



November 9, 2012

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Mackenzie Valley Environmental Impact Review Board  
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Dear Mr. Hubert:

**Technical Report Responses – Government of the Northwest Territories**

De Beers is pleased to provide the Mackenzie Valley Environmental Review Board with Responses to the Technical Submission from the Government of the NWT dated October 25, 2012.

Should you have any questions regarding this submission, please contact our office.

Regards,

Veronica Chisholm  
Permitting Manager

Attachment

c: Gavin More, Manager, Environmental Assessment & Monitoring, Government of the NWT





DE BEERS

CANADA

GAHCHO KUÉ PROJECT

**Government of the Northwest Territories**  
**Technical Report Responses**

**November**  
**2012**

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# **1 INTRODUCTION**

On October 25, 2012 the Government of the Northwest Territories (GNWT) submitted their technical report to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) for the De Beers Canada Inc. (De Beers) proposed Gahcho Kué Project (Project). This report provides responses to those recommendations outlined in the GNWT technical report (GNWT 2012).

## **2 GOVERNMENT OF THE NORTHWEST TERRITORIES RECOMMENDATIONS AND RESPONSES**

### **2.1 AIR QUALITY**

#### **2.1.1 Recommendation 1**

The GNWT recommends DBCI commit to develop and implement an AQEMMP and IMP in consultation with the GNWT and Environment Canada

#### **2.1.2 Response**

De Beers commits to implement the Air Quality and Emissions Monitoring and Management Plan (AQEMMP), and Incinerator Management Plan in consultation with the Government of the Northwest Territories (GNWT) and Environment Canada (EC). The plans have been developed in consultation with EC and GNWT in accordance with the commitment made by De Beers at the May 2012 technical session. The plans were submitted to the public registry in October 2012 (De Beers 2012a,b).

De Beers will continue consultation with GNWT and EC as the Project proceeds.

### **2.2 WILDLIFE**

#### **2.2.1 Recommendation 2 DBCI WMP Review**

- a. The GNWT recommends the effects follow-up programs be statistically robust and clearly indicate how DBCI will test the predictions made in the Gahcho Kue project EIS. Programs need to include detailed objectives, study designs, and an overview of how the data will be used to gauge mine effects (or lack thereof) and explain the linkages between local and regional monitoring programs.
- b. The GNWT believes that some effects follow-up programs might be needed after the closure of the mine. GNWT recommends that these specific programs be included in the closure and post closure plans.
- c. The GNWT recommends that DBCI and the GNWT enter into an MOU that provides further clarity on how DBCI and GNWT can collaborate on regional wildlife monitoring programs and cumulative effects assessments.

## **2.2.2 Response**

De Beers agrees and has submitted a robust Wildlife Effects Monitoring Program (WEMP) to the public registry on October 4, 2012 (De Beers 2012c). De Beers expects that wildlife monitoring may be necessary into the closure phase and this has been identified within the WEMP already submitted. De Beers and the GNWT are currently developing a memorandum of understanding (MOU) to clarify roles and responsibilities with respect to the WEMP and consultation will continue on adaptive management and to refine details as needed. De Beers will continue to work collaboratively with the GNWT to refine and adapt study designs for the Project.

## **2.2.3 Recommendation 3 Barren Ground Caribou**

If DBCI does test for a ZOI, then the GNWT recommends that DBCI design a monitoring program using standardized protocols to properly assess if there is a ZOI around the Gahcho Kue project for caribou. This program could be expanded on to include determining if caribou behaviour changes in relation to mining activity and if a given mitigation strategy is effective at reducing ZOI. If DBCI does not test for a ZOI, then the GNWT recommends DBCI clarify what ZOI will be used around the project itself and the associated winter access roads.

## **2.2.4 Response**

De Beers committed to monitoring of the zone of influence (ZOI) in the WEMP submitted to the public registry on October 4, 2012 (De Beers 2012c; also refer to response to Tłıchǫ Government Recommendation #13 [De Beers 2012d] and Yellowknives Dene First Nation Recommendation #8 [De Beers 2012e]).

