

November 13, 2012

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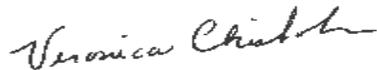
Dear Mr. Hubert:

**Technical Report Responses – North Slave Metis Alliance**

De Beers is pleased to provide the Mackenzie Valley Environmental Review Board with Responses to the Technical Submission from the North Slave Metis Alliance dated October 22, 2012.

Should you have any questions regarding this submission, please contact our office.

Regards,



Veronica Chisholm  
Permitting Manager

Attachment





**DE BEERS**

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CANADA

GAHCHO KUÉ PROJECT

**North Slave Métis Alliance  
Technical Report Responses**

**November**

**2012**

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# **1 INTRODUCTION**

On October 22, 2012 North Slave Métis Alliance (NSMA) submitted their technical report to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) for the De Beers Canada Inc. (De Beers) proposed Gahcho Kué Project (Project). This report provides responses to those recommendations outlined in the NSMA technical report (NSMA 2012).

## **2 NORTH SLAVE MÉTIS ALLIANCE RECOMMENDATION AND RESPONSE**

### **2.1 THE INCORPORATION OF NORTH SLAVE MÉTIS TRADITIONAL KNOWLEDGE**

#### **2.1.1 Recommendation 1 Traditional Knowledge Study**

The NSMA recommends that De Beers please:

- a. Integrate all primary source traditional knowledge studies from all Aboriginal parties involved.
- b. Guarantee and honour their commitment to include and incorporate the North Slave Métis Alliance's traditional knowledge study post-hearing into their site planning.
- c. Hire a TK Director. They would be placed at the Executive Level with decision making powers and the authority to mitigate impacts on wildlife during high impact seasons.

#### **2.1.2 Response**

De Beers entered into a Traditional Knowledge Study Agreement with the North Slave Métis Alliance on November 2, 2012. De Beers has committed to the North Slave Métis Alliance that the company will consider and incorporate the information from their Traditional Knowledge Study report post-hearing into the Project planning.

In total, De Beers has funded six Traditional Knowledge Studies for the Gahcho Kué Project (Project): Lutsel K'e Dene First Nation, Yellowknives Dene First Nation, Deninu Kue First Nation, Tłıchǫ Government, North Slave Métis Alliance and the Northwest Territories (NWT) Métis Nation. The Tlıcho Government study has been completed and submitted to the public registry. De Beers has requested that the remaining five groups submit an interim report or update on their Traditional Knowledge Studies to the public registry later this month.

The completion of all of these Traditional Knowledge studies will result in new Traditional Knowledge available for the company to consider and incorporate into the Project and its ongoing monitoring. De Beers is committed to doing so and remains committed to providing opportunities over the life of the Project for the incorporation of Traditional Knowledge. This will occur through site visits and

workshops, through ongoing community engagement, in monitoring programs, developed with the input of communities, and through Traditional Knowledge Studies undertaken and completed by communities with the support of De Beers.

De Beers has indicated in the Wildlife Effects Monitoring Program (WEMP) that it is considering hiring a senior-level Traditional Knowledge specialist for the Project (De Beers 2012a).

### **2.1.3 Recommendation 2 Long-term Traditional Knowledge Monitoring**

The NSMA recommends that De Beers please:

- a. Amend section 5.4.5, bullet 7: "...field monitoring programs from time to time;" in order to incorporate actual frequencies (i.e., monthly, annual, century, etc.) and add details to the program commitments.
- b. Commit to funding long-term traditional knowledge monitoring on-site, including the transmission of knowledge from elders to youth. This would facilitate a process in which Aboriginal elders would assess the environment in order to determine if it has been altered or changed based on their traditional knowledge of the region and would involve inviting elders and students to site workshops.
- c. Integrate traditional knowledge holders, as experts on par with biologists, planners and other experts in the design, implementation, analysis and interpretation of all environmental monitoring and management plans and programs.
- d. Negotiate an Environmental Agreement with the Aboriginal Parties. The Environmental Agreement must have specific details of how traditional knowledge holders will be involved, clear goals, well defined objectives, objectively measureable criteria of success, and enforceability. Ensure that the Aboriginal Parties have the capacity to negotiate effectively, and to benefit from lessons learned from the existing De Beers Environmental Agreement with the Snap Lake mine.
- e. Consideration should be given to reviving the multi-project environmental monitoring agency concept.
- f. Hire a full time TK Director at the Executive Level within the Environment, Health and Safety Department, with decision making powers and the authority to mitigate impacts on wildlife during high impact seasons.

