RioTinto

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Katie Rozestraten
Securities and Project Assessment
Government of Northwest Territories, Department of Lands
P.O. Box 1320
Yellowknife, NT X1A 2L9

6 February 2020

Dear Katie Rozestraten:

Subject: DDMI Updated Engagement Record for the Environmental Assessment of the Processed Kimberlite to Mine Workings Proposal

Diavik Diamond Mines (2012) Inc. (DDMI) is pleased to provide the Government of Northwest Territories (GNWT) with a highlevel summary of stakeholder engagement conducted by DDMI during the Mackenzie Valley Enironmental Impact Review Board's (MVEIRB) Environmental Assessment for the Processed Kimberlite to Mine Workings Proposal (PKMW Project) as Attachment #1. A summary of DDMI's stakeholder engagement on the PKMW Proposal prior to submitting the Water Licence Amendment Application to the Wek'èezhìi Land and Water Board (WLWB) is included as Attachment #2.

As part of the preliminary design process for the proposed PKMW Project and in advance of the submission of the Water Licence Amendment Application for the Project to WLWB in June 2018, DDMI engaged with a wide range of stakeholders, including our Participation Agreement partners (Tłįchǫ Government; Łutsel K'e Dene First Nation; Yellowknives Dene First Nations; North Slave Métis Alliance; Kitikmeot Inuit Association) and potentially impacted communities. The potential for impacts, proposed mitigation measures, the acceptability of residual impacts, and how mitigation might be enhanced were discussed during these stakeholder engagements. DDMI's stakeholder engagement efforts included in-person meetings, teleconferences, and open houses.

As highlighted in Attachment #1, DDMI also conducted stakeholer engagement throughout the subsequent MVEIRB Environmental Assessment for the PKMW Project to address stakeholder concerns through PowerPoint presentations and meetings at varous venues, including in potentially impacted communities, to provide project clarifications and resolve outsanding issues. In addition, DDMI organized tours of the Diavik Diamond Mine site for various Indigenous groups (including Diavik Participation Agreement signitory and non-signatory groups), and federal and terriorial government staff, to give stakeholders a first-hand idea of the location and scale of the PKMW Project.

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DDMI has committed to ongoing Engagement with potentially impacted Indigenous groups to inform Project Design and the Construction, Operation, Closure and Post-Closure Phases of the PKMW Project, including a Commitment to working with potentially impacted Indigenous groups toward the development of Traditional Knowledge-based Acceptance Criteria for Re-connection of the pit lake(s) to Lac de Gras at closure. The objective of this Engagement and associated measures is that at closure, with the PKMW Project, the Diavik Mine site is not only safe for cultural use, but is also perceived as such. To this end, DDMI facilitated a workshop for the Diavik Tradional Knowledge (TK) Panel in Semptember 2019 to discuss TK-based criteria for assessing the environmental performance of closure programs for the Diavik Mine and the PKMW Project. DDMI's intent for this workshop was to begin engagement with a focused group of Indigenous community members to develop culturally acceptable closure criteria for the PKMW Project and the Diavik Mine to inform and support subsequent/future engagement with a broader group of stakeholders.

DDMI recognizes that approval of the PKMW Project from the Responsible Minister(s) at the current Environmental Assessment stage does not imply DDMI can commence field activities, such as construction, associated with the PKMW Project. DDMI looks forward to the aforementioned additional stakeholder engagement throughout the subsequent regulatory process(es), including in support of water licencing and review of updates to water quality modelling, monitoring program(s), management plans, and project design reports.

We thank the GNWT for the opportunity to provide our record of stakeholder engagement during the MVEIRB's Environmental Assessment and our plans for subsequent engagement during the regulatory phase and throughout project execution to inform government decision-making with respect to the PKMW Project. Please do not hesitate to contact the undersigned or Kofi Boa-Antwi (867 447 3001 or kofi.boa-antwi@riotinto.com) if you have any questions related to this submission.