## **2.2.5 Recommendation 4 Barren Ground Caribou**

GNWT recommends further discussion between GNWT and DBCI on how to collaborate on (a) the caribou monitoring program; and (b) the regional wolf monitoring program and wolf predation study as it relates to the Bathurst herd (see Recommendation #2c).

## **2.2.6 Response**

De Beers commits to additional discussions with the GNWT on (a) caribou monitoring program collaboration; and (b) the regional wolf monitoring program and wolf predation study as it relates to the Bathurst herd. De Beers and the GNWT are currently developing an MOU to clarify roles and responsibilities with respect to implementation of the WEMP.

### **2.2.7      Recommendation 5 Increased Access and Cumulative Effects**

The GNWT recommends DBCI work in collaboration with the GNWT, communities, and Aboriginal governments to jointly develop and implement a Road Access Management Plan to proactively address uncertainties about wildlife mortalities, harvest and other issues as they arise along the Gahcho Kue Winter Access Road.

### **2.2.8      Response**

De Beers has worked collaboratively with the GNWT, communities, and Aboriginal governments on the development of the WEMP. The WEMP includes Project Winter Access Road monitoring options. De Beers will continue to work with GNWT, communities and Aboriginal governments to address potential wildlife mortalities, harvest and other issues that may arise on the Project Winter Access Road.

### **2.2.9      Recommendation 6 Increased Access and Cumulative Effects**

GNWT recommends that any MOU between GNWT-ENR and DBCI provide clarity on how DBCI and GNWT-ENR can collaborate on the development and operation of check stations along the winter access road, and the development of public education programs and materials that emphasize respect for caribou and hunter excellence.

### **2.2.10     Response**

De Beers commits to working with GNWT-ENR to develop an MOU for collaborating on the development and operation of check stations along the Project Winter Access Road and the development of public education programs and materials that emphasize respect for caribou and hunter excellence.

### **2.2.11     Recommendation 7 Reporting and Adaptive Management**

The GNWT recommends DBCI further elaborate on the structure and function of the AMC, including describing how decisions will be made within the terrestrial sub-group and how these decisions may or may not alter programs that are set out in the WMP and WMMP.



## **2.2.12 Response**

De Beers is continuing dialogue with Aboriginal groups and GNWT on how the Adaptive Management Committee (AMC) proposal can be formatted to the mutual agreement of the parties.

## **2.2.13 Recommendation 8 Reporting and Adaptive Management**

The GNWT recommends DBCI describe its intended annual and periodic reporting procedures (particularly when DBCI will provide results from monitoring programs or evaluation by the AMC). The GNWT also recommends that monitoring results and analyses be completed prior to requesting the Annual Wildlife Research Permits for their upcoming field work.

## **2.2.14 Response**

De Beers commits to discuss opportunities to coordinate the timing of reporting with the GNWT and Aboriginal groups.

## **2.3 SOCIO-ECONOMICS**

### **2.3.1 Recommendation 9 Employment**

The GNWT recommends that the following issues be considered:

- information regarding quantitative Aboriginal and northern resident hiring predictions for each phase of the project.
- a forecast regarding how many workers and for which positions DBCI expects to hire southern workers for each phase of the project.
- development of apprentice and trade positions (EIS Table 12.7-1) in accordance with the requirements of the NWT *Apprenticeship, Trade and Occupations Certification Act* and including filling these positions further to the identified hiring priorities. (EIS 12.4.3).
- provision of employment, training and economic development end points in Table 12.5-1 of the EIS (page 12 -118)
- DBCI report on its recruitment and employment outcomes and other indicators as per Snap Lake.
- expansion of pickup points beyond the LSA.

- details and clarification with respect to the travel allowances and employment incentives and benefits for NWT-based employees as compared to employees living outside the NWT.

### 2.3.2 Response

The company is committed to recruiting and employing as many Aboriginal and Northwest Territories (NWT) residents as possible, building on our current experience with recruitment, training and development and retention strategies already implemented for the Snap Lake Mine.

