14. CORPORATE COMMITMENTS

14.1 INTRODUCTION

De Beers is committed to doing business in a socially and environmentally responsible manner

De Beers has global history of community investment, good corporate citizenship, environmental responsibility, and economic development. De Beers is committed to continue operating and doing business in the Northwest Territories (NWT) in a socially and environmentally responsible manner.

De Beers is committed to integrated environmental management and sustainable development

Throughout all phases of its projects, from development through to post-closure, De Beers is committed to the underlying principles of integrated environmental management and sustainable development. This includes the need to find the right balance between biophysical and socio-economic impacts, and ensuring that current operations do not limit or diminish the opportunities for future generations. These principles will continue to be to be realized at the Snap Lake Diamond Project through the implementation of De Beers' Environmental Policy (Appendix III.8).

This section summarizes De Beers' corporate commitments found in the environmental assessment document

This section provides a summary of the corporate commitments De Beers has made and will honour. These commitments are found throughout the EA document. Some of these commitments are related to how De Beers will continue to build relationships with the primary communities, and how they will manage the construction, operation, and closure of the mine. These overall operating commitments are summarized in Table 14.2-1.

This section also summarizes proposed mitigation and monitoring plans found in the environmental assessment document

This section also summarizes the proposed mitigation measures and proposed monitoring plans related to specific environmental and socio-economic components assessed in the EA. These are summarized in Table 14.2-2. De Beers understands that the final mitigation measures and monitoring plans will be dependent upon the results of the environmental assessment (EA) and regulatory review processes. In the end, they will reflect the requirements of the Mackenzie Valley Environmental Impact Review Board's (MVEIRB) recommendations and the permits and licences issued for the Snap Lake Diamond Project.

Many measures that mitigate environmental effects result from early corporate decisions

Many measures that help to mitigate the effects of the Snap Lake Diamond Project on the environment are directly as a result of decisions made by De Beers early in the conceptual and design stages of the project. One example is the rejection of an open pit as a development option. Although this was economically advantageous to De Beers, the option was rejected

due to the size of the waste rock pile at closure and the associated concerns with acidified runoff and seepage, and impacts on vegetation and terrain. In turn, rejection of the open pit option reduces the noise, dust and potentially contaminated run off generated on the surface, which reduces potential impacts on wildlife, air quality, vegetation, water quality, and terrain. Further examples of how De Beers' early decisions help mitigate project effects are discussed in Section 2.

Table 14.2-2 does not summarize mitigation as a result of early corporate decisions about design

Table 14.2-2, Summary of Mitigation and Proposed Monitoring Plans for the Snap Lake Diamond Project, does not identify the associated measures that mitigate effects on the environment as a result of decisions made by De Beers initial design phases of the project and limit or eliminate environmental effects. It summarizes only the action-oriented mitigation measures De Beers has proposed.

A proposed monitoring approach is presented

Finally, this section presents De Beers proposed approach and commitments related to monitoring the effects of the Snap Lake Diamond Project.

14.2 COMMUNITY RELATIONS, COMMUNITY CONSULTATION, AND COMMUNITY INVOLVEMENT

De Beers is committed to building long term relationships with communities

De Beers is committed to building long-term relations with the communities in which it operates, and recognizes and respects cultural and regional diversity. Community input is critical to the success of the Snap Lake Diamond Project. Results of community input has contributed to an identification of the issues that were examined in the EA, has helped to develop mitigation measures and impact predictions, and has contributed to the project's design.

De Beers is committed to a consultation process through the life of the project

De Beers is committed to continuing the process of consultation and community involvement throughout the life of the project. One of the ways to achieve this is through the implementation of a mine management advisory committee, which would have a high level input to the management of the mine thorough regular reviews of mine performance and policy, and through community consultation. Table 14.2-1 summarizes De Beers' community relations and consultation commitments.

