



# SNAP LAKE MINE

## Engagement Plan V.2

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March 2019

DE BEERS GROUP

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## REVISIONS HISTORY

Version	Date	Notes/Revisions
1	N/A	N/A
2	Updated for Closure	All sections

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## GLOSSARY

Aboriginal organization	An organization representing the rights and interests of a First Nation (as defined in section 2 of <i>the Mackenzie Valley Resource Management Act</i> ), Inuit community or region, a Tłı̨chǫ First Nation, or the Tłı̨chǫ Government.
Affected party	A party that is predicted to be affected by a proposed project, such as an Aboriginal organization/government, an individual occupying land for traditional purposes, a private landowner, or lease holder (e.g., for a lodge).
Board	Mackenzie Valley Land and Water Board, as established by the <i>Mackenzie Valley Resource Management Act</i> .
Engagement	The communication and outreach activities a proponent undertakes with parties prior to and during the operation of a project.
Engagement Plan	A document that clearly describes how, when, and which engagement activities will occur with affected parties and parties of interest during the life of the project.
Engagement record	A summary and log which details the engagement processes and outcomes between De Beers and representatives of an affected party or party of interest.
Parties of interest	A party in the Northwest Territories that expresses an interest in the project.

## 1. INTRODUCTION

### 1.1 Context

De Beers Canada Inc. (De Beers) owns and operates the Snap Lake Mine located approximately 220 kilometers (km) northeast of Yellowknife, Northwest Territories, 30 km south of MacKay Lake, and 100 km south of Lac de Gras where the Diavik Diamond Mine, and the Dominion Diamond Mine are located (Figure 1-1). An Environmental Assessment Report (EAR) for the Mine (De Beers 2002) was submitted to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) in February 2002. The Mine received approval from the Minister of Indian and Northern Affairs in October 2003, based on MVEIRB (2003). Final regulatory approvals for construction and operation of the Mine were granted in May 2004 and construction began in April 2005. The Mine reached full production in 2008 and was expected to continue operations for approximately 20 years. However, on December 4, 2015, De Beers announced that it would be suspending operations at Snap Lake Mine, and that the Mine would be placed under “care and maintenance”. An Extended Care and Maintenance Plan was submitted to the Mackenzie Valley Land and Water Board (MVLWB) in April 2016 (De Beers 2016). In December 2017, following an on-going evaluation of the Mine, De Beers announced the Mine would enter into final closure.

This Engagement Plan is an update to previously prepared plans and has been modified for final closure.

De Beers will continue to work closely with our stakeholders and affected parties during closure, and Post-Closure. As activities at Snap Lake change over the years, De Beers will regularly update stakeholders and affected parties and seek their input at key decision points. This plan describes the methods by which De Beers will undertake Engagement on key topics related to the water licence and land use permit(s) over the life of the licence and permit(s).

