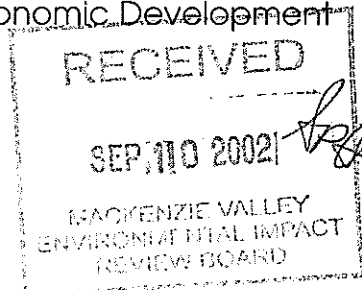




Northwest Territories Resources, Wildlife and Economic Development



Robin Johnstone PhD
Senior environmental Manager
DeBeers Canada Mining Inc.
Snap lake Project
300-5102 50th Ave.
Yellowknife NT
X1A 3S8

Dear Mr. Johnstone.

Information Required for a Thorough Technical Review

In the final round of information requests under the environmental assessment Work Plan for De Beers Snap Lake project, the Government of the Northwest Territories was unable to meet the August 31, 2002 deadline. On September 5th, 2002 the Government of the Northwest Territories received a letter from Mackenzie Valley Environmental Impact Review Board (MVEIRB) staff that noted while the MVEIRB recognized our significant efforts in the EA process, the MVEIRB was unable to accommodate our request to submit our information requests through the EA process. We understand their rationale in the desire to follow process timelines.

That recognized, many of the questions are germane to the completion of a comprehensive technical review on socio-economics, wildlife and air quality. For this reason, we are forwarding the questions to both De Beers and the MVEIRB. This will allow you to be aware of the state of our present analysis in these regards. As well this letter and questions will be posted on the MVEIRB public registry so that the public is aware of some of the concerns to date in our review.

If you are able to fill in some of the information gaps, this would contribute to the effectiveness of our technical review, and the associated technical sessions. The GNWT's technical report will reflect any information supplied, as well as define any outstanding issues.

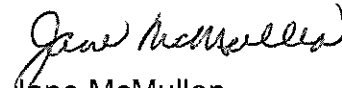
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As well DeBeers has thoroughly researched numerous topics and cited various documents. However some of these are unpublished documents that would be useful in our technical reviews. As noted in our information requests, please provide copies of these documents.

Thank you for your consideration of these requests. Our technical reviewers will appreciate any assistance you can give in regards to these requests. Should you need to clarify the questions or have other concerns, please feel free to contact me by phone at (867) 920-8069 or email at jane_mcmullen@gov.nt.ca.

Sincerely



Jane McMullen
Policy and Environment Analyst
Policy, Legislation and Communications
Resources, Wildlife and
Economic Development
Government of the Northwest Territories

Attachments:

C Mr. Gordon Wray
Chair, DeBeers Environmental Assessment
Mackenzie Valley Environmental Impact Review Board

Ms. Doris Eggers
Director Policy, Legislation & Communication Division.
Department of Resources, Wildlife, & Economic Development.
Government of the Northwest Territories.

Mr. Louie Azzolini
Environmental Assessment Officer.
Mackenzie Valley Environmental Impact Review Board

**De Beers Canada Mining Inc. (De Beers)
Snap Lake Diamond Project**

Supplementary Requests

RWED Information Request No. 3b

SOCIAL, CULTURAL AND ECONOMIC INFORMATION REQUESTS

1.1 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 1.39

Reference: Section 3.9.1.3 & 5.3.4.2.4

ToR Line: 465-467

To: De Beers Canada Mining Inc.

Preamble: De Beers discussed specific training initiatives in the above sections of the EAR and IR. In these sections they stated the following:

- Ten apprenticeship positions will be provided to Aboriginals or northerners who meet the requirements of the NWT Apprenticeship Trade and Occupations Act.
- Within the first three years of production, De Beers will set up a trades training program and will provide 10 positions for Aboriginals or northerners. The program will be designed for individuals who do not qualify for the apprenticeship program but will become eligible for the apprenticeship program through successful completion of the De Beers program.
- Within the first three years of production, a De Beers underground miner training program will be set up and 20 positions will be made available to Aboriginals or northerners. This program will be modeled after the Common Core Program in Ontario.

In reading these statements it is unclear what type of positions the company is planning to provide and when. It is also unclear if there might be any overlap with the above categories of training.

Request: Please provide the following clarification and detail regarding the above statements:

- a) For the first point please list what type of apprenticeships will qualify for this program.
- b) For all points noted, please note if the positions mentioned are jobs, training positions or training on the job positions.
- c) For all of the above points, please state if there will be 40 positions in total, or if some positions are captured in more than one category, making the total less than 40.
- d) Please clarify during what phase(s) of the project each of these position / programs will be implemented, i.e., construction, operations, decommissioning and reclamation.

1.2 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 1.20

Reference: 2.5.2, Appendix IV.2 (Extract: De Beers Annual Report 2000 pg. 69)

ToR Line: 465-467, 586-589

To: De Beers Canada Mining Inc.

Preamble: In the above IR Responses De Beers references the Human Resource Development Plan and the Impact Management Measures. These are to be implemented by De Beers to help ensure that De Beers' commitment to hire as many aboriginal people as possible is met.

In Appendix IV.2 and in IR Response 2.5.2 various programs are mentioned that De Beers currently uses elsewhere as

Human Resource and Impact Management Strategies. The following are some of the programs mentioned:

- The De Beers Fund
- The DBCM Incentive Scheme
- The De Beers Achiever Program
- "The War for Talent" Program

Request: From the above listed programs, please provide the following:

- a) A description of the programs.
- b) The expected use of any of these programs in the NWT. Please describe these in their context within the proposed Human Resource Development Plan and/or the Impact Management Measurements.

