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ENVIRONMENTAL IMPACT
REVIEW BOARD

To: Glenda Fratton From: Howard Townsend
Fax: (867) 766-7074 Pages: 20 pages
Phone: (867) 766-7052 Date: April 7th.
Re: Snop Lake EA CC:
☒ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

• Comments:

Please advise if incomplete or if
you need anything else.

Sincerely
Howard Townsend.

**Lutsel K'e Dene Band**

Post Office Box 28
Lutsel K'e, Northwest Territories
X0E 1A0

Telephone: 867 370-3051
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Charlie Catholique
Chairman
Wildlife, lands and Environment Committee

Our File(s): 11.1.12.17
Your File(s):

April 7th, 2003

Vern Christensen
Executive Director
Mackenzie Valley Environmental Impact Review Board (MVEIRB)
Box 938, 5102 -50th Avenue, Yellowknife, NT, X1A 2N7

Dear Mr. Christensen,

**Subject: Environmental Effects of the Proposed De Beers Canada
Diamond Mine at Na Yaghe Kue (Snap Lake)**

First I must reiterate that we do not recognize the Mackenzie Valley Land and Water Board's (MVLWB), authority to issue dispositions on our Traditional Lands. That aside, we feel we must still register our concerns with the proposed activity at Snap Lake.

The proposed De Beers Diamond Mine will result in many environmental changes in the Na Yaghe Kue region and for our community. Many of these changes will affect the:

- Landscape and plants in the Na Yahge Kue region
- Water and Fish
- Wildlife including Caribou, Grizzly Bear, Wolverine and Other Furbearers

We are recommending the following:

- De Beers Canada continue to work with Lutsel K'e Dene First Nation to minimize the environmental impacts of the proposed project and protect our land, water and wildlife for future generations;
- De Beers Canada Ltd. work with Lutsel K'e Dene First Nation and other groups in the region to develop a program of wildlife monitoring and

management based on traditional knowledge. This monitoring should be specific to the proposed project at Na Yaghe Kue but should also include consideration of the other projects in the region including the Diavik Diamond Mine and the BHP Billiton Mine at Lac De Gras. The Regional Traditional Knowledge panel currently being established through the Environmental Monitoring Advisory Board may be useful in designing and implementing these regional studies;

- De Beers Canada Ltd. continue work with Lutsel K'e Dene First Nation to conduct additional traditional knowledge studies for the purposes of managing the impacts of the proposed project on our land, water and wildlife in the Na Yaghe Kue region.

Lutsel K'e Dene First Nation has worked with De Beers Canada over the last two years to learn about the project and its potential effects. A Traditional Knowledge Study in the Na Yaghe Kue region was conducted with our elders in 2001. This was a very valuable opportunity for us to gather traditional knowledge about the project for our community and for De Beers Canada Ltd.

Through the current environmental assessment process, we have received additional information about the project and its effects from De Beers Canada, Environment Canada, the Department of Fisheries and Oceans, RWED, DIAND and other organizations. Lutsel K'e Wildlife, Lands and Environment Committee have reviewed this information and have the following outstanding concerns and issues related to:

- Regional impacts of the proposed De Beers Canada project, the Diavik Diamond Mine and the Ekati Diamond Mine on the health and migration patterns of the Bathurst Caribou
- Wildlife Population Studies
- Waste Management Plans – Prevention and Protection of Wildlife on-Site
- Waste Water (Effluent) Discharge
- Ground Water Flow and Contamination
- Permafrost
- Landfills
- Waste Treatment and Storage
- Cumulative project effects on the Na Yaghe Kue landscape

We look forward to working with the Department of Indian and Northern Affairs and De Beers Canada to address these outstanding issues. Please contact us if you require additional information.

Sincerely,



Charlie Catholique
Chairman

Cc: Chief & Council
Robin Johnstone, De Beers Canada Mining

Deneso'ine Perspectives and Issues
About the Proposed
De Beers Canada Diamond Mine at Na Yaghe Kué

1. Background

Na Yaghe Kué lies within the traditional territory of Áutsyl K'e Dene First Nation in an area we call **katthinýne**. This region is called Chipewyan Dene land. We have lived and used this land for thousands of years. Our elders say this - "Our footprints are out there". (ND July 9, 1997)

Katthinýne is the area of **Deneso'ine Nýne** (Chipewyan Land) that elders describe as rich with resources. People would always go to Katthinýne to harvest caribou, to trap for furs - traveling by dog team, by canoe and on foot. People always knew they could find food in that area. Katthinýne is an older word which the elders use but is not commonly known by the younger generation. Other common references or spellings for Katthinýne include katinýne or kakinýne which means the area at the end of the lake.