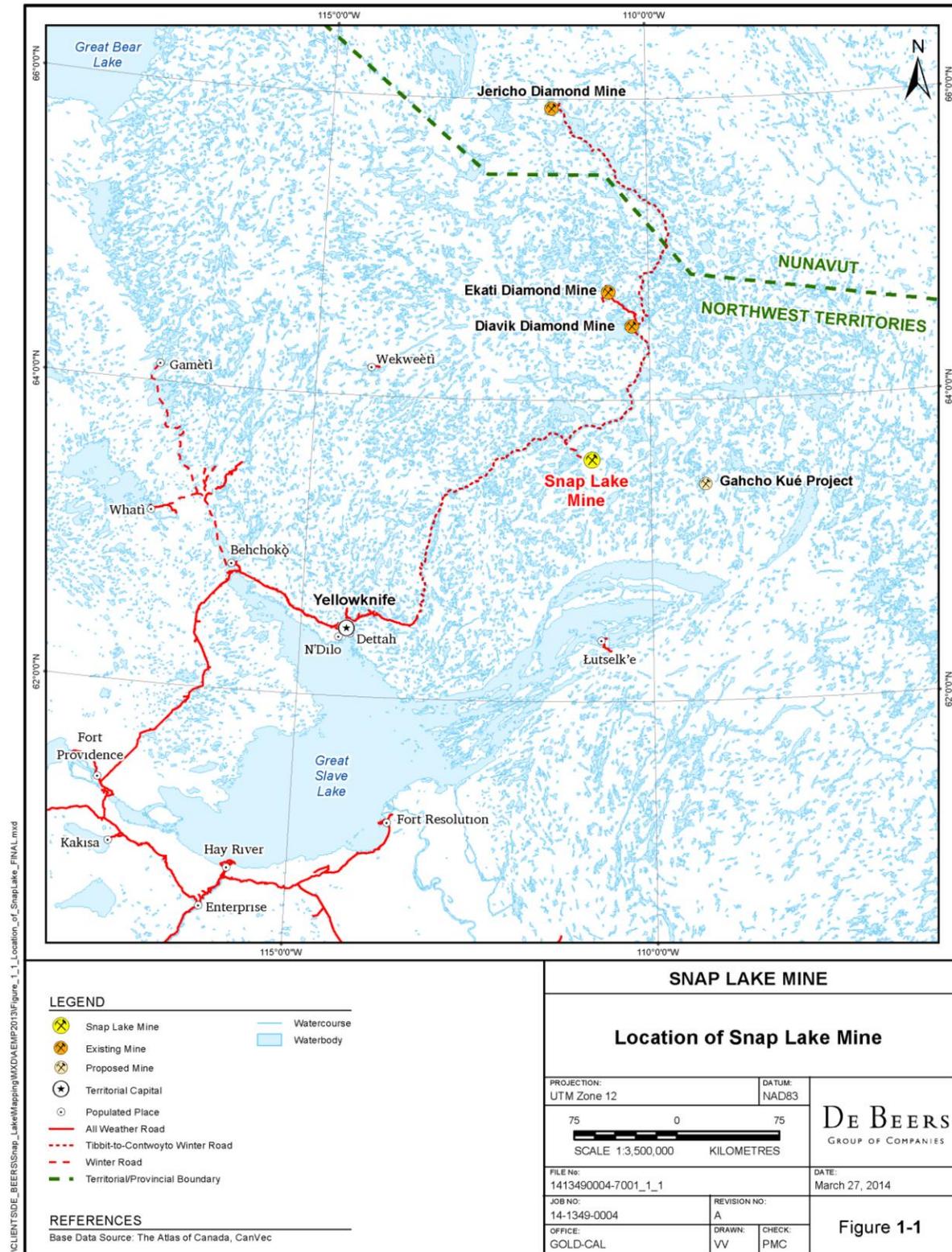
This Plan is primarily based upon the guidance identified in the Mackenzie Valley Land and Water Board (Board)’s *Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits* (The “Engagement Guidelines”). It also conforms to De Beers’ *Sustainable Development Policy and Guidelines for working with Aboriginal Communities*. As noted in the Board’s Engagement Guidelines, this Engagement Plan describes how De Beers will continue to work with affected parties and parties of interest, throughout the life of the project.

### 1.2 Plan Objective

Engagement, as defined by the Engagement and Consultation Policy of the Land and Water Boards of the Mackenzie Valley, is *“the communication and outreach activities a proponent undertakes with affected parties prior to and during the operation of a project.”* The Boards require that proponents provide both an engagement record and an engagement plan along with their applications for permits, and as may be required by the Board.

The objective of this Plan is to describe in general, the process that De Beers will follow when engaging with affected parties and other parties of interest on topics related to Snap Lake Mine. It is understood that De Beers’ engagement efforts and actions, along with Board consultative processes, together contribute to meaningful involvement of parties by:

Figure 1-1 Location of the Snap Lake Mine



- enabling the understanding of a proposed development;
- providing a forum for feedback on issues of concern with a proposed development; and
- strengthening relationships between De Beers and Aboriginal organizations.

### **1.3 Guiding Principles**

De Beers is committed to building and maintaining positive, respectful and meaningful relationships with Aboriginal organizations consistent with our policy: *Working with Aboriginal Communities*. De Beers views our relationships with Aboriginal organizations in particular as integral to the sustainable operation of the mine. This plan describes the means by which De Beers intends to foster those relationships, ensuring that the framework for engagement is solid and acceptable to all parties. Engagement will be:

- **Respectful:** recognize each parties' unique history, knowledge, perspective, values, customs and culture.
- **Timely:** provide adequate time to evaluate and respond.
- **Informative:** honest communication in a diversity of formats will provide sufficient detail and explanation to promote trust and understanding.
- **Comprehensible:** communication will be in an understandable manner, cognizant of differences in language, culture, customs, literacy and knowledge.
- **Ongoing:** the process allows for feedback and fosters lasting and meaningful relationships.
- **Responsive:** communication leads to meaningful changes and/or feedback regarding perspectives or practices.

