

Proposed Environmental Assessment Terms of Reference

of the

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

November, 2000

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**PROPOSED
ENVIRONMENTAL ASSESSMENT
TERMS OF REFERENCE
FOR THE DE BEERS CANADA MINING INC.
SNAP LAKE DIAMOND PROJECT**

1 INTRODUCTION

1.1 Purpose of the Proposed Terms of Reference

The Environmental Assessment Report (EAR) will address the Terms of Reference (ToR) provided by the Mackenzie Valley Environmental Impact Review Board (the Review Board). However, the final ToR will not be available while the EAR is being written. Therefore, a proposed ToR has been developed from the ToRs for the BHP Diamond Inc. Mine Extension and the Diavik Diamond Mines EARs. When these two ToRs are compared, they demonstrate that ToRs are a moving target. The BHP ToR is more detailed and more relevant to the BHP project. It is therefore, a better model to use. However, the ToR only addresses the expansion of the mine and many important aspects of a new development are not included (e.g., the mill emissions and effluent).

The Review Board determined what it considered to be the BHP Diamonds Inc. development, and to what extent the interactions between components of the proposed development and the environment will be looked at in the EA. The Review Board also requested the developer to demonstrate its capacity and ability to undertake the proposed development in an environmentally safe and sustainable manner. The following revision of BHP's ToR will provide the EA team with a better understanding of the Review Board's expectations. We will have to predict the likely Terms for components present in the Snap Lake project that were not included by BHP.

1.2 Public Consultation and Traditional Knowledge

The BHP ToR clearly emphasizes the consultation process with local communities and Aboriginal peoples. The EAR will also have to emphasize this process.

1.2.1 Public Consultation

The BHP ToR was drawn from the Review Board's expectations of BHP for the use and integration of public consultation and traditional knowledge in the EAR and throughout the EA process. Recently, a Review Board staff member attended BHP community/stakeholder meetings held in Lutsel K'e, Dettah, N'dilo, Yellowknife and Rae-Edzo, and with the North Slave Metis Alliance. The staff member prepared meeting notes that should be confirmed with the meeting participants. This process will likely be repeated. In addition to attending the BHP community/stakeholder meetings, the Review Board's staff held information sessions in Wha Ti, Wekweti and Gameti. Consultations with all of these communities will be critical to the project's success.

The purpose of public consultation is to inform those who may be affected by the proposed development and to provide them the opportunity to participate in the process. The Review Board will decide who is included, but, as a minimum, the residents, First Nations, Metis, and Inuit organizations in Gameti, Wekweti, Wha Ti, Rae-Edzo, Yellowknife, Dettah, N'dilo and Lutsel K'e should be included. This does not prevent De Beers from including industrial, recreational, environmental and other recognized individuals, groups and organizations who have an interest in the proposed development. De Beers must provide adequate public notification that it is preparing an EAR, and advise the public of opportunities to provide input so that they may be involved in the environmental assessment process.

According to the Review Board, De Beers will likely be required to describe public consultation objectives including programs and activities undertaken and committed to regarding:

- I. methods used to identify, inform and solicit input from potentially interested parties;
- II. those who provided comments and input;
- III. outcomes of consultation including any additional information provided by those consulted;
- IV. key concerns identified;
- V. major differences in views between those consulted;
- VI. agreements or commitment to agreements with interested participants and/or communities;
- VII. issues tracking and management; and

- VIII. an indication of how consultation affected the outcome of predicting impacts and determining mitigation, as well as, affecting the design of the proposed development.

This is an expansion from the Diavik ToR which only listed four points as follows:

- I. the criteria used by the proponent to determine which parties were consulted, and who was consulted;
- II. the general approach and specific methodologies used to solicit public input throughout the evolution of the project design and during the preparation of the environmental assessment report;
- III. summary of information collected from public consultations and sources of additional information; and
- IV. a summary of how issues raised during the consultations were considered and addressed by the proponent.

