

# **NORTH SLAVE MÉTIS ALLIANCE**

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



June 20, 2014

Chuck Hubert  
Regulatory Officer  
Mackenzie Valley Review Board  
Phone: (867) 766-7052  
Email: [chubert@reviewboard.ca](mailto:chubert@reviewboard.ca)

Dear Mr. Hubert,

**Re: North Slave Métis Alliance Closing Argument for De Beers Canada Inc., Snap Lake Diamond Mine Amendment Project (EA1314-02)**

The North Slave Métis Alliance ("NSMA") participated in the Public Hearing ("the Hearing") held on June 5 and 6<sup>th</sup>, 2014 concerning the proposed amendments to the existing Water License for De Beers' Snap Lake Diamond Mine ("the Project"). At the Hearing the NSMA voiced the concerns of its members relating to the impacts that proposed changes could have on the environment in the area of the mine. The Aboriginal parties present at the Public Hearing process (the North Slave Métis Alliance, Yellowknives Dene First Nation, Lutselk'e Dene First Nation, and Deninu Kue First Nation) held the common concern that if this amendment should proceed in its current form, it could pose several risks to the environment and regulatory process.

During the public hearing, uncertainties were identified in the following areas: effluent quality criteria ("EQC"), monitoring, and mitigation. All three of these items are within the scope of concern as they all relate to whether significant adverse impacts to the environment are likely to occur. Uncertainties in the proposed effluent quality criteria ("EQC") require further resolution through a transparent process. This process should include further scientific study into all currently available information by an independent body, and consultation with the above mentioned Aboriginal Parties on whose land the impacts could potentially occur.

In regard to the proposed changes to De Beers' Snap Lake Water License the NSMA voiced the following six (6) recommendations during the Public Hearing:

*Recommendation 1: Develop endpoints for future water discharge that are mutually agreed upon and will not cause harm to the fish and wildlife of Snap Lake and downstream, ensure these endpoints are verified through multiple peer reviewed scientific studies.*

*Recommendation 2: Require additional consultation and face-to-face meetings to occur with each Aboriginal party to further explain the quantity and quality of proposed mine effluent, how the environment will be protected, and what technology will be installed when.*

*Recommendation 3: Require additional water treatment technology be installed by De Beers to reduce total dissolved solids in mine effluent to meet effluent quality criteria that is proven to protect the health of the aquatic environment.*

*Recommendation 4: Require a dedicated site inspector be employed by the Government of the Northwest Territories for the life of the Project and ensure communication with the existing independent monitoring body SLEMA be continued as well as with Aboriginal parties.*

*Recommendation 5 (developed since new information was learned by the NSMA in the recent Snap Lake Working Group): Require that De Beers develop, with stakeholders, an official management strategy which includes a set of precautionary response steps to predict, identify, and manage for increasing trends in TDS.*

*Recommendation 6: Require an additional third-party, unbiased scientific study be conducted to review all current and available data, and communicate the findings of this study to related Aboriginal parties.*

These recommendations remain valid concerns for the NSMA following information gained during the Hearing. The NSMA encourages the Board to address any identified gaps from the public hearing, and use all newly provided information while making its determination to ensure that the Water License retains a sustainable and environmentally protective design. De Beers has discussed the installation of a water treatment plant at Snap Lake, but to date little is known on what this may mean. Unless all pilot study information into water treatment options is available, making an informed decision on what level effluent is reasonable achievable is not possible.

The above comments and recommendations summarize what the NSMA wishes to see the Mackenzie Valley Environmental Impact Review Board require of DeBeers respecting the latter's proposed alterations to the existing Water License. It is, in addition, NSMA's wish that DeBeers operates the Snap Lake mine in a sustainable manner that achieves a good return on its investment while preserving the health of the land and water and the species that depend on it.

We thank you for listening to our concerns and we look forward to continued involvement in this process.

Sincerely,



Matt Hoover  
Regulatory Analyst  
North Slave Métis Alliance