The water, ground, plants, animals, air of **katthinýne** are very valuable to us. All of these parts of the environment are connected together and to our community. This land is part of our past, our present day culture, economy health and identity. This land is also the basis for our future. It is because of our strong connection to this area that we are concerned about the environmental and socio-economic effects of the proposed De Beers Diamond Mine.

Denesoïne Perspectives and Issues
About the Proposed
De Beers Canada Diamond Mine at Na Yaghe Kué

2. Land and Vegetation

The **land** where De Beers Canada Ltd. proposes to mine is called **Na Yaghe Kué** or "very rocky area". It is called that because of the large boulders and sharp rocks that can be found around that area. There are many different features within the Na Yaghe Kué region that are valuable to the Denesoïne. Although it appears to be a barren land, Na Yaghe Kué is rich with landscape features and vegetation valuable for wildlife and for people.

The proposed De Beers Canada Ltd. Diamond Mine at Na Yaghe Kué may have a variety of effects on the land and vegetation in region. The following landscape features and vegetation species are of particular interest to the Denesoïne.

1.1 Ts'uazé di Aasi

Ts'uazé di Aasi or the small pockets of black spruce (*picea mariana*) and the thickets of willow (*salix planifolia*) and birch (*betula pumila var. glandulifera*) found in the valleys and along rivers in the barrenlands are very important areas of traditional use by the Denesoïne. They provide shelter and a source of dry wood and other resources for those hunting and trapping in the barrenlands.

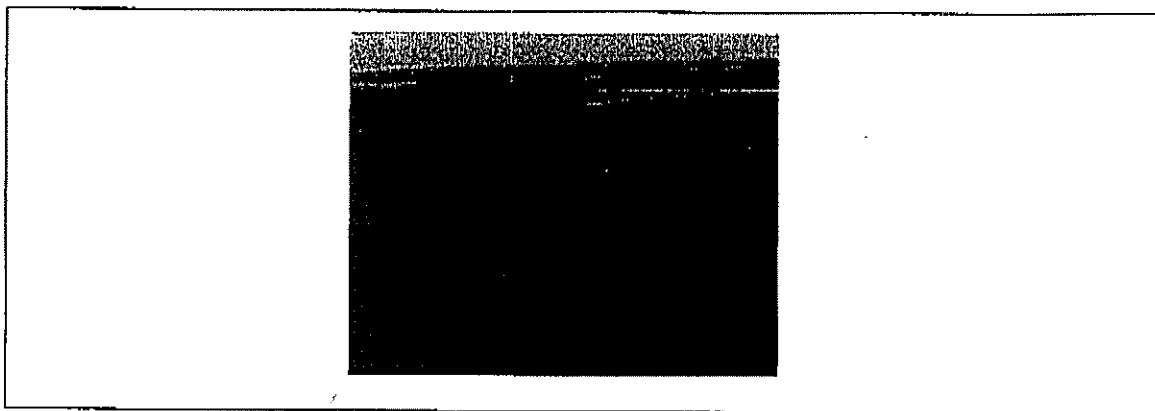


PHOTO 1 - Ts'uazé di Aasi in the Barrenlands
(Photo File of Lutsel K'e Dene First Nation)

Certain **ts'uazé di Aasi** have strong cultural and historical meaning to our community because we know our ancestors stayed in those places. You can see that they were there by the markings on the trees and the **k'unke** (tent rings) on the ground. We continue to use these areas in practicing our traditional way of life.

Ts'uazé di Aasi are also important areas for wildlife. They provide shelter as well as food for small animals such as:

- kásba - ptarmigan
- gahcho - arctic hare
- thýle - ground squirrel

Other species that use these areas include:

- sas cho - grizzly bear
- nuni - wolf
- nághai - wolverine
- ts'íba - white fox
- nagítthe - red fox

The proposed De Beers Diamond Mine will impact on some **ts'uazé di Aasi** through the development of roads. Other **ts'uazé di Aasi** in the Na Yaghe Kue area may lose their cultural and ecological value to the Densoline due to their proximity to the proposed De Beers project.

