in (1) above are prima facie owners of the lands covered by the caveat -- that they have what are known as aboriginal rights.
3. There exists a clear constitutional obligation on the part of the Canadian Government to protect the legal rights of the Indigenous peoples in the area covered by the caveat.
4. Notwithstanding the language of the two treaties, there is sufficient doubt on the facts that Aboriginal title was extinguished that such claim for title should be permitted to be put forward by the caveators.

In addition, the British Columbia Supreme Court ("BCSC") in *Yahey v British Columbia*, 2021 BCSC 1287 ("Yahey") recently articulated the importance of the promises made under Treaty stating the following:

Treaty 8 guarantees the Indigenous signatories and adherents the right to continue a way of life based on hunting, fishing, and trapping, and promises that this way of life will not be forcibly interfered with. Inherent in the promise that there will be no forced interference with this way of life is that the Crown will not significantly affect or destroy the basic elements or features needed for that way of life to continue.<sup>1</sup>

The BCSC held that Treaty 8 protects resource rights in relation to specific locations and broader territories emphasizing that Indigenous peoples did not want to be confined to a prescribed list of cultural practices and economic activities in restricted locations, but rather wanted the freedom and ability to travel throughout the territory. The Board previously advised that it is "committed to safe and effective engagement and consultation" and as such, SLFN expects the Board to adequately consider Treaty rights and the cumulative effects of development in the NWT to ensure that the Project does not contribute to the meaningful diminishment of SLFN's Treaty rights. In *Yahey*, the Court made some of the following findings with respect to the standards of the duty to consult:

- The Crown must consider and assess cumulative impacts of development on Treaty rights and implement protection measures on a broader scale. This requires more than the occasional implementation of site-specific mitigation measures. A piece-meal project by project approach to consultation is not sufficient to address concerns about impacts to Treaty rights.<sup>2</sup>
- Consultation requires more than a template response provided by the Crown to address First Nation concerns. The BCSC noted that "this is conduct that 'substantially frustrates

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<sup>1</sup> *Yahey*, at para 175.

<sup>2</sup> *Yahey*, at para 1735.

the purposes of a solemn promise'; in particular, it frustrates the essential promise of the Treaty."<sup>3</sup>

- The consultation process requires meaningful and enforceable thresholds or triggers to inform decision makers on whether to approve a proposed activity, rather than simply gathering additional information while proceeding with a proposed activity which adversely impacts Treaty rights.<sup>4</sup>

We trust that the Board will seriously consider SLFN's submission when it is finalizing the TOR given that our Treaty rights are at stake, and we look forward to continued consultation with the Board on the proposed Project. Please contact Becky Kostka, Lands and Resources Manager at (867) 872-5656 or [lands@slfn196.com](mailto:lands@slfn196.com) if you have any questions about our submission.

Sincerely,

A handwritten signature in blue ink on a light yellow background. The signature is cursive and reads "Gerry Cheezie".

Chief Gerry Cheezie

CC: Becky Kostka, Lands & Resources Manager  
Mandy Olsgard, Integrated Toxicology Solutions Ltd.  
Patricia Heaton, Lands Assistant  
Megan McConnell, Rana Law

*We, the Tthebatthi Dénésuliné, have been sovereign since time immemorial. Together, we will continue our journey in harmony with the environment to sustain a healthy and self-sufficient lifestyle for future generations. To honour our Creator and ancestors, we will protect and nurture the integrity of our Déné Ch'anie.*

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<sup>3</sup> *Yahey*, at para 1779.

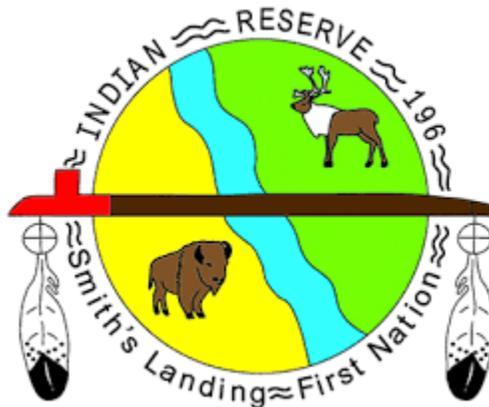
<sup>4</sup> *Yahey*, at para 1759.