1.3 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 1.37, 2.2.6, 2.5.4

Reference: EAR Section 3.9.1.3, 5.3.4, 14

ToR Line: 465-467, 472, 586-589

To: De Beers Canada Mining Inc.

Preamble: In the above IR Responses and EAR Section De Beers makes reference to either the Impact Management Measures or the Human Resource Strategy. De Beers also states similar comments to the following:

"De Beers is committed to doing its utmost to implement these mitigation measures, success will depend upon partnerships between De Beers, government and communities."

It is also noted that both the Impact Management Measures and the Human Resource Strategy are referenced

throughout the EA except for Section 14 and that they are especially not mentioned in table 14.2-1 (Summary of De Beers Canada Commitments)

- Request: Please provide the following:
- a) Please state if De Beers views both the Impact Management Measures and the Human Resource Strategy as commitment for De Beers, and if so, should be included in the Summary of the De Beers Canada Commitments
 - b) A description of the programs.
 - c) An approximate budget that outlines the total cost to implement the Impact Management Measures and the Human Resource Strategy,
 - d) what financial commitments De Beers feels will be necessary from other partners to ensure the programs are implemented successfully and similarly,
 - e) The non-financial commitments required by other partners that would be necessary to ensure the programs are successfully implemented.

1.4 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 1.20a

Reference: EAR Table 5.3-1 (Page 5-112 EAR)

ToR Line: 235-236, 238-240, 247-248, 461

To: De Beers Canada Mining Inc.

Preamble: In table 5.3-1 De Beers reviews the Employment impacts on the NWT. The total "closed" (where "closed" includes direct, indirect and induced employees) figures were as follows:

Construction: 1,000

Operations: 930

Closure: 180

In IR response 1.20(a) De Beers estimates that the total potential labour force for the NWT is 1,507 persons.

Request: Please clarify the following:

- a) From the estimated potential labour force of 1,507 persons, the number that live in 1) the primary communities, 2) the catchment communities.
- b) Using the stated "closed" figures, please calculate the total NWT potential labour force for the mine only at each stage of its operation.
- c) Given these calculations, the spatial area that will be required to provide this labour force (i.e. from how wide an area will DeBeers need to recruit to fill the closed figures?).

1.5 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.9

Reference: EAR Section 14

ToR Line: 235-236, 247-248

To: De Beers Canada Mining Inc.

Preamble: In IR Response 2.5.9(a), De Beers discusses the membership of the Mine Management Advisory Committee (MMAC). De Beers states the following:

"The Mine Management Advisory Committee (MMAC) will be made up of two De Beers representatives and one representative from each of the primary communities. The primary communities consist of Lutsel K'e, N'Dilo, Dettah, Gameti, Wha Ti, Rae/Edzo, Wekweti and the membership of the North Slave Metis Alliance."

Request: Please clarify the decision making process used to identify the selected communities as well as the North Slave Metis Alliance as representative of the total population that will be affected by the mine. Please define how Yellowknife, other

employment catchment area community residents, and the remainder of the NWT were considered.

1.6 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.2.2

Reference: EAR Section, 3.7.1

ToR Line: 198

To: De Beers Canada Mining Inc.

Preamble: The Lutsel K'e Dene First Nation requested commitments regarding outdoor recreation opportunities / facilities will De Beers provide for its employees. What activities will be allowed / not allowed?

In its response, De Beers describes plans for recreation, but specific commitments to action were not mentioned in regard to "What activities would be allowed or not allowed."

Request: Please provide specific commitments to action regarding outdoor recreation opportunities / facilities that De Beers will provide for its employees, including what activities employees will be allowed / not allowed to pursue on site. As well, please comment on policies or actions that may be put in place regarding these activities.

1.7 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.2.6

Reference: EAR, 3.9.1.3, 5.3.3, 5.3.4

Preamble: The Lutsel K'e Dene First Nation asked a number of questions in this IR. Specifically:
a) How De Beers will contribute to the improvement of literacy and technical skills among the aboriginal population;

- b) How De Beers will mitigate the impacts of mining work upon aboriginal families (i.e. increased pressure on spousal relationships, childcare, etc.);
- c) How De Beers will encourage and support the traditional lifestyle of aboriginal people; and
- d) How De Beers will help familiarize aboriginal employees with some of the basics of surviving in a wage economy system (i.e. banking, money management, job advancement, etc.).

In its response, De Beers states that "Some of these measures will be developed and implemented solely by De Beers". Further to this, De Beers commits to work with the federal and territorial governments, local learning institutions, other mining companies, community agencies and each primary community. De Beers also refers to "local social services agencies".

Request:

- 1) For all of the above questions, please define:
 - a) the minimum commitments that De Beers' is prepared to make towards each of these questions, both solely and in partnership with federal and territorial governments, local learning institutions, other mining companies, community agencies, and each primary community.
 - b) how DeBeers will influence the roles/commitments of contractors in these regards.

As a point of clarification, please identify specific "local social service agencies" that exist separately from GNWT programs.

- 2) Please identify if De Beers commits to developing and implementing a policy and/or program that supports employees to carry on a traditional lifestyle in partnership with affected communities. If so, please describe the key elements of this policy/program that are envisioned.