1.2 Thai heā (Eskers)

Eskers are part of the landscape at Na Yaghe Kué that have both cultural and ecological significance for our community. There are several different kinds of eskers that we recognize as important including:

- Thai heā (Eskers in the Barrenlands)
- thai t'ath (eskers on the treeline)
- thai t'atheā (long esker)
- thai cho heā (very long esker)
- thai tue āa (esker with a lake on top of it)
- thai t'uth tué (esker beside water (water underneath))

Not all eskers are the same. Different kinds of eskers have different values in terms of wildlife habitat and different meanings to the Densoline elders. The proposed De Beers Diamond Mine will impact on some nearby eskers through the development of roads and the excavation of gravel resources.

1.3 Other Landscape Features

Other landscape features important in this area that may be affected by the DeBeers Diamond Mine include:

- the - rock
- tthe cho - boulder
- tthe cho hetāyā - cracked boulder
- tthe cho chāghé - (no translation)
- k'a - boulder that can be used for shelter or as a waiting place in hunting
- tthe k'e dathé ᐃᐃ - piled rocks on a boulder
- tthe chálé ᐱets'ali - large pile of small boulders
- thai heᐃᐃ - drumlin
- ní heth k'ul the k'athe - ground is cracked and water underneath

Although impacts on these landscape features may appear insignificant, even subtle changes in this fragile landscape may be profoundly disturbing to wildlife and community members to know that area well.



PHOTO 2 - T'a bath and Thai heᐃ (Vegetation near an esker)

(Photo Credit: Lutsel K'e Dene First Nation File)

1.4 Nikyī (Wet areas of Land)

Although **Na Yaghe Kue** is a very rocky area, it is still an area of rich vegetation and plant life. The ground and vegetation is also very important. **Nielaze** (hummocks), **nikyī kue** (valleys with water and moss) and **nikyīle** (muskeg) provides valuable habitat for ducks and geese as well as provide a rich source of plant life including birch and lichens for caribou feeding.

- ts'āju- shrub lichen; northern reindeer lichen
- ts'āju kal - shrub lichen; Iceland moss
- ts'āju zen - hair lichen; simple horsehair
- hatā'ys - black dirt

- t'â bath - bog birch (dwarf birch)

1.5 Jié (Berries and Plants)

The Na Yahge Kue area is also rich with berries that are valued by the Denesoïne for food and medicine.

- Ts'ât'eth dhé (black berries)
- nitá'yr (cranberries)
- Denie (bearberries)
- ts'âächogh (blueberries)
- nadlaré (cloudberries)
- ejizé naghé (whiskey jack eye)

1.6 Recommendations regarding Land and Vegetation

De Beers Canada Ltd. has said that their project will have an insignificant impact on the land and vegetation in the Na Yaghe Kué region. However, we do not feel that these predictions can be guaranteed.

We therefore recommend that ongoing monitoring based on traditional ecological knowledge of the Denesoïne of the project and its effects on the land and vegetation be carried out. Monitoring should focus on key landscape features including:

- ts'uazé di Æasî (spruce stands)
- thai heâ (eskers)
- nikyl (wet areas)

Monitoring should focus on key species of vegetation including:

- ts'âju- shrub lichen; northern reindeer lichen
- ts'âju kal - shrub lichen; iceland moss
- ts'âju zen - hair lichen; simple horsehair
- hatá'ys - black dirt
- t'â bath - bog birch (dwarf birch)
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- nitá'yr (cranberries)
- Denie (bearberries)
- ts'âächogh (blueberries)
- nadlaré (cloudberries)
- ejizé naghé (whiskey jack eye)

Specific monitoring and studies should also be carried out related to the following issues and questions as identified through the interventions made to the Mackenzie Valley Environmental Impact Review Board.

Cumulative Landscape Effects

- What will be the total cumulative effect of the development projects (DeBeers Canada Ltd., Diavik Diamond Mine, BHP Diamond Mine) on the land as defined and classified by i) traditional ecological knowledge and by ii) the Government of the Northwest Territories (i.e. land classification units)?
 - What will be the direct and total loss or disturbance of landscape features and vegetation valued as habitat?
 - What will be the direct and total loss or disturbance of landscape features and vegetation that is culturally significant?
 - What is the potential for reclamation of these areas?

