

February 2, 2017

Angela Love
Regulatory Officer
Mackenzie Valley Land and Water Board
7th Floor, 4922 48th St.
PO Box 2130, Yellowknife, NT
Canada | X1A 2P6

Dear Ms. Love:

Re: Re-Submission of the Interim Closure and Reclamation V.3 Objectives (MV2005L2-0015)

Please find below the revised Objectives for the Interim Closure and Reclamation Plan V.3, consistent with De Beers responses provided during the review process (Proponent responses provided November 24, 2016) and to address the Board's decision letter (January 12, 2017).

Although we are re-submitting the objectives as requested by the Board, De Beers requires further clarification from the Board on the process for approval of the ICRP. The draft work plan proposed by the Board in the January 12 letter introduces a substantial degree of uncertainty to the usual process of plan review and approval. De Beers requests further discussions with the Board regarding the process and scope of the additional review as well as a refinement of the work plan prior to proceeding with additional re-submissions related to this Plan.

As always I may be contacted at sarah.mclean@debeersgroup.com or 867-688-9227 to discuss this matter and re-submission anytime.

Respectfully,



Sarah McLean

Regulatory Specialist

Revised Objectives for the Interim Closure and Reclamation Plan V.3

MVLWB January 22, 2017 Direction Closure Objectives [1]	De Beers ICRP v3 Proposed Closure Objectives [2]	Reviewer comment and Response References (3)	MVLWB January 22, 2017 Direction Closure Objectives – Comments [4]	De Beers revised Objectives and Explanation (5)
Site Wide Objectives (the mine footprint)				
SW1 – Air quality levels safe for people, vegetation, aquatic life and wildlife.	SW1 – Air quality levels safe for people, vegetation, aquatic life and wildlife.	NSMA 7 & Tlich 6	Please include a general definition of 'safe' including if and how that definition will need to be modified for each mine component and anticipated criteria.	<i>SW1 – Air quality levels safe for people, vegetation, aquatic life and wildlife</i> Explanation- No Change. Safe is generally defined as “not likely to cause harm or injury”. In the case of AQ objectives, the term will be interpreted as air quality that is not likely to cause harm or injury to people, vegetation, aquatic life or wildlife. The proposed criteria will provide the specific measure relevant to this objective.
SW2 – Drainage pathways for surface runoff will reflect pre-disturbance conditions where feasible and are physically stable.	SW2 – Drainage pathways for surface runoff are physically stable.	NSMA 20 & Tlich 19	Wording clarified based on comments and responses. If this objective is not accepted by DBCI, please discuss why.	<i>SW2 – Drainage pathways for surface runoff are physically stable.</i> Explanation: No Change. This a Site Wide Objective, and so will apply to the entire site, including the mine rock piles and PK facilities. The drainage pathways on PK facilities and mine rock piles will not closely reflect pre-disturbance conditions because the topography of those areas are not similar to the baseline conditions, rendering the Boards proposed objective impossible to achieve. Inclusion of the term 'where feasible' leaves the objective open to interpretation and reduces the measurability of the objective. In the De Beers response to NSMA 20 in the review of ICRP V.3, De Beers indicated that we would add the text 'drainage pathways will reflect pre-disturbance conditions where feasible' to the 'Reclamation Activities', not to the Objective itself. This is important to ensure that the objective is achievable, measurable, and applicable to the entire site.