*Smith's Landing First Nation*

*Review and Recommendations*

“Draft Terms of Reference EA 2021-01  
Pine Point Mining Limited Pine Point Mine  
Project”

*Dënë Knowledge and Western Science Considerations*



Date of Submission:

September 17, 2021

Submitted by:

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## Introduction

*“We, the Tthebatthi Dēnésuliné, have been sovereign since time immemorial. Together, we will continue our journey in harmony with the environment to sustain a healthy and self-sufficient lifestyle for future generations. To honour our Creator and ancestors, we will protect and nurture the integrity of our Dēné Ch'anie.”*

Smith's Landing First Nation (SLFN or the Nation) members have occupied their Territory for countless generations, using and managing resources through rich cultural practices guided by Dēné Ch'anie. Dēné Ch'anie is a sacred concept that best translates to ‘the path we walk’, visualizing walking in the path of Dēné ancestors, or living within the image of the ancestors. Dēné Ch'anie is the lens through which SLFN members view, analyze, and interact within the world and provides a foundation for their relationships with family, community, and environment. While the definition or interpretation of Dēné Ch'anie may vary between members because it is more of a sense than a formal and static phrase due to SLFN's long-term connection with the land pre-European contact, members largely agree that there are several *values* that must be considered for Dēné Ch'anie to remain healthy, intact, and/or restored. When assessing how potential projects impact Dēné Ch'anie, it is important to understand how these *values* can find balance and how they may be degraded; *values* as defined by the community include:

- **Ní Chu Ku (Land & Water)**: Will the land be healthy for our grandchildren?
- **Háyorila (Community)**: Will the community be filled with love?
- **Dēne Ch'anie (Culture)**: Will the culture be treasured?
- **Lá k'e (Economy)**: Can we provide for our families?
- **Dēne tl'ezl (Responsibilities)**: Will SLFN ethics and protocols be respected?
- **Dēne Dáyíné (Spirituality)**: Will spiritual relationships be valued?

Further, the community has identified that each value has subcomponents that we call aspects. For example, the value of land and water may include aspects such as travel routes, clean water, healthy animals, clean air; but it is important to note that many aspects are not completely unique to each value due to the interconnectedness of Dēné Ch'anie.

In Dēné Ch'anie, SLFN members are given the role and responsibility of steward of their Territory, ensuring the land and water is healthy for the future generations. Dēné Ch'anie emphasizes the interconnection of things. The land is prominent; healthy land is inseparable from all other components of SLFN culture and society, including physical health, healthy social relationships and values, the retention and teaching of knowledge that include respectful harvesting practices, the use of traditional medicines, the use of Dēnésuliné language, sharing knowledge of SLFN and Dēné history, and healing the intergenerational trauma found throughout the Nation.

In assessing impacts to Dēné Ch'anie, SLFN is utilizing its own framework informed by Elders and knowledge holders to define aspects specific to each core value related to a project area, to determine how a project may destroy, harm, maintain, enhance, or restore Dēné Ch'anie

Below, we provide recommendations on the draft Terms of Reference (TOR) for the Mackenzie Valley Resource Board (MVRB) consideration regarding Pine Point Mining Ltd's (PPML or the Proponent)

proposed Pine Point Mine Project (the Project). This document reflects Dënë Ch'anie, the mandate of SLFN, and provides direction on SLFN's requirements for land and water management and protection, to not only ensure that Treaty Rights are upheld, but that Dënë Ch'anie is protected and restored.

## SLFN Response to the Draft Terms of Reference

Western scientists and SLFN Elders have worked together to provide meaningful suggestions for the MVRB to consider and incorporate into the Project draft TOR which are summarized in this document and detailed in the accompanying spreadsheet. The following submission provides a narrative summary of the spreadsheet with comments reflecting SLFN's Dënë Ch'anie *values* of land and water, culture, community, economy, spirituality, and responsibilities.

- 1) SLFN has strong ties to its territory. This land has sustained SLFN and has provided physical, mental, spiritual health for the people. In return, SLFN has managed and protected the land and resources by living a balanced life in line with Dënë Ch'anie. As shown in Figure 1, the proposed Project is within SLFN territory, and overlaps with areas of specific interest and historic use and occupancy for SLFN (including Paulette River). The proposed area of development also overlaps with an area where a small marginalized (and relocated) community called the Rocher River once existed. SLFN notes that it does not appear anywhere in the TOR as a noted community that maybe impacted by the proposed Project. This is important due to ancestral connection to the community. SLFN is a community that was and continues to be impacted by the legacy left by previous development and will undoubtedly be impacted by the proposed Project.