De Beers believes a good measure against which it can assess its performance in employing Aboriginal and NWT residents is through the establishment of hiring priorities for the Project as noted in Section 12, Section 12.4.3 (De Beers 2010, page 12-106). De Beers has established hiring priorities and has committed to reporting on its employment by hiring priorities. Reporting will also be for gender across skill categories and job categories (see Tłıchǵ Government Round 1 Information Request Responses TG\_18 and TG-35 in De Beers 2012f).

During the life of the Project, De Beers commits to supporting training positions at the Project. These will include apprenticeships, trades training positions and the development of professional occupations. The company will assess where these placements will occur as part of its annual business planning process. De Beers will report annually regarding the number of current and cumulative placements in these training positions by hiring priority.

Determining measurement endpoints for employment, training and economic development for the purpose of predictive impact assessments can be problematic (as noted in response to Tłıchǵ Government Round 1 Information Request TG\_34 [De Beers 2012f]). To identify a precise employment endpoint, the developer would have to include considerations for all of the variation<sup>1</sup> in demand for and supply of labour for each year the Project is scheduled to be open. With each successive year, this variance becomes wider and wider, and predicted endpoints become less accurate and of less use. The same can be said for education and training opportunities, and the persistence of economic sustainability as related to the Project and Project employment. As such, it would not be appropriate to establish endpoints for the purpose of the EIS.

In each year of operations, however, it is reasonable to establish reporting endpoints for employment, training and economic development, as variability is

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<sup>1</sup> Variations are predominantly related to the supply of labour, the willingness of the available labour force to work, other fluctuations in the labour market, the availability of goods and services from year to year, fluctuations in the NWT economy, high school graduation rates, and changes in closure schedules at other NWT mines.

limited throughout the course of a year. Endpoints are known based on human resources monitoring conducted by the developer. To this end, De Beers has included the reporting end points for employment, training and economic development in the table below (adapted from Section 12.5, Table 12.5-1 reflected on Page 12-118 of the 2010 EIS [De Beers 2010]).

**Table GNWT 9-1 Employment, Training and Economic Development Valued Components and Reporting Endpoints**

Key Line of Inquiry / Subject of Note	Valued Component	Assessment End Points	Reporting End Points
Employment, Training and Economic Development	Employment Training Procurement Government Payments	Persistence of economic sustainability in the NWT Persistence of jobs and income for individuals and contractors Continued Opportunities for education, training and development of new skills on project related trades and careers	Number of NWT Residents and Aboriginals hired and employed by De Beers and its contractors Number of NWT Residents and Aboriginals participating in and completing trades training programs and apprenticeships Purchases of goods and services through or from NWT and Aboriginal Businesses Report on the gross value of goods and services purchased annually

With respect to reporting on recruitment and employment and procurement outcomes, De Beers commits to report publicly on the following (also see Tłıchǵ Government Round 1 Information Request Responses TG\_18 and TG-35 in De Beers 2012f):

- Hiring by Hiring Priority and job category in total numbers and percentage of total hires.
- Hiring by NWT community in total numbers and percentage of total hires.
- Total employment in person years by hiring priority and job category in total numbers and percentage of the workforce.
- Total employment in person years by NWT community in total numbers and percentage of the workforce.
- Participation in and results of training activities undertaken by the company to increase NWT and Aboriginal employment in the Project.
- Report on the gross value of goods and services purchased annually.

De Beers will have pickup locations and travel allowances such that these optimise the employment of NWT residents.

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### **2.3.3      Recommendation 10 Contractor Hiring and Employment**

The GNWT recommends that the following issues be considered:

- monitoring and reporting of contractor employment data and the programs and practices put in place to support training and development of a skilled northern workforce, including apprentices, be provided annually.
- clarification on the process that DBCI will use to ensure that contractors meet employment and recruitment commitments made by DBCI.

### **2.3.4      Response**

De Beers has outlined in response to GNWT Recommendation #9 above, proposed reporting with respect to employment, training and development of the skilled northern workforce.

De Beers will require its contractors to provide all relevant information to allow for reporting on hiring and employment according to the hiring priorities. De Beers will also work with its contractors to obtain information annually regarding their training with respect to training and apprenticeships for NWT residence. This information will be included in the annual report produced by De Beers and made available to the public.

