

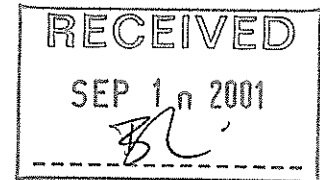
DE BEERS

A DIAMOND IS FOREVER

September 6, 2001

File: O-23/7.2.20

Gordon Lennie, Chairperson
MacKenzie Valley Environmental Impact Review Board
PO Box 938
Yellowknife, NT X0E 1A0



Dear Mr. Lennie:

RE: SNAP LAKE DRAFT TERMS OF REFERENCE (TOR)– REPLY TO SUBMISSION
OF WILDLIFE, LANDS AND ENVIRONMENT COMMITTEE (WLEC), LUTSEL
K'E DENE FIRST NATION

This is De Beers' response to the submission made to the MVEIRB by the WLEC, Lutsel K'e Dene First Nation, dated August 27, 2001. For ease of reference, our response is in the same order, as the comments and suggestions made by the WLEC.

General

- While De Beers fully supports oral, face to face communication at the community level with community members with respect of the environmental assessment process, we feel that scoping hearings in regards to the draft ToR are unwarranted. The observation that no substantive issues on the scope of the EA were raised in any submissions to the Review Board on the draft ToR supports this position. We consider that the draft ToR reflect reasonable standards and current practises for good environmental assessment in the North. It is also worth remembering that the Review Board has the opportunity to come back to the Proponent if something has been missed, at a later stage. Considering these factors, it is our opinion that hearings to discuss the draft ToR would not advance the rigor, thoroughness or quality of the Snap Lake Diamond Project EA and any inadvertent gaps would be best addressed later in the EA process.
- With respect to De Beers presenting the completed EAR in the community of Lutsel K'e to the WLEC and to the public, De Beers completely agrees with that suggestion and would welcome the opportunity to do so.
- De Beers also agrees that it is the responsibility of the MVEIRB to weigh the relative merits of predicted impacts, not the applicant.
- With respect to the monitoring program, De Beers will describe in the EAR its approach and its objectives. These will be provided to all First Nations who will then be involved in developing the monitoring program.



DE BEERS CANADA MINING INC.
SNAP LAKE DIAMOND PROJECT

300 - 5102 50TH AVENUE
YELLOWKNIFE NT X1A 3S8 CANADA
TEL (867) 766 7300 FAX (867) 766 7347

Specific

Again, De Beers' comments are organized by section number, consistent with those used by the WLEC:

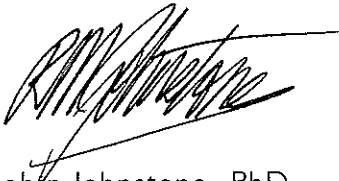
- 5.3.2. De Beers concurs that it would be more informative if this section were organized according to mine function. Further, De Beers will include the esker access road, the Lupin winter road access and continuing exploration on the claim block in the project description.
- 5.5 De Beers concurs that the emphasis should be upon verifiable knowledge, regardless of whether it is verified by quantitative data or by traditional knowledge. With respect to expert opinion, De Beers agrees that the credentials of the expert whose opinion is being provided, should be made available for scientific experts and that a life history for Elders, should be made available, assuming they agree to provide it. De Beers agrees that the question of the validity of expert opinion should be a matter for the MVEIRB to determine.
- 5.5.1 The matter of providing a description of the alternatives to the living conditions to which employees will be subject will be included in De Beers' project description.
- 5.5.2 De Beers agrees that the description of the existing environment should include a discussion of the current and historic land use and occupancy in the region, whether industrial or aboriginal.
- 5.5.3 De Beers concurs that a discussion of how the "maximum zone of influence of the proposed development for each valued ecosystem component" is determined should be included in the EAR.
- 5.7.4 De Beers concurs that the potential development impacts upon the spiritual and cultural health of employees, their families and communities should be considered.
- 5.9 De Beers will state what cumulative effects might possibly occur but, in our opinion, it is the Review Boards responsibility to determine whether our assessment and resulting conclusions are accurate. Also, De Beers' considers that the inclusion of all lodges and exploration, scientific and maintenance camps within the Slave Geological Province is beyond the reasonable scope of cumulative effects assessment for the Snap Lake Diamond Project EA. The rationale for which developments are considered in cumulative effects assessment will be described in the EAR.

- 3 -

We thank the WLEC for their helpful suggestions.

Sincerely,

SNAP LAKE DIAMOND PROJECT

A handwritten signature in black ink, appearing to read 'Robin Johnstone', with a long horizontal stroke extending to the right.

Robin Johnstone, PhD
Senior Environmental Manager

DS/RJ/hb