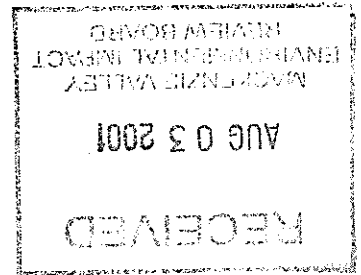




Northwest Territories Resources, Wildlife and Economic Development



AUG 03 2001

Mr. Louie Azzolini
Mackenzie Valley Environmental Impact Review Board
BOX 938
YELLOWKNIFE NT X1A 2N7

Dear Mr. Azzolini:

**Government of the Northwest Territories (GNWT) Comments on the
Draft Terms of Reference for De Beers' Snap Lake Project**

The GNWT has reviewed the above document circulated by the Mackenzie Valley Environmental Impact Review Board on June 21, 2001. Please find enclosed the comments submitted by the GNWT for the consideration of the Review Board.

Thank you for the opportunity to provide these comments on the draft terms of reference. The GNWT looks forward to working with the Review Board towards the timely and thorough completion of this environmental assessment.

Sincerely,


Robert McLeod
Deputy Minister

Enclosure

c. Mr. Brett Hudson
Environmental Assessment Analyst, RWED



GNWT Comments on the Draft Terms of Reference for De Beers Canada Mining Inc.'s Snap Lake Project

The Government of the Northwest Territories (GNWT) has reviewed the Draft Terms of Reference for the above project that were distributed by the Review Board on June 21, 2001, and respectfully submits the following comments for consideration by the Review Board.

Section 3.1

The environmental assessment should be conducted in accordance with s. 115 of the *Mackenzie Valley Resource Management Act* (MVRMA), as well as with s. 126. This would explicitly acknowledge the Review Board's responsibility to conduct the assessment with a view towards the protection of the social, economic and cultural well being of the residents and communities of the Mackenzie Valley.

Section 3.3

The reference to The Department of Resources, Wildlife, and Economic Development should be changed to "The Government of the Northwest Territories".

Section 4.1.5

The GNWT would prefer that the proponent be required to provide a description of the existing biophysical and socio-economic environment, and similarly, to include a discussion of impacts or effects on the socio-economic environment.

Section 5.2.2

Lines 46 and 47 are duplicate to lines 51 and 52.

Section 5.3

The word "drilling" should be deleted.

The GNWT suggests that the proponent be directed to detail the expected gross quantity and value of the resources being developed over the predicted life of the mine.

Section 5.5

De Beers should also provide a sufficient base for the prediction of positive and negative impacts, and the extent to which negative impacts may be mitigated and positive impacts enhanced; by planning, development design, etc.

De Beers should also be required to provide a summary of all corporate policies and programs that bear on the expected environmental and socio-economic impacts of the project, including environmental management policies, northern hiring and business participation policies and programs, etc.

Section 5.5.1

The GNWT would like the Board to add a ninth section under alternatives, directing the proponent to discuss the options De Beers is considering for sorting and marketing the diamonds mined at Snap Lake. This should include a clear delineation of the options considered and the reason for selecting the preferred option.

Section 5.5.3

The scope of the assessment for socio-economic variables should include all those communities that could reasonably expect to experience impacts as a result of the project, including but not limited to, increased traffic volumes or employment and business opportunities.

Line 260 should direct the proponent to distinguish between biophysical and social, cultural, and economic parameters.

Section 5.6.1

The list of greenhouse gases provided does not mention CO₂.

Section 5.6.4

The GNWT requests that the proponent be directed to discuss the alternative water treatment options that could feasibly be employed at the Snap Lake project for any mine water, waste rock seepage, or process water that will be discharged into Snap Lake.

Section 5.6.6

The GNWT would like to note that the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) has changed their species listings. The "Endangered" and "Threatened" listings remain the same, however, the "Vulnerable" listing has been changed to "Special Concern". Please refer to the website, www.cosewic.gc.ca, for further information.