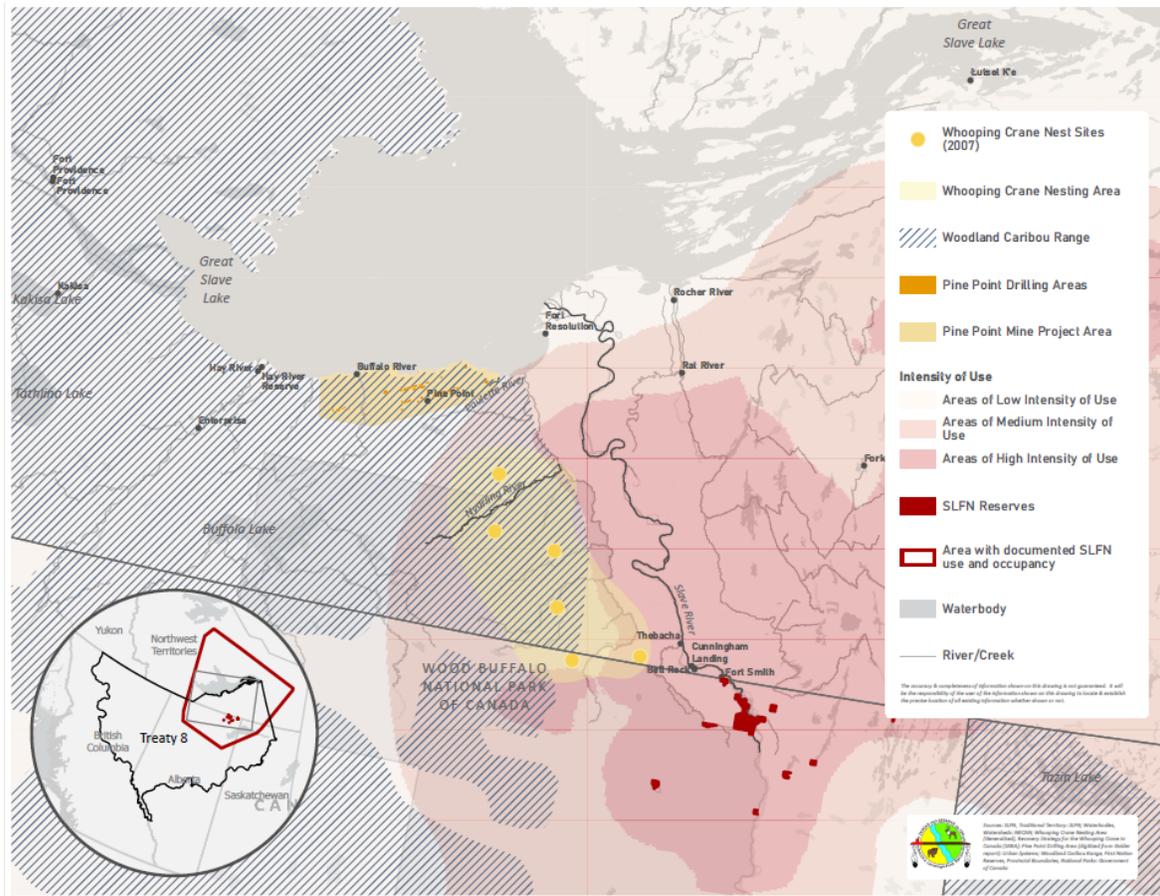


Figure 1: SLFN Specific Impacts

### Recommendation

SLFN requires that the MVRB recognizes that the project is within the territory of SLFN in Section 1.1 and any other applicable sections of the TOR.

- 2) Harvesting is a key activity in Dēné culture. It is economic in nature, but the interaction is not transactional. Harvesting not only provide food and medicines but provide lessons and teachings on living a balanced Dēné Ch’ame.

The ability of SLFN members to confidently access healthy animals and clean water, has a direct effect on every aspect of SLFN society. Healthy animals and clean water encourage and allow people to spend time on the land, exercise and optimize rights, teach children intergenerational knowledge and practices, practicing culture, sharing, forming community connections, and actively reaffirming their identity as Dēnésułiné. For SLFN this is health and healing. Damage to the land and resources in their territory is destructive to Dēné Ch’ame as it disconnects members from one another, their history, culture, traditional values, and ancestors. The health of the Nation suffers greatly.

### Recommendation

The scope of the line of inquiry for Traditional Land Use (Section 4.2.8) is limited and SLFN is concerned that the current scope will not reflect the holistic nature of Indigenous land use and the broad reaching implications of disturbances to these activities. The existing and baseline conditions listed in

the TOR (Section 4.2.8) are focused on harvesting. Indigenous land use is complex and cannot be accurately reflected through harvesting activities alone. As such, this section should be expanded to reflect the complexity of Indigenous land use.

- 3) A dominant concern about the proposed Project expressed by SLFN Elders was the current level of pollution and lack of clean up from previous mining activities conducted by Cominco. Within the Déné Ch'anie system this land should have been returned to its previous condition before discussions on future development started. The current site is polluting the groundwater and surface water of Great Slave Lake and is now actively avoided by SLFN, despite their long history in the area. The existing pollution and contamination make the area unusable, except as a corridor for travel to safer and uncontaminated hunting areas. SLFN notes a decrease in the quality and quantity of the animals in the area and have concern over the disease and deformations observed in animals and fish, along with the safety of those resources for human consumption. The mistrust and avoidance of this area is further perpetuated by a lack of information and data describing water quality in the old mine pits and groundwater moving into Great Slave Lake.

### **Recommendation**

SLFN requests that the responsible party address our concerns with respect historic liability, including the immediate remediation and reclamation of contaminated and destroyed areas of the site and to ensure the results of monitoring are shared with SLFN members using appropriate communication techniques and with a reasonable level of detail to meaningfully answer community questions.