Table 14.2-1 Summary of De Beers Canada Commitments

Component	Commitment
Overall commitments	- Will certify the Snap Lake Diamond Project Environmental Management System to ISO14001 standard, which is the International Organization for Standardization's certification program for environmental management. - Is committed to the concept of sustainable development, which requires balancing good environmental stewardship with economic growth. - Will use the Environmental Policy (Appendix III.8) to guide all phases of the Snap Lake Diamond Project. - Will finalize the various management plans (*i.e.,* Quarry Management Plan, North Pile Development Plan, Spill Contingency Plan, Decommissioning and Reclamation Plan, *etc.*) to incorporate the final engineering and site design, and the results of the environmental assessment and regulatory review processes. - Is committed to implementing monitoring programs that meet the requirements of the results of EA and regulatory review processes, and are designed in collaboration with communities, Elders, and governments.
Community Relations, Community Consultation, Community Involvement	- Will build long-term relationships with communities in which it operates. - Will undertake a public participation process that seeks out and supports the involvement of its neighbours. - Will report back to the community on how their input shaped project decisions. - Will maintain on-going communications and consultation programs for the life of the mine. - Will hold technical sessions in Yellowknife to provide an orientation to the EA for reviewers, following EA submission. - Will meet with each primary community to further update them and provide orientation for the technical review of the project, following EA submission. - Will hold information sessions in Fort Providence, Fort Smith, Enterprise, Hay River, Hay River Reserve, and Fort Resolution to provide information on project planning, business, training, and employment opportunities. - Will set up a mine management advisory committee (MMAC) with community representation, which will have "high level" input into the management of the mine through regular reviews of mine performance and policy, and community consultation. Will develop the make of the MMAC through community consultation.
Recruitment, Employment, and Training	- Preferential hiring will first be given to Aboriginal born or residing in a primary community, then to residents of the NWT, then to Canadians willing to relocate to the NWT, and finally to all other Canadians. - Will develop a long-term recruitment, employment and training strategy, whose success would depend upon cooperation and commitment with communities, and the federal and territorial governments. - The strategy would be composed of, among other things, a northern workforce education and skill assessment, capacity survey of primary communities, mine employment orientation program, underground mine training program, and specific on the job training programs, and apprenticeship program.
Northern Business Opportunities	- A northern business opportunities strategy will be finalized that will include hiring a manager of business development, structuring contracts so they can be accessed by a variety of different sized NWT businesses; publication of a Snap Lake business opportunities profile, and requiring contractors to disclose their policies and practices for providing preferential opportunities to Aboriginals and northerners.

Table 14.2-1 Summary of De Beers Canada Commitments (continued)

Component	Commitment
Health and Safety	- Is committed to a program of risk reduction, which will provide protection from accidental losses for all personnel and physical assets. - Will use the Loss Control Policy (Appendix III.7) to guide all phases of the Snap Lake Diamond Project.
Traditional Knowledge	- Will continue to work with the Dogrib Treaty 11 Council, the Yellowknives Dene, Lutsel K'e and the North Slave Métis Alliance on the development of traditional knowledge studies and the continued application of traditional knowledge to the project. - Will develop environmental monitoring programs that incorporates both traditional knowledge and science.
Energy Sources	- Will continue to examine possibilities for solar energy, fuel cells, and wind turbines as possible future alternative energy sources. - Will implement various methods of power reduction and energy conservation.
Mine Reclamation	- Will use adaptive management approaches to ensure advances in reclamation research are included in final closure planning efforts.

14.3 TRAINING, HIRING, EMPLOYMENT, AND ECONOMIC DEVELOPMENT

Hiring priorities and training, employment and economic development commitments

De Beers is committed to hiring as many Aboriginals and northerners as possible as a first priority, and to help them become prepared and trained for a long term career with De Beers at the Snap Lake Diamond Project. Table 14.2-1 includes a summary of the overall hiring preferences, commitments to a recruitment, employment and training strategy, and commitments regarding northern business opportunities. Table 14.2-2 provides specific mitigation measures and monitoring identified in the EA which are related to the potential effects of the project on training, hiring, employment and economic development opportunities. Subject to confirmation through the EA and regulatory review processes, De Beers is committed to implementing these mitigation and monitoring measures.

14.4 HEALTH AND SAFETY

De Beers' loss control policy will be followed

De Beers is committed to a program of risk reduction to ensure a safe and healthy environment for all personnel employed by the Snap Lake Diamond Project. De Beers has established a Loss Control Policy (Appendix III.7) which guides the company in health and safety matters through all phases of the project. Accidental losses will be controlled through best management practices and systems, combined with the active participation of the workforce. Table 14.2-1 identifies De Beers' health and safety commitments.

