



Tłıcho Government

RE: EIR0607-001 [2006]

Mackenzie Valley Environmental Impact Review Board  
200 Scotia Centre  
Box 938, 5102-50th Ave  
Yellowknife, NT X1A 2N7

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July 16, 2012

Dear Panel Manager:

The Mackenzie Valley Environmental Impact Review Board has asked for questions on specific topics regarding the Gahcho Kue mine (EIR 0607-001 (2006)). The Tłıcho Government has questions specifically on environmental monitoring, flowing from the specific suggestions that De Beers has made about the Environmental Monitoring and Management Framework (EMMF).

The Tlıcho Government notes that this EMMF does not match the standards that have been set through various exiting agencies. Rather than responding specifically to the suggested framework, the Tlıcho Government will submit suggestions to the public record on key components of a framework.

There are, however, specific questions about the relationship between the existing and proposed mine, given they will be run by the same developer. We have posed these questions to the company, the GNWT, AANDC, DFO and Environment Canada.

Thank you for the opportunity to contribute on this topic.

In Tłıcho Unity,

Laura Duncan  
Tłıcho Executive Officer

**IR Number:** TG-1

**Source:** Tłıchǫ Government

**To:** DeBeers Canada

**Subject:** Incorporation of Traditional Knowledge in WEMP through life of mine

**Preamble:**

In May 2012, DeBeers Canada submitted the Environmental Monitoring and Management Framework (EMMF) to the public registry; which outlined in limited detail, the functional integration of monitoring programs within an adaptive management approach (p.3). The document has one short paragraph in which it discusses Traditional Knowledge by saying "Where provided, TK will be used to improve monitoring programs and management practices" (p. 6).

Under the Snap Lake Agreement, De Beers has the responsibility to ensure the "integration of traditional knowledge of the nearby Aboriginal peoples in the mine's environmental plans" (Snap Lake Environmental Agreement).

Tłıchǫ knowledge and science both have an important role to play in the monitoring programs that are developed for this mine. Understandably, the holders of these different knowledge systems are specialists in their own right and each deserves equal respect and recognition; and their voices and depth of knowledge must be taken into equal and meaningful consideration in the development of these monitoring programs.

In a letter dated June 15, 2012 the proponent responded to a commitment made at the Technical Sessions held May 22 to 25, 2012, whereby:

DeBeers to commit to forming a working group – with the communities and regulators – to develop a management framework for the WEMP, and hosting a workshop – mid to late September.

In this letter, the proponent invited participants who attended a follow up meeting on the afternoon of May 25 to be the working group representatives and in September a workshop will be held, which will be open a "broader audience, including additional Aboriginal Representation". In a follow up letter dated July 9, the proponent has confirmed representatives from all groups, but makes a point that "the WMP Working Group discussions are expected to be technical and as such it is recommended that participants have an appropriate level of technical expertise".

**Requests:**

1. Please explain in detail how the developer will ensure meaningful incorporation of Traditional Knowledge in a structured and formal way, into the WEMP.
2. Please how other environmental programs, such as closure plans, developed at the outset and through life of mine will meaningfully engage Traditional Knowledge.

**IR Number:** TG-2

**Source:** Tłıchǫ Government

**To:** DeBeers Canada

**Subject:** Relationship between Snap Lake Environmental Monitoring Agency and Gahcho Kue body

**Preamble:**

Under the Snap Lake Environmental Agreement, the Snap Lake Environmental Agency was formed to ensure the environmental integrity of the Snap Lake area. This agency has responsibilities for:

- a) Reviewing and commenting on the design of monitoring and management plans and the results of these activities;
- b) Monitoring and encouraging the integration of traditional knowledge of the nearby Aboriginal peoples in the mine's environmental plans;
- c) Acting as an intervener in regulatory processes directly related to environmental matters involving the Snap Lake Project and its cumulative effects;
- d) Bringing concerns of the Aboriginal peoples and general public to De Beers Canada Mining Inc and government;
- e) Keeping Aboriginal peoples and the public informed about Agency activities and findings, and
- f) Writing an Annual Report with recommendations that require the response of De Beers Canada Mining Inc. and / or government.

The Snap Lake mine and the proposed mine, operated both by De Beers, are very close together.

**Requests:**

1. Will the proponent please describe the proposed relationship between the existing SLEMA and any new authority? Has the proponent considered having one authority or agency to ensure environmental integrity? Can the proponent provide insight into how the mechanisms of environmental monitoring can be implemented without duplication or replication?
2. What is De Beers' current position towards a multi-project environmental monitoring agency?