In addition, we request that the Proponent provide a more accurate assessment of potential risks from ingestion of surface water (untreated) and fish. It is recommended that the Proponent include a comparison of surface water quality predictions (Section 4.1.5) to both Health Canada (2021) "Guidelines for Canadian Drinking Water Quality" and US EPA (2015 updated to 2021) "National Recommended Water Quality Criteria Tables – Human Health for the consumption of Water + Organism".

SLFN elders also recommend that Indigenous people in the area be trained and take responsibility for monitoring of the site. The Project TOR must clearly describe the requirement for PPML to describe the current condition and contaminant levels in the groundwater and surface water and provide an assessment of potential risks. Each of these recommendations should be considered in sections of the TOR discussing the baseline conditions (Section 3.1).

- 4) The key lines of enquiry identified in Section 2.2.2 are too narrow and limited to guide an assessment that reflects Déné Ch'anie (see Supplemental table).

### **Recommendation**

It is recommended that the following additional key lines of enquiry be added to the TOR to guide the assessment undertaken by the Proponent.

- Managing water to prevent further deterioration from the current condition (which reflects contamination and ongoing liability management from historical development).
- Sustainable and healthy surface water and groundwater quantity and quality.
- Sustainable and healthy wildlife populations
- Sustainable and healthy fish populations

- Sustainable and healthy plant populations (including, but not limited to, berries, food plants, medicinal plants)
  - Preventing negative impacts to cultural ways of life and the peaceful optimization of SLFN’s Rights, and social and economic conditions.
- 5) Harvesting fish from the Slave River and its tributaries has a deep cultural and spiritual history for SLFN and is critical for SLFN to live a life guided by Dënë Ch’ame. Many fish populations have migratory ranges that originate in the Slave River Delta and Great Slave Lake. It is SLFN’s fear that fish populations, such as the long nose and white suckers that are harvested in the spring are being exposed to contamination from both the past mine and the proposed project.

The following Figure outlines the interconnectivity of the watershed and spawning routes. Every spring SLFN members have gathered on the Salt River at the Tthejëre Ghaļı reserve (located in red on the Salt River) to harvest both long nose and white suckers, which travel up the Slave River from the delta to spawn on the Salt River.