1.8 Source: Government of the Northwest Territories

Supplementary to: IR Response 2.2.7

Reference: EAR, 3.9.1.5

ToR Line: (not identified in Lutsel K'e question)

Preamble: The Lutsel K'e Dene First Nation asked De Beers to explain how it will adjust the work schedules of aboriginal people for important cultural / community events such as spiritual gatherings, community hunts and annual assemblies.

In its response De Beers stated that with respect to accommodating Aboriginal people for important culture/community events, employees will receive time off as a result of the rotational shift schedule, as well as annual vacation. This annual vacation can be used in combination with the rotation schedule, which will provide significant blocks of time for people to pursue traditional activities, attend spiritual gatherings, community hunts and annual assemblies should they choose.

The response does not fully address the request.

Request: Please indicate how (in what ways and to what extent) De Beers is prepared to adjust work schedules to accommodate cultural/community events.

1.9 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.4.6

Reference: EAR 3.10, 5.3.2.2.1 to 5.3.2.2.3, 5.3.2.3.4, 10.2.2.2.2, 10.3.2.2.2, 10.4.2.2.2, Appendixes III.1 & III.11

ToR Line: Section 2.4.3, Lines 164 to 170

To: De Beers Canada Mining Inc.

Preamble: In its response to the above IR, De Beers outlines how it would administer a temporary closure of the Snap Lake Project.

Request: Please outline a human resources plan and community-preparation plans for both De Beers and its contractors in event of closure.

1.10 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.2 (a)

References: EAR Section 1.1.2

ToR Lines: 585 - 599

To: De Beers Canada Mining Inc.

Preamble: In its response to the above IR, De Beers indicates that it contributes "slightly over 3 million dollars Canadian towards diverse socio-economic and educational initiatives" in South Africa through its De Beers Fund.

Request: Please indicate
a) if this is a total or periodic figure.
b) what proportion of gross annual value of resources mined in South Africa this represents.

1.11 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.3 (a)

References: EAR Section 5, 12

ToR Lines: 181-181

To: De Beers Canada Mining Inc.

Preamble: In its response to the above IR, De Beers states on page 223 (of DeBeers Canada Mining Inc. Snap Lake Diamond Project Responses to Information Request Round 1, Second IR Round, received by the MVEIRB July 30, 2002) that it conducted interviews with community representatives and diamond mine workers, reviewed and analyzed documents and case studies that considered the effects of industrial development in the NWT, Nunavut and the northern parts of provinces.

Request: a) Please describe interview methodology including, but not limited to: sample size, randomization, consistency of questions, and interview technique.
b) Please provide citations for documents being referred to in this response and copies of any unpublished documents or results (specifically the documents listed on page 223 of DeBeers Canada Mining Inc. Snap Lake Diamond Project Responses to Information Request Round 1, Second IR Round, received by the MVEIRB July 30, 2002.)

1.12 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.4 (b)

References: EAR, Sections 5.2.3, 5.3.1

ToR Lines: 230, 461

To: De Beers Canada Mining Inc.

Preamble: De Beers has answered the question by stating how they will inform the NWT business community about itself. The original question requested information on how De Beers will inform itself about the NWT business community.

Request: Please respond to the question.

1.13 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.6 a, b, c & d

References: EAR, Sections 5, 12

ToR Lines: 235-236, 238-240

To: De Beers Canada Mining Inc.

Preamble: The proponent was requested to provide a rationale for the selection of spatial boundaries for each of the specific components. The response to the above IR does not adequately answer the request in respect to each component.

Request: Please provide the requested rationale so that the methodology of how spatial boundaries for each of the specified components were determined can be properly analyzed for each component in the original request.

1.14 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.7 (d), (e) & (f)

References: EAR Section 5.3.4, Appendix V.3-4, and V.3.4.2

ToR Line: 574-577

To: De Beers Canada Mining Inc.

Preamble: In the response to the above stated section, De Beers comments on the importance of Community Liaison personnel as serving as a communications link between De Beers, employees and the primary communities

Part of question (g) (the process that will occur if commitments are unfulfilled) was not answered.

Request: a) Please identify the minimum and maximum expectation to regularly visit communities (in question d).

b) Please clarify if MMAC will have liaison personnel working for it, and what resources will be dedicated to socio-economic matters by De Beers (question e)?

c) Please provide an answer to question g (as noted above).

1.15 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.8 a), b), & c)

References: EAR Section 5.3.5

ToR Line: 573 - 577

To: De Beers Canada Mining Inc.

Preamble: To assist the GNWT in fulfilling its responsibilities to affected

communities, it has developed an indicator-based monitoring program. For industrial projects, this is supplemented by an on-site employee survey. In the past, the NWT Bureau of Statistics has set the survey methodology (sampling, weighting, etc.). The GNWT views this as an integral part of post-approval environmental monitoring, in the same way that proponents monitor other aspects of on-site environmental impact.

De Beers has supplied responses to the questions noted above. However, the information supplied does not adequately address the questions asked.

In order to continue socioeconomic reporting, the basis of which has been established already with Diavik and BHP as well as other industry, GNWT had asked De Beers for a commitment to provide annual employment and procurement data as follows:

... reported by De Beers on behalf of itself, its contractors and subcontractors:

- a) Hiring (reported as number of people hired) . by community, priority group, and job category;*
- b) Employment (reported in person years) . by northern community, priority group, and job category;*
- c) Employment (reported in person years) . of non-NWT residents, by job category.*

To assist it to understand and encourage sustainable economic development for affected communities and for the Northwest Territories, the GNWT seeks the following annual procurement data for industrial projects,

reported by De Beers on behalf of itself, its contractors and subcontractors:

- a) An Advance Business Opportunities Forecast, identifying potential business opportunities related to the Project;*
- b) The gross value of goods and services purchased, by: category of purchase; business preference category (northern, Aboriginal, or other); community; and Project phase (Construction, Operations).*

Request:

Please indicate De Beers' willingness to provide the requested information annually in the specified format.