Sincerely,

Sean Sinclair

Principal Advisor, Environment and Closure Readiness

cc: Melissa Pink, GNWT

Alex Power, Government of Canada

Attachment:

- Attachment #1: Diavik Stakeholder Engagement Record for the MVEIRB's Environmental Assessment for PKMW Project
- Attachment #2: Diavik Pre-submission Stakeholder Engagement Record in support of the Water Licence Amendment Application for the PKMW Project

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ATTACHMENT #1

2019

DIAVIK STAKEHOLDER ENGAGEMENT RECORD

MACKENZIE VALLEY ENVIRONMENTAL IMPACT REVIEW BOARD'S ENVIRONMENTAL ASSESSMENT FOR THE PROCESSED KIMBERLITE TO MINE WORKINGS (PKMW) PROJECT

Approval: Final

Recorded By: DDMI, Environment

DATE	ENGAGEMENT TRIGGER	ATTENDEES	LOCATION/ ENAGEMENT ACTIVITY TYPE	ISSUES RAISED	DDMI RESPONSE	MATERIALS PROVIDED TO ENGAGED PARTY
February 5, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Tlicho Government (TG) representatives	Diavik Mine Site/In- person Presentation and site tour	No comment from TG	N/A	PowerPoint Presentation on the PKMW Proposal
February 28, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Kugluktuk Hunters and Trappers Organization	Kugluktuk, Nunavut/Presentation	No issues raised	N/A	PowerPoint Presentation on the PKMW Proposal
April 3, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Łutsel K'e Dene First Nation (LKDFN)	Łutsel K'e, NWT/Presentation	 Study cited by LKDFN that Lac de Gras water quality had changed; LKDFN attendees noted that people do drink from Lac de Gras. Discussion on historical caribou migration routes and caribou use of the site (grazing, escape from mosquitoes, watering holes) 	DDMI clarified that water has changed but potable.	PowerPoint Presentation on the PKMW Proposal
April 15, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Fisheries and Oceans Canada staff	Diavik Corporate Office in Yellowknife/In-person Presentation	 Pit water quality estimates provided – PK deposition WL amendment. Whether DDMI has demonstrated acceptable water quality 	DDMI's updated water quality modelling demonstrates water quality in the top 40 metrecolumn in pits will be protective of fish and aquatic life.	PowerPoint Presentation on the PKMW Proposal

April 23, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Yellowknives Dene First Nation (YKDFN) s	Yellowknife/Presentation	 YKDFN rights and responsibilities to land and traditional uses. Environmental stewardship, particularly with respect to the PKMW Project. Environmental monitoring. Suitable information sharing related to the PKMW Project (plain language, 3D models) 	DDMI will continue to improve tools of engagement based on stakeholder feedback.	PowerPoint Presentation on the PKMW Proposal
June 3, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Yellowknives Dene First Nation (YKDFN) staff	Diavik Mine Site/ meeting, presentation and site tour	No issues raised	N/A	PowerPoint Presentation on the PKMW Proposal
June 6, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Tlicho Government representatives, including Grand Chief, Chiefs, Assembly Members, and staff.	Diavik Mine Site/Meeting, Presentation and site tour	How closure plan changed from original proposal. Whether filling the pits with Lac de Gras water at closure will affect lake water levels.	 DDMI now plans to put PK back where it came from before filling pits with water. Pit filling with Lac de Gras water after PK deposition will be controlled over 6 months to 2 years. 	PowerPoint Presentation on the PKMW Proposal
June 24, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Government of Northwest Territories – Department of Lands (GNWT Lands Inspector) – Jamie Steele	Diavik Mine Site/ Presentation and site inspection/tour	No issues with proposed project. Reviewed Land Leases and no issue related to this mining expansion.	N/A	PowerPoint Presentation on the PKMW Proposal