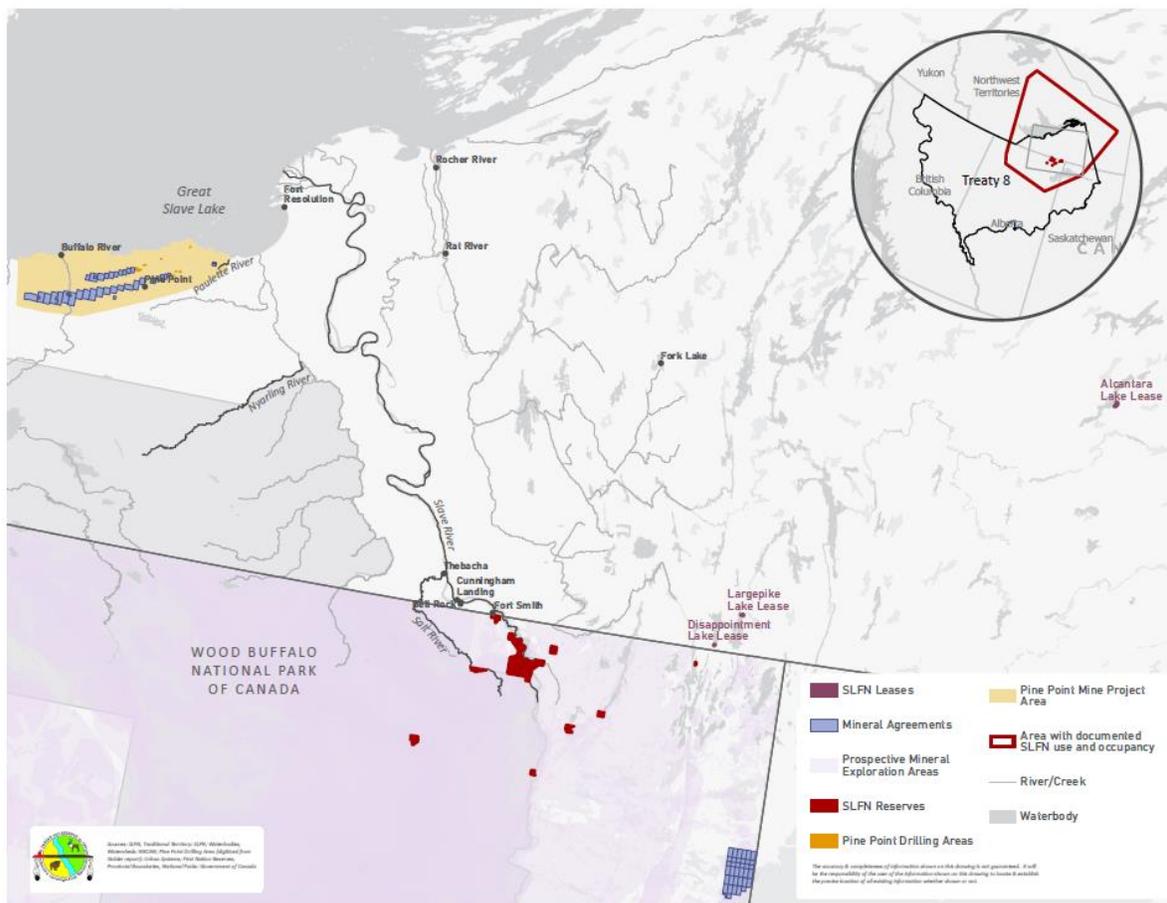


Figure 2: Watershed Interconnectivity

**Recommendation:**

SLFN requests that the potential impacts of the Project on these Slave River populations and the resulting impacts on SLFN socioeconomic and cultural values be assessed.

- 6) The Dënë culture is constructed upon reciprocal relationships formed between the community and the land. Thus, the integrity of the culture is dependent on the health and well being of the land and resources. Prior to the original mine, Pine Point was an area used by SLFN. SLFN practiced their culture extensively here; some lived in the area, it was frequented as a travel corridor, community gathering site, and was used for harvesting. SLFN would like to be confident in the health of the area so they can return to using the area. SLFN members have identified several areas of cultural importance as well as areas that have changed over the years and are not healthy.

**Recommendation**

SLFN will identify these areas to the Proponent for consideration as discrete receptor locations in modelling and assessment studies as proposed in Section 4 of the draft TOR.

- 7) Dënë Ch'anie guides SLFN members to make decisions about how to use and protect the integrity of the land and water to ensure the air, land, water, plants, animals, and people are healthy for time in-perpetuity. SLFN is currently experiencing significant cumulative impacts from development in its territory which has not only diminished and harmed the values of Dënë Ch'anie but has challenged SLFN's ability to make informed decisions on the management of the land. Management of the land includes the use of Dënë Ch'anie and western methodologies to understand if human and ecological health are in balance. Members of SLFN have explained that these elements are already out of balance due to impacts from development and require more information to develop culturally appropriate indicators with thresholds and limits.

**Recommendation:**

The TOR clearly describes that a human health assessment will be completed (Section 4.1.14) but it is unclear if a full ecological risk assessment (ERA) is proposed. Therefore, SLFN recommends that a comprehensive ERA describing and assessing potential risks to aquatic and terrestrial receptors (CCME 2021) be required. Supplemental documents indicate the Proponent has agreed to undertake an ERA; however, this must be identified in an updated and final TOR.

Section 4.2.12 identifies some of the social indicators that should be used in assessing social and community conditions. Consideration must be given to identifying indicators of social and community health that reflect Dënë Ch'anie system and values.

Any assessment of SLFN Dënesuñiné culture must occur through the lens of Dënë Ch'anie and include changes to relationships as an indicator. Integrating health impact assessment methods, such as those published by the Government of Canada is one mechanism by which direct and indirect impacts to traditional land use can be assessed and are recommended.<sup>1</sup>

- 8) The Dënë Ch'anie value of land and the role of SLFN as stewards of the land for future generations leads to concerns over the energy that will be used to operate the Project, its origin, its contribution to

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<sup>1</sup> Health Canada. The Canadian handbook on health impact assessment. Volume 1: The basics. Ottawa, ON: Health Canada; 2004. Available from: [http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/\\_environ/handbook-guide2004/index-eng.php](http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/_environ/handbook-guide2004/index-eng.php).

Health Canada. The Canadian handbook on health impact assessment. Volume 2: Approaches and decision-making. Ottawa, ON: Health Canada; 2004. Available from: [http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/\\_environ/handbook-guide2004/index-eng.php](http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/_environ/handbook-guide2004/index-eng.php).

Health Canada. The Canadian handbook on health impact assessment. Volume 3: The multidisciplinary team. Ottawa, ON: Health Canada; 2004. Available from: [http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/\\_environ/handbook-guide2004/index-eng.php](http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/_environ/handbook-guide2004/index-eng.php).

Health Canada. The Canadian handbook on health impact assessment. Volume 4: Health impacts by industry sector. Ottawa, ON: Health Canada; 2004. Available from: [http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/\\_environ/handbook-guide2004/index-eng.php](http://www.hc-sc.gc.ca/fniahsnpnia/pubs/promotion/_environ/handbook-guide2004/index-eng.php).

climate change, and the impact that will have on SLFN traditional lands and resources. SLFN Elders feel strongly that the Proponent should consider less energy intensive technologies for extraction, processing, and infrastructure to decrease both emissions and use of non-renewable resources.