- 1.16 Source: Government of the Northwest Territories (GNWT)
- Supplementary to: IR Response 2.5.9 d), f), e) & g)
- References: EAR Section 14
- ToR Line: 573, 577, 597-599
- To: De Beers Canada Mining Inc.
- Preamble: DeBeers has indicated their intent to create a Mine Management Advisory Committee (MMAC).
- Request: Please indicate De Beers':
- a) minimum commitment of funding to MMAC;
 - b) the minimum percentage of that amount that would be available for socio-economic issues; and
 - c) a level of certainty that De Beers will apply adaptive management to mitigate socioeconomic concerns given the solely advisory role of the MMAC.
- 1.17 Source: Government of the Northwest Territories (GNWT)
- Supplementary to: IR Response 2.5.16
- Reference: EAR Section 10.4.1.3.2 Page 10-120
- ToR Line: 414-436
- To: De Beers Canada Mining Inc.
- Preamble: De Beers states in its EA Report that on April 16, 18 and 23, 2000, reconnaissance flights were flown over traditional migration routes within and adjacent to the RSA to confirm the lack of caribou in the area. In the IR response, De Beers described traditional migration routes as being synonymous with historic trails. De Beers further explains that these trails are meant to provide a historical picture of the routes taken by caribou during the southern migration.
- Request: Please provide the rationale for flying the April 16, 18 and 23, 2000, reconnaissance flights over traditional southern migration routes and indicate how results were used in the EIS.

1.18 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.44 d), e) & f)

References: EAR Sections 5.3.4.2, 3.9.1.2

ToR Lines: 465-467, 470, 488-491

To: De Beers Canada Mining Inc.

Preamble:

As previously noted in the noted information request, in Section 3.9.1.2, De Beers makes a commitment to recruit and hire as many Aboriginals and northerners as possible during both the construction and operation phases. Priorities in hiring will be as follows:

- First: Aboriginals born or residing in one of the primary communities;
- Second: residents of the NWT;
- Third: Canadians willing to relocate to the NWT; and,
- Fourth: others from across Canada.

These priorities are set in place to give priority to Aboriginal and nonaboriginal residents of the NWT.

How De Beers intends to meet these priorities needs to be fully understood to make sure that they do indeed encompass all NWT residents. This is reiterated in Section 115b of the Mackenzie Valley Resource Management Act.

As well as De Beers, its contractors and their sub-contractors also play a role in the employment, recruitment, and retention of northern employees. Their commitments need to be established, as they provide an integral part of the mine environment.

In response to the above IRs, De Beers does not fully address the issues raised regarding incentives for:

- employees to relocate, monitoring of NWT residency, and
- enforcement measures in contracts for subcontractors.

This is required to adequately assess the response.

In the responses, De Beers indicates that specific policies will be developed through a Recruitment, Selection and Retention strategy and HR management procedures. De Beers makes no firm commitment, nor is any policy stated, that would bind De Beers' contractors to De Beers' commitments.

These questions are particularly important given De Beers consideration to contract a number of operational, as well as construction, services.

- Request: Please describe:
- a) what incentives De Beers will put in place to ensure that employees wanting to move to the NWT will have this opportunity; and
 - b) what policies and processes will be put in place to monitor whether employees continue to reside in the NWT.
 - c) How De Beers will influence contractors' and sub-contractors' commitments for hiring priorities, recruitment & retention strategies, and training, including any consequences De Beers will introduce to ensure contractors and subcontractors do meet De Beers commitments for hiring, recruitment and training.

1.19 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.46

References: n/a

ToR Lines: 213-216

To: De Beers Canada Mining Inc.

Preamble: The above IR deals with employment and procurement experience of De Beers during the advanced exploration phase. The information provided is useful however there are still information gaps that would assist in the estimation of impacts.

- Request:
- 1. Please indicate:
 - a) total numbers of the full workforce, not just northern/aboriginal;

- b) annual hiring levels, taking into account turnover, that would be required to maintain a 30% northern employee ratio;
- c) DeBeers' willingness to hire 100% of available northerners regardless of their drug and alcohol history or current use. Should this willingness not be in place, please detail the assumptions that will need to be factored into the calculations regarding employment presently appear in the assessment report.
- d) a likely family profile of the workforce in order to help predict impacts on infrastructure/service.

1.20 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.47

References: EAR Sections 5.3.4.3.5, 14.3 (Table 14.2-2), 12.2.4.1.1, Appendix IV.1

ToR Lines: 172-176, 201-207

To: De Beers Canada Mining Inc.

Preamble: In the above noted information request it was noted that the importance of having direct transportation between the mine site and communities from which its workforce is being supplied, is emphasized several times in the community consultation documentation.

It was requested that De Beers describe when direct transportation from a community would be 'feasible', including the following information and any other information necessary to make a careful assessment of potential project effects:

- a) an explanation of criteria that were used to decide whether transportation feasible;
- b) conditions that would be needed for De Beers to provide direct transportation to and from each community that supplies workers for the Snap Lake Diamond Project.