1.2.2 Traditional Knowledge

De Beers will likely be asked to make all reasonable effort to collect and facilitate the collection of traditional knowledge, relative to the proposed development, for integration into the environmental assessment report in collaboration with Aboriginal communities and organizations. De Beers will be expected to describe where and how traditional knowledge was used, and the effect that it had on predicting impacts and determining mitigation. Where traditional knowledge is not available to the developer, in a timely manner, despite appropriate diligence, the developer will describe efforts taken to obtain it.

The Diavik ToR provided a more detailed description of traditional knowledge in the EAR. The Diavik EAR was supposed to do the following:

- I. include a description of how traditional knowledge (including existing traditional knowledge reports) influenced the methodology used by the proponent to collect and incorporate traditional knowledge;
- II. include details on the methodology used to collect traditional knowledge, such as:
 - a. general format and location of meetings;
 - b. what type of background information was provided at each meeting;

- c. the general amount of time provided to prepare comments; and
 - d. an indication of the level of community participation (including elders, women and youth);
- III. include a table briefly summarizing the results of key meetings;
- IV. include information on how individual traditional knowledge studies were designed, how information was collected (e.g., interview, questionnaires), who participated in the studies, how they were selected, and how information collected was verified by the providers of the information and the community, where appropriate;
- V. provide a summary of where traditional knowledge was used in the project; and
- VI. where traditional knowledge is not available despite appropriate diligence, provide a description of efforts made to attain it.

1.3 Environmental Assessment Methodology

De Beers will be expected to provide information on the environment and how it could be affected by the proposed development. De Beers should also provide a sufficient base for the prediction of positive and negative impacts, and the extent to which negative impacts may be mitigated by planning, development design, construction techniques, operational practices, and reclamation techniques.

Where a determination of significance is provided in the EAR, De Beers should identify and explain the criteria used in forming its views. The Review Board has the final say on significance.

Explicit documentation of the assumptions, models, information sources used, as well as information limitations and associated levels of uncertainty should support all steps of the environmental assessment report. The analysis should be quantitative where data are available, but where data or models are lacking, best professional judgement may be used. The approach and methodologies used to identify and assess cumulative effects should be explained.

1.3.1 Description of the Existing Environment

De Beers will be expected to provide sufficient information on the existing environment, as it pertains to the proposed development, to give a brief but clear picture of the existing environment

and its use. Baseline data in existing reports and documents should be appropriately referenced. De Beers will be expected to clearly and succinctly describe the following environmental components, as they relate to the proposed development:

- I. air and climate;
- II. surface and ground water quality and quantity;
- III. aquatic organisms and habitat;
- IV. wildlife and wildlife habitat, including migratory birds;
- V. vegetation and plant communities;
- VI. terrain, surficial geology, bedrock geology, *seismicity, geological hazards, permafrost, soils, and lake sediments*;
- VII. human health;
- VIII. economy;
- IX. employment, education and training;
- X. infrastructure;
- XI. government *revenues*, cost; and
- XII. *social* and cultural resources.

This list is nearly the same as the list provided to Diavik. The words shown in italics were added in the Diavik ToR.

1.3.2 Spatial Boundaries

Spatial boundaries should be scoped based on the maximum zone of influence of the proposed development for each valued ecosystem component that De Beers is monitoring. The developer is not required to provide a comprehensive baseline description of the environment, but should provide sufficient detail to address the relevant impact issues.

1.3.3 Temporal Boundaries

In assessing the impact of the proposed development, the developer should consider, describe and evaluate the environmental impacts of the proposed development for all phases of the proposed development including construction, operation, care and maintenance, closure and post-closure. The term “care and maintenance” is not normally used by Golder, and the team should discuss

how this phase will be addressed since it is usually a component of all phases. There may be a special reason why the Review Board has highlighted this term, which should be explored.

1.3.4 Impact Description and Predicted Outcomes After Mitigation

Describe the impacts resulting from the proposed development, after mitigation, and present those in sufficient detail, including the method used in the analysis and prediction of impacts, to ensure reviewers can easily understand how the direct and indirect impacts were analyzed, and how residual impacts were determined. Information gaps should be identified along with actions needed to remedy them. De Beers will be expected to describe each impact identified and the proposed mitigation measure(s) for all phases of the proposed development (i.e., construction, operation, care and maintenance, closure and post-closure).

