

NORTH SLAVE METIS ALLIANCE

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Re: EA0506-008 Categorization and prioritization of scoping issues

This list of categorised and ranked issues are provided, as requested, to assist in the technical scoping of the Environmental Review of the Gahcho Kue Diamond Mine Project, without prejudice to any future positions or opinions of the North Slave Métis Alliance (NSMA). Fifty (50) stars (*****) are allocated to our currently perceived highest priority issues.

Please note that the relatively higher priority NSMA has placed on anticipated socio-economic impacts, as compared to ecological impacts, does not indicate that the biophysical environment is of low importance to NSMA members. Rather, NSMA's ranking reflects the severity, duration, and extent of the existing (baseline) and expected increases in socio-economic impacts combined with NSMA's low level of confidence in the ability of the existing assessment, regulation, management, and enforcement regime to address NSMA's socioeconomic issues, as compared to the relatively well developed regime addressing most ecological issues.

NSMA is highly likely to experience disproportionately large adverse impacts to social stability and community wellness, due to their existing uniquely disadvantaged, vulnerable, and marginalized status. NSMA's baseline conditions and ability to adapt to change differ significantly from the other aboriginal group. NSMA has no externally recognised land base, no Indian Act benefits, and no interim measures or resource co-management agreement. The Tlicho land claim covers a very large portion of NSMA's traditional land base, but does not include the NSMA. Repeated involuntary and non-compensated expropriations of NSM homes in Yellowknife over the past few generations, and the displacement of NSM from settlements they established, has left the NSMA struggling to survive as a distinct community.

North Slave Metis are uniquely challenged by the social stigma of belonging to a visible minority, which has often been labelled as "bastards" who are not Indians, and who are not White. The fact that Metis have so often been left out, ignored, treated differently, and disinherited, lends credence to this terribly unhealthy impression. The very small Metis community (officially but not in reality) gets discriminatory treatment from all sides. Many Metis people have claimed Indian status in an attempt to avoid some of the negative effects of historic and ongoing discrimination, socially, and administratively. If this continues, North Slave Metis, as a people, will eventually disappear... as has been the express intent of past colonial government policies. No other aboriginal community in the North Slave Region has been subjected to the demographic pressures that the North Slave Métis (NSM) in Yellowknife have and likely will experience.

1. Socioeconomic Concerns (9 issues, 22 stars)

- 1.1. **** Unresolved land claims lead to uncertainty over rights and responsibilities, to inefficiency in the process, to social and political turmoil, and to increased negotiation and litigation costs. Property rights, including aboriginal title and rights must not be expropriated without consultation, accommodation and compensation. Yellowknife's residential expansion is limited by unsettled land claims. NSM quality of life is strongly affected past and continuing injustices (ie: distributive=outcomes such as IBA's, seats on agencies; procedural =involvement and impartiality, such as capacity, community specific baselines, impact assessment, and CBA; and relational=maintenance of social relations, such as Metis being excluded and peripheral instead of leaders and decision makers.).
- 1.2. *** Equity, full cost accounting, cost-benefit analysis, and market efficiency. Freely competitive markets function efficiently only if existing rights and property are protected, information is adequate, and all transactions are voluntary. Cost-benefit analysis (CBA) for the project must explicitly recognise and account, separately, for impacts that affect NSMA. The net benefits of the project to NSMA can only be determined with the meaningful participation of NSMA in the CBA. The values, identification of impacts, indicators, criteria, and assumptions used in the CBA must be appropriate to NSMA. Most importantly, the CBA needs to be done with recognition of existing aboriginal rights and titles. Community specific assessment, mitigation, and monitoring are needed. Current mines are producing faster than predicted, and tipping the balance away from that which informed the original cost-benefit analysis.
- 1.3. *** Training and education needs to be appropriate, timely, and include transferable skills. Access to training should be equitable.
- 1.4. *** Depletion of non-renewable resources will result in a permanent and significant reduction in resources available for development by future generations of North Slave Metis. This is a very significant option cost to NSMA.
- 1.5. *** Capacity. Community and regional infrastructure such as highways, airports, hospitals, water treatment facilities, energy generation, waste management, storage space, are stressed by population growth and increased use and may need to be upgraded and maintained. The capacity of government, community, and industry to keep up with the pace of development is in question. There are already empty seats on monitoring agencies, conflicting schedules for regulatory processes, and shortages of inspection and enforcement personnel. Existing mines are already having trouble retaining adequate numbers of qualified workers, including environmental specialists. Competition from the Alberta oils Sands developments and the upcoming pipeline will increase the pressure. Wages, and inflation, will increase, affecting all economic activity in the region.
- 1.6. ** Inflation, unpaid work, and resource shortages. When a worker is away from home, their family, friends, or institutions must carry the workers share of the parental, household, social and cultural responsibilities. There is a significantly increased need, and increased costs, for care for children, elderly and disabled. Janitorial, mechanical repair, home maintenance, and many other services may also need to be purchased instead of do-it-yourself. Shortages of labour, goods, services, and real estate cause inflation. Women, disabled, students, retired persons, and various workers not involved directly in the mining industry may not receive adequate cost of living income increases to keep up. Non mining business also have to pay inflated rents, wages, taxes and fees, and can be forced out of business. Shortages of goods and services. Increased economic activity and workforce expansion adds to the demand for already scarce community and government services. Fewer volunteers are available, and line ups get longer for health care,

social services, recreation, education, and so on. The security deposit must be adequate to ensure **socioeconomic mitigation** is effective.