## 2.1.4 Response

a. See Response to NSMA Recommendation #1.

b, c, d, and e.

De Beers will meet with communities throughout the life of the Project, as a minimum on an annual basis, to review its monitoring programs and to seek input on how communities can participate.

De Beers is currently in discussion with Aboriginal groups on the development of a mutually agreeable mechanism to provide capacity to participate in the development and review of monitoring and management plans. This mechanism would provide a forum for parties to provide recommendations on how traditional knowledge can be incorporated and considered in monitoring programs. In addition, De Beers will be engaging Aboriginal communities on a regular basis, which will provide further opportunities for communities to provide recommendations on how best to incorporate traditional knowledge in monitoring programs (refer to response to YKDFN Round 2 Information Requests to YKDFN 2.3 [De Beers 2012b]).

f. As noted in the WEMP, submitted to the public registry on October 4, 2012, and above in the Response to NSMA Recommendation #1, De Beers is considering the employment of a senior level Traditional Knowledge position (De Beers 2012a).

## 2.1.5 Recommendation 3 Traditional Knowledge Regarding Land Use

The NSMA recommends that De Beers please:

- a. Acknowledge Métis Aboriginal Rights through the signing of an Impact Benefit Agreement.
- b. Consult the NSMA as a full partner for all heritage research and archaeological work.

## 2.1.6 Response

De Beers' Policy, "*Working with Aboriginal Communities*" is outlined in Section 4.2.1 of the 2010 Environmental Impact Statement (EIS; De Beers 2010). As noted therein, De Beers acknowledges the status of aboriginal people of Canada and their constitutionally entrenched rights. In working with aboriginal people, De Beers will ensure that this status and their rights are respected, and

will work to strike a balance between these considerations and other economic, social and environmental responsibilities.

De Beers' process for consultation is also outlined in Section 4.2.1 of the 2010 EIS (De Beers 2010). De Beers' engagement with Aboriginal groups regarding the Project has been ongoing and the records of our engagement, including the record of engagement with the North Slave Métis Alliance, have been submitted to the Panel as part of the Environmental Impact Review process. Section 4 of the 2010 EIS (De Beers, 2010) outlined the Community Engagement activities prior to submission of the EIS. Since submission of the 2010 EIS, De Beers has continued to provide opportunities to engage with the company in a discussion about the Project for all Aboriginal groups. Documentation of the company's community engagement activities that took place following the submission of the EIS by De Beers on December 23, 2010 and up until May 15, 2012 was submitted to the Gahcho Kué Panel on June 13, 2012 (De Beers 2012c). A further update of De Beers' Community Engagement activities from May 16, 2012 to November 23, 2012 will be submitted to the Panel in November 2012.

De Beers is fully funding the NSMA proposal for a Traditional Knowledge Study. In addition, De Beers also received a request for financial support from the NSMA for assistance to complete a heritage project. Through the Snap Lake Mine, De Beers is contributing to this project, among other contributors.

Archaeological work undertaken by De Beers for the Project has been presented and discussed with the NSMA as well as with all other aboriginal groups. The most recent example is the site workshops in August and September where De Beers brought Jean Bussey, archaeologist, to the Project site with all Aboriginal groups separately to outline the archeology work that has been completed to date, the process and methods used to complete the work to date, and to show the artifacts that have been recovered and provided to the Prince of Wales Northern Heritage Center as part of the archaeological work done at the Project site. De Beers provided funding for Aboriginal groups to include Traditional Knowledge holders who could provide expertise and Traditional Knowledge to the Company as part of these workshops.