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project

Component	Proposed Mitigation	Proposed Monitoring Plan
Recruitment, Training and Employment	- Establishment of recruitment, training and employment strategy that will consist of a workforce training needs assessment, training and recruitment plans, development of career plans for employees, and an Aboriginal student recruitment plan - Establish a Learning Centre on-site - Provide literacy programs on-site - Assist communities and local learning institutions to encourage community members to upgrade their literacy levels - Provide pre-employment education upgrading in primary communities, in partnership with appropriate agencies - Develop a learning guide in preparation for the entrance exam to the GNWT apprenticeship training program, in partnership with the federal and territorial governments - Provide ten apprentice positions for Aboriginals or northerners - Establish a trades training program and provide 10 positions for Aboriginals or northerners, within three years of production - Establish a mine employment orientation program for all new employees, to be offered in the communities - Establish a underground mining training program and provide 20 positions to be made available to Aboriginals and northerners within 3 years of production - Provide job-specific training programs on site	- Establish monitoring plans that monitor project-related mitigation that is within the company's control related to appropriate socio-economic indicators and the delivery of impact management measures

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Health and Wellness	- Provide substance abuse prevention and awareness programs on-site and in primary communities, in partnership with communities and governments - Disseminate materials and information to employees and in communities related to substance abuse awareness and prevention, in partnership with communities and governments - Provide successful graduates of addiction treatment programs with opportunities to participate in De Beers' pre-employment or employment training programs - Hire at least two full time community liaison personnel - Provide family counselling services in primary communities for mine employees and their spouses, in partnership with community social service agencies and governments - Provide money management training in the primary communities for employees and their spouses - Provide direct flights between primary communities and Snap Lake whenever feasible - Provide cross-cultural training to all onsite staff - Organize community appreciation days in primary communities - Develop a cultural exchange program for employees - Hold mine site visits for employees families - Provide traditional foods on site when commercially available - Provide occasional funding support to existing or emerging community-based programs or agencies with the mandate to strengthen Aboriginal culture in the primary communities - Help to obtain culturally appropriate resources for local schools, in partnership with community and government educational agencies	- Establish monitoring plans that monitor project-related mitigation that is within the company's control related to appropriate socio-economic indicators and the delivery of impact management measures

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Economic Development	- Hire a manager of business development - Provide business expertise to communities as requested - Provide support to community mine-related business initiatives - Provide a list of potential contractors to primary communities - Provide a list of contract service needs of the Snap Lake Diamond Project to primary communities in advance of the release to the general public - Require contractors to disclose their policies and practices related to Aboriginal and northerner hiring - Split large contracts into smaller contracts where feasible	- Establish monitoring plans that monitor project-related mitigation that is within the company's control related to appropriate socio-economic indicators and the delivery of impact management measures
Heritage Resources	- Systematic data recovery - Avoidance of heritage resources - Monitoring and surveillance by professional archaeologist - Implement heritage resource awareness education for all site personnel	- Monitoring and surveillance of final selected alignments and in-place facilities
Traditional Land Use	- Develop rock quarries from within the mine footprint - Minimize use of esker quarries - Implement progressive reclamation - Develop a quarry management plan - Mine site reclamation	
Establishment of Protected Areas	- Work through the Northwest Territories and Nunavut Chamber of mines for establishing a protected area in the Coppermine River Uplands Ecoregion	

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Natural Resource Use	- Limit the use of the airstrip for mine operations and emergency purposes - Develop rock quarries from within the mine footprint - Minimize use of esker quarries - Implement progressive reclamation - Snap Lake Diamond Project established as a fly-in-fly-out operation - Enforcement of no fishing and hunting policy for employees and contractors	- Monitor registered trapline activity in the regional study area
Aesthetic Quality	- Mine site reclamation - Storage of processed kimberlite underground - Dust control on airstrip, roads and north pile - Progressive capping of the north pile with quarried granite - Contour north pile to resemble surrounding terrain - Limit height of north pile to match the surrounding terrain - Adjust outside lighting appropriately and fit outside lighting with shields	
Air Quality	- Conduct primary crushing underground - Use of a wet process for diamond recovery - Use of covered conveyor belts to transport underground ore to the surface - Dust control on airstrip, roads and north pile - Progressive capping of the north pile with quarried granite - Implement various methods of power reduction and energy conservation	- Meteorological monitoring on site - Monitoring of total suspended particulates to confirm predictions of the EA - Monitor dustfall to confirm predictions of the EA
Noise	- Fit power plant with high performance engine exhaust silencers	