## **2. TOOLS OF ENGAGEMENT**

Engagement with affected parties and parties of interest, including Aboriginal organizations and communities, involves reaching out to a wide variety of community members. As a result, no single tool or method is likely to be fully effective to facilitate robust relationships. A variety of methods and a flexible approach to implementing those methods is needed in order to ensure engagement is appropriate and effective for the parties involved. Approaches in individual communities may differ slightly to suit the needs of the community, but the general tools of engagement are described below.

### **2.1 Process**

De Beers will follow common steps to engaging with parties regarding changes to mine development or operation, or topics related to the environmental management at the mine. Generally, the steps outlined in the following sections will be taken to engage regarding topics relevant to Snap Lake Mine.

#### **2.1.1 Request**

Either De Beers, or stakeholder (Community, Government, etc.), may request engagement. Any such requests will be made in writing (such as email or letter) so as to form part of the engagement record. Types of requests could include requests for meetings or workshops, tours, or written comments or other input. The request will be directed to the appropriate representative of each party as described in Section 4. Requests will contain the purpose (topic) of the requested engagement, suggested date(s), proposed format, scope of disbursements such as capacity funding or travel costs, a date by which a response is required and contact information.

#### **2.1.2 Response**

The response to the request by De Beers or the other party must indicate that the request is being considered, or that the invitation has been accepted or denied with reason. This may include proposed changes to the suggested format or dates. The response must include contact information for individuals tasked to represent the organization regarding further arrangements, if applicable.

#### **2.1.3 Scheduling and Logistics**

If the engagement requires further input or scheduling of further activities, such as a meeting, De Beers will work with the designated representative of the party to schedule that event. The scope and responsibility for organizing participants, travel and venues and meeting format will be proposed by either party in its request to engage. Interpretation services, if required by the Party or De Beers, will be arranged by De Beers or by the Party. For certain activities such as site visits, additional information will need to be provided by the participants. De Beers reserves the right to refuse entry to anyone who does not meet our minimum standard for medical and security safety.

#### **2.1.4 Circulation of Materials**

Materials required for full engagement on a topic will be provided to participants. These may include reports, designs, presentations or meeting agendas. Wherever possible these materials will be circulated ahead of the planned activity. Participants will be given an opportunity to adjust agendas, and review the materials beforehand.

#### **2.1.5 Engagement Activity**

The engagement activity will be conducted according to the agreed to format, and any changes to the scope or format will be documented by De Beers. The engagement activity may be translated, recorded or facilitated by a third party. The host party will be responsible for note-taking and preparing a record of meeting for review by all parties.