De Beers, through the tendering and contracting process, will:

- Require all Contractors to outline in their bids, a plan to hire and develop Aboriginal and NWT Resident employees in accordance with the Hiring Priorities set out in Section 12.4.3 (De Beers 2010).
- Include in the bid evaluation an assessment of the Contractors plan for the above.
- Incorporate into the contract document for the successful bidder, commitments to report on the employment data required by De Beers to provide the Project hiring and employment information by hiring priority, heritage and gender.
- Meet at least annually with contractors to review their performance, including their success in contributing to the employment of Aboriginal and NWT residents and to discuss ways to work together to grow Aboriginal and NWT resident participation in the Project.

### **2.3.5      Recommendation 11 Closure**

The GNWT recommends that the following issues be considered:

- temporary layoff notification by DBCI and its contractors to the GNWT.
- that DBCI and the GNWT work together to ease employees' transition to new jobs upon closure.

### **2.3.6      Response**

De Beers understands that all employees need the ability to quickly respond to manage the impact of lost employment. The company also understands that services provided by the GNWT are in place to help NWT resident employees in such circumstances. In the case of temporary closure, De Beers will, where operationally feasible, collaborate with the GNWT so the GNWT can optimize its preparedness for NWT resident employees affected by a temporary closure. With respect to permanent closure, De Beers will meet legislative requirements and will collaborate with the GNWT leading up to permanent closure to ease employee transition to new jobs.

### **2.3.7      Recommendation 12 Education, Training and Professional Development**

The GNWT recommends that the following issues be considered:

- provide information about as well as monitor and report on the outcomes of its programs and initiatives including, but not limited, to recruitment, scholarships, apprentices, advancement and promotion of women and northerners, outreach activities, etc. as identified and committed to in the *Gahcho Kue Project Human Resource Strategy* (2012).
- provide further details about its Leadership Development Program and the Needs Assessment. (Human Resources Tactic #21 and #13).
- continue to work with the GNWT and other organizations to plan, design and co-ordinate the delivery of education and literacy, pre-employment and on-the-job training, skill development, professional development and other related programs and services that support and inform employment and northern labour market development.
- provide details of the human resources development, orientation and training plans that expand upon the tactics identified in the *Gahcho Kue Project Human Resource Strategy* (2012)

### 2.3.8 Response

De Beers will monitor and report on the outcomes of its programs and initiatives identified and committed to in the *Gahcho Kué Project Human Resource Strategy* (De Beers 2012g).

De Beers' goal in delivering a leadership development program is to grow effective leaders who create an adaptive and creative means of motivating, influencing and energizing the people who report to them with a view towards sustaining a safe and high performance working environment. At De Beers, the Leadership Program is a combination of in-house delivered training along with other specialized training procured from time to time depending on the leadership skills being developed and the business challenges we are facing.

De Beers made reference in its Human Resource Strategy to conducting a training needs assessment (De Beers 2012g). The technical and operational needs of the organization will vary, based on the mining related economics and business landscape in effect at any given time as well as on the skills the company has in its workforce and the new skills it needs to develop to meet its business objectives, which include retaining and developing its workforce. De Beers will continue to collaborate with the GNWT and others on initiatives to plan, design and coordinate the delivery of education and literacy, pre-employment and on-the-job training, skill development, professional development and other related programs and services that support and inform northern labour market development.

De Beers notes that its human resource development, orientation and training plans are outlined in the tactics articulated in the Human Resource Strategy (De Beers 2012g). We have provided more details regarding the needs assessment and leadership development above. Details for each aspect and tactic of the strategy including training are being refined as part of the company's operational readiness planning that is ongoing and advancing as the Project advances in the regulatory process. The general training orientation for the Project will be similar to that of the Snap Lake Mine orientation, as all employees will be oriented to the same company, values, and policies, however it will be specific to open pit mining.