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SW3 – Surface runoff and seepage water quality that is safe for people, vegetation, aquatic life, and wildlife.	SW3 – Surface runoff and seepage water quality that is safe for people, vegetation, aquatic life, and wildlife.	NSMA 7 & Tlicho 6	Please include a general definition of 'safe' including if and how that definition will need to be modified for each mine component and anticipated criteria.	SW3 – <i>Surface runoff and seepage water quality that is safe for people, vegetation, aquatic life, and wildlife.</i> Explanation: No Change. Safe in this case again refers to the water quality resulting from surface water run-off and seepage being not likely to cause harm or injury to people, vegetation, aquatic life, and wildlife. The proposed criteria will provide the specific measures relevant to this objective.
SW4 – Mine areas are physically stable for use by people and wildlife.	SW4 – Mine areas are physically stable for use by people and wildlife.	N/A	No change.	SW4 – <i>Mine areas are physically stable for use by people and wildlife.</i> Explanation: No Change.
SW5 – Safe passage and use for Caribou and other wildlife.	SW6 – Safe passage and use for Caribou and other wildlife.	NSMA 7 & Tlicho 6 Tlicho 51 Tlicho 52	Formerly SW6. Please include a general definition of 'safe' including if and how that definition will need to be modified for each mine component and anticipated criteria.	SW5 – <i>Safe passage and use for Caribou and other wildlife.</i> Explanation: No Change. Safe in this case again refers to the site being not likely to cause harm or injury to wildlife as they pass through and use the area. The proposed criteria will provide the specific measures relevant to this objective.
Open Pits (5034 Pit, Hearne Pit, Tuzo Pit)				
OP1 – The backfilled and/or flooded pits will not adversely impact establishment <i>and/or maintenance</i> of sustainable aquatic ecosystems and life in the	OP1 – The backfilled and/or flooded pits will not adversely impact establishment of sustainable aquatic ecosystems and life in the overlying	DKFN 7 ECCC 5	Wording clarified based on comments and responses. Please provide a suggestion on how to 'strengthen the linkage' between OP1 and KL1.	OP1 - <i>The backfilled and/or flooded pits will not adversely impact establishment and/or maintenance of sustainable aquatic ecosystems and life in the overlying Kennady Lake and downstream waterbodies.</i> Explanation: Accepted as per the proponent response provided during the review of ICRP V.3. OP1 and KL1 are linked in that OP1 is a requirement for KL1. For example, the habitat in Kennady Lake over the

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overlying Kennady Lake and downstream waterbodies.	Kennady Lake and downstream waterbodies.			backfilled and/or flooded pits would need to be suitable to allow Kennady Lake to establish a sustainable functioning aquatic ecosystem and support traditional uses.
OP2 – Physically stable pit walls to limit risk of a failure impacting people and aquatic life.	OP2 – Physically stable pit walls to limit risk of a failure impacting people and aquatic life.	N/A	No change. Results of the Closure Risk Assessment will be required to define what an 'unacceptable risk' is.	<i>OP2 – Physically stable pit walls to limit risk of a failure impacting people and aquatic life.</i> Explanation: No Change.
Kennady Lake				
KL1 - Return Kennady Lake to a state that will support a functioning aquatic ecosystem and traditional uses.	KL1 - Return Kennady Lake to a state that will support a functioning aquatic ecosystem and traditional uses.	NSMA 15 & Tlich 14 NSMA 30 & Tlich 29 NSMA 33 & Tlich 32 NSMA 34 & Tlich 33	The main issue here is the use of the term 'support' as opposed to 'establish.' This concern should be addressed with reference to the EIR and commitments made during the EIR process.	<i>KL1 - Return Kennady Lake to a state that will support a functioning aquatic ecosystem and traditional uses.</i> Explanation: No Change. The term "support" encompasses the initial re-establishment of a functioning aquatic ecosystem through natural succession processes, as well as traditional uses. The relevant commitments on this subject are summarized below and interpreted that Kennady Lake will have the following characteristics post-closure: <ul style="list-style-type: none"> • Support traditional water uses (e.g., drinking, harvesting and consuming fish). • <i>Have suitable water quality to support</i> aquatic life before re-connecting with the watershed. • Have water quality that will not adversely affect: ability to drink the water and to eat the fish. • Have water quality to support a viable and self-sustaining ecosystem compatible with downstream and traditional uses. • Support fish. • Support aquatic life.

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				<p>At closure when criteria are achieved, Kennady Lake will be reconnected with the upstream and downstream watercourses to permit the re-establishment of fish species through natural migration processes. The re-establishment will be accomplished by reconnecting Kennady Lake with the watershed and achieving an environment within Kennady Lake that supports aquatic life and fish.</p> <p>The EIS residual impact predictions evaluated the projected impacts to water quality and fish in Kennady Lake; results are summarized in Appendix D, Section D5.2.2 of the ICRP. The residual impacts associated with the long-term biophysical effects on Kennady Lake are summarized in Appendix D, Section D.5.2.4 of the ICRP. Through the EIR process, it was discussed that once the dyke is breached, fish will be able to move into Kennady Lake to take advantage of the habitat and food base that is present.</p> <p>In conclusion, the term support, instead of establish, is best representative of the De Beers' commitments on this subject.</p> <p><u>RELEVANT COMMITMENTS</u></p> <p>The Gahcho Kué Panel Report of Environmental Impact Review and Reasons for Decision, Suggestion 1:</p> <ul style="list-style-type: none"> • "...Post-closure conditions in all waters in the region, including the refilled Kennady Lake, shall support all traditional water uses. Traditional water uses include: drinking the water; harvesting and consuming fish". • "...water quality objectives in Lake N11 or any waters downstream of Kennady Lake are met: water quality changes due to Project activities will not substantially alter