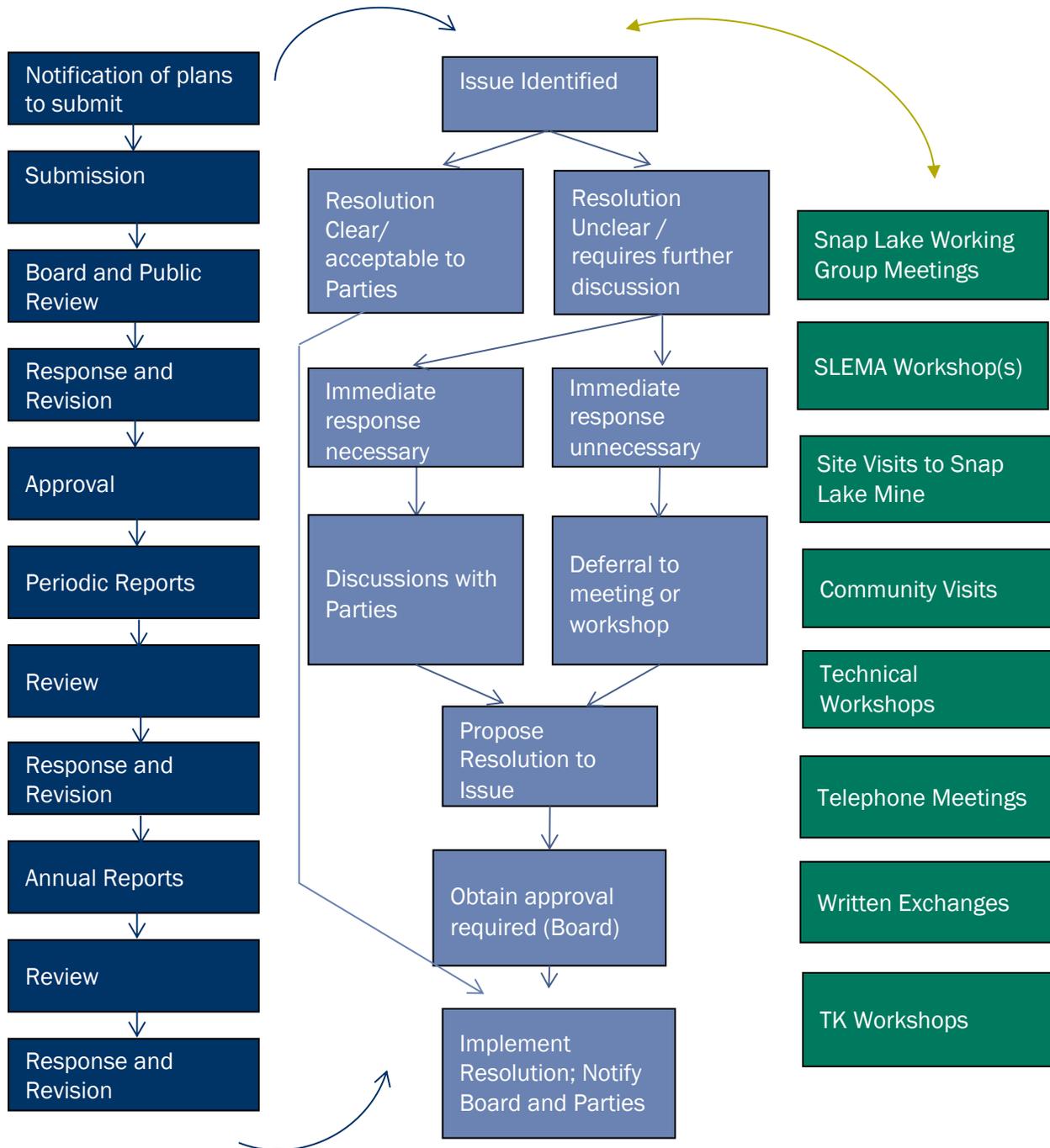
#### **2.1.6 Follow-up Materials**

Follow-up materials such as responses to comments, revisions to reports, notes, minutes (record of meeting), and action-items will be circulated following an engagement activity. Participants will be given an opportunity to check for completeness and errors in those materials. Where applicable, those materials will be kept on record for potential for submission to the Board as part of the engagement record.

The process outlined above will be modified according to the type of engagement and the over-arching process that may be guiding the particular engagement. Regardless of the variations that may occur to the above process, De Beers will strive to meet the goals of engagement at all times, and will practice the guiding principles outlined in Section 1.3 above.

A flow diagram, illustrating 1) the generalized MVLWB regulatory process for review of applications, 2) De Beers' annual cycle of engagement, and 3) the methods by which an issue will be addressed through additional engagement is provided in Figure 2-1. There are dozens of potential interactions between these concurrent processes. For example, an issue that is outside the jurisdiction of the Board could arise during the public review of a submission. De Beers may respond to a comment received on that issue by proposing further discussion at a workshop or within an existing regional forum. That issue would then move from the regulatory process on the left into the issue management process in the centre of the diagram. All possible connections are not illustrated to reduce clutter.

**Figure 2-1 Processes of Engagement**



Notes: The Board regulatory process is described on the left (dark blue). De Beers' forms of engagement with affected parties and other parties of interest is indicated on the right (green). The process by which issues will be addressed are indicated in the centre (light blue).

## 2.2 Community-Specific Engagement

The Board recommends, or even requires, that certain type of engagement be conducted dependent on the type of proposal being considered. Appendix B of the Board’s Engagement Guidelines summarizes possible engagement approaches based on the type of Board authorization requested. De Beers uses these guidelines, as well as feedback from individual Aboriginal organizations to plan and undertake its engagement. Table 2-1 summarizes the engagement format, as it relates to specific authorizations or ongoing operation at the mine.