De Beers will be expected to describe planned mitigation measures and consequences (environmental impacts) of potential failure. The residual impacts should be described at least in terms of the following parameters.

- I. magnitude;
- II. geographic extent;
- III. timing;
- IV. duration;
- V. frequency;
- VI. irreversibility of impacts;
- VII. ecological resilience; and
- VIII. probability of occurrence and confidence level.

Distinguish between ecological parameters and social / cultural parameters.

1.3.5 Environmental Optimization

The EAR should report the comparative costs of proposed development alternatives and the corresponding environmental benefits. Any assumptions or uncertainty surrounding implementation of mitigation measures, such as untested technology, will be reported. The reporting of development impacts should provide readers with a summary, and comparative understanding of development impacts.

1.4 Environmental Impacts

The environmental assessment report should report impacts resulting from the proposed development on the physical, biological and social, economic and cultural components of the environment.

1.4.1 Air Quality and Climate

Report the impacts of the proposed development on air quality. The analysis should include a discussion of measures considered to minimize the release of air contaminants (dust, particulate exhaust fumes and other air contaminants). The analysis should also include:

- I. atmospheric dispersion of emissions on a local and regional scale;
- II. greenhouse gas emissions including, but not limited to, NO_x and SO_x;
- III. atmospheric conversion processes of emissions (e.g., secondary particulates) and linkages between secondary particulates, the environment, and human health;
- IV. impact on biological receptors such as vegetation and wildlife; and
- V. potential environmental impacts from particulate matter deposition (e.g., dust emissions from road traffic and construction).

The first four points are similar in both the BHP and Diavik lists; the fifth point has been added to the BHP ToR. Items specifically related to the Snap Lake Diamond Project, that were not part of the BHP expansion (e.g., Kimberlite processing) need to be added.

1.4.2 Terrain

Report the impacts on the environment when surficial geology, bedrock or soils are disturbed, or used for construction purposes. The environmental assessment should report impacts resulting from, or on, the terrain and geological components. The following list has been modified from the list provided to BHP:

- I. impacts on the North Pile processed kimberlite containment area related to tailings disposal management (including impacts on existing frozen-core dams, or changes to capacity);
- II. the proposed development's impact on the thermal milieu, including:

- impact of the development on permafrost physical conditions (including physical strength characteristics) and thermal regime;
 - potential for thermal erosion in relation to altered drainage;
 - permafrost temperatures and ground ice conditions at mines and roadways, and in material being moved;
- III sensitivity of boggy / wetland terrain to drainage and thermal alterations (notably in relation to sewage treatment plant);
 - IV. with respect to aggregate use, limitations on volumes of resource material and minimization of terrain disturbance associated with ground ice thaw;
 - V. rock types, including the chemistry and stability of kimberlite by- products;
 - VI. seismicity and potential for rock heave;
 - VII. amount of overburden, sediments, and rock to be removed;
 - VIII. acid rock drainage potential and associated mitigation; and
 - IX. impact of remedial actions at the mine site (waste dumps, tailings).

Items that are clearly not relevant to De Beers were removed from the original BHP list to derive the above list. A second step, which adds items specifically related to the Snap Lake Diamond Project but not part of the BHP expansion, needs to be added.

1.4.3 Vegetation and Plant Communities

The EAR should analyze impacts of the proposed development on:

- I. local plant communities (classified as vegetation cover types);
- II. rare or highly valued species;
- III. long-term, direct and indirect, habitat loss or alteration;
- IV. biodiversity; and
- V. vegetation productivity.

This should include a quantitative account of loss of plant communities and could be presented in conjunction with wildlife habitat data. This list, which comes from the BHP ToR is upgraded from the Diavik list. The Diavik ToR also included effects to plants from contaminants originating from project activities.