### **2.3.9      Recommendation 13 Culture, Heritage and Archaeology**

The GNWT recommends that the following issues be considered:

- DBCI continue to work with the local government, employees, community members and the GNWT in ongoing support of traditional language use and cultural pursuits, as feasible, and the conservation and preservation of traditions, heritage and archaeological sites; and
- these activities be part of the DBCI socio-economic monitoring plan and used to inform strategies, policies and procedures.

### **2.3.10    Response**

De Beers will continue to work with the GNWT and Aboriginal communities to promote cultural preservation, sustainability and traditional language use. These activities will be part of the socio-economic monitoring plan. De Beers will report annually on its activities.

### **2.3.11    Recommendation 14 Culture, Heritage and Archaeology**

The Prince of Wales Northern Heritage Centre recommends DBCI immediately implement the October 2012 *Archaeological Management Plan*.

### **2.3.12    Response**

De Beers has implemented the October 2012 Archaeological Management Plan as part of the operational readiness for the 2013 Winter Road.

### **2.3.13    Recommendation 15 NWT Business Development**

It is recommended that NWT Business Procurement commitments be addressed:

- contractors will adhere to the commitments made by DBCI.
- local, Aboriginal and northern businesses remain the priority for contractors as they are for DBCI.
- northern businesses will be given full and fair opportunity, despite the additional contractor conditions.
- detail on how DBCI will ensure that contractors will implement DBCI's business priority given the expectations on contractor conditions.
- updated procurement and business development strategy.

- prediction of purchases from northern businesses.
- specify adaptive management measures to be applied under the procurement and business development strategies.

### 2.3.14 Response

As noted by the GNWT in their Technical Report submission, *“the NWT Business Policy applied at the Snap Lake Mine has proven successful for northern businesses, so extending this Policy to Gahcho Kué will continue to provide positive results. The NWT Business Policy, as well as results from the business interview, demonstrates that DBCI is willing to provide procurement benefits locally and that the local community is ready to grow with increased demand”* (GNWT 2012).

De Beers would like to clarify that priority will continue to be given to NWT and Aboriginal businesses for the Project and that De Beers’ existing NWT Business Policy will continue to apply to the Project.

The general criteria outlined in the existing De Beers’ NWT Policy are not new conditions and have and will continue to apply to the Project. De Beers has always expected companies bidding on opportunities will meet the general criteria of being cost competitive, delivering quality service and goods, ability to meet the technical specifications of prescribed goods and services, ability to supply and deliver the required goods and services, timely delivery, and have a proven safety, health and environmental performance record. As noted in De Beers’ response to Round 1 Information Request GNWT 9 (De Beers 2012h), after more than ten years of supplying goods and services to the diamond industry, NWT and Aboriginal businesses have developed a complement of skills and business capacity to address the needs of De Beers and the mining industry in general. It is the degree of northern and Aboriginal participation in the business bid that is the opportunity to score additional points for a northern business that is seeking to pursue business opportunities with De Beers. This is what ensures northern and Aboriginal businesses will be given full and fair opportunity to compete, as well as an opportunity to score higher for being northern and/or Aboriginal business. This approach ensures excellence in service support, economies of scale to address our purchasing requirements and it positions NWT and Aboriginal businesses for success beyond the Project.

De Beers’ procurement strategy was articulated in the company’s response to Round 1 Information Request GNWT 9 (De Beers 2012h). The strategy is to continue implementation of the existing NWT Business Policy for the Project and to use a competitive evaluation and adjudication system for the procurement of



goods and services, while including in the system extra points for having Aboriginal or northern content in the bid.

As noted by the GNWT, De Beers' track record with the Snap Lake Mine continues to demonstrate a commitment to sustainable development. The company is procuring close to 70% of its goods and services from NWT Businesses. While we are unable to predict which NWT and Aboriginal businesses may choose to bid on our Project business opportunities. De Beers, however, anticipates that the procurement of goods and services will follow a similar pattern to the Snap Lake experience, given that the same policy will be implemented, which was designed to maximize the involvement of NWT and Aboriginal businesses in a competitive setting.

De Beers commits to source our procurement needs from NWT and Aboriginal Businesses as much as possible for the Project and to working in collaboration to help them pursue new business opportunities with the Project.