The GNWT requests that the MVEIRB alter the Terms of Reference to reflect COSEWIC's changes; the proponent should give special consideration to species identified in COSEWIC's listing as "Endangered", "Threatened" and of "Special Concern". The GNWT has attached a copy of the updated NWT Species on the COSEWIC At-Risk List.

Section 5.7.1

The GNWT requests that this section be revised to include a description of potential impacts on the cultural well being of the impacted communities, for example in terms of social cohesiveness or language use (Line 363).

Section 5.7.2

Delete areas from line 373.

Section 5.7.3

The GNWT suggests the following changes to the section on Economy:

- IV. opportunities to diversify the northern economic base or to produce and supply new goods and services;
- V. barriers to employment, advancement, and retention of northern workers, including the training or retraining necessary for sections of the northern workforce to meet De Beers employment standards (i.e. former Con or Giant employees);
- X. economic diversification and sustainable development;
- XI. impacts on the national and territorial Gross Domestic Product (GDP);
and
- XII. discuss probability and any effects of employee migration into or out of NWT communities.

Section 5.7.4

The environmental assessment report shall analyse the potential development impacts on human physical and mental health, as they relate to the proposed development, its employees, their families, and community health and well being.

Section 5.7.5

Assess the impacts of the proposed development on revenues, costs, and net income accruing to Federal and Territorial governments. Report the (delete "non economic") benefits or costs to these governments.

Section 5.9

The proponent should be directed to examine the cumulative effects of the project in combination with existing tourism operations in the region, as well as with those of the other mines.

5.10

De Beers should provide a description of regulations (regulatory framework), industry standards and government agreements that are needed with respect to the closure phase of the proposed development, including plans for mitigating the social and economic impacts of mine closure.

NWT SPECIES ON THE COSEWIC LIST

as of May 2001

Terrestrial Mammals

Endangered

- 1.1 - Peary Caribou (*Rangifer tarandus pearyi*); Banks Island population
- 1.2 - Peary Caribou (*Rangifer tarandus pearyi*); High Arctic population

Threatened

- 1.3 - Peary Caribou (*Rangifer tarandus pearyi*); Low Arctic population
- 2 - Wood Bison (*Bison bison athabasca*)
- 1.4 - Woodland Caribou¹ (*Rangifer tarandus caribou*); Boreal population

Special Concern

- 3 - Grizzly (*Ursus arctos*)
- 4 - Polar Bear (*Ursus maritimus*)
- 5 - Wolverine (*Gulo gulo*); Western population

Marine Mammals

Endangered

- 6 - Bowhead Whale (*Balaena mysticetus*); Western Arctic populations

Birds

Endangered

- 7 - Eskimo Curlew (*Numenius borealis*)
- 8 - Whooping Crane (*Grus americana*)

Threatened

- 9.1 - Peregrine Falcon (*Falco peregrinus anatum*); subspecies anatum

Special Concern

- 10 - Ivory Gull (*Pagophila eburnea*)
- 11 - Ross' Gull (*Pagophila rosea*)
- 9.2 - Peregrine Falcon (*Falco peregrinus tundrius*); subspecies tundrius
- 12 - Short-eared Owl (*Asio flammeus*)
- 13 - Yellow Rail (*Coturnicops noveboracensis*)

Freshwater Fishes

Threatened

- 14 - Shortjaw Cisco (*Coregonus zenithicus*)

Special Concern

- 15 - Fourhorn Sculpin (*Myoxocephalus quadricornis*); Arctic Islands freshwater form

Marine Fishes

Threatened

- 16 - Northern Wolffish (*Anarhichas denticulatus*)²

Special Concern

- 17 - Blackline Prickleback (*Acantholumpenus mackayi*)

¹ Status provisional until reviewed by COSEWIC's Aboriginal Traditional Knowledge - Specialists Group.

² Change since 2000.