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				<p>the suitability of waterbodies to support viable aquatic ecosystems; water quality changes due to Project activities will not alter fish health, abundance or diversity or impact the ability of traditional users to harvest or consume fish”.</p> <ul style="list-style-type: none"> • “De Beers should monitor conditions, including water and sediment quality, during the refilling of Kennady Lake to ensure that conditions are suitable to support aquatic life before re-connecting the lake to the rest of the watershed”. <p>The following paraphrase relevant De Beers commitments (from Table 1, ICRP) on this topic:</p> <ul style="list-style-type: none"> • Commitment #20 – commits to monitoring re-establishment of fish species in Kennady Lake. • Commitment #22– commits to a water quality that will not adversely affect: ability to drink the water; ability to eat the fish; and the fish communities. • Commitment #27– Final water quality is sufficient to support a viable and self-sustaining ecosystem that is compatible with the regional watershed and maintains traditional use of the area. • Commitment #38 – Limit potential for fish species and life stages from entering Kennady Lake during refilling until it is demonstrated the lake can support fish. • Commitment #60 – Water in Kennady Lake will be able to support aquatic life following reconnection with the watershed. <p>Fish habitat will be re-established in Kennady Lake at mine closure through the re-filling of Kennady Lake and breaching of dykes allowing fish to</p>

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				migrate back to the lake and utilize the habitat that was de-watered.
KL2 – Physically stable constructed banks of Kennady Lake to limit risk of failure that would impact aquatic life, wildlife, and people.	KL2 – Physically stable constructed banks of Kennady Lake to limit risk of failure that would impact aquatic life, wildlife, and people.	ENR 4	No change. In the ICRP text, please identify all locations where constructed banks will be located within Kennady Lake. This should include reference to commitments by De Beers during the EIR to re-vegetate riparian and aquatic habitat.	<i>KL2 – Physically stable constructed banks of Kennady Lake to limit risk of failure that would impact aquatic life, wildlife, and people.</i> Explanation: No change. Revised ICRP will identify constructed banks and reference De Beers' commitment related to revegetation of riparian and aquatic habitat.
<i>KL3 – Kennady Lake is reconnected with the upstream and downstream and small craft navigation is possible within the Kennady Lake basin through the dyke and pit areas.</i>	KL3 – Small craft navigation through dyke and pit area.	NSMA 32 & Tlich 31	Wording clarified based on comments and responses.	<i>KL3 – Kennady Lake is reconnected with the upstream and downstream and small craft navigation is possible within the Kennady Lake basin through the dyke and pit areas.</i> Explanation: As per the proponent response already provided during the review of the ICRP V.3
Mine Rock Piles (South Mine Rock Pile and West Mine Rock Pile)				
MR1 – Physically stable slopes to limit risk of failure that would impact the people or wildlife.	MR1 – Physically stable slopes to limit risk of failure that would impact the people or wildlife.	N/A	No change.	<i>MR1 – Physically stable slopes to limit risk of failure that would impact the people or wildlife.</i> Explanation: No Change