1.4.4 Water Quality and Quantity

The environmental assessment report should provide an analysis of proposed development impacts on surface and ground waters. This analysis should include the impacts on water quality and quantity, catchment areas and permafrost in relation to:

- I. impacts of underground blasting and its associated residues, in particular, nitrogen;
- II. control of site runoff;
- III. impact of development on the water shed;
- IV. dewatering of underground workings and resulting impacts on the water balance, Snap Lake water level, outflow rates, etc.;
- V. impact on water quantity, including changes in timing, volume and deviation of peak and minimum flows due to project development;
- VI. impact of treated sewage flows to associated wetlands;
- VII. siltation effects (e.g., runoff along roadways and drainage channels);
- VIII. effects of nutrients in fish and non-fish bearing water courses;
- IX. use of berms for waste water containment; and
- X. water chemistry impacts of surface runoff.

Items that are clearly not relevant to De Beers were removed from the original BHP list to derive the above list. A second step, which adds items specifically related to the Snap Lake Diamond Project which were not part of the BHP expansion, needs to be added. The BHP ToR did not include effects of wastewater discharge. The Diavik ToR provides little guidance as well.

1.4.4.1 Water Balance

A water balance should be prepared that incorporates all components of the proposed development (specify).

1.4.4.2 General Water

The assessment of proposed development impacts on water quality should also consider:

- I. contaminant loading and dispersion (including surface runoff and airborne contaminants);
- II. acid rock drainage, metal leaching and geochemistry;

- III. sedimentation (plumes and dispersion); and
- IV. associated kimberlite toxicity and implications for aquatic wildlife.

This list comes from both the BHP and Diavik ToRs.

1.4.5 Aquatic Habitat

The impacts on aquatic organisms and their habitat should be considered taking into account predicted water quality and quantity impacts and their associated effects on fish, fish habitat, and local drainage patterns. The analysis of development impacts should include:

- I. productive capacity of aquatic systems during construction, operations, closure and post-closure;
- II. impact on all lakes likely to have changes to fisheries resources including, but not limited to Snap Lake and streams associated with these lakes;
- III. changes in water quality;
- III. habitat loss or alteration;
- IV. rare and/or sensitive fish species and habitat; and
- V. mortality (includes fishing).

This list is compiled from both ToRs.

The principle of No Net Loss (Policy for the Management of Fish Habitat, DFO, 1986) of fish habitat is to be addressed when the loss of lake and stream habitat is being considered and when various proposed development components are restored (i.e., dikes and waste rock piles). As such, the environmental assessment report should include an overview of how this principle will be achieved during the construction, operation, care and maintenance and closure stages of the proposed development.

1.4.6 Wildlife and Wildlife Habitat

The environmental assessment report should provide an analysis of the proposed development's impacts, (both direct and indirect), on wildlife and wildlife habitats, including migratory birds, giving consideration to and demonstrating linkages between predicted physical and biological changes resulting from the proposed development. Special consideration should be given to

species listed as vulnerable or endangered on the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) list. The analysis of development should include:

- I. habitat loss or alteration (e.g., fragmentation, connectivity);
- II. impact of loss of terrestrial habitat, and the quality of lost habitat for relevant species;
- III. disturbance of feeding, nesting, denning or breeding habitats;
- IV. improved or altered access impacts;
- V. wet-land habitat alteration, loss;
- VI. physical barriers to wildlife;
- VII. disruption, blockage, impediment and sensory disturbance, of daily or seasonal wildlife movements (e.g., migration, home ranges, etc.);
- VIII. rare, vulnerable, threatened or endangered species as outlined in the Canadian Organization of the Status of Endangered Wildlife in Canada (COSEWIC), as well as, species of international significance;
- IX. direct wildlife mortality;
- X. indirect wildlife mortality;
- XI. reduction in wildlife productivity;
- XII. implications of the proposed development acting as an attractant for particular species; and
- XIII. displacement impacts.

The report should assess the implication of these impacts on the overall health of wildlife populations, communities, and ecosystems. This section, which is mainly copied from the BHP ToR, is greatly expanded from the Diavik ToR.