**Recommendation**

It is recommended that Section 5.5 require the Proponent to consider renewable energy sources when assessing alternate means to carry out the Project and consider the Dënë Ch'anie principles of protection and sustainability rather than economics when making design decisions.

- 9) SLFN recognizes that the land is a living thing and that what occurs in one area can have lasting impacts not only in that area, but globally. SLFN has a responsibility to understand the legacy, from cradle to grave, of any activity that occurs in our territory and to ensure the ethical use of mined minerals.

**Recommendation**

SLFN requests a section outlining the purpose of the project, providing details on the following questions:

- What will happen to the minerals that are mined here?
- Where do they go?
- How are they used?

## Dënë Ch'anie (DC) VALUES:

**PROTECTING THE LAND**  
**REBUILDING AND MAINTAINING STRONG COMMUNITY**  
**HAVING A VIBRANT CULTURE NOW & IN THE FUTURE**  
**BALANCED, RESPECTFUL, ECONOMIC ACTIVITY**  
**FULFILLING OUR RESPONSIBILITIES AS DENESULINE**  
**MAINTAINING OUR SPIRITUALITY**

VALUE ASPECT	RECOMMENDATION	TOR CONCORDANCE	COMMUNITY COMMENT
<p style="text-align: center;"><b>Healthy Animals</b></p>	<p>Animals: Include an Ecological Risk Assessment.</p> <p>SLFN members provide discrete receptor locations and Valued Components (VCs).</p> <p>Animal health is assessed holistically as a function of ecosystem health and linked to human health and culture of Indigenous people.</p>	<p>4.1.1 Atmospheric environment 4.1.2. Noise and vibration 4.1.3 Visual changes 4.1.4 Soil component 4.1.5 Surface water and groundwater quality 4.1.6 Vegetation 4.2.1 Use of water by people 4.2.2. Fish and aquatic life 4.2.3. Birds and their habitat 4.2.4. Moose, furbearers and other wildlife 4.2.5 Boreal Caribou 4.2.6 Species at risk 4.2.7 Whooping crane 4.2.8 Indigenous Land Use 4.2.11 Culture 4.2.14 Human health 4.3 Holistic lens (all sub-sections)</p>	<p>Too much pollution coming from too much industry. Close to mine site; less and less actual harvesting. Fish quality and contamination. Protect the fish; very important. Deformed fish already being found. Fish run up and down the Slave from Great Slave Lake (GSL). How do we protect the spawning and runs? Moose infected and not able to consume due to Fort McMurray. Moose hunting still in area closer to Fort Resolution Birds and harvesting does happen but the quality has diminished. Berry picking available in area but again it's the quality. Woodland Caribou hunting has been affected. Trees dying along the creek. Lots of avoidance of area.</p> <p>RECOMMEND: Animals need to be tested. Are there animals even there? Studies are required. No animals = unhealthy environment. Fish need to be tested-sampling. Protect spawning areas.</p>
<p style="text-align: center;"><b>Clean Water</b></p>	<p>Water: SLFN members provide discrete receptor locations for modelling and assessment.</p> <p>Include human consumption guidelines (Health Canada Drinking Water Quality Guidelines; US EPA National Recommended Water Quality Criteria - Human Health Criteria Table).</p>	<p>4.1.5. Surface and groundwater quality and quantity 4.2.1 - Use of water by people 4.2.2. Fish and aquatic life 4.2.3. Birds and their habitat 4.2.4. Moose, furbearers and other wildlife 4.2.8 Indigenous Land Use 4.2.11 Culture 4.2.14 Human health 4.3 Holistic lens (all sub-sections)</p>	<p>Water major issue, contamination. Contain water. No leakage or spillage into the GSL. Water containment using proper new technology. Why can't they spend the money to do this properly? Water flows all the way to the ocean and PPML needs to be responsible.</p> <p>RECOMMEND: Need water testing on the existing water. Dug outs need to be tested by SLFN and not industry. Drain the tailings ponds and line the new pits. We want to do the water testing independently of industry. Use our own people to get results to protect future. Collect and analyze our own data. Water in the pits needing to be tested.</p>