Waste Treatment and Storage

- How effective is the waste treatment system currently proposed by De Beers Canada Ltd?
- What kind of risks are associated with waste rock disposal at the "north pile"? What is the potential for acid rock drainage (including metals) from this area? What are the risks associated with uptake of contaminants in vegetation? Does De Beers Canada Ltd. have a reclamation plan that would prevent wildlife from feeding in areas that are at risk for contamination?
- What are the opportunities and risks associated with biological remediation of hydro-carbon contaminated soils in this environment (i.e. arctic environment)?
- What are the opportunities and risks of hydrocarbon contaminated soil storage facility? What are the long term challenges of maintaining this facility?
- The terms and conditions for abandonment and reclamation of the land must be more clearly defined.
- Definitions and criteria for future reclamation should be developed based on traditional ecological knowledge.

Landfill

- What is the benefit of a "dedicated engineered landfill" as proposed by RWED instead of the "land fill and land farm system" proposed by De Beers Canada Ltd.?

Permafrost

- DeBeers Canada Ltd. has proposed a plan in which the North Pile (NP) would freeze completely in two years and a surface active layer 2 metres thick would develop. What are the risks associated with the North Pile not freezing as proposed by De Beers? What risk does climate change (i.e 1-2 degree increases in temperature) have on this proposed plan?

Denesoāine Perspectives and Issues
About the Proposed
De Beers Canada Diamond Mine at Na Yaghe Kué

3. Áu and Kué (Fish and Water)

3.1 Kué and Taché Deze

Na Yaghe Kué lies within the watershed of the Taché Deze (Lockhart River) Taché Deze is home to Tsank'ui Theda (Old Lady of the Falls), an important spiritual site to the Denesoāine. This spiritual site is very important to the community of Lutsel K'e and others in the region. The water that flows through this system are sacred to the people because they are connected to this spiritual site. It is for this reason that the community is very concerned about the water in the Na Yaghe Kue area and the potential risks posed by the DeBeers Canada project.

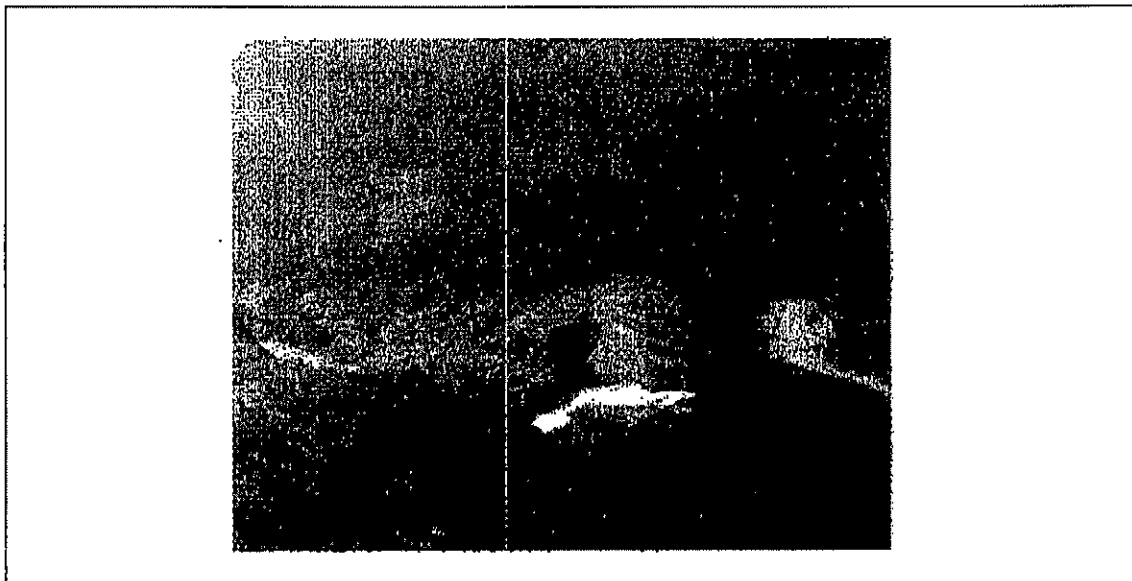


PHOTO 3 – Tsankui Theda (The Old Lady of the Falls) on the Lockhart River is downstream of the proposed mining project
(Photo – File of Lutsel K'e Dene First Nation)

The following aspects of mining activity and its impact on water quality in the Tache Deze are of concern to the Denesoāine.