**Table 2-1 Community and Trigger-Specific Engagement Plan**

Engagement Trigger	Party Engaged	Topics Covered	Type of Engagement	Timing
Environmental Updates	Community members and technical staff in: Wekweeti, Gameti, Whati, Behchokò, Yellowknife (NSMA), N’Dilo/Dettah, Łutsel K’e, Fort Resolution (DKFN)	Summary of annual water licence and annual reports; environmental incidents and management; site operations; new projects	Community visit	Up to once per year at the communities request
Operations Update	LKDFN, YKDFN, NSMA, DKFN and Tłı̄chq representatives as selected by Chief and Council / Executive	Summary of activities at the site including environmental management and new projects	Delegates’ tour of Snap Lake Mine	At the communities request
New LUP or WL	LKDFN, YKDFN, NSMA, DKFN and Tłı̄chq technical staff, Chief and Council / Executive; SLEMA TK Panel and Board	Scope of new authorization; purpose; timing, process to address questions or provide additional information	Written Notification	Prior to application
Amendment to LUP or WL	LKDFN, YKDFN, NSMA, DKFN and Tłı̄chq technical staff, Chief and Council / Executive; SLEMA TK Panel and Board	Scope of new authorization; purpose; timing, process to address questions or provide additional information	Written Notification	Prior to application
Renewal of LUP or WL	LKDFN, YKDFN, NSMA, DKFN and Tłı̄chq technical staff, Chief and Council / Executive; SLEMA TK Panel and Board	Scope of new authorization; purpose; timing, process to address questions or provide additional information	Written Notification	Prior to application
Extension of LUP	LKDFN, YKDFN, NSMA, Tłı̄chq technical staff; SLEMA	Notification of intent to extend process to address questions or provide additional information	Written Notification	Prior to request.

The format, duration or language of engagement may differ slightly from one community to the next. The following representatives of affected parties and parties of interest are to be contacted in respect of ongoing engagement regarding topics within the Board's jurisdiction at Snap Lake Mine:

Organization	Contact
• Tłı̨ch̨ Government	Mines Liaison Coordinator
• North Slave Métis Alliance (NSMA)	Regulatory Analyst
• Yellowknives Dene First Nation (YKDFN)	Regulatory and Research Specialist, Department of Lands and Resources
• Łutsel K'e Dene First Nation (LKDFN)	Wildlife, Lands and Environment Manager
• Deninu K'ue First Nation (DKFN)	IMA Coordinator
• Snap Lake Environmental Monitoring Agency (SLEMA)	Executive Director

De Beers also regularly engages with other organizations and individuals on matters not within the Board's jurisdiction, such as business relations, Impact Benefit Agreement (IBA) implementation and employment. These include:

- Chief and Council and/or Designated Staff;
- IBA Coordinator;
- Development/Investment Corporation;
- Community Employment Officer; and
- Northwest Territories residents.

De Beers assigns appropriate representatives to attend engagement activities, dependent on the topic of discussion, staff area of responsibility, and in response to specific request by the party.

## 2.3 Operational Engagement

De Beers' engagement pertaining to ongoing environmental management occurs throughout the year. These scheduled activities ensure that there are planned opportunities for party representatives and community members to engage with De Beers representatives. At each occasion, participants will be updated on site operations, ongoing or emerging issues related to environmental performance, and investments in environmental management systems or research. Engagement will also incorporate communication about planned developments or project modifications as required to meet the Board's engagement requirements. Generally, a cycle of potential engagement activities ensures that regular opportunities to communicate exist, and are accessible and open to communities.

Planned engagement typically includes:

- Bi-annual meetings with:
  - SLEMA staff and/or board;
  - Tłı̨ch̨ Government Kwe Beh Working Group;

- Community visits to:
  - Behchokò, Gamètì, Wekweètì, and Whatì;
  - D'Nilo and/or Dettah;
  - Yellowknife (North Slave Métis Alliance);
  - Łutsel K'e;
  - Fort Resolution;
- Occasional visits to Snap Lake Mine during summer by community representatives at the request of the community; and
- Annual SLEMA Technical or Traditional Knowledge (TK) workshop as provided for in the Environmental Agreement.

The participation of elders and youth in these engagements is encouraged, but it is up to each respective organization to nominate its participants – for example, each organization is responsible to identify the delegation to participate in site visits, and to sit on the SLEMA TK Panel.

