

EA1819-01: Diavik Diamond Mine – Depositing Processed Kimberlite into Pits and Underground

Implications and Recommendations: Caribou

Fort Resolution Métis Council



Priority Areas of Concern



- 1) Cumulative impacts to the vulnerable Bathurst barren-ground caribou herd**
- 2) Health of caribou populations and foraging grounds**

Importance of Caribou



Existing Vulnerable State

“[We have been] impacted greatly by the cost of us to harvest caribou now, fuel prices are up, gas prices are up, caribou are a lot farther away. When I was a young guy, I was only gone two nights taking my time with dogs. Last time [I went hunting caribou] with snowmobile I was gone eight nights, nine days and I was not taking my time. It’s almost not worth it...Last year it cost \$1,100 to go for caribou. It takes lots of money and time.”



Existing Cumulative Impacts

Additional impacts needed to assess if the PK to Mine Workings changes to the closure plan will have a significant impact:

- All Diavik mine activities and closure plans
- Additional pressures on the herd:
 - Predation
 - Wildfires
 - Parasites
 - Changes in quality of feeding grounds
 - Current/proposed mining and infrastructure developments
 - Additional climate change impacts



Inadequate Baseline

FRMC has two major concerns related to the baseline used in DDMI's SIS:

- 1) Timeline (2015-2018)
- 2) Lack of inclusion of FRMC Indigenous Traditional Knowledge

To decrease uncertainty, a more robust baseline is required both in terms of timeline and inclusion of FRMC ITK.



Recommendations

FRMC Recommendations related to Cumulative Impacts to Caribou include:

- **Recognition of cumulative effects context in making any decisions**
- **Robust TK data collection to support all management and monitoring**
- **Community- based caribou monitoring**



Population Health in Decline

“[Regarding caribou health changes] Up until this past winter, the caribou are less fat. When caribou are less fat, nature tells them they can’t reproduce; there is not enough food out there. [There is] fluid in the joints that have never been there before. Also some parasites right in the meat caused by stress to the body...It is not only industry that impacts caribou, but they are the biggest problem”



Health Impacts & Pathways

Pathways of concern:

- Drinking low quality water
- Sensory disturbances
- Potential contamination of caribou foraging grounds (changes in taste/smell)

“All water is all connected and connected to Great Slave Lake too. Impacting wildlife, fish, and caribou. All [the caribou have] moved away. If we eat something that is spoiled we leave it alone, just like the caribou moving on to new feeding groundings



Recommendations

FRMC Recommendations related to Cumulative Impacts to Caribou include measures to monitor both the forage and health of the Bathurst Caribou Herd.

“[We have] lost a lot of caribou, [caribou] used to be the main diet in 1950’s, but we lost caribou as more [industrial] activity and forest fires happen. For example, if you burn lichen, it takes 50 years to regrow. [Need to look at the] whole impact of everything combined, wolves, mosquitoes... “



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Implications and Recommendations: Culture

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Priority Areas of Concern



- 1) Understanding impacts to FRMC Culture**
- 2) Project Specific and Cumulative Impacts on Culture**

Importance of Lac de Gras



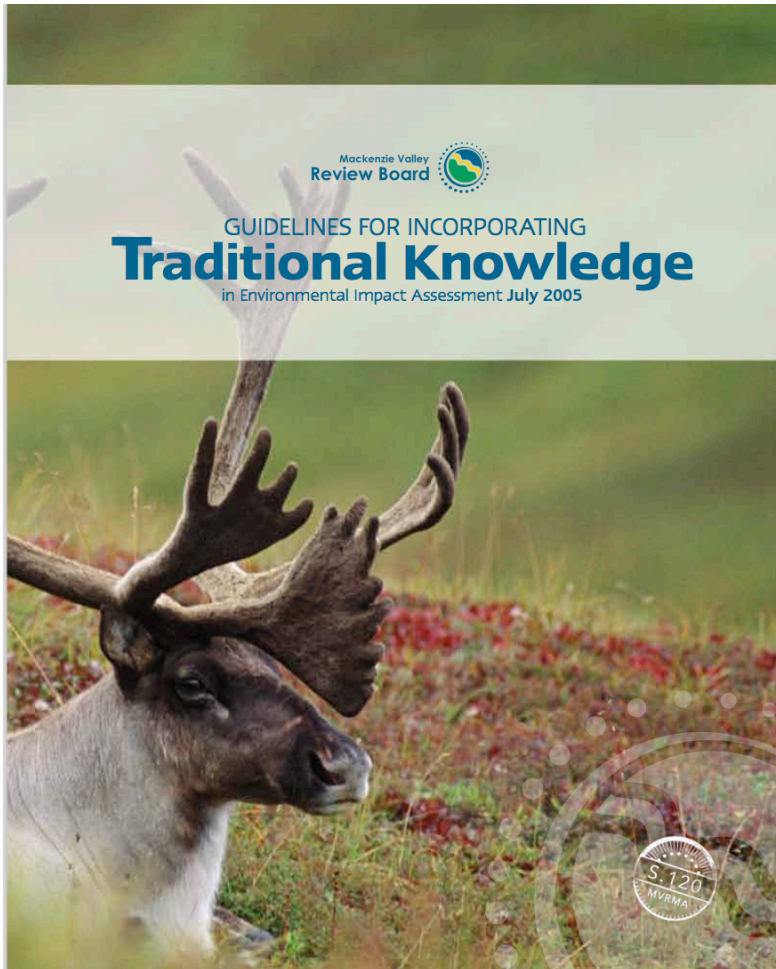
Source: The National Archives [London]. Map MFQ 1/1257/1