## **2.2 SOCIAL, CULTURAL, AND ECONOMIC IMPACTS**

### **2.2.1 Recommendation 4 Métis Traditional Language Use**

The NSMA recommends that De Beers please:

- a. Continues to work with the North Slave Métis in ongoing support of language and cultural pursuits.
- b. Pay equal respect to North Slave Métis culture, traditions, and language compared to other (Dene) First Nations.
- c. Incorporate North Slave Métis cultural activities to be part of the company's socio-economic monitoring plan and used to inform policy and procedure.

### **2.2.2 Response**

- a. De Beers will continue to work with Aboriginal groups, including the NSMA, and the Government of the Northwest Territories (GNWT) to promote cultural preservation, sustainability and traditional language use. These activities will be reported on by De Beers as part of the annual socio-economic report. See the response to GNWT Recommendation #13 (De Beers 2012d).
- b. De Beers respects all Aboriginal cultures equally including Métis and Dene First Nations.
- c. De Beers will report on socio-economic activities annually. De Beers will review with the NSMA how best to incorporate their cultural activities in the company's annual reporting.

### **2.2.3 Recommendation 5 Need for Southern Workers**

The NSMA recommends that De Beers please:

- a. Provide a plan of how they will mitigate competition with other mines while meeting their projected employment quota.
- b. Provide a forecast of how many workers and for which positions De Beers expects to hire for each phase of the project.
- c. Provide a forecast of how many southern workers and for which positions De Beers expects to hire for each phase of the project.

## 2.2.4 Response

- a. De Beers submitted its Gahcho Kué Human Resource Strategy to the Panel on September 12, 2012 (De Beers 2012e). The strategy outlines how De Beers will position itself successfully in a competitive labour market to recruit and retain the skills it needs for the proposed Gahcho Kué Project. The strategy articulates the ways De Beers will work with government, training agencies, communities and others to optimize the participation of Aboriginals and NWT residents in the employment and training opportunities available.
- b. The information that is currently available regarding the specific positions that De Beers will have for the Gahcho Kué Project is located on Page 14 of the Gahcho Kué Human Resources Strategy (De Beers 2012e). As part of its ongoing operational readiness planning, De Beers will further refine employment opportunities for each phase of the Project. In addition, De Beers has developed a preliminary job description booklet that was submitted to the Panel on October 31, 2012 (De Beers 2012f). The job description booklet provides a description of employment opportunities, and a summary of the skills, education and experience required for these opportunities.
- c. While De Beers is unable to predict how many southern residents and NWT residents will apply for and be successfully matched to available job opportunities, De Beers' commitment is to recruit and employ as many Aboriginal and NWT residents as possible. Our approach includes building on our current experience with recruitment, training and development and retention strategies already implemented for the Snap Lake Mine, and implementing the Gahcho Kué Human Resources Strategy (De Beers 2012e).

## 2.2.5 Recommendation 6 In-migration

The NSMA recommends that De Beers please:

- a. Clarify, expand, and explain how in-migration will be simultaneously *not likely* and *likely* occur, what the impacts of that change will be, how it will be monitored and mitigated.
- b. Negotiate a socioeconomic agreement with the Aboriginal Peoples (not just GNWT) and establish an effective socioeconomic and cultural impact monitoring agency.

- c. Participate in a review of the Diavik Communities Advisory Board to benefit from lessons learned.

## 2.2.6 Response

- a. In-migration has not been associated with mineral exploration and mining activity over the past decade. It is not anticipated that the Project will result in substantial in-migration. The 2010 EIS (De Beers 2010) consistently predicts that the Project will result in a very limited amount of in-migration. The population projection predicts in-migration to the NWT as a result of the Project, including indirect and induced in-migration, to be 60 people per annum (De Beers 2010, Section 12.6.1.3.2). The Project is not expected to change the pattern of out-migration in the NWT.