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Hydrogeology	- Use of grouting and/or providing a rock setback to high groundwater zones to reduce water flows to the mine - Conduct explosives management practices that reduce the quantity of explosives waste - Use of alternative grouts and cement to limit chemical leaching - Upon closure, treat water from the water management pond if it is to be used for flooding the underground workings - Construct water collection trenches along the north side of the north peninsula, between the north pile and the north arm of Snap Lake	- Monitor groundwater quality, quantity, and levels as the project progresses to refine the water quality and quantity models, if necessary - Collect further information to refine predictions of quantity and quality of groundwater affected by the mine post-closure.
Hydrology	- Collection of surface drainage water for direction to the water treatment plant - Direction of north pile drainage water to sedimentation ponds prior to directing it to the water treatment plant - Identification of all culvert requirements at the detailed engineering stage - Siting of facilities near the top of drainage divides - Installation of sediment traps adjacent to low lying areas of roads	- Monitor stream discharge at Snap Lake outlet, and Snap Lake elevation during open water seasons over the period of mine operations - On-site water quality monitoring for total suspended solids

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Water Quality	- Installation of a water treatment plant - Tertiary treatment of domestic effluent, including phosphorus reduction - Combine treated mine water and treated domestic waste water into a single line - Installation of a multi-port diffuser for discharging treated water into Snap Lake - Capping of the north pile with quarried granite - Conduct explosives management practices that reduce the quantity of explosives waste - Upon closure, removal of all buildings and infrastructure - Upon closure, provide a drainage system that is equivalent to baseline conditions - Upon closure, breach the water management pond to re-establish natural drainage conditions - Upon closure, establish runoff collection ponds for flood attenuation and sediment control - Conduct primary crushing underground - Use of a wet process for diamond recovery - Use of covered conveyor belts to transport underground ore to the surface - Dust control on airstrip, roads and north pile - Progressive capping of the north pile with quarried granite - Implement various methods of power reduction and energy conservation	- Monitor for the status of water quality and aquatic life during construction, operations and closure for potential effects - Monitoring near the multi-port diffuser under ice-free and ice cover conditions to confirm predictions of mixing - Testing for acute and chronic aquatic toxicity of treated mine water from the pilot water treatment plant, including a toxicity reduction experiment - Annual summer water quality monitoring in IL3 and IL4 to confirm predictions of the EA - Annual spring water quality monitoring in streams S1 and S27 to confirm predictions of the EA

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Aquatic Organisms and Habitat	- Installation of a water treatment plant - Tertiary treatment of domestic effluent, including phosphorus reduction - Combine treated mine water and treated domestic waste water into a single line - Installation of a multi-port diffuser for discharging treated water into Snap Lake - Upon closure, provide a drainage system that is equivalent to baseline conditions - Upon closure, establish runoff collection ponds for flood attenuation and sediment control - Conduct primary crushing underground - Use of a wet process for diamond recovery - Use of covered conveyor belts to transport underground ore to the surface - Dust control on airstrip, roads and north pile - Progressive capping of the north pile with quarried granite - Implement various methods of power reduction and energy conservation - Construction of a rock filled embankment at the water intake, rather than use of fish screens - Construction of water intake and outlet structures using washed non-potentially acid generating rock - Use of silt screens or other appropriate sediment control measures during the construction of water intake and outlet structures - Identification of all culvert requirements at the detailed engineering stage	- Monitor total suspended solids during the construction of the water intake and outlet structures - Monitor fish habitat use in the vicinity of the water intake and outlet structures after construction - Monitor blasting activity during initial production to confirm EA predictions - Collection of detailed baseline information for the north lake, northeast lake, NL5, NL6 and the outlet stream of the north lake to confirm environmental assessment predictions

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Ecological Land Classification Units (Vegetation)	- Avoid rare species where possible - Conduct closure procedures so the final topography and site conditions are similar to other ecological land classification units of the same type in the region - Establish suitable habitat for plant species to invade and re-establish - Use of covered conveyor belts to transport underground ore to surface - Dust control on roads, airstrip and north pile - Progressive capping of the north pile with quarried granite - Culvert installation	- Monitor success of decommissioning and reclamation procedures throughout the life of the mine - Monitor dustfall to confirm predictions of the EA
Terrain and Geology	- Conduct closure procedures so the final topography and site conditions are similar to the surrounding topography - Develop rock quarries from within the mine footprint - Minimize the use of esker quarries - Implement progressive reclamation - Use of existing winter road alignments for site access and esker access - Development and implementation of quarry management plan - Construct surface facilities with non-frost susceptible fill materials over the permafrost or use a synthetic insulation under or around buildings	- Monitor success of decommissioning and reclamation procedures throughout the life of the mine - Monitor volume of esker material extracted