June 27, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Fort Resolution Metis Council (FRMC) representatives, including President, Members, and FRMC consultants	Fort Resolution/Presentation at Open Membership Meeting	 Whether there chemicals in in the Processed Kimberlite (PK) to be deposited in pits. Sampling that has been done to characterize the material to be deposited in pits. Reasons for not proposing to put coarse PK into the pits. What DDMI will do if contaminants are found 25 years after deposition of PK in pits. 	 Most of the PK is water with some ground rock from ore processing. DDMI has collected hundreds of samples, on island mostly and conducts sampling two times per year throughout Lac de Gras. DDMI is not planning to put coarse PK in mineout pits as we have not developed a safe way to truck and deposit the coarse PK in the pits. DDMI will not relinquish the Diavik mine site until sampling criteria are met. 	PowerPoint Presentation on the PKMW Proposal
July 9, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Government of Northwest Territories – Department of Environment and Natural Resources (GNWT ENR) staff	Diavik Yellowknife Office/Presentation	No issues raised	N/A	PowerPoint Presentation on the PKMW Proposal

July 12, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Environment and Climate Change Canada (ECCC) Staff	Diavik Corporate Office in Yellowknife/In-person and teleconference Presentation	Discussion focused on DDMI's responses to ECCC's review comments and recommendations submitted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) as part of the Review of the Processed Kimberlite to Mine Workings Project.	DDMI addressed ECCC's outstanding concerns/issues, including DDMI's provision of additional details of the monitoring program, including water quality sampling, to be implemented by DDMI to confirm that pit water quality is stable prior to any dike breach. DDMI noted ECCC's concern about about DDMI's predictions regarding the stability of meromixis for the A21 mine workings and committed to alleviating ECCC's concern on this matter in responses to reviewer comments as part of the MVEIRB process.	PowerPoint Presentation on the PKMW Proposal
July 16, 2019	 Processed Kimberlite to Mine Workings (PKMW) Project Proposal and Request to Amend Water Licence to allow for the A21 Below Pit Mining Project 	Fisheries and Oceans Canada (DFO) Staff	Diavik Corporate Office in Yellowknife/In-person Presentation	 Will this impact PK deposition option in A21 if PKMW approved? No other issues. 	This would not change the water cover thicknesses. N/A	PowerPoint Presentation on the PKMW Proposal

July 24, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Representatives and staff of the following organizations: Mackenzie Valley Environmental Impact Review Board Government of Northwest Territories Yellowknives Dene First Nation Tlicho Government Fisheries and Oceans Canada North Slave Metis Alliance Deninu Kue First Nation	Diavik Mine Site/Inperson Meeting, Presentation and site tour	No issues raised about PKMW Proposal	N/A	PowerPoint Presentation on the PKMW Proposal
July 26, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Fisheries and Oceans Canada staff	Diavik Corporate Office in Yellowknife/In-person Presentation	Potential fish habitat compensation requirements in a scenario where the pits/mine workings are not reconnected to Lac de Gras after project closure.	DDMI is considering alternative Offsetting approaches, including community-supported off-site fish habitat enhancement initiatives, to meet the requirements of its No Net Loss Policy.	PowerPoint Presentation on the PKMW Proposal
August 7, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Fort Resolution Métis Council (FRMC) representatives including President, staff and consultants	Diavik Corporate Office in Yellowknife/In-person meeting and teleconference Presentation	FRMC's concerns about the significance of existing and likely future impacts on caribou, FRMC cultural use, and water quality.	DDMI noted that, based on the results of its environmental assessment presented in the Summary Impact Statement, residual impacts to all valued components assessed will not be significant if mitigation measures proposed by DDMI are implemented.	PowerPoint Presentation on the PKMW Proposal

August 14, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	Government of Northwest Territories (GNWT) – Department of Environment and Natural Resources staff	Diavik Corporate Office in Yellowknife/In-person and teleconference Presentation	Discussion of GNWT's Intervention and DDMI's planned responses to GNWT's Recommendations in the Intervention as part of the MVEIRB's Review of the PKMW Project.	DDMI provided clarifications of the proposed project to address a number of GNWT's outstanding concerns. DDMI also committed to addressing some GNWT issues/concerns during the regulatory phase/Water Licencing stage of the PKMW Project approvals process.	PowerPoint Presentation on the PKMW Proposal
August 19, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal	North Slave Metis Alliance (NSMA) representatives and staff	Diavik Mine site/in- person meeting and presentation	DDMI's proposed closure plans, particularly with respect to the Environmental Assessment for Processed Kimberlite to mine workings before the Mackenzie Valley Environmental Impact Review Board.	DDMI gave a presentation on the Environmental Assessment for PK to mine workings, including a review of the NSMA's intervention recommendations and DDMI's draft responses.	PowerPoint Presentation on the PKMW Proposal