<p><b>CLEAN LAND</b></p>	<p>Assess land contamination from groundwater and surface water runoff.</p> <p>SLFN members provide discrete receptor locations.</p> <p>Compares predicted soil quality to environmental and human health guidelines (CCME).</p>	<p>4.1.1 Atmospheric environment  4.1.3 Visual changes  4.1.4 Soil component  4.1.5 Surface water and groundwater quality  4.1.6 Vegetation  4.2.2. Fish and aquatic life  4.2.3. Birds and their habitat  4.2.4. Moose, furbearers and other wildlife  4.2.5 Boreal Caribou  4.2.6 Species at risk  4.2.7 Whooping crane  4.2.8 Indigenous Land Use  4.2.11 Culture  4.2.14 Human health  4.3 Holistic lens (all sub-sections)</p>	<p>Water evaporation-- Rain and snow contaminants.  What is being evaporated into the air?  Pollution/contaminants in the air?  Cumulative effects of the air contaminants.  How does it affect traditional land?  Reclamation-Pits left over, Tailings ponds left, No clean up.  Canada has a fiduciary responsibility to protect land and harvesting.  Past, No organization of camp.  Disposal issues with garbage and wastewater.  Where did the water come from?  No principles or values from management.</p>
<p><b>Clean Air</b></p>	<p>Models deposition and assesses contamination of soil and water and risks to VCs.</p> <p>SLFN members provide discrete receptor locations.</p> <p>Assesses near and far range transport of contaminants across SLFN traditional territory (RSA).</p>	<p>4.1.1 Atmospheric environment  4.1.3 Visual changes  4.1.4 Soil component  4.1.5 Surface water and groundwater quality  4.1.6 Vegetation  4.2.2. Fish and aquatic life  4.2.3. Birds and their habitat  4.2.4. Moose, furbearers and other wildlife  4.2.5 Boreal Caribou  4.2.6 Species at risk  4.2.7 Whooping crane  4.2.8 Indigenous Land Use  4.2.11 Culture  4.2.14 Human health  4.3 Holistic lens (all sub-sections)</p>	<p>No current air monitoring.</p> <p>RECOMMEND:  Air monitoring will be required by SLFN.</p>
<p><b>Time on the Land (for harvesting or recreation)</b></p>	<p>Traditional land use studies must be holistic in nature and include all aspects of SLFN life and culture on the land, and not be limited to harvesting.</p>	<p>4.1.1 Atmospheric environment  4.1.2. Noise and vibration  4.1.3 Visual changes  4.1.4 Soil component  4.1.5 Surface water and groundwater quality  4.1.6 Vegetation  4.2.1 Use of water by people  4.2.2. Fish and aquatic life  4.2.3. Birds and their habitat  4.2.4. Moose, furbearers and other wildlife  4.2.5 Boreal Caribou  4.2.6 Species at risk  4.2.7 Whooping crane  4.2.8 Indigenous Land Use  4.2.11 Culture  4.2.14 Human health  4.3 Holistic lens (all sub-sections)  4.2.1. Use of water by people  4.2.8 Indigenous land use</p>	<p>Area was always used prior to mine opening.  Harvesting through treaty rights.  Paulette Creek is right through this area.  Ancestors used to live there.  Community gathering place.  Avoidance really started to impact all First Nation communities.  If they reopen, no possibility of reclamation ever.  Damage too great to recover if this mine opens again.  Lost area.</p>

<p><b>People practice healthy lives</b></p>	<p>Results of all VC assessments are integrated (quantitatively) to understand holistic effects (Section 4.3). Assesses cultural impacts of wage earning and traditional lifestyles.</p>	<p>Section 4.3 Holistic lens (integrated previous studies and assessments described in Sections 4.1 and 2)</p>	<p>First time with a road into Fort Resolution. Impacts of the community started with addiction during this time. Bootlegging started to become an issue within the communities. Fort Resolution didn't want the mine to expand any larger Protest within Res to protect the traditional land</p>
<p><b>Technology is used positively (alternatives, why is this necessary, what are mine products being used for)</b></p>	<p>Identifies and assesses alternate technologies to decrease reliance on non-renewable sources and decrease emissions. Adopted DC values of protection and sustainability and limits economic focus.</p>	<p>Section 5.5 Alternate means of carrying out the project</p>	<p>Power to operate mine. Where is it coming from Taltson? Going to use LNG for generators. This will lead to pollution. ☐ What's the energy corridor? Where are they getting it from to operate mine. Who will be impacted by this; will power bills go up in Fort Smith due to this? Clean energy like solar, wind, hydronic, geothermal should be used to generate What are the options? Do you think that Pine Point is leading the Taltson/Site C expansion? Always taking the easy way out; we need to protect the environment by being and using new technology.</p>
<p><b>Harvesting experiences Traditional Food Security</b></p>	<p>Results of all VC assessments are integrated (quantitatively) to understand holistic effects (Section 4.3) Assesses cultural impacts of wage earning and traditional lifestyles</p>	<p>4.1.1 Atmospheric environment 4.1.2 Noise and vibration 4.1.3 Visual changes 4.1.4 Soil component 4.1.5 Surface water and groundwater quality 4.1.6 Vegetation 4.2.1 Use of water by people 4.2.2. Fish and aquatic life 4.2.3. Birds and their habitat 4.2.4. Moose, furbearers and other wildlife 4.2.5 Boreal Caribou 4.2.6 Species at risk 4.2.7 Whooping crane 4.2.8 Indigenous Land Use 4.2.11 Culture 4.2.14 Human health 4.3 Holistic lens (all sub-sections)</p>	<p>Marten (used to be very prevalent prior to mine, not sure if they are still around because there are no SLFN trappers using this area anymore) Traditional harvesting of moose, birds, berries, fish (sucker run come up Paulette Creek), and buffalo Fort Resolution had a buffalo ranch after the mine opened to generate food security</p>