What happens when they explode the rock - everything [the dust] spreads out everywhere. If that happens, the fish will die or get spoiled. Dams - they flood the area and the land dies - the

overflow kills the plants. The fish start to eat the plants from the land and they die. The water we drink will also be spoiled. There are large dynamite explosions at the mine - in the water. It's very loud. I think it will kill the fish. They shouldn't use so many explosives. (GM 1130 00)

The concern the elders have about impacts on migratory birds relates to their concern about impacts on water quality.

The animals / birds live on the land they drink the water... they will feel the effects. (PC 11 30 00)

The caribou around that place; I am concerned about if they caribou start eating food around the mine area; anything that spills on the ground is taken up by the plants. There is muskeg in that area too. The spills will stay in that area. Someone said they would put up a fence in that area but they haven't done anything yet. If they put a fence in that area - we wouldn't worry about the caribou. It's not good to have caribou in that mine area. (JB 02 14 01)

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3.2 Åu (Fish)

Fish in the region of Na Yaghe Kué are valued for many different reasons and in different geographic areas. At least 12 different species of fish are commonly harvested in lakes throughout the study region. The Lake Trout is called Åu zane in Chipewyan and is among the most commonly harvested species along with the Åu and Åu Cho or Whitefish. Both species are valued for their relative abundance especially in later spring and summer when caribou were scarce. People valued fresh fish and would also dry and store it for future use for themselves and for their dogs.

3.3 Recommendations regarding Fish and Water

De Beers Canada Ltd. has said that their project will have an insignificant impact on the water and fish in the Na Yaghe Kué region. However, we do not feel that these predictions can be guaranteed.

We therefore recommend that ongoing monitoring based on Denesoline traditional ecological knowledge of the project and its effects on fish and water be carried out. Monitoring should focus on key indicators of water quality and the health of fish including:

Water

- Water Levels
- Water Quality
- Respect of the Water

Fish

- Size / Shape: length / weight ratio
- Population / Diversity
- Fat - fat around organs
- Organs - Parasites
- Colour / Texture of Flesh

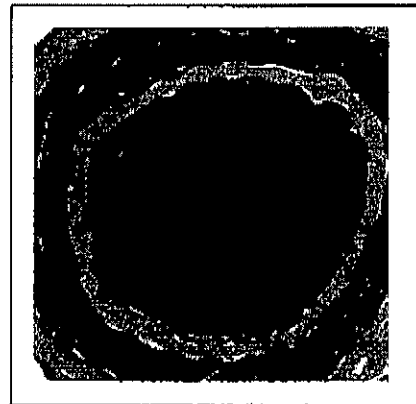


PHOTO 4 – Drawing of a Fish Below the Ice in the Barrenlands (2001)
(Photo – File of Lutsel K'e Dene First Nation)

More specific study and monitoring should also be done in respect of the following questions and concerns:

Ground Water Flow and Contamination

- What are the current patterns of ground water flow? How will the proposed mining activity affect and be affected by these flows?
- How does DeBeers Canada Ltd. ground-truth the computer models that have been developed to understand groundwater flows?
- How will groundwater seeping into the mine be managed? What is the plan for ensuring that water seepage does not exceed the capacity of water treatment facilities?

- What is the proposed process for testing and treating mine water (deep ground water, and water infiltrating from the lake) for dissolved metals (e.g. chromium)?
- What is the proposed process for testing and treating water from inside the rocks (connate water) for dissolved solids such as phosphorus?
- How will groundwater be managed and monitored upon abandonment? How will De Beers prevent dissolved chemicals from the backfilled pit from surfacing and contaminating Snap Lake?
- How will connate water (water from the pores of rocks) affect overall water quality? What is the potential impact of sulphides and dissolved phosphorus?