### **2.3.1 Meetings**

De Beers participates in meetings with the Tłı̨ch̨o Kwe Beh Working Group, and SLEMA. Participants vary but may include the Chief and designated Councillors, technical staff of the Aboriginal Party and committee members. De Beers may request or be requested to attend these meetings to provide updates on Mine development, to answer questions on a topic of interest, or to request further engagement. De Beers will send staff members who are able to present the necessary information, to answer questions and to follow-up appropriately. Details on SLEMA are provided in Section 2.7.

### **2.3.2 Community Visits**

Subject to approval by community council or executive, De Beers visits Aboriginal communities, usually together with the GNWT and the other mines, up to once per year for a community visit. Communities to be visited include: Behchokò, Gamètì, Wekweètì, Whatì, D'Nilo, Dettah, Yellowknife (NSMA), Łutsel K'e and Fort Resolution. These community visits are intended to provide an opportunity for community members, including Elders, Youth, to receive up-to-date information about the mines' development and operations, and to ask questions of De Beers related to the Mine. Key topics of interest may include: mine status and performance, environmental programs and key results; incident management and environment job opportunities. During the meeting, De Beers may use posters, presentations, videos, three-dimensional models, breakout groups or open house format to stimulate discussion.

If questions are raised that cannot be immediately answered or addressed, De Beers representatives will follow-up afterwards to provide the requested information.

Community meetings are intended to be open to all members of the respective community. Financial assistance may be provided to the Aboriginal organization to help encourage active participation and involvement of Elders and Youth. De Beers may contribute to the costs associated with meeting expenses

(e.g., hall rental, sound system, interpreters, and refreshments). These community visits are advertised well in advance.

A record of meeting is prepared for each community visit and forwarded to the respective community representatives to review and provide comments. The record of meeting includes a follow up section that outlines any commitments made to do follow up.

### **2.3.3 Site Visits**

By invite or request, typically during the summer months during periods of mine operation, De Beers will host visits by Aboriginal organizations at the Mine. Each party may send representative(s) to join a single day Site Visit. Organizations are encouraged to send interested members including both Youth and Elders, community leaders and staff. Financial assistance is provided to each organization, and any necessary travel and accommodations costs borne by the party are reimbursed by De Beers.

The primary purpose of a Site Visit is to facilitate a better understanding and discussion of ongoing or proposed activities at the Mine by allowing community members to see the site for themselves. The site visits also create opportunities for participants to share their knowledge and provide guidance to De Beers on development and environmental management activities.

The process for site visits is as described in Section 2.1.

Site visits generally follow a standard format involving:

- Check-in at point-of-departure terminal (visit specific);
- Flight to the Mine site;
- Safety Orientation;
- Introduction and Overview of the Mine;
- Activity #1;
- Lunch;
- Topic-specific presentation;
- Activity #2;
- Activity #3;
- De-Brief and Feedback;
- Check-in at Snap Lake security reception; and
- Flight to home community/Yellowknife.

Activities will be adjusted according to the interests and preferences of community representatives, and safety and logistical issues at site. Each visit will include a general surface tour showing key features of the mine, but may focus on specific areas.

## 2.4 Workshops

From time to time, group meetings (sometimes called “workshops”) will be held to discuss particular subjects of importance to the mine development and to Aboriginal organizations and other parties. The workshop format is particularly useful when a subject matter is highly technical, complicated or when parties have much to contribute to a given topic. De Beers will generally contract a third-party facilitator to ensure workshops are well run and inclusive of all participants. Workshops will often be held in a central location such as Yellowknife to facilitate ease of travel for participants, however some workshops may be held on the mine site, in communities, or on the land depending on the demands of the subject matter. Workshops will typically be open to all communities (Table 2-1), but may also include participation from relevant government departments and SLEMA. De Beers will cover the cost of travel and meals for participants. Translators will be provided where necessary. Key deliverables from any given workshop to each participating party include:

- agenda;
- presentations or other handout materials;
- record of meeting;
- action items; and
- participant list;
- follow-up.

## 2.5 Snap Lake Environmental Monitoring Agency

The Snap Lake Environmental Monitoring Agency (SLEMA) was established as a requirement of the Environmental Agreement between De Beers Canada, the Government of Canada, the Government of the Northwest Territories, Tłı̨chǫ Government, Łutsel K'e Dene First Nation, Yellowknives Dene First Nation and the North Slave Métis Alliance. The Agency provides independent monitoring and review information regarding environmental management at Snap Lake Mine, to regulators, signatories and the public to ensure environmental regulatory compliance by De Beers and comprehensive inspection by government regulators.