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Wildlife	- Implement environmental awareness education - Establishment and enforcement of rules related to waste management procedures, wildlife encounter procedures, consequences of wildlife harassment, outside recreational activities for all site personnel. - Conduct pre-project surveys to identify sensitive or important wildlife locations and avoid them - Encouraging vegetation regeneration on road and airstrip embankments, and within the active mine site - Use of mining and stationary combustion equipment that meets emission guidelines - Minimize road and airstrip widths - Use of existing winter road alignments for site access and esker access - Minimize use of esker quarries - Implement progressive reclamation - Consolidate location of above-ground crushing - minimize use of haul trucks on roads - Conduct primary crushing underground - Use of a wet process for diamond recovery - Use of covered conveyor belts to transport underground ore to surface - Dust control on airstrip, roads and north pile - Development of a waste management program - Separate food and non-food waste at source - Installation of appropriate fencing around the waste transfer area - Installation of food waste containers within the waste transfer area - Designing contained areas for employee break areas - Installation of approved incinerators to burn food and non-toxic combustibles	- Monitor success of decommissioning and reclamation procedures throughout the life of the mine - Monitor success of waste management program - Monitor potential effect of mining activities (including dustfall and reclamation) on direct and indirect habitat loss - Monitor abundance and distribution of caribou that migrate through the regional study area - Monitor Valued Ecosystem Components - Monitor for wildlife-human interaction - Monitor for increased access from the Snap Lake winter road and esker access road

Table 14.2-2 Summary of Proposed Mitigation Measures and Proposed Monitoring Plans for the Snap Lake Diamond Project (continued)

Component	Proposed Mitigation	Proposed Monitoring Plan
Wildlife (cont)	- Disposal of waste oil in waste oil furnaces or taken off-site for recycling - Design buildings to avoid wildlife/human interactions - Establishment and enforcement of speed limits, wildlife "right of way" on roads, wildlife removal procedures from the airstrip, and procedures for communicating presence of wildlife on the site to appropriate personnel - Establishment and enforcement of spill management training and clean-up plans and procedures - Installation of double walled fuel containers or use of single walled fuel containers within lined and bermed containment areas - Installation of double-locked fuel transfer hoses - Storage of ammonium nitrate in enclosed areas - Enforcement of no fishing and hunting policy for employees and contractors	
Environmental Health	- Air and water mitigation measures pertain to environmental health - See air quality and water quality	- Soil characterization and analysis
Accidents and Malfunctions	- Implement proper training, awareness, education - Implement proper equipment maintenance - Incorporation of inherently safe designs into the project - Develop and implement site environmental management plan including effective and efficient emergency response plans - Assess accident and malfunction risks during all project life cycles, including detailed design, construction, operation and closure	- Use of EMS for monitoring

14.5 ENVIRONMENT

De Beers environmental policy will be followed

De Beers is committed to the concept of sustainable development, which requires balancing good environmental stewardship with economic growth. De Beers has established an environmental policy (Appendix III.8) which helps to guide the company in all phases of the Snap Lake Diamond Project.

Improvements to the project will be made continually

To help meet the environmental policy, De Beers will continue to examine areas where the project can be improved. This includes a commitment to the continued application of traditional knowledge to the project, continuing to look for alternative energy sources, further power reduction opportunities, and the use of adaptive management approaches for developing the project's final closure plans. Table 14.2-1 summarizes these commitments.

Mitigation measures and monitoring plans have been proposed

Throughout the EA document, De Beers has proposed mitigation measures to decrease possible negative effects or enhance possible positive effects of activities for each component of the environment that has been assessed. As well, monitoring plans are proposed for most components assessed in the EA. Table 14.2-2 summarizes these proposed mitigation measures and monitoring plans. Subject to confirmation through the EA and regulatory review processes, De Beers is committed to implementing these mitigation measures and monitoring plans.

14.6 MONITORING

People want to make sure De Beers protects the air, water and land

Throughout the consultation process, a repeated concern raised by members of the communities was that De Beers respect the environment and work diligently to ensure that air, water and land are protected. De Beers has listened to these concerns.

A formal environmental management system will be developed for Snap Lake

It is De Beers' intent to construct and operate the Snap Lake Diamond Project in an environmentally and socially responsible manner. That intent is embodied in De Beers' Environmental Policy that is set out in Appendix III.8. To meet this policy in such a way that the expectations of northerners and Aboriginal communities are met and to provide the level of assurance and comfort that De Beers is indeed "doing what it said it would do", De Beers' will develop a formal environmental management system (EMS) that will meet the highest international standard – ISO 14001. De Beers has set a goal of having all its operations worldwide certified to the ISO 14001 standard by 2003. Snap Lake will be certified prior to the start of construction.

