IR Number: *Number assigned by MVEIRB*

Source: North Slave Métis Alliance

To: Developer, GNWT, BHP Billiton, Diavik, De Beers.

Subject: Socio-economic impact assessment

Preamble

The TOR for the DAR required Deze' to describe current and trend patterns in socio-economic conditions of potentially-affected communities. The table of concordance identifies section 15.9 as the location of the information, but there is no information there on the indigenous North Slave Métis. Only the South Slave communities of Hay River, Fort Smith, Fort Resolution and Lutselke' are mentioned. The MVEIRB Guidelines for conducting Socio-Economic Assessment state, on page 19, section3, that the Developer should explain why potentially affected communities which have expressed an interest in engagement have been left out.

During the environmental assessment of the Ekati, Diavik and Snap Lake diamond mining projects, the employment and business benefits of the projects for the North Slave Region Aboriginal Groups, and other NWT residents, were weighed against the environmental costs – including cultural changes, depletion of non-renewable resources, wildlife disturbance and habitat loss, to name a few. As a result of those environmental assessments, Impact Benefit and Participation Agreements were negotiated between the Tlicho, Akaitcho, and North Slave Métis People and the mining companies to ensure that socio-economic mitigation occurred. Subsequently, the Tlicho, Akaitcho and North Slave Métis have all invested heavily in business and human resource development in order to take advantage of the business and employment opportunities associated with the winter road transportation of diesel fuel.

Although the NSMA does not normally receive many fuel haul orders, we are certain that any reduction in truck traffic which reduces the fuel hauls of the other two aboriginal groups will have a trickledown effect on the NSMA, as non-fuel truck loads are re-allocated away from the NSMA to satisfy conditions of the IBA's of the other two preferentially treated First Nations. This will reduce the transportation related employment and business opportunities for NSMA members.

The current proposed project intends to create a transmission line across the North Slave Region, and to "steal" the energy transportation business opportunities (104 million litres of diesel fuel) already allocated to the North Slave Region aboriginal groups, and re-distribute those benefits to South Slave Region aboriginal groups, but has made no effort to assess the socio-economic impacts on the North Slave Region aboriginal groups.

The project descriptions for those three mines included the use of the Tibbitt to Contwoyto winter road as their transportation method, and diesel fuel as the energy source. Any change in transportation route or energy source is considered by the North Slave Métis as a significant change in the project which will require an environmental assessment.

The majority of the impacts of the currently proposed project will result from the transmission lines and winter roads which pass through the North Slave Region, and overlap the NSMA traditional territory, as well as the electrical substations which will all be within our territory.

To re-allocate benefits from the North to South while allocating costs from South to North is fundamentally unfair, and contrary to the distributive justice principles underlying sustainable development, as well as our Canadian legal and political systems. Paradoxically, in table 18.1 the developer explicitly adopts the Bellagio sustainability principles which are supposed to consider equity and disparity within current populations and future generations.

Request

Please provide a credible, professional and unbiased assessment of the socio-economic impacts of this proposed project on the North Slave Métis People.

Please indicate whether socio-economic impact mitigation will occur by adding the NSMA to the ownership structure of the project, or through an Impact Benefit Agreement.

Alternatively, please provide evidence that the three existing diamond mines intend to address issues of social and economic equity for the North Slave Métis as part of the environmental assessment of the changes in their project descriptions.

Alternatively, please state whether the project is still needed and feasible if Gahcho Kue and Peregrine are the only two customers.