

Ekati – Type A Water License Amendment Application
(W2020L2-0004) and Type A Land Use Permit
Application (W2021D0005) for the Point Lake Project



Intervention by the North Slave Métis Alliance (NSMA)

November 2021

The North Slave Métis Alliance (NSMA)

- Represents Métis people of the Great Slave Lake area, which have Aboriginal rights recognized and affirmed under s.35 of The Constitution Act, 1982.
- Members continue to exercise their collectively held, unextinguished Aboriginal rights as Métis people, including in the area of Lac de Gras and Lac Du Sauvage where the Ekati mine is situated.



The North Slave Métis are concerned with the protection of the environment within their traditional territory.

Recent NSMA Participation with the Point Lake Project

1. Point Lake Project – Virtual Public Meeting (April 26, 2021).
2. Preliminary Water License and Land Use Permit reviews (July 2021).
3. Point Lake Technical Session (September 7-9, 2021).
4. Ekati Mine Point Lake Traditional Knowledge Workshop (October 7, 2021).
5. Fisheries Offsetting and Fish-Out Planning meeting (Nov 12, 2021).



The Métis continue to exercise their s.35 rights in the area of Lac de Gras / Lac du Sauvage, and are concerned with the protection of the local environment.

Importance of Point Lake Project and Concerns

- In general, the NSMA is supportive of the Point Lake Project because of socio-economic opportunities that benefit the Métis, provided that concerns are adequately addressed.

Concerns:

1. Protecting caribou - mitigate impacts of Ekati operations on caribou movement.
2. Monitoring seepage - adaptive management for monitoring and collection of seepage from the waste rock piles.



Caribou (Arctic Canadian Diamond Company Ltd. from Poole et al. 2021)

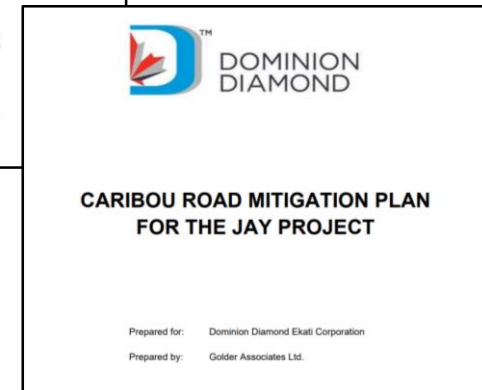
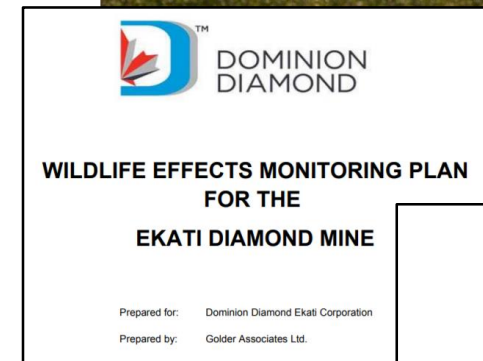


Map for waste rock piles (Figure 2, page 19, of Ekati - Point Lake - Permit Application)

Concern 1: Protecting Caribou

Overview:

- Poole et al. (2021) indicates that Ekati mine infrastructure is likely interfering with caribou movements.
- Caribou movements delayed in areas around mine.
- Only a fraction that approach roads cross them.



Concern 1: Protecting Caribou

Arctic's Conclusions (our understanding):

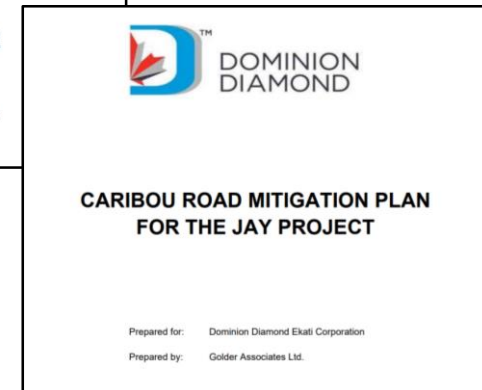
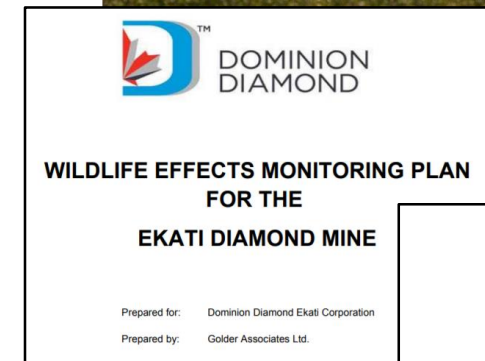
- Mine roads do not prevent caribou moving through Ekati.
- Mitigations (WEMP + CRMP), and coverings on temporary water pipelines are generally effective.
- Arctic is willing to explore adding more / different caribou crossings.

NSMA's conclusions:

- CRMP not as effective as anticipated, and unclear what additional impacts to caribou will be with addition of PLP.

Recommendations:

- NSMA recommends Arctic undertake dedicated review of effectiveness of the CRMP.



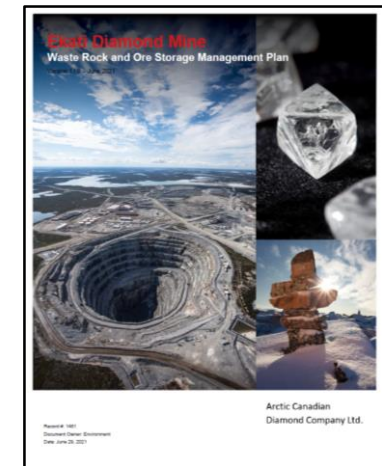
Concern 2: Monitoring Seepage

Overview:

- Acid generating potential of waste rock for Point Lake pit will be higher than other pits at the Ekati mine.
- Kinetic tests to determine the rate at which waste rock may turn acidic are not yet complete (pre-hearing conference discussions).
- Therefore, effectiveness of proposed mitigation for seepage from waste rock storage area (WRSA), and impacts to ground water quality are unclear.



Map for waste rock piles (Figure 2, page 19, of Ekati - Point Lake - Permit Application)



Concern 2: Monitoring Seepage

Arctic's Conclusions (our understanding):

- Current monitoring locations around WRSA(s) and sump along road with schedule of spring freshet + fall are sufficient.

NSMA's conclusions:

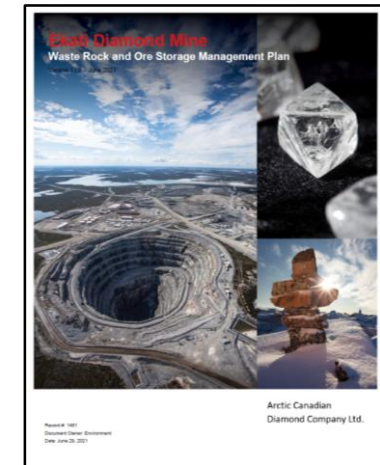
- Current waste rock and ore storage management plans do not address contamination to ground water and monitoring will not occur frequently enough to detect problem seepage.

Recommendations:

- Monthly ground water monitoring around proposed WRSA(s).
- Continued involvement of the NSMA in development of plans for closure and remediation.



Map for waste rock piles (Figure 2, page 19, of Ekati - Point Lake - Permit Application)



Summary of Recommendations

- NSMA generally supports Water License Amendment and Land Use Permit for Point Lake Project provided that concerns are reasonably addressed.

Key considerations:

- Ineffectiveness of existing mitigation measures for caribou (mainly the CRMP) when combined with added impacts of the Point Lake Project.
- Uncertainties regarding plans to contain and monitor seepage from the WRSAs.