De Beers indicated that a response to above response was forthcoming.

Request: Please indicate when a response to this question will be forwarded.

1.21 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.48 (a) & (b)

References: EAR Sections 5, 12

ToR Lines: 475

To: De Beers Canada Mining Inc.

Preamble: As noted in this previous information request, the importance of having direct transportation between the mine site and communities from which its workforce is being supplied, is emphasized several times in the community consultation documentation.

De Beers was asked to examine possible alternatives for employee residency and the impacts of those alternatives, giving particular consideration to issues of vacancy rates, electricity and land development costs, existing infrastructure capacity, and municipal burden for two scenarios. This request was not answered.

Request: Please provide a response to the questions originally presented.

1.22 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.52 (c)

References: EAR Section 5.3.4, 5.3.4.3

ToR Lines: 172-176

To: De Beers Canada Mining Inc.

Preamble: In its response the above IR, De Beers has indicated that it will provide supplementary health care that will include addiction and family services. The level of service that will be offered had not been determined yet.

Request: Please provide a description of industry norms for this type of coverage. State De Beers' minimum commitment and expected maximum commitment towards this coverage.

1.23 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.53 (c) & (d)

References: EAR Sections 4, 5, 12

ToR Lines: 201-207, 188-189, 196

To: De Beers Canada Mining Inc.

Preamble: The above IR deals with rotation schedules and cost benefit analysis that was performed by De Beers. Additional information is required to properly assess the response.

Reference is made to the rotation preference of single male employees on page 354 of DeBeers Canada Mining Inc. Snap Lake Diamond Project Responses to Information Request Round 1 (Second IR Round) received by the MVEIRB July 30, 2002. In response to IR# 2.5.46 (e) De Beers indicated that it could not make any predictions based on worker profiles for any phase of the project. If De Beers knows that a certain percentage of its workforce will be single males, it can apply this knowledge to the previous IR and can provide the assumptions used in determining social implications.

In response 2.5.53(a) De Beers indicates that "Some skilled workers have indicated they would not work a 1/1 rotation during construction".

Request: Please provide:

- a) details of cost analysis for rotation cost estimates;
- b) the technical basis for these statements:
 - "personnel productivity/efficiency would be lower"
 - "attracting skilled construction workforce may be difficult"
- c) details on the expected extent of required workforce that wouldn't work a 1/1-rotation cycle.
- d) information regarding paid transportation costs as relates to departure points used in cost analysis.

- e) Information on services expected to be completed under contract to De Beers, including the types of services and the expected number of positions that will be employed by contractors.

1.24 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.59

References: EAR Sections 5, 12

ToR Line: 560 – 565: Abandonment and Restoration

To: De Beers Canada Mining Inc.

Preamble: De Beers provided a list of case studies in its response to the above IR.

As well, De Beers noted that it will encourage its contractors and sub-contractors to follow its example in relation to lay-offs and closure.

Request: Please provide:

- a) copies of each case study as noted in response to IR 2.5.59 on page 377 of DeBeers Canada Mining Inc. Snap Lake Diamond Project Responses to Information Request Round 1 (Second IR Round) received by the MVEIRB July 30, 2002; and
- b) the predicted portion of the Snap Lake workforce that will be employed by contractors or sub-contractors.

1.28 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.2.5 (a)

Reference: EAR Section 3.9.1.2

To: De Beers Canada Mining Inc.

Preamble: The GNWT supports the development of an adaptive management program in regards to hiring aboriginal people during all phases of the project. The GNWT wishes to emphasize the importance of policies and processes that

trigger adaptive management to re-assess actions when expected results deviate from predictions.

Under Section 128 of the MVRMA the Review Board shall, where the development is likely in its opinion to have a significant adverse impact, state such measures as it considers necessary to prevent the significant adverse impact.

In order to assess significance of the De Beers project on the social, cultural and economic well-being of residents and communities in the Mackenzie Valley, further details are required.

Request:

De Beers has described the likely employment impact of its project. Please provide further information regarding:

- a) De Beers' minimum commitment to aboriginal employment;
- b) the deviation from this minimum that would trigger adaptive management to assure increased aboriginal employment;
- c) the minimum measures that would be taken to ensure adaptive management is applied in this case.

1.25 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.2.11

ToR Line:

Reference: EAR Section 5.3.6

Preamble: The Mackenzie Valley Resource Management Act, S. 115(b) states that the Board will consider the protection of the social, cultural and economic well being of residents and communities of the Mackenzie Valley.

In its response to this information request from Lutsel K'e, DeBeers states that it is committed to socio-economic monitoring that would monitor the effectiveness of project related mitigation within their control. De Beers will consider participating in community based monitoring initiatives for socio-economic impacts where they would contribute to this monitoring goal.

Request: Please provide details on De Beers' willingness to commit to community-based monitoring initiatives.

1.26 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.5 (b), (c) & (d)

References: EAR Sections 4, 5 (5.3.1.1), 12

ToR Lines: 30-31

To: De Beers Canada Mining Inc.

Preamble: In the response to the above IR, De Beers states that it was not required to provide action items resulting from consultation activities. However, the ToR states that De Beers is required to describe its public consultation policies, objectives, programs and activities undertaken and committed to regarding agreements, or commitment to agreements, with interested participants and/or communities.

Request: Please provide details regarding activities undertaken and committed to as a result of public consultation.