1.5 Social, Economic and Cultural Components

1.5.1 Cultural and Heritage Resources

Describe potential impacts of the proposed development on cultural and heritage resources.

1.5.2 Land and Resources Use

Land Use occurs twice in the BHP ToR. Both are listed here although there is considerable overlap.

Describe land and resource uses potentially impacted by the proposed development. Include maps of these land and resources uses in relation to the proposed development. For additional clarity, describe at least the following land and resource uses:

- I. rare or ecologically significant areas;
- II. traditionally or spiritually significant areas;
- III. renewable resource harvesting areas;
- IV. seasonal camp areas;
- V. permanent camp areas;
- VI. recreational and tourism land uses;
- VII. snowmobile trails;
- VIII. wildlife outfitting area;
- IX. Echo Bay winter road; and
- X. Echo Bay winter road camps and quarry land use permits.

Assess the impacts of the proposed development on the use of land, water and renewable resources, including:

- I. traditional land use and occupation;
- II. existing land use and occupation;
- III. hunting, trapping, and outfitting, recreational, commercial and sport fishing;
- IV. availability, abundance and quality of wildlife, fishing, gathering, recreational and commercial land and water-based areas; and
- V. protected areas.

This is the BHP ToR; the Diavik ToR also included Aboriginal (subsistence) fishing.

1.5.3 Economy

The impact of the proposed development on the economy, having regard to direct, indirect and induced impacts on income and employment. Consideration must be given to:

- I. wage and salary employment by skills category over the life of the proposed development, including estimates of local and Aboriginal participation;
- II. activities such as tourism, outfitting, harvesting and recreation;

- III. opportunities for local, regional and territorial businesses to supply goods and services both directly to the proposed development and to meet the demand created by the expenditure of contractors and new employees;
- IV. opportunities to diversify the northern economic base to produce and to supply new goods and services;
- V. barriers to employment;
- VI. availability and use of skilled workers in the NWT to meet job requirements;
- VII. the impacts on the subsistence economy;
- VIII. impacts to hunters, trappers;
- IX. federal and territorial revenues and costs;
- X. local government finances;
- XI. inflation and the cost of living impacts; and
- XII. economic diversification.

This section, which comes from the BHP ToR is an expansion of the Diavik ToR. All components of the Diavik ToR were embedded in the BHP ToR, although the Diavik ToR had a greater emphasis on education and training.

1.5.4 Human Health

The environmental assessment report should analyze the potential development impacts on human health, as they relate to the proposed development, (i.e., physical health, including death and disease rate, psychological, emotional, spiritual, or mental health and wellness).

Information should also be provided on the toxicological risks associated with substances hazardous to human health and human exposure to identified hazards via water, air, vegetation and wildlife. Routes of exposure to human populations using an environmental pathway analysis should be provided, including both routine and accidental release of materials or disposal of waste products.

The first paragraph is common to both ToR's, but the second paragraph is an expansion included in the BHP ToR.

1.5.5 Government

Assess the impacts of the proposed development on revenues and costs accruing to federal and territorial governments, and the net incremental benefits or costs to these governments arising from the proposed development. De Beers should also report other fee structures/costs it will incur such as quarry royalties, security deposits, and abandonment and restoration costs resulting from the proposed development.

1.5.6 Infrastructure

Assess the impacts of the proposed development on existing social, institutional and community services, transportation facilities, services, infrastructure (e.g., transportation safety), and permanent changes to the infrastructure and services arising from the proposed development.

1.5.7 Noise

Assess the impact of the proposed development on the environment resulting from changes to ambient noise levels, and the effect of these changes on humans and wildlife.

1.5.8 Visual and Aesthetic Resources

Assess the visual and aesthetic impact of the proposed development. Report design components that mitigate visual and aesthetic impacts.

1.6 The Effect(s) of the Environment on the Proposed Development

De Beers should assess the effect(s) of the environment on the proposed development, and activities forming part of the proposed development. The environmental assessment should include a discussion of the impacts of the environment on the proposed development. De Beers should consider such things as severe weather, climate change, (e.g., global warming) precipitation and temperature.