The effects of the limited Project-driven in-migration on the Key Lines of Inquiry (KLOI) Long-term Social, Cultural and Economic Effects are discussed in Section 12.6.1.3.2 of the 2010 EIS (De Beers 2010). Effects on the KLOI Family and Community Cohesion are detailed in Section 12.6.2.7 of the 2010 EIS (De Beers 2010). Effects on Infrastructure and Services are discussed in Section 12.7.2.8.2 of the 2010 EIS (De Beers 2010). Overall, the effects of Project-driven in-migration are assessed as being low given mitigation measures, and due to the fact that much of this in-migration is expected to occur outside of the Local Study Area (LSA) in Yellowknife. The effect of Project-driven in-migration is not considered to be significant.

Pick-up points within the LSA communities, in combination with travel allowances that assist employees in getting to established pick-up points, will largely mitigate Project-driven in-migration by removing the need for workers to relocate to communities in close proximity to the Project. Any external or temporary labour brought in by the Project will not likely remain in the NWT.

While no additional monitoring of Project-driven in-migration is recommended in the 2010 EIS, De Beers does monitor the residency status of its workers, and provides this information to the public in annual socio-economic monitoring reports for the Snap Lake Mine and plans to continue this level of reporting for the Project.

De Beers has committed, in response to Tłıchǫ Government Round 1 Information Request TG\_35 (De Beers 2012g) and in response to GNWT Technical Report, Recommendation #16 (De Beers 2012d), to reporting annually on:

- Hiring by Hiring Priority and job category, in total numbers of and percentage of total hires.
  - Hiring by NWT Community in total numbers and percentage of total hires.
  - Total employment in person years by Hiring Priority and job category in total numbers and percentage of the workforce.
  - Total employment in person years by NWT Community in total numbers and percentage of the workforce.
- b. The GNWT recommended in its Technical Report, Recommendation #18, that a formal follow-up program, in the form of a Socio Economic Agreement between the GNWT and De Beers be a condition of approval for the Project. De Beers agrees, and plans to negotiate a Socio Economic Agreement, as a follow-up program, with the GNWT (De Beers 2012d).

De Beers will meet with the GNWT to review annual report results, to discuss challenges and to identify opportunities for collaboration to overcome those challenges or to optimize NWT resident participation in the Gahcho Kué Project. The Socio Economic Agreement with the GNWT will be for the benefit of the entire population of the NWT.

De Beers believes it is more meaningful to report to and meet with each Aboriginal group to provide results, discuss challenges and identify opportunities for collaboration in order to optimize the benefits from and participation in the Gahcho Kué Project. De Beers committed, in its response to the Tłı̨chǫ Government Round 1 Information Request TG\_35 (De Beers 2012g) to continue to track and report to Aboriginal groups the same data, specific to their members, that it does now for the Snap Lake Mine. These annual reports will provide information to Aboriginal communities regarding their participation in the Project and regarding activities undertaken by the Company in and/or with communities that address socio economic aspects of the Project. De Beers commits to meet with Aboriginal groups annually to discuss socio-economic results and reports, including reports produced by the Company that are specific to the community's participation in the Project.

- c. De Beers will upgrade its existing socio economic tracking systems, established for the Snap Lake Mine, to incorporate annual tracking and reporting for the Project. This upgrade will be completed upon receipt of permits to proceed and will enable the company to build on its existing operations, procedures and systems, and current reporting processes it has already established with Aboriginal communities.

### **2.2.7 Recommendation 7 Health and Wellness: Sexually Transmitted Infections**

The NSMA recommends that De Beers please:

- a. Implement preventative interventions, such as sexual health programming for employees.
- b. Expand and elaborate on how they will mitigate sexually transmitted infections with employees (both on/off-site).
- c. Partner or assist in funding a local sexual health organization.

### **2.2.8 Response**

De Beer's commitments on Health and Wellness are captured in a joint GNWT and De Beer submission to the public registry on October 19, 2012 (GNWT 2012a). Specific to sexual health programming for employees, De Beers has committed to collaborate with NWT communities and GNWT, to disseminate information to employees and in communities related to awareness prevention areas such as: substance abuse, sexually-transmitted infections, and family violence.