1.27 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.53

References: EAR Section 5

ToR Lines: 232, 499-503, 507-510, 548, 553-557

To: De Beers Canada Mining Inc.

Preamble: In previous IRs De Beers indicated that it could not project worker profiles to any degree of accuracy to be useful in making predictions. However, Response 2.5.53 (c) indicates that the proponent has used some demographic information to predict population shifts and mobility by stating, "However, in the interviews conducted with community representatives, employees of the BHP Billiton and Diavik, and personnel from the Advance Exploration Program at Snap Lake" in the context of IR response 2.5.53 (a) referenced in 2.5.53(c) of DeBeers Canada Mining Inc. Snap Lake Diamond Project Responses to Information Request Round 1 (Second IR Round) received by the MVEIRB July 30, 2002.

Request: Please provide an expected demographic profile of the population De Beers expects to secure as its workforce.

1.28 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.41

References: EAR Section 11.3.3.1

ToR Line: 497-498

To: De Beers Canada Mining Inc.

Preamble: Previously in the above noted information request, the GNWT had noted that, based on the above noted ToR and the MVRMA Section 115(b), it is its expectation that De Beers would address the potential development impacts on the physical and mental health of not just employees, but their families and communities as well. De Beers limits its human health assessment to non-occupational involuntary exposure to chemical release. It states, "The health & safety of on-site employees is protected by occupational health and safety regulations, and was not evaluated in this assessment. The health and safety regulations are protective of employees at all times while on the sites."

There are important aspects of on-site employee health that are not proscribed by regulations. However, an employer can, through its own initiative, care and action, protect or enhance the health of its employees.

The GNWT is interested in industry initiatives and had previously requested information on De Beers policies through IR 2.5.41 (a) which requested that De Beers provide information on proposed actions planned to protect workers, and their families and communities, from contracting and spreading communicable diseases such as tuberculosis. De Beers responded to IR 2.541 (a) as follows, "De Beers is interested in promoting and maintaining a healthy workforce. As part of this approach, De Beers is currently developing a communicable disease program, which will be implemented at the Snap Lake site. Regional medical service groups will be utilized on an outreach basis as a support to the program".

Request Please clarify:

- a) what is meant by "regional medical service groups"; and
- b) if these groups have been contacted with respect to providing outreach support to the program.
- c) If not, the expected timing of these consultations; and
- d) the expected timing of the availability of this program.

1.29 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.41

References: EAR Section 11.3.3.1

ToR Line: 497-498

To: De Beers Canada Mining Inc.

Preamble: In this information request De Beers had been asked if medivac services be available 24/7. De Beers responded (in 2.5.41 (d) of De Beers Canada Mining Inc. Snap Lake Diamond Project Responses to Information Request Round 1 (Second IR Round) received by the MVEIRB July 30, 2002.) that medivac services are available full-time, weather permitting. In the case of a serious medical emergency that would require immediate medivac services, all reasonable attempts would be made to evacuate a patient.

Request: Please indicate:

- a) what qualified personnel would accompany the medivac; and consequently,
- b) what qualified personnel would be left on site.
- c) In regard to the above, please note how this would vary during the different phases of the project (construction and operations).
- d) As well, please identify what communities will be used to provide medical services and treatment in a medivac situation.

1.30 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.41

References: EAR Section 5.3.4, 5.3.4.3

ToR Line: 172-176

To: De Beers Canada Mining Inc.

Preamble: De Beers has not indicated, what, if any, employee assistance programs are available.

Request: Please describe:

- a) industry standards for employee and family assistance programs, including addiction and family services;
- b) the expected minimum and maximum coverage, including the minimum number of visits for use of services.

WILDLIFE

1.31 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.27

Reference: EAR Section 10.4.2.4.1

ToR Line: 433, 143 and 436

To: De Beers Canada Mining Inc.

Preamble: De Beers has identified food odors, shelter, oil products and raised areas as elements that are likely to attract wildlife. Each of these elements is different and requires a different and specific mitigation action. There are not clear mitigation actions identified for each of these elements, which makes it difficult to assess the impacts on wildlife and the effectiveness of the mitigation actions.

Request:

Please indicate:

- a) if De Beers has examined and selected mitigation actions to specifically address the following attractants: Food odors from the kitchen, food odors from food storage areas, shelter, oil products, raised areas.
- b) If so, please describe the mitigation actions selected and explain why those actions were selected.
- c) If not, when De Beers will develop mitigation actions to address each of the attractants and what factors will be considered.

1.32 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.30

Reference: EAR Section 10.4.2.4.2

ToR Line: 433, 143 & 436

To: De Beers Canada Mining Inc.

Preamble: De Beers has stated in their response that they are examining an alternative method of handling food waste. Without the details of what the alternative method consists

of, it is not possible to assess the waste handling methods and the potential impact on wildlife.

Request: Please provide a detailed description of how De Beers proposes to handle food wastes.

1.33 Source: Government of the Northwest Territories (GNWT)

Supplementary to: IR Response 2.5.25

Reference: EAR Section 10.4.2.4.2

ToR Line: 433, 143 & 436

To: De Beers Canada Mining Inc.

Preamble: The effectiveness of the proposed methods of removing wildlife from the runway may vary with the species and numbers of individual animals present at one time. This has been shown through the experience of Diavik and Ekati when large herds of caribou have moved on to their runways.

Request: Please provide information on the following:

- a) a contingency plan to address situations where the proposed methods of removing wildlife from the runway are ineffective;
- b) how De Beers intends to use the Diavik and Ekati experiences to ensure that a contingency plan is in place.

