



August 3, 2001

Chairperson  
Mackenzie Valley Environment Impact Review Board  
Box 938  
Yellowknife NT X1A 2N7

Attention: Gordon Lennie

Dear Mr. Lennie:

**SUBJECT: SNAP LAKE DIAMOND PROJECT**

De Beers Canada Mining Inc. would like to respond to the following issues pertaining to the environmental assessment of the Snap Lake Diamond Project:

Draft Rules of Procedure

De Beers was asked by Board staff for our opinion on whether the draft Rules of Procedure should be followed for this Environmental Assessment (EA). We have reviewed the draft Rules of Procedure and request that they be applied to the Snap Lake Diamond Project EA. De Beers considers that it is advantageous to all stakeholders to have the EA conducted under a procedural framework, rather than in the absence of one.

Draft Terms of Reference

De Beers has reviewed the draft Terms of Reference (ToR) distributed by the MVEIRB on June 21, 2001. The review concluded that the draft ToR represents an appropriate framework to assess the Snap Lake Diamond Project, reflects high standards for thorough environmental assessment, and builds on the experience gained in the NWT with two previous diamond projects.

.../2



**DE BEERS CANADA MINING INC.**

#300 - 5102 50<sup>th</sup> AVENUE  
YELLOWKNIFE NT X1A 3S8 CANADA  
TEL (867) 766-7300 FAX (867) 766-7347

For the following disciplines, the terms of reference were found to be sufficient in their scope and detail to allow for a comprehensive assessment of the potential impacts associated with the development of the Snap Lake Diamond Project:

- Water quality
- Aquatic Ecology
- Wildlife
- Vegetation and Terrain
- Traditional Land Use
- Hydrology
- Cumulative effects
- Traditional Knowledge
- Human health
- Archaeology
- Noise
- Geochemistry

In Air Quality and Socio-economic Sections, however, De Beers respectively suggests the following:

#### **Air Quality**

We suggest that the terms of reference be refined to specifically state the following:

- Atmospheric dispersion of emissions on a local and regional scale;
- Air quality emissions including, but limited to NO<sub>x</sub>, SO<sub>2</sub> TSP, PM<sub>10</sub> and PM<sub>2.5</sub>;
- Impact on biological receptors such as vegetation and wildlife; and
- Greenhouse gas emissions from all sources at Snap Lake.

## Socio-Economic

We note in the socio-economic section, that there was no mention of impacts on individuals, families, and communities. De Beers will examine such impacts and a discussion of these issues will be part of the EA report.

In addition, De Beers identified several areas where further definition would be advantageous for all parties. It is critical that the proponent and all reviewers have the same understanding of a term or statement and use the same definitions consistently throughout the EA process.

We would therefore find it extremely helpful if the MVEIRB would provide definitions for or clarify what the EA should address in relation to the following terms or statements:

### 1. Section 5.7.3

- “skilled workers”;
- “barriers to employment”;
- “federal and territorial government costs”;
- “local government finances”; and,
- “economic diversification”

### 2. Section 5.7.5

- “non-economic incremental benefits”.

### 3. Section 5.7.6

- Further details on requirements for this section would be useful.

4. Section 5.9

- “cumulative impacts on the economic environment”.

Draft Work Plan

It is De Beers opinion that the schedule for milestones outlined in the Draft Work Plan represents a fair and reasonable timeline that meets the need for thorough environmental assessment and certainty for development schedules. We note recent concerns of the Canadian Arctic Resources Committee (CARC) submitted to the MVEIRB (July 30<sup>th</sup>, 2001) that it is inappropriate for the Board to list the submission date of the Snap Lake EA. We would like to advise the Board that it is De Beers intention to submit the Snap Lake in advance of the November 23<sup>rd</sup>, 2001 date noted in the draft Work Plan presented to EA reviewers on July 27<sup>th</sup>, 2001.

Requests for Rulings from CARC

*Intervenor Costs*

De Beers notes CARC's concern (July 30<sup>th</sup>, 2001) regarding intervenor costs but observes that the Mackenzie Valley Resource Management Act (MVRMA) does not provide the MVEIRB with any jurisdiction to make a ruling that would allow for intervenor funding.

*Public Hearings.*

De Beers suggests that public hearings on the ToR are not necessary because no substantive issues have been raised with the Draft ToR to date and there has been a lack of requests from community based stakeholders for public meetings. Some have stated they are not required.

Gordon Lennie  
Re: Snap Lake Diamond Project

Page 5  
August 3, 2001

*Extension for consideration of the draft ToR*

De Beers does not see any substantive need for a time extension for finalization of the ToR. Few participants attended a meeting to discuss the draft ToR was poorly attended and most points raised had already been addressed.

Sincerely,

SNAP LAKE DIAMOND PROJECT



Robin Johnstone PhD  
Senior Environmental Manager

RJ/hb