September 12-16, 2019	Processed Kimberlite to Mine Workings (PKMW) Project Proposal and Options for Pit Closure	Diavik Traditional Knowledge Panel members	Diavik Mine site and Community Based Monitoring Camp site/site tour and workshop	TK Panel Members recommended that: DDMI store soft material that is produced from processing kimberlite away from the surface so animals and humans cannot access it. DDMI remove the soft processed kimberlite material that are currently in the PKC such that Diavik can start to cover the Processed Kimberlite Containment Facility to create a safe and hard surface at least three years earlier than the original closure plan. DDMI should ensure that TK Panel members are on site to witness transfer of the soft processed kimberlite and filling the	DDMI agreed to carefully consider the TK Panel's recommendations as part of PKMW Project design and in closure planning for the Diavik Mine.	PowerPoint Presentation on the PKMW Proposal
				pits with water		

ATTACHMENT#2

2018

DIAVIK COMMUNITY ENGAGEMENT RECORD

W2015L2-0001 AMENDMENT PK TO MINE WORKINGS AND ADMINISTRATIVE UPDATES

Approval: Final

Recorded By: DDMI, Communities & External Relations

DATE & TIME	ENGAGEMENT TRIGGER	ATTENDEES	LOCATION/ ENAGEMENT ACTIVITY TYPE	ISSUES RAISED	DDMI RESPONSE	MATERIALS PROVIDED TO ENGAGED PARTY
12 January 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	North Slave Metis Alliance staff (3)	DDMI Corporate Office, Yellowknife, NT - Meeting	No concerns or issues. Discussions focused on: dam raise and PK to A418, timing, methods and process for moving PK, Ekati's PK storage methods, mine life, potential PKC closure options, minimizing footprint & utilizing underground, timeline for amendment process.	• N/A	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
29 January 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	 Lutsel K'e Dene First Nation Chief LKDFN Staff (1) LKDFN Councillor (1) LKDFN Member (1) 	Diavik mine site, Lac De Gras, NT - Meeting	No concerns or issues. Discussions focused on: dam raise and PK to A418, timing, methods and process for moving PK, Ekati's PK storage methods, mine life, potential PKC closure options, minimizing footprint & utilizing underground, timeline for amendment process.	• N/A	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf

30 January 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	• YKDFN Chiefs (2) • YKDFN Staff (3)	DDMI Corporate Office, Yellowknife, NT - Meeting	Requested information of other examples of this type of process, if it has been done in other operations – not including Ekati. Will this change meromictic effect in pit? How will this impact caribou and fish? How will the impact long term water quality and closure plan?	Conceptual design to date; with further modeling to be completed in second phase of amendment process. Detailed studies on water quality will be guided by the Amendment process AEMP will monitor fish health and effects in the lake and the closure plan will be updated.	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
2 February 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Kwe Beh Resource Working Group (5)	TG Office, Yellowknife, NT - Meeting	Asked if the AEMP would monitor for possible effects from this. No other concerns were noted.	DDMI confirmed the AEMP would monitor for possible effects from this change.	• 2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
13 Febr uary 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	KIA Lands and Environment Staff (At request of President and ED) (6)	KIA Office, Kugluktuk, NU	What is the anticipated quantity of "slime" slurry? Are there expected effects of nitrate to the lake from the PK slurry at closure? Interested if there will be seepage of the material to the lake after closure. Noted that the key difference for Diavik's amendment is PK storage in Lac de Gras at closure (vs in-land pit lakes). Asked how the PK material will stay in place.	Estimate just over 4Mt of operational PK to the mine workings Detailed studies on water quality will be guided by the Amendment process Water table will try to equalize with the mine workings; water to flow in to the mine vs from the mine. Agreed Freshwater cap on top of PK	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf

28 Febr uary 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Kugluktuk Hunters and Trappers Organization	• Telephone	Manager of HTO to present to Board at next meeting & send DDMI any comments or questions in 1 week; none received.	• N/A	• 2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
30 January 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Department of Fisheries and Oceans	Yellowknife, DDMI boardroom	Discussion about fish habitat compensation within the A418 footprint Suggested providing an overview and rationale for recommended changes to the Water License	 Habitat compensation plans for A418 closure currently remain the same. Overview and rationale for all changes will be provided with Amendment application. 	• 2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
23 January 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Environment and Climate Change Canada	• Teleconference	No concerns or issues. Discussions focused on: dam raise and PK to A418, timing, methods and process for moving PK, Ekati's PK storage methods, mine life, potential PKC closure options, minimizing footprint & utilizing underground, timeline for amendment process.	• N/A	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf

24 January 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Government of the Northwest Territories, ENR	ENR Boardroom, Scotia Center	Impacts/benefits to PKC closure? Asked if security estimate revision is required with application. Mentioned ENR supports sequencing security updates later.	 Discussed possible change in closure option for PKC and the expected overall benefit to PKC closure. It is DDMI's view that it is not required at this time. 	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
				 Discussed deposition plans and monitoring requirements. Suggested possible extension of Water License term to 2026 and benefit of avoiding simultaneous operation and closure licenses. Asked about pipeline spill contingency. Effect on water quality in pit at closure? 	 N/A DDMI to request 2025. An updated Contingency Plan will incorporate this risk. Detailed studies on water quality will be guided by the Amendment process. 	

24 January 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Government of the Northwest Territories, Lands - Inspector	Yellowknife, DDMI Boardroom	Modelling for requirements of water cap on top of PK? Would filling the pits with water constitute a water usage? Is a potential freeboard limit required? If so, how would it be measured? Suggested possibly extending the term of the Water License to 2026	Modelling work is in progress and detailed studies on water quality will be guided by the Amendment process. Unsure at this time. Filling of the pits will be covered by future closure license. Operational limit will be required that is significantly below the freeboard of the pits (lake level). DDMI to request 2025.	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
1 February 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Government of the Northwest Territories, Lands - Administration	Yellowknife, Lands Boardroom	 PK storage is not described within the use of current mining lease. Suggest administrative adjustment of the boundaries of Mining lease #76D/8-5-2 and PK containment lease #76D/8-6-2. 	DDMI agrees and will submit an administrative lease boundary adjustment before which time this change takes effect.	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf
28 February 2018	Amendment to Environmental Management Plans and programs; -Processed Kimberlite management and storage -Administrative changes	Environmental Monitoring Advisory Board and Staff	Teleconference	How high can be PK be deposited in the pit so as not to impact water quality in Lac de Gras?	Modelling work is in progress and detailed studies on water quality will be guided by the Amendment process.	2018-01-11 DDMI_PK to A418 Engagement Presentation.pdf

10-14 May 2018	Processed Kimberlite management and storage concept	Diavik Traditional Knowledge (TK) Panel members	Diavik Mine site and Community Based Monitoring Camp site/site tour and workshop	 Diavik TK Panel members were interested in knowing whether PK would affect fish and water, and expressed significant concern that fish might ingest PK or that PK may affect fish gills. Diavik TK Panel members requested a tour of key infrastructure to support the proposal to deposit and store processed kimberlite in mine workings. General concerns about the potential for impacts to water quality, fish, and wildlife from processed kimberlite deposition and storage in the mine workings. 	 DDMI presented results from the PK toxicology study that found that PK does not contaminate water or chemically harm fish. TK Panel members were given a tour of site infrastructure including the mine pits, underground mine workings, and the processing plant. DDMI highlighted studies conducted to date to support project design and indicated additional studies, including water quality modelling, are planned as part of ongoing project development. 	PowerPoint Presentation on the PKMW Proposal
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