Waste Water (Effluent) Discharge

- DeBeers Canada Ltd. proposes to treat water from the mining operations and release it back into the Na Yaghe Kué using a pipe that sprays the water out into the lake (a diffuser). This water is heavier and a different temperature than the rest of the lake so it may just sink to the bottom of the lake in a cloud (plume). Also this cloud of water may affect the fish.
- How will ice conditions affect the plume? What alternative plans are there for discharging this treated water?
- What are the cumulative effects of effluent discharging this treated water into Snap Lake over the life of the mining project? How will the effects of this treated water on the lake and watershed be monitored and managed?
- More studies are needed on the "very small fish" and "insects" that live at the bottom of the lake (benthic invertebrates)
- How will the effects of the cloud of water (plume) being released into the lake be monitored?
- The area around the diffuser (where the water is being released into the lake) may be important for fish. They may be feeding or laying eggs (spawning) in that area. It may be a safe area for very young fish (rearing habitat). What does DeBeers Canada know about how fish use the area around the diffuser?

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Denesoaine Perspectives and Issues
About the Proposed
De Beers Canada Diamond Mine at Na Yaghe Kué

4. Wildlife

4.1 Etthÿn (Caribou)

Etthÿn (caribou) are very culturally and ecologically important to the Denesoaine. We have always depended on the caribou for almost every aspect of our daily life. Caribou meat has always been and remains today, the main source of protein in the diet. The caribou is also the basis for the community's social and cultural well being, tying families and extended families together in traditional activities that date back thousands of years.

The fall caribou harvest at the treeline holds particular significance to the Denesoline of Lutsel K'e. After many months without caribou meat, the fall harvest has always been associated with great celebration.

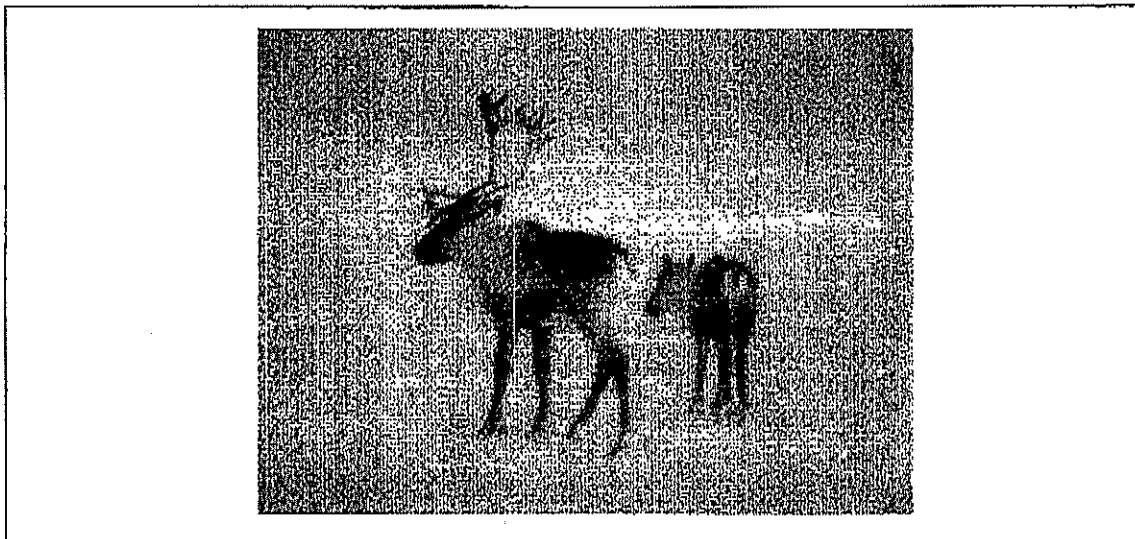


PHOTO 5 - Caribou in the Barrenlands
(Photo - File of Lutsel K'e Dene First Nation)

The proposed De Beers Project has created two major concerns with respect to the caribou.

- How will the proposed project affect caribou coming from the west (Bathurst) and their migration towards our community?
- How will the proposed project affect caribou health?

Caribou Migration

Elders have raised concerns that the proposed mining activity will affect the caribou migrating from the west (Bathurst Herd). In particular, they have raised concerns about how roads, planes and blasting will affect their movements.

In a few years, the caribou will change their route again. They will go a different way. They will be disturbed by the winter road, planes and blasting. You will see [these changes] in 3-5 years from now. – Louis Abel, 2001

Roads are of particular concern to elders; they are perceived as unnatural barriers to caribou movements.

