

3.1 DIRECT HABITAT LOSS

promote natural re-vegetation and practice progressive reclamation as the Mine develops;

- Will there be effort to vegetate the south rock mine pile while during current operations. When will DeBeers restart there compost program to help in preliminary studies of Revegetation.

De Beers Response:

The current re-vegetation plan for GK is to re-vegetate the priority area (i.e. process plant site, laydown and main roads, etc.). Whereas the plan for the reclamation of mine rock piles are to maintain the as-built and block any access to the piles, i.e. active revegetation will not occur at the mine rock piles.

Given the wildlife attraction issues, particularly the wolverines, when we first started the compost trial, we have suspended the composting program, and it will not be restarted until we are certain any resulting compost will not become a wildlife attractant.

4.2.1.2 Frequency and Duration

with future assessments planned for Year 5 (2021)

- will there be an assessment of where noise monitoring will be done based on placement of noise generating equipment and infrastructure (e.g., in-line pumps along the N11 road)

De Beers Response:

Noise assessments are designed to test predictions of the EIS about the spatial distribution of noise from the Mine. The location of noise monitoring devises is to capture maximum effects, which would include all sources of noise such as in-line pumps along the N11 road.

4.3.1.1 Methods

The reconnaissance survey will include a fixed-wing flight

- should update type of aircraft since Helicopter was used winter 2021 in January.

De Beers Response:

A fixed-wing aircraft was not available to complete the survey in 2021, so a helicopter was used instead. The WMMP will be revised to include fixed-wing or helicopter use.

4.3.2.1 Methods

will be recorded regarding recreational use of the winter access road

- record of carcass found along winter road and record if it is within the Harvesting exclusion zone. Also, if there is remnants left behind by recreational users (e.g., garbage, abandon equipment) if this occurs DeBeers should remove these items.

De Beers Response:

De Beers does not monitor carcasses found along the road but does record hunting parties encountered. The location of a carcass along Winter Access Road does not indicate where the animal was harvested. Monitoring harvest is the responsibility of the GNWT-ENR.

4.3.3.1 Methods

The wildlife sighting logs will be maintained at various areas around the Mine site for staff to record observations of wildlife both on the patrols of the winter access road and at other areas around the Mine site. All staff will be encouraged to add observations to the log. This may include observations of commonly observed species, unusual species, potential. problem wildlife, and observations of caribou. Observations of species that pose a risk to human safety, or alternatively observations that pose a risk to wildlife will be reported to Environment staff immediately.

- wildlife logs are rarely used, and observations of wildlife go unreported most of the time. Unless it is a large animal such as a bear, wolf, caribou, or wolverine. Smaller wildlife are less often reported on the sighting logs that are set up around site.

De Beers Response:

Mine staff are not expected to monitor wildlife but are encouraged to add incidental observations to the form. Wildlife sightings are used to record the presence of wildlife incidentally and not considered as a measure of abundance. The 2020 WMP report shows that small animals have been recorded at the Mine site since 2013 when the wildlife log was implemented. There are also other regular and systematic monitoring programs such as site surveillance and small mammals that also record observations of all sizes of wildlife.

5.1.1.1 Mine Development Area

A mitigation strategy is also proposed for progressive reclamation, which will be initiated when a disturbed area becomes available for reclamation (Table 5-1).

- What are DeBeers criteria to determine disturbed area become available? The south rock mine pile is not in active use should that not qualify it as available for reclamation it is within the two-year time frame. Should DeBeers look at their sewage (sewage sludge) generation from human waste and determine if that can be used as a growing medium for plants on top of the rock pile.

De Beers Response:

Generally speaking, an area that will be progressively reclaimed includes facilities or disturbed areas that are no longer used for the operation. Even though mine rock hasn't been deposited on the South Mine Rock Pile in recent months, the construction has not been completed. Roughly additional two lifts are required to be placed on the top of the pile.

Currently, treated sewage or sewage sludge has not been identified as reclamation supporting materials, due to the expected storage and wildlife avoidance challenges.