The discussion must specifically describe and assess how the potential for climate change could affect permafrost and soils with high ice content in relation to the integrity of the proposed development infrastructure, particularly the tailings (processed kimberlite) containment impoundment, water retention dikes and waste rock piles.

1.7 Cumulative Impact

For the purposes of this development, the environmental assessment should include an evaluation of cumulative effects that are likely to result from the proposed development in combination with other developments; and developments within the regulatory process on the day these Terms of Reference are issued.

De Beers should include, as a minimum, the BHP Ekati Diamond Mine (including the expansion), Diavik Diamond project, and the Echo Bay Mines Ltd. Winter Road and Lupin mine. De Beers should also report and describe developments considered but not included in the cumulative effects assessment, and rationale for the decision.

De Beers should provide confirmation that all existing facilities, infrastructure, etc., De Beers plans to use can adequately handle the demands generated by the proposed development. Include cumulative impacts in relation to:

- I. the environment;
- II. social environment;
- III. economic environment;
- IV. cultural environment;
- V. heritage resources; and
- VI. visual and aesthetic resources.

Explicit documentation of the assumptions, models, information sources used as well as information limitations and associated levels of uncertainty should support all steps of the CEA in the environmental assessment report. The analysis should be quantitative where data are available but where data or models are lacking, best professional judgement may be used. The approach and methodologies used to identify and assess cumulative effects should be explained.

1.8 Abandonment and Restoration

De Beers should provide a complete description of regulations (regulatory framework), industry standards and government agreements that are needed with respect to the closure phase of the proposed development. Where regulatory requirements, industry standards or government agreements exist, their minimum standards, criteria, etc. should be reported. Based on the implementation of regulatory requirements, government agreements and industry standards, De

Beers should identify and report and describe environmental impacts resulting from the proposed development, and mitigation taken to address the impacts. De Beers should provide a clear (visual and textual) description of the proposed development site at closure, and after restoration.

1.9 Follow-up Programs

Follow-up programs should focus on addressing any new concerns and environmental management questions that result from the proposed development. Proposed follow-up programs should be clearly described.

Describe reporting (feedback) procedures in regards to the environmental impacts monitoring program. The intent is to ensure that remedial actions are taken if the results of a monitoring program deviate from any established operational standards on environmental performance or predictions on environmental impacts.

Provide information on any proposed environmental impacts monitoring program(s) or amendments to existing environmental monitoring program(s), designed to determine the actual environmental impacts as compared with those predicted during the environmental assessment process, measure the performance and the mitigation measures, and identify unexpected environmental impacts and alternatives. Adaptive management practices already undertaken and incorporated in the mitigation measures should be clearly identified.

Provide information on any proposed environmental management plans or amendments to existing environmental management plans such as air quality, water quality, materials management, wildlife, traffic, aquatic life, waste, quarry and environmental monitoring and social, economic and cultural monitoring as required.

1.10 Compensation

The developer should provide key elements of its policy on individual compensation and on compensation agreements, contracts or other forms of compensation they have or will negotiate as it relates to mitigating adverse environmental impacts, within the confines of confidentiality.

2 PRESENTATION

2.1 Conformity

The environmental assessment report should include a conformity table outlining to reviewers the areas in the report (including appendices and technical reports) that address the specific sections, and where appropriate line items, of the Terms of Reference.

2.2 Format

The format of the environmental assessment report is largely left to the discretion of the developer although reviewers must be able to clearly identify where specific issues have been addressed and directions followed.

2.3 Appendices

Detailed data should be contained in appendices and technical reports submitted in support of the primary environmental assessment report.

2.4 Data Presentation

The developer should present the environmental assessment report in the clearest language possible. Where technical language is used a glossary defining technical words and acronyms should be included. De Beers should provide charts, diagrams and maps wherever useful to clarify the text. Where possible, maps should be of common scale and orientation to allow for comparison and overlap of mapped features. De Beers should also provide the EAR report in electronic format (e.g., CD-ROM).