De Beers will report annually on the purchases of goods and services through or from NWT and Aboriginal Businesses. Adaptive management measures are articulated in De Beers NWT Business Policy.

### **2.3.15 Recommendation 16 Monitoring and Follow-up**

1. The GNWT recommends DBCI report publically annually on the following, in addition to the above indicators:
  - total number of NWT resident employees who resigned or who were laid off, fired or otherwise terminated in the previous year;
  - gross value of goods and services purchased during the calendar year by major category or purchase in relation to each phase of the project. ('Purchases' based on the gross value of all purchases of goods and services including both goods and services produced in the NWT and goods and services produced outside the NWT that are purchased through NWT businesses); and
  - business opportunities forecast and assessment for the upcoming year.

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## 2.3.16 Response

De Beers has committed, in response to Tłıchǫ Government Round 1 Information Request TG\_35 (De Beers 2012f) and in the Gahcho Kué Project Human Resource Strategy (De Beers 2012g), to reporting on:

- Hiring by Hiring Priority and job category, in total numbers of percentage of total hires.
- Hiring by NWT Community in total numbers and percentage of total hires.
- Total employment in person years by Hiring Priority and job category in total numbers and percentage of the workforce.
- Total employment in person years by NWT Community in total numbers and percentage of the workforce.
- Participation in and results of training activities undertaken by the company to increase NWT and Aboriginal employment in the Project.

De Beers is committed to and believes it is meaningful and valuable to meet with communities, governments and others to discuss the hiring and retention challenges the company is facing and to identify through collaboration, opportunities to work together to address such challenges, rather than to report on the NWT resident employees who resigned, were laid off, fired or otherwise terminated in the previous year.

As noted above in response to GNWT Recommendation #15, De Beers will report annually on the purchases of goods and services through or from NWT and Aboriginal Businesses. This reporting will be in the same format the company currently reports for the Snap Lake Mine.

In accordance with NWT Business Policy, De Beers' has established and maintains a position with the key role and responsibility of working with NWT and Aboriginal Businesses. In addition, consistent with the policy, De Beers will inform Aboriginal and NWT Businesses of our business opportunities first, as a measure to assist them in to prepare competitive bids.

### **2.3.17 Recommendation 17 Monitoring and Follow-up**

2. The GNWT recommends that DBCI publicly report its results each year and to distribute a copy of the report to both the GNWT and to affected communities.

### **2.3.18 Response**

De Beers will publicly report its results each year, and will distribute the report to the GNWT and to the communities in the Local Study Area.

### **2.3.19 Recommendation 18 Monitoring and Follow-up**

3. The GNWT recommends that a formal follow-up program, in the form of a SEA between the GNWT and DBCI, be a condition of project approval for the Gahcho Kue Project.

### **2.3.20 Response**

De Beers confirmed with the GNWT on May 17, 2012 the intention to proceed with negotiation of a Socio Economic Agreement for the Project. On August 30, 2012, De Beers and the GNWT met and De Beers confirmed our intention to negotiate a Socio Economic Agreement for the Project. At that time, the GNWT had not yet received a mandate to proceed with such an agreement. De Beers is pleased to report that on November 2, 2012 the company received a letter from the GNWT, dated October 29, 2012 confirming the GNWT is now ready to proceed with the negotiation of such an agreement. De Beers looks forward to concluding such an agreement for the Project.

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## **4 ACRONYMS AND ABBREVIATIONS**

AMC	Adaptive Management Committee
AQEMMP	Air Quality and Emissions Monitoring and Management Plan
DBCI	De Beers Canada Inc.
De Beers	De Beers Canada Inc.
EC	Environment Canada
GNWT	Government of the Northwest Territories
GNWT-ENR	Government of the Northwest Territories Environment and Natural Resources
IMP	Incinerator Management Plan
MOU	memorandum of understanding
MVEIRB	Mackenzie Valley Environmental Impact Review Board
NWT	Northwest Territories
Project	Gahcho Kué Project
WMMP	Wildlife Effects Mitigation and Management Plan
WMP	Wildlife Monitoring Program
YKDFN	Yellowknives Dene First Nation
ZOI	zone of influence