

WORKING WITH THE PEOPLE FOR THE ENVIRONMENT



July 4, 2019

Mark Cliffe-Phillips
Executive Director
Mackenzie Valley Environmental Impact Review Board
P.O. Box 938
Yellowknife, NT X1A 2N7

Re: EMAB Response to MVEIRB Information Request of April 29, 2019

EMAB would like to thank the Mackenzie Valley Environmental Impact Review Board (MVEIRB) for its information request regarding closure options. EMAB has reviewed the questions

1. When determining if the pits should be reconnected to Lac de Gras at closure, is water quality in the pit lake the only criteria that should be considered?
2. If not, please describe what additional criteria for re-connection should be considered.

and submits the following responses:

EMAB agrees that water quality in the pit lake is the most critical criterion that needs to be considered in determining whether the pits should be re-connected with Lac de Gras.

Criteria for re-connection of the pit lakes based on Traditional Knowledge should also be developed and given full consideration. Ideally these would be developed by Traditional Knowledge holders and reviewed and ratified by Affected Communities; the Traditional Knowledge Panel administered by Diavik would be a way to develop proposed criteria (EMAB notes that the Panel has explicitly stated that it does not represent the communities).

Other considerations that should be taken into account include:

- loss of fish habitat if one or more pits are not re-connected with Lac de Gras;
- potential to increase loadings associated with the pits, including porewater from processed kimberlite;
- sediment quality in areas potentially used by fish and other aquatic life;
- physical stability of pit walls in relation to safety of humans and wildlife who may use the pit lake area post-closure, as well as in relation to potential for a collapse that could result in mixing of contaminated porewater with the rest of the water in the pit lake;
- adequate characterization of the water quality in the pits, and trends over time, through a comprehensive monitoring program, prior to making the decision to re-connect; and
- a detailed description of all mitigation and monitoring measures to be implemented in the case of a sudden deterioration of water quality due to porewater mixing with the pit water.

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I hope this response is useful. If you require further information please contact John McCullum at the EMAB office.

Sincerely,

Charlie Catholique
Vice-Chair

Cc Board Members and Alternates (by email)
Parties to the Environmental Agreement (by email)
Catherine Fairbairn, MVEIRB (by email)
Kate Mansfield, MVEIRB (by email)
Ryan Fequet, Executive Director, WLWB (by email)