<p><b>Connection to the land</b></p>	<p>Results of all VC assessments are integrated (quantitatively) to understand holistic effects (Section 4.3). Assesses cultural impacts of wage earning and traditional lifestyles.</p>	<p>4.1.1 Atmospheric environment 4.1.2 Noise and vibration 4.1.3 Visual changes 4.1.4 Soil component 4.1.5 Surface water and groundwater quality 4.1.6 Vegetation 4.2.1 Use of water by people 4.2.2. Fish and aquatic life 4.2.3. Birds and their habitat 4.2.4. Moose, furbearers and other wildlife 4.2.5 Boreal Caribou 4.2.6 Species at risk 4.2.7 Whooping crane 4.2.8 Indigenous Land Use 4.2.11 Culture 4.2.14 Human health 4.3 Holistic lens (all sub-sections)</p>	<p>What are they going to use these minerals for? Where is the ore going to? There is a social responsibility to know where the resource will be used and the legacy that it will bring.</p>
<p><b>Member Employment</b></p>	<p>Employment agreement with strict substance abuse policies; locally-built cultural awareness program; and mentorship and capacity building for local admin and leadership positions.</p>	<p>4.2.11 Culture 4.2.12 Social &amp; Community Condition 4.2.13 Economy &amp; Employment</p>	<p>Mine investment. First time SLFN members getting into the wage economy (Cominco mine). Lots of income started to flow into the communities. Long hours. High pay. Lead to many social issues.</p> <p>Work camps. Alcohol and drugs will be introduced to the community. Indigenous cultural training required for workers. Liaison or FN employees. Meet a % of FN employees. Ensure our people get hired first. Who is going to benefit from this mine reopen? Company, Res, Katlodeche, Metis Only 1-2% of FN were working at the old mine. Need to get First Nation into more admin positions and not just laborer's.</p>
<p><b>Employment &amp; Economic Opportunities</b></p>	<p>Create SLFN Opportunities Agreement to address community expectations on ethical investment and sustainable legacy</p>	<p>4.2.11 Culture 4.2.12 Social &amp; Community Condition 4.2.13 Economy &amp; Employment 4.2.9 Other Land Uses</p>	<p>Make it beneficial for all involved Ethical investment and sustainability What employment and economic opportunities will be available to the Nation should the Nation consider the Project appropriate?</p>

<p><b>Stewarding of land and water</b></p>	<p>SLFN is provided answers to specific questions regarding the history and current state of the site.</p>	<p>4.1.1 Atmospheric environment  4.1.2. Noise and vibration  4.1.3 Visual changes  4.1.4 Soil component  4.1.5 Surface water and groundwater quality  4.1.6 Vegetation  4.2.1 Use of water by people  4.2.2. Fish and aquatic life  4.2.3. Birds and their habitat  4.2.4. Moose, furbearers and other wildlife  4.2.5 Boreal Caribou  4.2.6 Species at risk  4.2.7 Whooping crane  4.2.8 Indigenous Land Use  4.2.11 Culture  4.2.14 Human health  4.3 Holistic lens (all sub-sections)</p>	<p>Open communication with PPML required for meaningful community.  They shut down the mine in the 80's  Why are they opening it up again?  What's the hurry or rush to reopen?  Why did they shut down the mine initially?  Government never supported the treaty rights of the Nation trying to protect.  Arsenic poisoning.  Tailing's pond leaking into the lake back them.  Contaminants making nature die off; complete denial from industry.  Offerings for everything that is removed from the land.  We want a indigenous co management board for responsibility  Unify the Dënésutine community.</p>
<p><b>Traditional Governance</b></p>	<p>PPML must follow appropriate governance and protocol requirements as described by SLFN.</p>	<p>4.2.8 Indigenous Land Use  4.2.10 Heritage Resources  4.2.11 Culture  4.3 Holistic lens (all sub-sections)</p>	<p>Land use protocol.  Ceremony required.  They never ever made the area as good as they found it.  They abused the land .  They never offered anything back to the land.</p>
<p><b>Healing historical trauma</b></p>	<p>Conduct ceremony to heal and honor the land and its gifts; ensure reclamation is a process of restoration and healing, leaving the land better than when it was pre-disturbance.</p>	<p>4.2.8 Indigenous Land Use  4.2.9 Other Land Uses  4.2.10 Heritage Resources  4.2.11 Culture  4.2.12 Social &amp; Community Conditions  4.3 Holistic lens (all sub-sections)</p>	<p>Land is spiritual, land is alive, it is the land, water and air.  If this mine gets approved; everything needs to be done properly in the spirit of reconciliation with land.  We must ensure that we protect the land and culture.  Reclamation/restoration.  It should look like the camp was never there.</p>