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<p>MR2 – Contaminated rock and non-hazardous waste disposal areas within piles do not pose an unacceptable risk to aquatic life, people or wildlife.</p>	<p>MR2 – Contaminated rock and non-hazardous waste disposal areas within piles do not pose an unacceptable risk to aquatic life, people or wildlife.</p>	<p>MVLWB</p>	<p>No change. Results of the Closure Risk Assessment will be required to define what an ‘unacceptable risk’ is.</p>	<p>MR2 – Contaminated rock and non-hazardous waste disposal areas within piles do not pose an unacceptable risk to aquatic life, people or wildlife. Explanation: No change</p>
<p><i>MR3 – Chemically stable Mine Rock piles that do not pose an unacceptable risk to aquatic life, people or wildlife.</i></p>		<p>ENR-17</p>	<p>New objective proposed by GNW-TENR. MR2 refers to waste buried within the piles, MR3 refers to the Mine Rock piles themselves.</p>	<p><i>MR3 – Chemically stable mine rock piles that do not endanger human, wildlife, or environmental health and safety.</i> Explanation: De Beers will accept an objective related to the chemical stability of the Mine Rock Piles specifically targeting the solids portion (i.e., PAG rock) of the rock piles. Criteria will align with the approved design of the mine rock piles with respect to placement of PAG and NAG. The liquid run-off (e.g., seepage water) is already addressed by KL1. The proposed objective is re-worded in alignment with the explanation of chemical stability provided in the Guideline (AANDC 2013). This wording is clearer and simpler to interpret, therefore improving the measurability of the objective.</p>
<p><i>MR4 – Promotion or Establishment of vegetation and/or aesthetic conditions similar to surrounding natural conditions.</i></p>	<p>SW5 – Promote accelerated natural recovery of vegetation at disturbed areas. SW7 – Aesthetic conditions of</p>	<p>MVLWB NSMA 10 & Tlicho 9 NSMA 15 & Tlicho 14 NSMA 23 & Tlicho 22</p>	<p>Please discuss why objectives suggested in the Closure Guidelines are not considered for the reclamation of the mine rock piles at Gahcho Kué: i.e. piles are blended with</p>	<p>De Beers does not accept this objective. Explanation: The proposed objective is not achievable. The mine rock piles are very tall compared to the surrounding topography. This design was selected, and approved, because it reduces the disturbed footprint of the mine. This design was fully evaluated as part of the EIR. A summary of the alterative</p>

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	<p>the Mine area are similar to surrounding natural conditions.</p>		<p>current topography and revegetated as necessary to be compatible with wildlife use and/or meet future use targets.</p> <p>This concern should be addressed with reference to the EIR and a commitment made during technical sessions to: listen and have an open conversation with Aboriginal communities about preferences regarding re-vegetation of mine rock piles.</p> <p>Former SW5 acknowledged at least the scarification of mine rock pile access roads and application of salvaged overburden within the criteria – at the very least, this should be carried over in the form of a new mine rock objective and associated criteria.</p>	<p>analysis is provided in Section 4.4.1.2 of the ICRP. The selected configuration of the mine rock piles was fully assessed during the EIR and accepted for implementation.</p> <p>Revegetation of the mine rock piles was not the approach that formed the EIR, which further informed the economics of the mine. De Beers has not committed to vegetate the mine rock piles. The project impacts have accounted for this scenario in the EIR.</p> <p>As noted in Commitment #41 (Table 1, ICRP), De Beers commits to listen and have an open conversation with Aboriginal communities about preferences regarding re-vegetation of mine rock piles (see Section 2.3 of the Reclamation Research Plan). The commitment is recognized in the reclamation research plan. A component of reclamation research is to evaluate where priority areas for vegetation could be integrated into the mine rock pile if it is decided that we want to encourage wildlife to access and use the mine rock piles. The outcomes from the research will inform the closure method and proposed criteria.</p>
Processed Kimberlite Facilities (includes the Coarse PK Facility and the Fine PK Facility)				

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<p>PK1 – Prevent PK from entering the surrounding terrestrial and aquatic environment.</p>	<p>PK1 – Prevent PK from entering the surrounding terrestrial and aquatic environment.</p>		<p>No change.</p>	<p><i>PK1 – Prevent PK from entering the surrounding terrestrial and aquatic environment.</i></p> <p>Explanation: No Change</p>
<p>PK2 – Physically stable PK disposal areas to limit risk of facility failure.</p>	<p>PK2 – Physically stable PK disposal areas to limit risk of facility failure.</p>		<p>No change.</p> <p>Please explain why this objective does not include limiting the risk of failure that would impact the people or wildlife. (MR1)</p>	<p><i>PK2: Physically stable PK disposal areas to limit risk of facility failure.</i></p> <p>Explanation: No change.</p> <p>This objective is related to the construction of the facility as per the design so the structural integrity is achieved and the facility contains PK as expected. Site wide objective 4, (SW4) already fully addresses the board comment regarding physical stability of the mine site for use by people and wildlife.</p>
<p><i>PK3 – Chemically stable Processed Kimberlite Facilities (Piles) that do not pose an unacceptable risk to aquatic life, people or wildlife.</i></p>		<p>ENR 19</p>	<p>New objective proposed by GNWT-ENR.</p>	<p><i>PK3 – Chemically stable Processed Kimberlite Facilities (Piles) that do not endanger human, wildlife, or environmental health and safety</i></p> <p>Explanation: De Beers accepts that an objective related to chemical stability can be applied to the PK facilities which will relate to solid material placement within the facility. Seepage or run-off from the facility is already addressed through KL1.</p> <p>The proposed wording adjustment is preferred to remain in alignment with the explanation of chemical stability provided in the Guideline (AANDC 2013).</p>

