

# **NORTH SLAVE MÉTIS ALLIANCE**

**PO Box 2301 Yellowknife, NT X1A 2P7**



June, 20 2014

Angela Love  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
7<sup>th</sup> Floor – 4910 50<sup>th</sup> Avenue  
PO Box 2130  
Yellowknife, NT  
X1A 2P6

Dear Ms. Love,

**Re: North Slave Métis Alliance Closing Argument for DeBeers Gahcho Kué Type A Water License and Land Use Permit Application (MV2005L2-0015 and MV2005C0032).**

The North Slave Métis Alliance (“NSMA”) would like to thank the Mackenzie Valley Land and Water Board (“the Board”) for the opportunity to present at the Public Hearing (“the Hearing”) held from May 6-8, 2014. During this hearing concerning the Type A Water License and Land Use Permit (MV2005L2-0015 and MV2005C0032) for De Beers’ proposed Gahcho Kué mine the NSMA voiced several concerns regarding potential environmental impacts. The Aboriginal parties in attendance during the Hearing (the NSMA, Yellowknives Dene First Nation (YKDFN), and Deninu Kue First Nation (DKFN)) share a common concern that the current mine design could result in harm to the downstream environment due to the lack of a water treatment process. The NSMA has repeatedly requested a water treatment plant to prevent potential harm to the downstream environment that would subsequently harm cultural and traditional values. The NSMA continues to believe that water treatment is necessary given the existing issues occurring at De Beers’ Snap Lake Mine.

With this in mind, the NSMA supports the stance of the YKDFN that it is De Beers’ responsibility to find a way to operate their proposed Gahcho Kué mine in a manner that is protective of the environment. To this end, the effluent quality criteria and site specific water quality objectives for the Water License should be determined in a transparent manner that involves Aboriginal parties and assures them of the protectiveness both in the short and long term. Whatever solutions are necessary to achieve the Water License criteria for the life of the mine should be feasibly planned by the proponent in advance and implemented without delay to prevent environmental damage occurring

should unpredictable developments such as those at Snap Lake happen to occur. Whether these solutions come in the form of a water treatment plant or some other technology, the NSMA must be assured that the water quality in the area of the mine and downstream is protective of aquatic life, cultural, and traditional values.

In addition to mine-water quality, the NSMA voiced concerns during the Hearing in regard to De Beers' proposed winter dewatering of Kennady Lake. The NSMA is pleased to see that the Board has considered these concerns within Draft Water License version 2.0 distributed on May 23, 2014. These additions by the Board are an important first step in ensuring that significant alterations to seasonal flows do not cause harm to the aquatic environment. In order to successfully mitigate potentially negative effects of lake dewatering (and other site activities) action level responses have been selected as a management tool. Action levels are a feasible management tool, however they must be developed in a transparent process and worded in such a way that proactive responses to measured changes in the environment occur, and improvements to mine operations are implemented. It is the NSMA's view that to-date action levels have provided little impetus for proponents to identify and improve their operations, and therefore the NSMA encourages the board to focus on this issue for both the Water License and Land Use Permit. In this respect, winter dewatering should not occur unless effective action levels have been agreed upon and established by all parties.

The above recommendations summarize what the NSMA wishes to see the MVLWB require of DeBeers respecting the latter's proposed Gahcho Kué diamond mine. It is, in addition, NSMA's wish that DeBeers operates the Gahcho Kué mine in a sustainable manner that achieves a good return on its investment while preserving the health of the land and water and the species that depend on it.

We thank you for listening to our concerns and we look forward to continued involvement in this process.

Sincerely,



Matt Hoover  
Regulatory Analyst  
North Slave Métis Alliance