### **2.2.9 Recommendation 8 Health and Wellness: Drugs and Alcohol**

The NSMA recommends that De Beers please:

- a. Expand and explain as to how their mitigation strategies (i.e., Dry Site Policy and Drug and Alcohol programming) will lessen negative lifestyle choices, both on- and off-site.
- b. Expand and explain how their drug and alcohol programming will operate.
- c. Explain the residual effects with boom economies, substance abuse, and the effect on local infrastructure (policing, counselling, rehabilitation, etc.)
- d. Partner or assist in funding a local addiction clinic.

## 2.2.10 Response

- a. De Beers' Drug and Alcohol programming is mitigative in that it is both preventative and responsive. De Beers' Dry Site Policy and Drug Programming are companion components aimed at ensuring all employees:
- work safely on site;
  - are informed about the dangers at work and in their personal lives regarding the use and/or dependency on alcohol or drugs;
  - know about the programs that De Beers has in place to identify drug and alcohol use on site and the consequences if an employee is determined to be in violation of company policy; and
  - understand what options the company has available through its employee assistance programs for employees who have drug and alcohol issues to help employees recover from addictions.
- b. Individuals considering employment with De Beers or at De Beers sites are informed prior to employment about the Dry Site Policy, that it is a fundamental term for employment and that there is zero tolerance for violation of this policy. All employees and contractors working at Dry Sites are required to sign a form acknowledging the policy, and agreeing to terms that enable the company to enforce this policy, i.e., the screening of their luggage coming onto site. This is a preventative measure to mitigate the possibility employees are using drugs and alcohol while at work.

Training is delivered to all employees as part of their orientation upon hiring. This training includes information regarding the Dry Site Policy, enforcement of the policy, an overview of the impacts that drug and alcohol use will have on their ability to perform their job, the safety issues drug and alcohol use create for themselves and others, and the impact that dependency on drugs and alcohol can have on other aspects of their lives. As part of the mandatory training for supervisors, supervisors are trained on how to identify potential concerns related to drug and alcohol use by their employees, how to assist employees in such circumstances, and on the programs available through the company to assist employees in recovering from dependencies.

Employees found to have used drugs or alcohol on site and thus to be in violation of policy, are given an opportunity to meet with Human Resources staff to discuss the company supports available, including those supports for rehabilitation and recovery that are available through third-party service providers to address addictions. Drug and alcohol addiction rehabilitation is

confidential and arranged with the Company's Employee Assistance service provider. These are responsive mitigation measures.

- c. 2010 EIS Section K4.1 (De Beers 2010, Annex K – Socio-Economic Baseline Report) notes that the NWT economy is in a boom state as a result of diamond mining and oil and gas exploration and extraction. This was taken into account when describing baseline conditions in the Local and Regional Study Areas (LSA and Regional Study Area [RSA], respectively).

2010 EIS Annex K, Sections K6.4.2 and K6.4.3 (De Beers 2010) describe in detail existing issues related to substance abuse in the LSA and RSA, while Annex K, Section K6.4.4 (De Beers 2010) notes the correlation between substance abuse and multiple forms of crime, and the resulting increase in demand on policing services.

Annex K, Section K6.2.2.1 of the 2010 EIS identifies the role that substance abuse can play in the spread of sexually transmitted diseases, and Annex K, Sections K6.2.2.7 and K6.2.2.8 of the 2010 EIS discuss the correlation between substance abuse, mental illness and suicide (De Beers 2010).

Annex K, Section K8.6 of the 2010 EIS describes in detail the health and well-being services in the RSA (De Beers 2010). Mental health and addiction services, including counselling and rehabilitation services are detailed in Annex K, Section K8.6.6 of the 2010 EIS (De Beers 2010). It can be reasonably assumed that, with elevated levels of substance abuse and the resulting increase in mental illness noted in those sections identified above, demand for mental health and addiction services will also be elevated.