**IR Number:** TG-3

**Source:** Tłıchǫ Government

**To:** GNWT

**Subject:** Relationship between Snap Lake Environmental Monitoring Agency and Gahcho Kue body

**Preamble:**

Under the Snap Lake Environmental Agreement, the Snap Lake Environmental Agency was formed to ensure the environmental integrity of the Snap Lake area. This agency has responsibilities for:

- a) Reviewing and commenting on the design of monitoring and management plans and the results of these activities;
- b) Monitoring and encouraging the integration of traditional knowledge of the nearby Aboriginal peoples in the mine's environmental plans;
- c) Acting as an intervener in regulatory processes directly related to environmental matters involving the Snap Lake Project and its cumulative effects;
- d) Bringing concerns of the Aboriginal peoples and general public to De Beers Canada Mining Inc and government;
- e) Keeping Aboriginal peoples and the public informed about Agency activities and findings, and
- f) Writing an Annual Report with recommendations that require the response of De Beers Canada Mining Inc and / or government.

The Snap Lake mine and the proposed mine, operated both by De Beers, are very close together.

**Request:**

1. Will the GNWT please describe the proposed relationship between the existing SLEMA and any new authority? Has the GNWT considered having one authority or agency to ensure environmental integrity? Can the GNWT provide insight into how the mechanisms of environmental monitoring can be implemented without duplication or replication?
2. What is GNWT's current position towards a multi-project environmental monitoring agency?

**IR Number:** TG-4

**Source:** Tłıchǫ Government

**To:** AANDC

**Subject:** Relationship between Snap Lake Environmental Monitoring Agency and Gahcho Kue body

**Preamble:**

Under the Snap Lake Environmental Agreement, the Snap Lake Environmental Agency was formed to ensure the environmental integrity of the Snap Lake area. This agency has responsibilities for:

- g) Reviewing and commenting on the design of monitoring and management plans and the results of these activities;
- h) Monitoring and encouraging the integration of traditional knowledge of the nearby Aboriginal peoples in the mine's environmental plans;
- i) Acting as an intervener in regulatory processes directly related to environmental matters involving the Snap Lake Project and its cumulative effects;
- j) Bringing concerns of the Aboriginal peoples and general public to De Beers Canada Mining Inc and government;
- k) Keeping Aboriginal peoples and the public informed about Agency activities and findings, and
- l) Writing an Annual Report with recommendations that require the response of De Beers Canada Mining Inc and / or government.

The Snap Lake mine and the proposed mine, operated both by De Beers, are very close together.

**Request:**

1. Will AANDC please describe the proposed relationship between the existing SLEMA and any new authority? Has AANDC considered having one authority or agency to ensure environmental integrity? Can AANDC provide insight into how the mechanisms of environmental monitoring can be implemented without duplication or replication?
2. What is AANDC's position towards a multi-project environmental monitoring agency?

**IR Number:** TG-5

**Source:** Thich Government

**To:** Environment Canada

**Subject:** Reduction of duplication

**Preamble:**

Under the Snap Lake Environmental Agreement, the Snap Lake Environmental Agency was formed to ensure the environmental integrity of the Snap Lake area. This agency has responsibilities for:

- m) Reviewing and commenting on the design of monitoring and management plans and the results of these activities;
- n) Monitoring and encouraging the integration of traditional knowledge of the nearby Aboriginal peoples in the mine's environmental plans;
- o) Acting as an intervener in regulatory processes directly related to environmental matters involving the Snap Lake Project and its cumulative effects;
- p) Bringing concerns of the Aboriginal peoples and general public to De Beers Canada Mining Inc and government;
- q) Keeping Aboriginal peoples and the public informed about Agency activities and findings, and
- r) Writing an Annual Report with recommendations that require the response of De Beers Canada Mining Inc and / or government.

The Snap Lake mine and the proposed mine, operated both by De Beers, are very close together. Some consideration has gone into the creation of environmental monitoring through technical sessions.

**Request:**

1. Can Environment Canada provide insight into how the mechanisms of environmental monitoring can be implemented without duplication or replication?
2. What are Environment Canada's thoughts on a multi-project environmental monitoring agency?

**IR Number:** TG-6

**Source:** Tłıchǫ Government

**To:** Department of Fisheries and Oceans (DFO)

**Subject:** Reduction of duplication

**Preamble:**

Under the Snap Lake Environmental Agreement, the Snap Lake Environmental Agency was formed to ensure the environmental integrity of the Snap Lake area. This agency has responsibilities for:

- s) Reviewing and commenting on the design of monitoring and management plans and the results of these activities;
- t) Monitoring and encouraging the integration of traditional knowledge of the nearby Aboriginal peoples in the mine's environmental plans;
- u) Acting as an intervener in regulatory processes directly related to environmental matters involving the Snap Lake Project and its cumulative effects;
- v) Bringing concerns of the Aboriginal peoples and general public to De Beers Canada Mining Inc and government;
- w) Keeping Aboriginal peoples and the public informed about Agency activities and findings, and
- x) Writing an Annual Report with recommendations that require the response of De Beers Canada Mining Inc. and / or government.

The Snap Lake mine and the proposed mine, operated both by De Beers, are very close together. Some consideration has gone into the creation of environmental monitoring through technical sessions.

**Request:**

1. Can Environment Canada provide insight into how the mechanisms of environmental monitoring can be implemented without duplication or replication?
2. What are DFO considerations with respect to the possibility of a multi-project environmental monitoring agency?