



Mr. Gordon Wray A/Chairperson Mackenzie Valley Environmental Impact Review Board BOX 938 YELLOWKNIFE NT X1A 2N7

VIA Facsimile: (867) 920-4761

Dear Mr. Wray:

DeBeers Snap Lake Project - Environmental Assessment (EA) Process

Thank you for the opportunity to provide the Mackenzie Valley Environmental Impact Review Board (MVEIRB) with comments and concerns regarding the June 24, 2002 proposed changes to the DeBeers Snap Lake Environmental Assessment Workplan (the Workplan). The GNWT believes that consultation with all directly affected parties and interveners throughout the environmental assessment process is of great value and we would encourage the MVEIRB to ensure the views of all affected parties are heard.

Following discussions between the Department of Resources, Wildlife and Economic Development personnel with your staff, the Government of the Northwest Territories (GNWT) has four remaining concerns with the revised Workplan.

1. The proposed schedule does not allow sufficient time to prepare, review and coordinate the submission of comprehensive technical reports. The GNWT will require six weeks. These reports require considerable effort for review, input and coordination to accurately represent GNWT concerns. We believe it is in everyone's best interests, including the Proponent's, to ensure a thorough and complete review. Failure to adequately address technical aspects at this stage will only cause further delays and costs for the Proponent in the future.

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- 2. Completeness of, and accuracy within, technical reports depends on reviewers having full information prior to preparing a technical report. The GNWT requests that the amount of time allotted for the coordination and preparation of the Technical Reports begin only once the Environmental Assessment Report is in conformity and all responses have been received to Board-issued Information Requests. In this way, delays associated with the Proponent's response to conformity and information requests will not jeopardize the quality of technical advice we are able to provide the MVEIRB.
- 3. The GNWT is concerned with the adequacy of public consultation and participation during the summer months. The GNWT feels that input from Aboriginal groups is particularly important. We would encourage MVEIRB to ensure that sufficient time is provided to the public to provide adequate input to the environmental assessment process. The GNWT relies significantly on the established transparent and public procedures of the board to adequately provide for consultation.
- 4. The proposed Workplan requires that technical reports be completed prior to technical sessions. We feel that it would be more efficient to schedule the submission of technical reports following the technical session. Following the technical session we would be in a better position to provide more complete and comprehensive technical advice.

Thank you for the opportunity to review the revised process and associated timelines. I hope these comments are helpful.

Sincerely,

Doris Eggers

Director, Policy, Legislation, and Communications Resources, Wildlife and Economic Development