Regarding the winter road – if you make a road you cannot make it too high. It's too hard for the caribou to get over it. It should be lower. The caribou won't just pass through a little pathway you make, they go all over. The road needs to be fixed. – (JBR 2000)

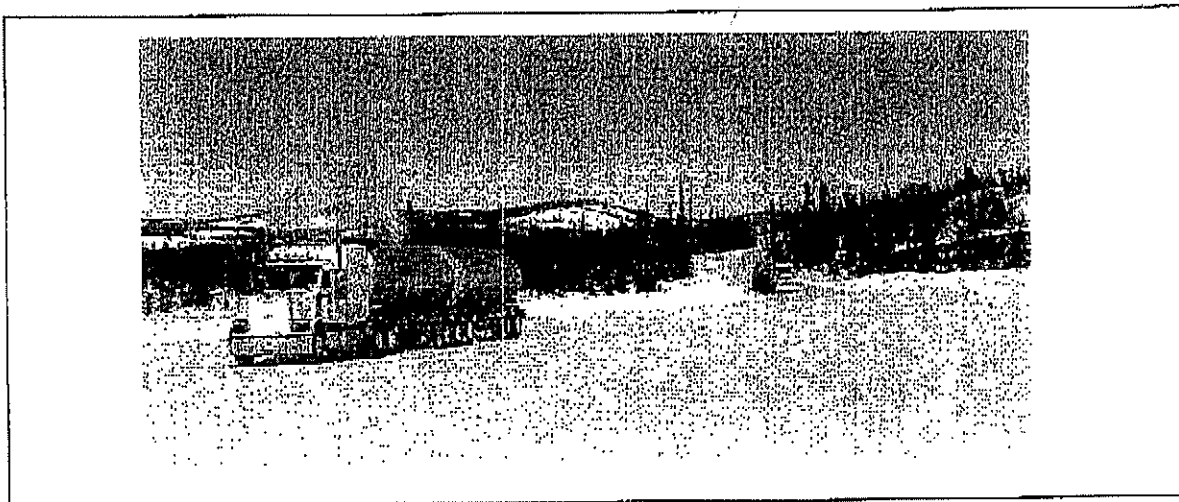


PHOTO 6 – Trucks on the Winter Road
(Photo – File of Lutsel K'e Dene First Nation)

Other concerns relate to the overall health of the herd and how mining operations including waste, spills and contaminants may affect them.

The caribou around that place; I am concerned about if they caribou start eating food around the mine area; anything that spills on the ground is taken up by the plants. There is muskeg in that area too. The spills will stay in that area. Someone said they would put up a fence in that area but they haven't done anything yet. If they put a fence in that area – we wouldn't worry about the caribou. It's not good to have caribou in that mine area. (JBR 2001)

4.2 Sas Cho (Grizzly Bears)

The grizzly bear is also an important species to the Denesoäine. Oral histories of the Denesoäine describe the grizzly as having spiritual powers. He can be nurturing. The Denesoäine legend describes how a young man was cared for by a grizzly after being lost in a winter blizzard. Although he may act as a protector, the grizzly can also be dangerous. Camps, including mining camps in the Na Yaghe Kué area, may be at risk to grizzly bears who are used to this area as part of their natural habitat. In some cases the bears need to be shot to prevent them from harming people. It is for this reason that elders have raised concerns about the impact of mining camps on grizzly bears.

De Beers Canada must develop an approach to preventing grizzly bears from being attracted to the area and keeping mine workers in the area safe. Some ideas include:

- keeping the area clean of waste that might attract the bears
- developing grizzly bear safety policies for the mine workers

4.3 Nághai (Wolverine) and Other Furbearers

Wolverine and other furbearing species are also very important to the Denesoäine. The Denesoäine have traditionally trapped in the region of Na Yaghe Kué and depended on the wolverine, as well as whitefox and wolf for furs. Fur bearing animals also pose risks for people. The proposed De Beers mining camp may be visited often by animals who view this area as their home or natural habitat.