Annex K, Section K8.7.2 of the 2010 EIS details protective services in the RSA (De Beers 2010). It is noted that substance abuse increases demand for policing services, and jeopardizes community safety (De Beers 2010, Annex K, Section K8.7.2.2).

- d. The establishment and funding of local addictions clinics is the role and responsibility of government. De Beers will provide assistance to employees for drug and alcohol addiction rehabilitation through our Employee Assistance Program. There is flexibility in this service to determine what local supports are suitable and available to the employee. There is further flexibility in this service to incorporate alternative options, however, that decision is made by the employee together with the counsellor. As it is an anonymous and confidential process, respecting the employee's privacy, De Beers does not get involved in the specifics for any individual.

### **2.2.11 Recommendation 9 Health and Wellness: Mental Health**

The NSMA recommends that De Beers please:

- a. Consider on-site counselling services.
- b. Expand on how offering counselling service through the company health plan will *not* impact local health services (i.e, counselling services in Yellowknife, Hay River, etc.).

### **2.2.12 Response**

- a. De Beers will make information available on site to its employees regarding its Employee Assistance Program (EAP) and will ensure toll-free access to the EAP service provider both on and off site. Obtaining counseling is a confidential and personal matter, and it is De Beers' view that employees are uncomfortable with having other employees or their employer see them obtain such services in their work environment. There is flexibility in the EAP service to determine what local supports are suitable and available to the employee when they are off site.
- b. De Beers benefit package includes an Employee Assistance Program (EAP), which provides confidential counselling services to employees. Services for De Beers employees are arranged by the EAP service providers by working with local and other agencies to identify services that are available to meet the needs of employees.

### **2.2.13 Recommendation 10 Travel to the Mine Site and Rotation Flexibility**

The NSMA recommends that De Beers please:

- a. Amend EIS 12.5.6 to expand and clarify "operational requirements".
- b. Consider providing direct flights at no cost to employees, contractor employees, and subcontractor employees to and from the mine site from all NWT communities without stopping or staying in Yellowknife.
- c. Give further consideration to a flexible rotation schedule and offer shorter shifts, where operationally feasible, and communicate this to the potential northern workforce to maximize opportunities for all NWT residents including NWT Aboriginal residents and women.

## **2.2.14 Response**

- a. De Beers has provided additional information in response to the GNWT Round 1 Information Request, GNWT\_8, request 4 (De Beers 2012h). This information expands and clarifies “operational requirements”.
- b. De Beers’ consideration of employee transportation, including the use of direct flights has been explained in De Beers’ response to GNWT Round 1 Information Request, GNWT\_8, request 4 (De Beers 2012h).
- c. De Beers’ consideration of rotation schedules is explained in response to GNWT Round 1 Information Request, GNWT\_8, requests 5 and 6 (De Beers 2012h).

## **2.2.15 Recommendation 11 Career Advancement and Training**

The NSMA recommends that De Beers please:

- a. Develop a detailed workplace education strategy and consider hiring instructors to help employees achieve success in their education and career development activities
- b. Clarify whether the company intends to provide incentives for employees to pursue training/education on their out-rotation
- c. Deliver further details regarding the company’s contribution to student achievement awards and its educational assistance program.
- d. Provide more details regarding its pre-employment plans and preparations.
- e. Offer further details on the professional development and training opportunities for Aboriginal and northern employees who would like to pursue supervisory and management roles.

## **2.2.16 Response**

- a. De Beers committed to the establishment of an on-site learning centre equipped and resourced with computers and a learning centre resource library. De Beers has committed to working with community agencies so that literacy programs will be directly linked to other kinds of upgrading, such as education and training programs that enable participants to further improve their qualifications towards employment. See Section 12.4.14 of the 2010 EIS (De Beers 2010).

