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June 24, 2014

EC file: 5100 000 013 /007  
WLWB file: MV2005L2-0015,  
MV2005C0032

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Via Online Submission

**RE: MV2005L2-0015, MV2005C0032 – Gahcho Kue Mine Project, De Beers  
Canada Inc - Water Licence and Land Use Permit Applications**

Environment Canada (EC) participated in the review of the proposed Gahcho Kue Mine Project in order to provide specialist advice, information and knowledge to the Mackenzie Valley Land and Water Board (MVLWB). The specialist advice provided during this review was pursuant to EC's mandated responsibilities arising from the *Canadian Environmental Protection Act, 1999*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act* and the *Species at Risk Act*.

Following the public hearings held May 6 - 7, 2014, interveners in the review process were given the opportunity to submit, in writing, closing comments and provide additional clarification arising out of the hearings.

EC's comments and recommendations are in no way to be interpreted as any type of acknowledgement, compliance, permission, approval, authorization, or release of liability related to any requirements to comply with federal or territorial statutes and regulations. Responsibility for achieving regulatory compliance and cost effective risk and liability reduction lies solely with the project proponent.

EC provided eleven recommendations, in its Intervention of April 7, 2014, which related to: Effluent Quality Criteria; Toxicity Testing; Triggers, Action Levels and Management Responses; Management of Airstrip Runoff; Sewage Treatment Plant Contingency Measures; Chemocline Stability; Geochemical Management and Mine Rock Monitoring; and the Incineration of Sewage.

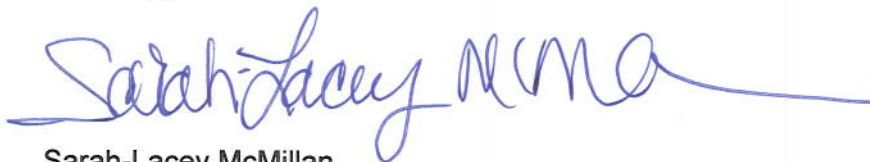
Constructive progress was made in the course of the hearings and this is reflected in many of the proponent's responses and commitments to EC's concerns. Specifically, progress was made on the Aquatic Effects Monitoring Plans (AEMP) and triggers for action in various plans; monitoring and mitigation of impoundment and nutrient effects; ensuring contingency plans cover the airstrip and Area 8 of Kennady Lake; periodic use

of supplemental samples and additional test methods to confirm acid rock drainage monitoring results; sewage sludge management practices; and stack testing.

The MVLWB circulated a draft water licence for review and EC provided comments on the draft licence on June 9, 2014. De Beers responded with agreement on comments pertaining to the wording of the definitions, but may have misunderstood the recommendation EC provided for Part G. 31 which addresses an omission (cross-reference) in the Surveillance Network Program (SNP) (not a change in the tests recommended). EC's Recommendation 4 on the draft water licence pertains to whether the Lake D2/D3 impoundment is monitored as part of the SNP or the AEMP. EC feels that the SNP would be appropriate for operational information, but this could also be covered off under a management plan.

EC would like to thank the MVLWB for the opportunity to comment on De Beers' Gahcho Kue applications and hopes that the technical comments and recommendations provided are useful to the Board in their decision-making process. Should you have any questions or wish clarification on any aspect of this letter, please contact me at (867) 669-4724 or [sarah-lacey.mcmillan@ec.gc.ca](mailto:sarah-lacey.mcmillan@ec.gc.ca).

Sincerely,



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cc: Carey Ogilvie Head Environmental Assessment North (NT & NU), EPO  
EC Review Team