Snap Lake Environmental Agency's Board is comprised of eight representatives from the four signatory Aboriginal organizations. The Board strives to include Aboriginal traditional knowledge and western science in its activities and in making recommendations, and to this end, the Agreement establishes a Traditional Knowledge Panel and Science Panel. The Traditional Knowledge (TK) Panel is comprised of Elders nominated by their organization and science panel includes nominated experts who have relevant and leading knowledge of a specified subject matter, such as wildlife or fish. The TK Panel, or Science Panel meets once per year in a workshop format, as agreed to during the annual planning process.

During these annual TK or Science Panel workshops led by the Agency, De Beers provides presentation materials, plain language handouts, translation materials and topical experts as required to facilitate the discussion of either the Agencies' topics or De Beers' topics brought to the agenda. Translators and a scribe are provided to prepare a detailed record of meeting. De Beers, with the permission of SLEMA, incorporates observations and recommendations from the workshop(s), as well as regular Agency meetings, in the design and development of specific projects and environmental management plans.

To facilitate communication between the Agency and the individual signatory organizations, De Beers expects the Board members to attend and participate in other De Beers engagement activities within their respective

communities, such as community meetings or site visits. De Beers also expects the Board members to keep their respective community leadership informed of activities undertaken by the Agency and information prepared by SLEMA. In this way, the perspectives of the Agency, as informed by their own data analysis, and outcomes of meetings and workshop forums, can be transferred to the respective organizations.

## **2.6 Non-scheduled Engagement**

In addition to the regular activities scheduled as part of the annual cycle of engagement (Section 2.2), De Beers will participate in additional engagement opportunities on an as needed basis. Activities may include:

- conference calls and face-to-face meetings on key topics;
- regional meetings involving multiple stakeholders;
- government or Aboriginal-led Working Groups or forums;
- conferences; and
- community events.

These unscheduled activities may be required from time to time as a result of new or emerging issues, unexpected Mine developments or in response to community concerns. They may be initiated by other parties, or by De Beers. De Beers will adhere to the guiding principles of engagement described in Section 1.3 and the process described in Section 2.1. As much as possible and as applicable, De Beers will also strive to address these matters within the scheduled activities planned as part of the annual cycle of engagement.

## **2.7 Engagement on Environmental Monitoring Programs and Management Plans**

Environmental monitoring programs and management plans are required to describe key environmental components of mine operations. Most of these programs are authorized as part of the Land Use and Water Licence permitting processes regulated by the Board, while others are reviewed and approved by various Territorial or Federal government bodies.

Consistent with the land use permit and water licence conditions, De Beers will review each respective plan annually and adjust as required to reflect changes in activities, or as directed by the Board. Annual review may include the submission of an annual report along with proposed revisions. Parties will be notified of the submission concurrent with the submission to the Board, and will be given an opportunity to review and provide comment through the Board's online system (ORS). De Beers will respond to comments received and will consider revisions accordingly where possible, subject to Board approval. If a proposed revision is substantial or requires more thorough and detailed engagement. De Beers may host or participate in a workshop, a meeting, or a conference call to discuss the matter with representatives of Aboriginal organizations prior to submission. The outcomes of this additional engagement will be captured within the revised version of the plan. In addition, De Beers will discuss the outcomes of the annual report with Aboriginal organizations at regularly scheduled events such as the community visits, site visits, or meetings.

### **3. COMMUNITY-SPECIFIC-ENGAGEMENT**

The annual schedule for community engagement will be adjusted as needed to reflect the regulatory processes underway in any given year. Adjustments may also be made to reflect the engagement preferences of each Aboriginal organization. De Beers will propose engagement activities, format and timing to each party for comment. Once mutually agreed to, the plan will be implemented and form part of the engagement record. De Beers notes that reasonable effort will be made to accommodate individual party preferences, but that in the event of disagreement, De Beers will maintain a record of all attempts to engage in accordance with this Engagement Plan.

## 4. REFERENCES

De Beers. 2002. Snap Lake Diamond Project: *Environmental Assessment Report*. Submitted to the Mackenzie Valley Environmental Impact Review Board. Yellowknife, NT, Canada.

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