De Beers Canada must develop an approach to dealing with furbearing animals on site. Some preventative tactics include:

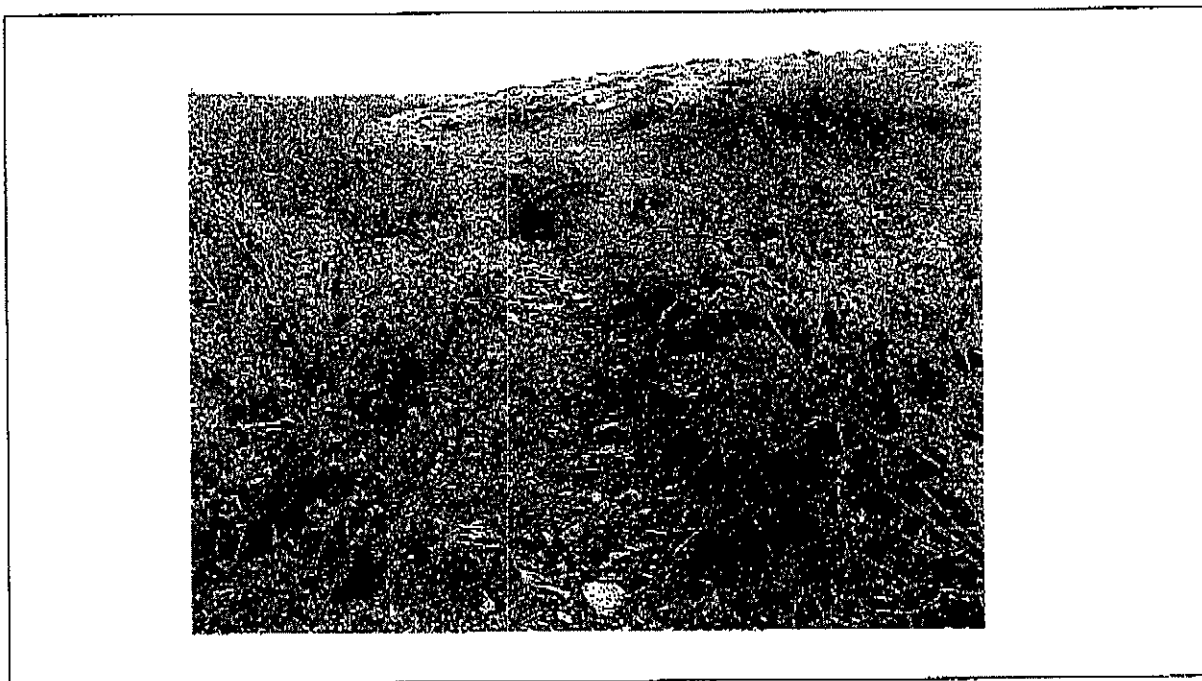
- keeping the area clean of waste that might attract the animals
- developing safety policies for the mine workers

4.4 Recommendations

Wildlife Monitoring and Management based on Traditional Knowledge

A comprehensive process for monitoring the impact of disturbance in the Na Yahge Kué region on the health of wildlife needs to be developed. This system should be based on traditional knowledge of the Denesoáine people.

The Denesoáine have their own ways of monitoring caribou or "watching, listening, learning and understanding" the caribou.



**PHOTO 7 – Caribou Trails in the Barrenlands
(Photo – File of Lutsel K'e Dene First Nation)**

Using Denesoáine strategies for caribou monitoring during the fall hunt, it may be possible to design a regional monitoring system to track impacts of development.

Such a system would not only examine the effect of individual roads, but also the cumulative impacts of a number of mines, their associated roads and other resource developments across the range of the caribou herd. Monitoring caribou crossings over all-weather roads and winter roads, elders may be able to predict potential changes in migration and in winter range. Such traditional systems of monitoring can help address community concerns over new uncertainties. They also have the potential to complement scientific methods to help understand how the proposed De Beers project and other mining activities in the region may be impacting the caribou. Some other issues that need to be addressed include:

Caribou Population and Movement Studies

- The information (baseline data) that De Beers has collected suggests that there are very few caribou migrating through the Na Yaghe Kué area. However, the studies done by De Beers Canada have been short terms in nature. More studies, including long term monitoring of caribou population and movements through the Na Yaghe Kué area are needed.
- More studies are required to determine the total loss of grizzly bear habitat that may result from the proposed DeBeers Project? What impact will this proposed project, the Diavik Diamond Mine and the Ekati Diamond Mine have on grizzly bear habitat (cumulative effects)?

Waste Management Plans --Prevention and Protection of Wildlife on Site

- A waste management plan needs to be developed based on traditional knowledge as well as western science. This waste management plan is important for ensuring that grizzly bears and furbearers are not attracted to the site. What other plans does De Beers Canada have for preventing and managing wildlife on site? Can De Beers Canada guarantee that no wildlife will be destroyed ("no mortality") as a result of the project?