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<i>PK4 – Promotion or Establishment of vegetation and/or aesthetic conditions similar to surrounding natural conditions.</i>	SW5 – Promote accelerated natural recovery of vegetation at disturbed areas. SW7 – Aesthetic conditions of the Mine area are similar to surrounding natural conditions.	NSMA 10 & Tlicho 9 NSMA 23 & Tlicho 22 NSMA 39 & Tlicho 38	New objective proposed by NSMA and Tlicho. If this objective is not accepted by DBCI, please discuss why objectives suggested in the Closure Guidelines are not considered for the reclamation of the mine rock piles at Gahcho Kué: i.e. piles blend with local topography and vegetation, where appropriate. This concern should be addressed with reference to the EIR and lessons learned from other active diamond mines in the NWT.	De Beers does not accept this proposed objective. Explanation: Revegetation of the PK piles was not the approach that was assessed in the EIR, which further informed the economics of the mine. De Beers did not commit to vegetate the PK piles. The approved design for both the PK facilities involves capping with mine rock (Coarse Processed Kimberlite Final Detailed Design; Processed Kimberlite and Mine Rock Management Plan). It is not appropriate to establish an objective that is inconsistent with our project description, EIR, or approved management plans and designs. Regarding aesthetics, the surface of the PK facilities will be managed primarily to ensure integrity of the facilities, containment of PK, and the establishment of adequate drainage. Aesthetics will be considered secondarily. As we indicated in our responses to reviewer comment 27 from the NSMA during the last review of the ICRP V.3, and with respect to SW7 - “As the reviewer alludes, the objective of aesthetic conditions similar to the surrounding environment is likely not achievable for the waste rock facilities. De Beers therefore will move this objective (SW7) to Infrastructure to become the third Infrastructure objective (I3). Table 20 will be revised as such. “
Infrastructure areas (main camp, pads, laydown areas, roads etc.)				
I1 – Disturbed areas will be safe for people, wildlife, and vegetation.	I1 – Disturbed areas will be safe for people, wildlife, and vegetation.	NSMA 7 & Tlicho 6	Please include a general definition of ‘safe’ including if and how that definition will need to be modified for each	I1 – Disturbed areas will be safe for people, wildlife, and vegetation. Explanation: No Change.

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			mine component and anticipated criteria.	
I2 – Establishment of vegetation at disturbed sites.	SW5 – Promote accelerated natural recovery of vegetation at disturbed areas.	DKFN 5 NSMA 10 & Tlich 9 NSMA 23 & Tlich 22 NSMA 25 & Tlich 24	New objective in response to comments on former SW5 (Promote accelerated natural recovery of vegetation at disturbed areas).	<p><i>I2: Revegetation targeted to priority areas.</i></p> <p>Explanation:</p> <p>Key priority areas for establishment of vegetation will be identified in the revegetation plan. This is consistent with the approved objective for the Snap Lake Mine, and with commitments made previously with respect to Gahcho Kue.</p> <p>De Beers' commitments (paraphrased below, see Table 1, ICRP for full description) on this topic regarding scope and criteria consideration include:</p> <ul style="list-style-type: none"> • Commitment 31 – Develop a re-vegetation management plan. • Commitment 32 – Informed by the Vegetation and Soils Monitoring Program. • Commitment 43 – Summarize best management practices for vegetation restoration and vegetation trials. • Commitment 46 – Complete research and revegetation trials to determine relative success of the effort and to inform best management practices. <p>The ICRP outlines the current method of vegetation is accelerated natural recovery. Research is to be completed to assess alternative method(s) of vegetation and their achievable criteria (see Section 2.1 of the Reclamation Research Plan).</p>
I3 - Aesthetic conditions of the Mine area are similar to surrounding	SW7 – Aesthetic conditions of the Mine area are similar to	NSMA 27 & Tlich 26	New objective in response to comments on former SW7 (Aesthetic	<p><i>I3 - Aesthetic conditions of the infrastructure areas are similar to surrounding natural conditions.</i></p> <p>Explanation:</p>

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<p>natural conditions.</p>	<p>surrounding natural conditions.</p>		<p>conditions of the Mine area are similar to surrounding natural conditions).</p>	<p>Replaced the words 'Mine Area' with 'Infrastructure areas' to reduce confusion about what aspects are covered by this objective.</p>