AIR QUALITY

- 1.34 Source: Government of the Northwest Territories (GNWT)
- Supplementary to: IR Response to Environment Canada (Dave Fox 2.3.1 Air Quality Pg 58)
- References: EAR Section 7.3.2
- ToR Line: 280 – 281
- To: De Beers Canada Mining Inc.
- Preamble: In response to the above IR, De Beers provided detailed information on the calculations used to estimate emissions from the project (Table 2.3-1). The Table indicates that emissions were estimated for the power plant, and mine air and water heaters based on fuel consumption. The fuel consumption of the power plant (24000m³/yr) is less than that of the mine air heaters and water heaters (29,700m³/yr). However, the EA Tables 7.3-1 & 7.3-2 indicate that the estimated NO_x and particulate emissions for the power plant are greater than those for the heaters while the SO₂ emissions are less. This does not appear consistent if the emission estimates are based solely on fuel consumption.
- Request: DeBeers should clarify the emission estimates for the above emission sources given the noted discrepancies.
- 1.35 Source: Government of the Northwest Territories (GNWT)
- Supplementary to: IR Response 2.3.1
- References: EAR Sections 7.3.2, 7.3.3
- ToR Line: 280 – 281
- To: De Beers Canada Mining Inc.
- Preamble: Fuel combustion for power and heat generation is responsible for a considerable portion of the emissions generated from this project. The IR# 2 response to Environment Canada (Dave Fox 2.3.1 Air Quality Pg 58) indicates that the daily emission estimates documented in

EA Section 7.3.2 are derived from the estimated total annual fuel consumption. However, the demand for power and heat is unlikely to remain consistent throughout the year. Therefore, the fuel is unlikely to be consumed evenly throughout the year and consequently the hourly/daily/monthly emissions are also unlikely to be consistent. Such variability in emission rates could have a considerable effect on the shorter term (less than annual) ambient concentrations predicted by the dispersion modeling.

Request:

Please provide information on likely emission fluctuations throughout the year and demonstrate that emission variability was accounted for in the dispersion modeling. If emission variability was not addressed in the original modeling, the dispersion modeling should be redone to reflect 'worst case' emission scenarios.

**De Beers Canada Mining Inc. (De Beers)
Snap Lake Diamond Project**

RWED Information Request No. 3b

Wildlife

1.1.1 Source: Government of the Northwest Territories (GNWT)

Reference: EAR, Section 10.4.1.3.1

ToR Line: 414-417

To: De Beers Canada Mining Inc.

Preamble: Small mammals have not been included in the Valued Ecosystem Components. Small mammals are an ecologically important animal, as they are a food source for other VECs. (Raptors, grizzly bears, foxes, wolves and wolverine) Without monitoring small mammals, it would be difficult to interpret changes to the population and density of some of the other VECs.

Request: Please explain why small mammals were not included as Valued Ecosystem Components.

1.1.2 Source: Government of the Northwest Territories (GNWT)

Reference: EAR Section 10.4.1.3.3 Page 10-123

ToR Line: 414-436

To: De Beers Canada Mining Inc.

Preamble: There is no explanation as to how active dens were determined to be wolf dens or bear dens. A better understanding of what information was used to determine the species using the den is required in order to be able to assess the results obtained.

Request: Please describe what information was used to classify dens as either bear dens or wolf dens.

1.1.3 Source: Government of the Northwest Territories (GNWT)

Reference: EAR Section 10.4.1.3.4

ToR Line: 414-436

To: De Beers Canada Mining Inc.

Preamble: There is no explanation or description of what is meant by "number of individual tracks". Is this the number of actual wolverine footprints seen, or the number of wolverine trails, or the number of wolverine tracks believed to belong to different animals no matter where located? A better understanding of is meant by "number of individual tracks" is needed in order to be able to assess the results obtained.

Request: Please explain what is meant by "number of individual tracks".

Air Quality

1.2.1 Source: Government of the Northwest Territories (GNWT)

References: EAR Section 6.5.2.2.3

ToR Line: 514 – 515

To: De Beers Canada Mining Inc.

Preamble: The diesel power generators and air and water heaters are a source of Sulphur Trioxide (SO₃) which readily combines with moisture (ambient and steam plumes) to produce sulphuric acid mist and adds to visibility degradation. Likewise there are other emissions from the power plant and heaters (e.g. Nitrogen Oxides and fine particulate) which can have detrimental effects on local visibility. There is no discussion of potential effects on plume formation and local visibility of these emissions.

Request: DeBeers should evaluate the potential impacts of emissions from the power plant and other combustion sources on plume formation and local visibility.

1.2.2 Source: Government of the Northwest Territories (GNWT)

References: EAR Section 7.1.3.1, 7.3.2, 7.4.1

ToR Line: 280 – 283

To: De Beers Canada Mining Inc.

Preamble: 1. The sections identify many of the air quality contaminants associated with the project emissions. However there are others of concern - particularly those associated with combustion sources:

- Sulphur Trioxide (SO₃) and the production of sulphuric acid mist,
- Carbon Monoxide – a criteria air pollutant,
- Organic Compounds (VOC's e.g. BTEX) some of which are carcinogenic

2. There is no discussion regarding the use of downstream emission control systems and the potential to reduce discharge concentrations.