The environmental management system will meet international standards

The International Organization for Standardization has developed standards that represent an international consensus on the "state of the art" in a variety of different areas. The standards on environmental management systems and environmental auditing were published in 1996. Among other things, the ISO 14001-1996 standard requires that:

- potential impacts of all aspects of the operation be identified;
- plans be put in place to monitor environmental performance;
- all environmental laws and regulations be met;
- regular audits take place;
- reports are made on a regular basis to management; and,
- changes are made to improve the performance.

The environmental management system will identify how the project will be managed

An EMS includes detailed plans of how project activities will be managed, and identifies critical pathways for decision-making, allocates responsibilities and identifies procedures for taking corrective action to achieve improvement.

All aspects of environmental performance will be reviewed and reported

A fundamental element of an EMS is the establishment and continual improvement of a comprehensive monitoring system that identifies, measures and reports on all aspects of environmental performance throughout the life of the operation. De Beers' monitoring program for the Snap Lake Diamond Project will address all components of the biophysical and socio-economic environment of importance to northerners and will comprise a wide array of data collection, assessment and reporting

De Beers will design the Snap Lake EMS to achieve the following:

The environmental management system will ensure the environmental policy is being met

- **Compliance with the ISO 14001 EMS Standard** De Beers' will, in accordance with the international standard, develop and maintain a monitoring system to ensure that the Snap Lake EMS is meeting all expectations of the Environmental Policy. This monitoring system will include regular audits of the EMS and a documented corrective action procedure to ensure that improvements are made where needed. Also, De Beers will develop and monitor procedures for ensuring that all contractors and suppliers involved with the project meet De Beers' environmental policy in accordance with the standard.

The environmental management system will ensure all regulatory requirements are being met

- **Compliance with Regulations, Licenses, Permits and Authorizations** De Beers will monitor to ensure the Project is complying with all regulatory requirements, such as regulations, terms set out in the land use

permit and water licence, and provisions of any other approval or authorization issued in relation to the project.

Mitigation plans will be monitored through the environmental management system

- **Measure Effectiveness of Mitigation** Effectiveness of the mitigation measures proposed for each component of the EA will be monitored through the EMS. In cases where implementation of the mitigation measures produces an effect that differs from the predicted effect, monitoring will provide a basis for changing the mitigation measures.

Environmental predictions can be monitored through the environmental management system

- **Monitor for Project-related Effects** Where a high level of uncertainty surrounded an impact predicted in the EA, De Beers will monitor to confirm the accuracy of predictions of project-related socio-economic and bio-physical effects. Monitoring can confirm or refute the prediction.

Data suitable for cumulative effects monitoring will be collected

- **Cumulative Effects** Although there is currently no requirement in law or regulation obliging a proponent within the Slave Geological Province (SGP) to monitor for cumulative effects, the previous two diamond mining projects have been required to participate in regional studies to collect data and to contribute to independent monitoring of the effects of projects in the SGP. Since then, initiatives have been undertaken to develop a framework for cumulative effects monitoring and to prepare for implementation of Part 6 of the MVRMA that provides for cumulative impacts monitoring and environmental auditing. Once Part 6 of the MVRMA is implemented, responsibility for monitoring and management of cumulative effects within the SGP will be clarified. In the meantime, De Beers will continue to collect data in a form and manner comparable to present monitoring activities in the Slave Geological Province. De Beers will also participate in regional initiatives to develop cumulative effects monitoring.

Important goals of northerners related to Snap Lake will be met through implementation

De Beers believes that by implementing an ISO 14001 certified EMS inclusive of an environmental monitoring program developed in consultation with northerners, and by linking the results of the monitoring program back to the EMS to ensure the plans are amended through adaptive management, two important goals will be realized:

- a high level of environmental performance will be achieved; and,
- the concerns of northerners regarding compliance and effects monitoring will be addressed.

Independent audits of the environmental management system will take place

The Snap Lake EMS will be independently audited annually. The intent of the audit is to confirm management is operating the Snap Lake Diamond Project in a way that is consistent with it's Environmental Policy and that the EMS is operating as intended. Audit reports will be submitted to the

Mine Management Advisory Committee (MMAC) which includes representation from primary communities. It will also be made available to the public. Further, senior representatives of the company will be available to review the results of these audits with interested communities and government in a public forum.