- 1.7. ** Post-closure socioeconomic impacts of the bust which will follow this boom. The security deposit must be adequate to cover the social and economic mitigation that will be needed on closure. Individuals, families, communities, governments, and companies will all have to re-adjust to decreased population, falling real estate values, business decline, and increased bankruptcy. The socio-economic closure plan should provide appropriate education and training, to ensure workers, families, communities and governments are prepared to capture, retain, and invest the profits from the liquidation of our non-renewable resource to generate a sustainable replacement income. The effectiveness of the mitigation requires that it start before the mine starts, and continues while the mine is in operation and the benefits are flowing.
- 1.8. * Interference with exercise of rights. NSM will be prevented from harvesting in the area of the mine, the watershed downstream, and along transportation routes to the mine. Shooting will be restricted within several hundred meters of all human activity areas, but harvesting success will be affected, due to changes in the distribution, abundance, behaviour, and palatability of wildlife in a much wider area. Fishing in the Lockhart water shed, especially in Kennedy Lake and downstream will be affected. Dust and other air quality changes may affect the nutritional or medicinal value of plants. At the same time, there will be increased harvesting competition due to population and cash flow increases. Thresholds where these cumulative impacts become significant are unknown, but in the Yellowknife area, it is common knowledge that competition for hunting, fishing and outdoor recreation opportunities has been a very significant impact for decades already, especially along the Inraham trail. NSM are slowly being driven off the land because land use competition and travel expenses are too high, and conflicting time demands are too great.
- 1.9. * Cost of participation. NSMA must incur **expenses** to participate in the environmental review, permitting, negotiations, and monitoring of the project during construction, operation and closure. Costs include such things as; travel, accommodation, communication, honoraria, technical support, research studies, meetings, site visits, monitoring.

2. Human Health, Safety, and Wellbeing Concerns: (7 issues - 19 stars)

- 2.1. **** The influx of workers and increase in traffic from south to north increases access to illegal substances at the same time as increases in disposable income. **Substance abuse** is already epidemic in the North Slave Métis (NSM) community, and getting worse. The damage to individuals, families and the community is severe and often permanent. Existing law enforcement and health care resources and infrastructure are inadequate. We desperately need an addictions treatment center, home care, and respite care, so that the family members of addicted persons have a fair chance of pursuing their own lives. The influx of workers to Yellowknife and the worksite also increases NSM risk of exposure to **communicable disease** at the same time as placing additional burdens on existing healthcare resources and infrastructure.
- 2.2. **** Uncontrolled economic growth at the same time as a land-freeze creates **housing shortages** and **crowding** which affect people's access to privacy, peace and quiet, hygiene, and security of persons and possessions. Crowding increases **stress** levels in homes, and therefore also the probability of domestic **violence** and stress related **illness**. Housing shortages leads to inflated prices, which affects **housing affordability**, especially for those without mine related employment. There is also already shortages and crowding at recreational and educational facilities which decreases quality of life, and is likely to become worse.
- 2.3. *** Rotational work schedules interfere with **family and community cohesiveness**. Families and friends of mine site workers are deprived of the social contact , cultural interaction, and support

they would normally receive. Spouses of workers must take on additional responsibilities for parenting, household chores, and cultural activities, and may feel neglected, lonely, stressed, and resentful. Spousal separation contributes to infidelity, illegitimate children, family violence and **family breakdown**. When the mine closes, there will be unemployment, bankruptcy, and reduced access to luxuries. **Family conflict, breakdown, depression, and substance abuse** commonly increase as a result of the economic distress that occurs in the bust phase on non-renewable resource development.

- 2.4. *** **Lifestyle changes**. A switch away from a physically and mentally active and creative land based lifestyle to the repetitive and routine activities of mine employment may impact physical and mental **fitness**. A switch away from country foods to processed foods can have a negative impact on **nutrition** and **gustation**. There will also be a **loss of traditional land-based skills** from lack of use.
- 2.5. ** **Injuries**. The potential for work related accidents and injuries is generally recognised by all and addressed. However, there has not been adequate consideration of the **accidental and crime related injuries** that are likely to be secondary effects of population increase at the same time as housing shortages and demographic change, as well as injuries related to substance abuse linked to increased disposable income, and stress over disruption of family routines.
- 2.6. ** **Discrimination or racism** in the workplace and in home communities can affect **social stability** and **self esteem**. Since most NSMA members reside in Yellowknife, where the greatest demographic changes are expected, and where the NSMA community is already severely challenged in stability and cohesiveness, the potential for negative effects appears significantly greater for NSMA members than for other communities.
- 2.7. * **Changes in water level**, and rate of flow rate could create **safety hazards** for downstream water users. There may be a risk to human health by **contamination of the food chain** from mine discharges into the air, water or on land.

3. Ecological Concerns (4 issues - 9 stars)

- 3.1. *** **Human / Wildlife relationship** problems – **individual safety** issue for various species and possible **population effects** for sensitive or at risk species. Rock piles, pits, roads, blasting, waste management, noises, odours, etc. Particularly concerned with **caribou, and cumulative effects of traffic on winter road**. May be a need for an all winter road.
- 3.2. *** **Watershed** impacts upstream and downstream to **water quantity, quality and rate of flow** (including groundwater and permafrost) due to large impoundments and pumping of water. Interference with use by wildlife, fish, birds, vegetation, people. Need an alternatives to ANFO for blasting.
- 3.3. ** **Increased human access** = more **harvesting pressure**, greater risk of **invasive species**, **reduction in "wilderness" value**, risks to **heritage resources**. **Habitat reduction**. **Competition**.
- 3.4. * **Airshed impacts** - visibility, dust, odors, temperature changes and microclimates, greenhouse gasses, contaminants, contribution to climate change.

Sincerely,

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