Inadequate Baseline

“We know everything out on the land because we live with it, we have a memory that you wouldn’t believe, it’s passed down for us. Everything in here, you have to start listening to elders, we have lost over half of them now. This stuff should have been brought to us from the start, should have shown us how they wanted to start the mine and put the first shovel in the ground”



MVRB Guidelines for Incorporating Traditional Knowledge



“A relationship between the developer and the traditional knowledge holders should be well established prior to an EIA (see section 5). This will enable the EIA process to proceed more quickly and smoothly” (p. 7).



MVRB Guidelines for Incorporating Traditional Knowledge

“... Developers should still engage in discussions with appropriate aboriginal organizations and traditional knowledge holders to determine if there is relevant traditional knowledge available to be considered in its project design and for use in the EIA process. This should be done prior to the start of an environmental impact assessment, so that local concerns can be identified quickly about the proposed development.” (p. 14).



MVRB Guidelines for Incorporating Traditional Knowledge

“Developers should involve traditional knowledge holders in this stage [prior to the application process] to enable relevant traditional knowledge to:

- a) Assist in establishing baseline information and impact predictions;*
- b) Determine if there are any necessary project design changes based on the above information; and*
- c) To determine any outstanding public concerns prior to entering the application process “(p. 16).*



MVRB Guidelines for Incorporating Traditional Knowledge

“...Determine if any available traditional knowledge needs to be further researched and presented because it is undocumented information that:

- 1) might not be presented by individual traditional knowledge holders at community hearings, or*
- 2) is not available to the developer using public sources. ” (p. 14).*



MVRB Guidelines for Incorporating Traditional Knowledge

“The Review Board may in its recommendation at the end of an EIA process include a measure or suggestion related to traditional knowledge in follow-up or monitoring programs” (p. 27).



Identification of Impact Pathways for Culture

FRMC has not been involved in:

- identifying impact pathways on FRMC cultural use;
- setting thresholds of acceptable change against which effects should be assessed; and
- given opportunity to verify the Proponent's updated estimations of effects on FRMC cultural use.



Identification of Impact Pathways for Culture

Impact Pathways of Concern:

- Real and or Perceived Tainting of our Traditional Foods
- Real and or Perceived contamination of our water on the land; and
- Loss of teaching areas to our youth due to real and or perceived contamination



Identification of Mitigation for Impacts to Culture

- Mitigations and commitments proposed by DDMI do not reflect input from FRMC members
- Mitigations specific to Culture must be developed with Indigenous Groups



Project Specific Effects to Culture

- Impacts to FRMC culture go beyond changes to the availability of resources.
- The cultural context for Indigenous Groups is not adequately accounted for in DDMI's significance threshold
- There is not enough information to make a valid project-case significance estimate for impacts to Culture with confidence.



Cumulative Effects & Culture

The Existing Cumulative Effects context needs to be recognized:

- FRMC Cultural well-being and way of life is already severely impacted
- Existing stressors need to be considered in addition to any existing impacts, barriers, stressors specific to FRMC practice of culture and rights in Lac de Gras



Recommendations

Ultimately FRMC requests that :

The Review Board to find that there is already a pre-existing significant adverse cumulative effect on culture, and consider Project effects in light of this highly sensitive receiving environment, and make its decisions on whether the Project should be allowed to proceed and under what conditions.



Closing Statement