De Beers has also identified in its Gahcho Kué Project Human Resource Strategy, on Page 14, that there will be two training coordinators for the Project (De Beers 2012e). The De Beers' employee performance appraisal process includes a discussion with employees regarding the key skills required for employees to advance in the company. The employee appraisal process involves meetings with the employee twice annually and it plays an important role in helping employees achieve success in their current position and in advancing (refer to De Beers' response to Tłı̄chǫ Government Round 1 Information Request TG\_40, request 1 [De Beers 2012g]).

- b. The company has policies and procedures that provide incentives for employees to pursue training and education that support their advancement and professional growth. These currently apply to the Snap Lake Mine and will apply to the Gahcho Kué Project. De Beers works with schools in communities close to its projects to support community initiated graduation or award ceremonies and/or special school recognition events for students. De Beers is also providing scholarships that encourage the completion of high school and the pursuit and completion of post secondary education.

DeBeers' educational assistance program includes a variety of mechanisms or tools to support the advancement of its employees, which include the following:

- NWT Apprenticeship Policy – establishes the supports the company will put in place for employees to assist them in completing an NWT apprenticeship. De Beers provided information regarding its current NWT Apprenticeship Policy in its joint submission to the Panel with the GNWT on October 26, 2012 (GNWT 2012b).
- NWT Training Program – details on the DeBeers' 2012 scholarships program were submitted to the public registry on October 17, 2012 (De Beers 2012i).
- De Beers' Professional Development and Training Policy – recognizes that learning is a shared responsibility between the employee and the employer and that the employer can play a role in encouraging employees to invest their time in studying for self advancement. It establishes financial and other supports for professional development. This policy, for example, provides for opportunities for employees to receive assistance with tuition fees for approved programs, assistance to employees completing professional designations, and creates opportunities for reimbursement of a variety of costs to assist employees in pursuing training and development that has been requested by the employee and pre-approved by the company.

- Engineers co-op placement and an Engineer in Training Program – a program that supports the development and training of engineers.

These mechanisms are in addition to the mandatory training and development opportunities that De Beers' identifies as a result of work location and/or position, including pertinent new employee orientation training, on-the-job training and safety related training that is budgeted for, and delivered, by the training department directly or through specialized training organizations.

- d. De Beers' Gahcho Kué Human Resource Strategy, submitted to the public registry in September 2012, outlines that partnerships with education, training and career development organizations that are currently in place that will be expanded to include the Project (De Beers 2012e). These relationships will be maintained for the success of training and developing NWT residents. Please refer to Tactics #10, 12, 14, 15, 19 and 22 in the Gahcho Kué Human Resource Strategy that provides specifics on how De Beers will deliver on its pre-employment programs and preparations (De Beers 2012e).
- e. The De Beers' employee performance appraisal process includes a discussion with employees regarding the key skills required for employees to advance in the company. The employee appraisal process involves meetings with the employee twice annually and it plays an important role in helping employees achieve success as does the suite of tools outlined in point c above (refer to De Beers' response to Tłıchq Government Round 1 Information Request TG\_40, request 1 [De Beers 2012g]). As does the suite of tools in the company's educational assistance program outlined in point c above.

## **2.2.17 Recommendation 12 Medical Services Available at Mine Site**

The NSMA recommends that De Beers please:

- a. Hire NWT-licensed physicians and/or NWT-registered nurse-practitioners in sufficient numbers to provide 24-hour, 7-day per week medical services at the mine site.

## 2.2.18 Response

- a. De Beers has committed to the provision of medical personnel, accessible 24/7 at the Gahcho Kué Project site. This commitment was made by De Beers in Section 12.7.2.1.3, Table 12.7-7 of the 2010 EIS (De Beers 2010). In addition, De Beers has engaged in discussions with the GNWT, Department of Health and Social Services regarding commitments for the Gahcho Kué Project. Those commitments were submitted jointly by De Beers and the GNWT to the Panel on October 19, 2012 (GNWT 2012a). De Beers has agreed in that set of commitments to discuss and confirm mutually acceptable protocol arrangements regarding medical matters prior to commencement of construction.

