



Snap Lake Environmental Monitoring Agency
Main Floor, Lahm Ridge Tower
4501 Franklin Avenue
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Phone: 867-765-0961 FAX: 867-765-0963
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Lionel Marcinkoski
Environmental Scientist
Aboriginal Affairs and Northern Development Canada
PO Box 1500
Yellowknife, NT
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File: DeBeers, Snap Lake Environmental Agreement Annual Report for 2010

March 4, 2013

RE: Environmental Agreement Annual Report 2010

Dear Mr. Marcinkoski,

Please accept this document as SLEMA's comments for the submission of the 2010 Environmental Agreement Annual Report, submitted by De Beers.

Before making comment on the content, SLEMA would like to address the issue of submission timeliness. The Environmental Agreement is somewhat ambiguous as to the required date, each annum, that the parties can expect this submission. A report is required for each calendar year as per direction of the agreement. Considering that a calendar year ends December 31st, SLEMA feels that it is reasonable to expect this report a considerable time before the end of the following calendar year. For the purpose of reasonable expectation, SLEMA would like to request that there be an agreement, between De Beers and the reviewing parties, that this submission have an expected submission date in August of the following year.



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Comments on Content:

- The title Environmental Monitoring Agreement Report: 2010 is not consistent with the Environmental Agreement, the title should be "Environmental Agreement Annual Report". This would make it also consistent with past years document.
- In page ii, Compliance, it is stated that there were 12 inspections in 2010, but in Table 5-1 there are only 11
- Section 1.2 2010 Annual Report: in the past, this section describe the previous year EAAR submission. For example, Section 1.2 of 2009 EAAR describes the submission of 2008 EAAR
- Section 4: in the past, this section summarizes the documents submitted in the current year. For example, Section 4 of 2009 EAAR summarizes the reports submitted in 2009, i.e. Water Licence annual reports, Air Quality report, vegetation report, and wildlife report for 2008, and TDS and DO reports for 2009
- Table 5-1 Summary of Compliance, 2010 is incomplete. The following are missing
 - The areas of the Mine that were inspected during each inspection
 - Summary of De Beers responses to the Inspector concerns
- In the summary of mitigative measures on page 81, the author references the AEMP annual reports conclusion that," as results are in line with the Environmental Assessment, that mitigative measures are effective". This statement may be very true, but SLEMA feels that the Environmental Agreement Annual Report should be a "stand-alone" document, therefore details on mitigative measures should be more robust, and the reader should not be referred to other documents to establish performance.

Conclusion

The EAAR for 2010 fulfills the criteria established within the Environmental Agreement for a successful document, in fact De Beers wisely used the 13 articles as the backbone to produce its document, thereby ensuring the inclusion of all the requirements. Although the document conforms to all the articles, it does very little to go beyond the basic



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requirements. The document is lacking in illustrative presentation. Apart from the cover page and one map there are no images to help the reader understand what the Snap Lake Mine is like and what type of footprint it exhibits. Although this is not required, it would be nice to see photographs and illustrations aiding and complimenting the text in future versions of this report.

If you have any questions whatsoever please feel free to contact the undersigned or David White at 867-765-0961 / dwhite@slema.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Weyallon", is written over a light blue rectangular background.

Johnny Weyallon
Chairperson