



Mackenzie Valley Environmental Impact Review Board

Our File EA01-004

April 4, 2003

Mr. Gavin More
Environmental Assessment Analyst
Policy, Legislation & Communications
Resources, Wildlife & Economic Development
Government of the Northwest Territories
6th Floor-Scotia Centre
P.O. Box 1320
Yellowknife NT X1A 2L9

Dear Mr. More:

**Re: The Record for the DeBeers Canada Inc. Snap Lake Diamond Project
Environmental Assessment – Socio-economic and Wildlife Questions**

As part of its preparations for the March 26th-27th, 2003 pre-hearing conference for the Snap Lake Environmental Assessment (EA), the Mackenzie Valley Environmental Impact Review Board (Review Board) conducted a review of the information filed to date on the public record for this proceeding.

The Review Board must ensure that there is sufficient evidence on the record to provide a foundation for any analysis which will be undertaken after the completion of the public hearings and for any recommendations which may be included in the Report of the Environmental Assessment sent to the Federal Minister. The Review Board also wants to ensure that the discussion of the proposed Snap Lake project at the hearings will be undertaken on the basis of the best available evidence.

As a result of the review of the record referred to above, the Review Board has concluded that there are two areas of general importance to the EA where the filed information is not sufficient to meet these needs. Specifically, the Review Board is concerned about the adequacy of the information addressing socio-economic issues and impacts, including cumulative impacts, and it has similar concerns about the information related to wildlife and the impacts of the proposed project on wildlife. In light of these concerns, the Review Board intends to ensure that it has a basis for making the determinations required

by subsection 128(1), as well as sufficient information to address section 115(a) and, in particular section 115(b) of the *Mackenzie Valley Resource Management Act*.

Consequently, the Review Board has prepared a number of questions, which are attached for the Government of the Northwest Territories (GNWT). These questions are intended to address and alleviate the Review Board's concerns with respect to the public record and the hearing. The attached questions largely stem from previously raised questions or issues, for which sufficient information has not yet been placed on the public record.

Your timely response would be appreciated. The Review Board encourages the GNWT to make every effort to file the relevant information and provide written answers to the questions in its hearing submissions due April 17th, 2003. If all of the questions cannot be answered by these dates, the GNWT is advised that it should be prepared to address the outstanding questions at the public hearing.

Should you have any questions, please feel free to call Glenda Fratton at (867) 766-7052.

Yours truly,


Gordon Wray
MVEIRB
Chair



Socio-Economic

Q. (1)

Preamble

Most if not all of the issues raised to date, and anticipated to be raised during the hearing process, have already been dealt with in the review and monitoring of the two existing diamond mines. The experience of these two projects should provide important background information to help better understand the likely impacts of the Proposed Snap Lake Project.

Request

Please file on the public record:

1. A copy of the Socio-Economic Agreements with Diavik and BHP-Billiton.
2. Copies of all monitoring reports prepared by the companies, the GNWT and any other parties as part of the above Socio-economic Agreements.
3. Copies of any employee surveys or other socio-economic related surveys that have been filed by the GNWT, Diavik, BHP-Billiton or any other participants to the above Socio-Economic Agreements.

Please note that the Review Board is not seeking private or personal information, or information otherwise protected by law.

Cumulative Effects

Q. (2)

Preamble

Terms of Reference lines 256-260 instructed De Beers to describe each impact identified and the proposed mitigation measure(s) for all phases of the proposed development (i.e., construction, operation, closure and post-closure). De Beers was to describe planned mitigation measures.

In Section 5.3.3 Socio-Economic Impact Assessment in the EAR, De Beers lays out the predicted direct, indirect and induced social impacts on individuals, families and communities. These are summarized in Table 5.3.7 in the EAR. Increased risks of community dysfunction, family problems and personal stress. Increased rates of alcohol problems, gambling, family violence, marital problems and child neglect are among the potential impacts noted.

In Section 5.3.4.1 of the EAR, De Beers notes that “Many of the mitigation measures cannot be done by the proponent acting alone. While De Beers is committed to doing its utmost to develop and implement these mitigation measures, success will depend on government and community partnerships.” In the pages that follow there are numerous references to De Beers “acting as a catalyst...” “playing a substantial role in facilitating...” “work closely with communities...” “support initiatives and resources...”, “seek collaboration with...” While these expressions provide a good general sense of De Beers’ intentions for supporting mitigating measures, they are lacking in specific detail.

Request

1. Describe what specific contributions, in material terms (dollars, workers, resources, etc.) the Government of the Northwest Territories proposes to bring to the partnerships and collaborative efforts that will be necessary to enact the mitigating measures outlined in Sections 5.3.4.3.1 through 5.3.4.3.7 in the EAR.

Wildlife Resources

Carnivores

Q. (3)

Request

Please file a copy of McLoughlin *et al.* (2003a)¹ and McLoughlin *et al.* (2003b)² on the public registry.

Q. (4)

Preamble

Wolverines have low reproductive rates and are found at low densities. These aspects of their ecology make wolverine populations potentially susceptible to small changes in mortality rates of both juveniles and adults. Because wolverines are a Species of Special Concern, potential environmental impacts from the Snap Lake project should be considered within the context of an understanding of the current population status and long-term viability.

Request

Please provide the following:

1. Provide an indication if, in your opinion, there is sufficient data available to conduct a population viability analysis for wolverines, given what is known about both natural and human-caused mortality rates within the Slave Geological Province. If yes, provide that analysis and an indication of the level of additional mortality that the wolverine population may withstand. Please put the source material for this analysis on the record.
2. If no, please put on the record what source material is available to develop an understanding of population viability in the Slave Geological Province.

¹ McLoughlin, P.D., M.K. Taylor, H.D. Cluff, R.J. Gau, R. Mulders, R.L. Case, S. Boutin, and F. Messier. 2003a. Demography of barren-ground grizzly bears. *Canadian Journal of Zoology*. 81: 294-301.

² McLoughlin, P.D., M.K. Taylor, H.D. Cluff, R.J. Gau, R. Mulders, R.L. Case, and F. Messier. Arctic. In Press.