Request: 1) DeBeers should evaluate all potential contaminants associated with the project emissions or provide the rationale for those excluded.
2) DeBeers should evaluate the use of emission control devices for all point source discharges and the reduction in emissions that might be achieved through their use. If use of the devices is rejected, DeBeers should provide the rationale for such rejection.

1.2.3 Source: Government of the Northwest Territories (GNWT)

References: EAR Section 7.1.5.4. , Table 7.1-9

ToR Line: 280 – 281

To: De Beers Canada Mining Inc.

Preamble: The assessment method pertaining to magnitude appears to be creating a hierarchy of relevance in which exceedences of federal air quality guidelines are deemed of greater significance than those of the NWT and in turn the federal

guidelines are superceded by those of the USEPA. For instance, the predicted air quality impact for SO₂ is rated "moderate" if the NWT air quality guidelines are exceeded and "high" only if the federal air quality guidelines are exceeded. Similarly, for PM₁₀ and PM_{2.5}, exceedences of the provincial and federal guidelines are ranked as "moderate" with a ranking of "high" assigned only to exceedences of the USEPA guidelines. The proposed mine is located within the NWT and the guidelines to be met are those of the NWT where available or the federal government. Therefore any exceedence of the applicable NWT or federal guidelines should trigger a "high" rating.

Request: DeBeers reevaluate the assessment method and the subsequent environmental consequence rating.

1.2.4 Source: Government of the Northwest Territories (GNWT)

References: EAR Section 7.2.2.2.2

ToR Line: 280 – 281

To: De Beers Canada Mining Inc.

Preamble: The section discusses analysis of snow samples for PAH's and states that none of the identified PAH compounds were present in detectable amounts. The detection limit of the analytical method is, however, not provided and therefore it is not possible to determine if the method used provides sufficient sensitivity to accurately characterize PAH concentrations in the snow.

Request: DeBeers should provide the Minimum Detection Limit or Concentration (MDL/MDC) for the PAH analytical method.

1.2.5 Source: Government of the Northwest Territories (GNWT)

References: EAR Section 7.3.2

ToR Line: 280 – 281

To: De Beers Canada Mining Inc.

Preamble: This section discusses the estimated emissions from underground activities but the discharge points of these emissions are not identified – are they the mine portal and the two exhaust vents located to the north?

Request: DeBeers should clarify the discharge points of the underground emissions and confirm how the emissions were incorporated into the dispersion modeling.

1.2.6 Source: Government of the Northwest Territories

Reference: EAR Sections 7.3.8.3, 7.5

ToR Line: 287-288

To: DeBeers Canada Mining Inc.

Preamble: DeBeers indicates emissions of carbon dioxide and other greenhouse gases (GHG) have been linked to global warming. The total GHG emissions from the Snap Lake Mine will produce 102 kilotonnes per year (kt/yr) accounting for a 5% and 4.7% increase in the respective 2000 and 2005 "business as usual" GHG emissions for the NWT. As indicated in IR# 2.5.34 these percentages include both Nunavut and the NWT.

Request Could DeBeers please provide a yearly GHG emission forecast broken-down by activity for the life of the mine . The forecast needs to take into account yearly fluctuations in mining activity.

1.2.7 Source: Government of the Northwest Territories (GNWT)

Reference: EAR Section 2.8.3

ToR Line: 193

To: DeBeers Canada Mining Inc.

Preamble: DeBeers indicates solar heating using Solarwall and similar technologies may be sufficient to increase the temperature of intake air passing through a metal panel by about 8C to 10C in summer months. This reduces the diesel power generation required to heat the air to proper temperature.

The Solarwall system has been installed in the NWT and other areas of similar climates.

Request: Has DeBeers studied the other Solarwall systems that have been installed in the NWT and other areas of similar climates to estimate the capital costs, energy savings and technological design requirements?

1.2.8 Source: Government of the Northwest Territories (GNWT)

Reference: EAR Sections 7.3.8.3, 7.5

ToR Line:

To: DeBeers Canada Mining Inc.

Preamble: Given the Government of the Northwest Territories Green House Gas strategy, the probability of Government of Canada ratifying and implementation of the Kyoto accord on Green House Gas GHG and the potential effects GHG on world climate change.

Request: 1) What is DeBeers corporate global stance on climate change? Has DeBeers developed programs or innovations to reduce GHG at any of their other mines?

2) Would DeBeers be willing to join Canada's Climate Change Voluntary Challenge and Registry Inc. or other self-regulatory GHG groups? Is DeBeers currently a member of such an organization in other foreign countries?

Socio-Economic

1.3.1 Source: Government of the Northwest Territories (GNWT)

References: EAR Section 5.3.2.3.5

ToR Line: 2.7.3

To: De Beers Canada Mining Inc.

Preamble: Corporate income taxes for the federal and territorial governments are put at \$443 and \$222 million respectively while mining taxes are estimated at \$234 million.

Request: Can De Beers indicate:

- 1) What diamond value (\$US/ct) was used in these calculations.
- 2) Whether accumulated costs in the Canadian Exploration Expense pool were used in the calculation of taxable income.
- 3) Whether costs in the Canadian Development Expense pool were used in the calculation of taxable income. Specifically, how were acquisition costs in respect of the Snap Lake project treated?
- 4) What diamond value was used to calculate the above income taxes and what diamond value was used to calculate diamond revenues as stated in the EAR.
- 5) If the last diamond valuation is lower than that used in the original assessment, what are the revised income and mining tax revenues that can be expected from the project.