## 2.2.19 Recommendation 13 Socioeconomic Impacts of the Closure Phase

The NSMA recommends that De Beers please:

- a. Take measures to mitigate the negative impacts of closure and to assist transition to post-closure for its employees be formalized in the Closure and Reclamation plan that will be developed in cooperation with communities.
- b. Provide a plan of how they will mitigate negative social, cultural, and economic effects post-reclamation.
- c. Complete a Closure Socioeconomic Impact Assessment, targeted for three years prior to closure of the operation.
- d. Research the possibility of creating an employment transition centre (both online and tangible).
- e. Provide a plan of action on business diversification and sustainability planning for each affected First Nation (that term includes Métis organisations, by legal definition, in the NWT) business that depends on diamond mining related business.

## 2.2.20 Response

De Beers understands that all employees need the ability to quickly respond and manage the impact of lost employment. De Beers' also understands that services provided by the GNWT are in place to help NWT residents plan for employment transitions resulting from mine closures. De Beers will meet legislative requirements and will collaborate with the GNWT leading up to permanent closure to ease employee transition to new jobs. De Beers will continue to engage Aboriginal communities regarding the Project during all

phases and will discuss employee transition to new jobs leading up to permanent closure as part of its engagement process

### **2.2.21 Recommendation 14 Infrastructure Use Offset**

The NSMA recommends that De Beers please:

- a. Develop a legally binding *Good Neighbour/Developer Agreement*. Such an agreement would facilitate the creation of financial offset that would transfer directly to the communities. The amount would be calculated by an independent oversight agency, based on employee infrastructure use and residual impact.

### **2.2.22 Response**

The Project will be a remote diamond mine located 280 kilometres from Yellowknife, the closest service centre. As a result, the Project will not draw significantly on community infrastructure resources. De Beers' activities are guided by its policies concerning *Sustainable Development* and *Working with Aboriginal Communities*. Financial security for the Project is set by the Mackenzie Valley Land and Water Board and held by the Queen in Right of Canada as represented by the Minister of Aboriginal Affairs and Northern Development Canada. Additional oversight and financial offset would duplicate these existing instruments.

## **2.3 ENVIRONMENTAL IMPACTS**

### **2.3.1 Recommendation 15 Caribou**

The NSMA recommends that De Beers please:

- a. Develop a caribou monitoring plan with the NSMA.
- b. Implement a caribou tasting aspect to the long-term monitoring.
- c. Develop mitigation plans to assure NSMA of a caribou harvest adequate to meet its members justifiable needs.

### **2.3.2 Response**

- a. De Beers has developed a caribou monitoring plan as part of the WEMP, which was submitted to the public registry on October 4, 2012 (De Beers 2012a). The WEMP was developed with a working group and workshop that was inclusive of all Aboriginal parties, including the NSMA. While the NSMA did not attend the WEMP working group meetings, they were invited and did participate in the workshop. The NSMA will be invited to provide further input on the progression of the WEMP as the Project advances.
- b. De Beers has provided consideration of a caribou tasting event in the WEMP (De Beers 2012a). The details and logistics of this aspect require further discussion with Aboriginal groups and the GNWT.
- c. De Beers has developed wildlife mitigation plans, which are captured in the Wildlife and Wildlife Habitat Protection Plan to that was submitted to the public registry on October 4, 2012 (De Beers 2012a). However, the GNWT is ultimately the responsible authority for wildlife management in the NWT.

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## **4 ACRONYMS AND ABBREVIATIONS**

De Beers	De Beers Canada Inc.
EAP	Employee Assistance Program
EIS	Environmental Impact Statement
GNWT	Government of the Northwest Territories
KLOI	Key Lines of Inquiry
LSA	Local Study Area
MVEIRB	Mackenzie Valley Environmental Impact Review Board
NSMA	North Slave Métis Alliance
NWT	Northwest Territories
Project	Gahcho Kué Project
RSA	Regional Study Area
WEMP	Wildlife Effects Monitoring Program
YKDFN	Yellowknives Dene First Nation