



Independent Environmental Monitoring Agency

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February 23, 2018

Joseph Mackenzie
Chair, Wek'eezhii Land and Water Board
#1-4905 48th St, Yellowknife, NT
X1A 3S3

Re: Dominion Diamond Engagement Plan Version 4.0

Dear Mr. Mackenzie,

The Independent Environmental Monitoring Agency (Agency) has reviewed the Engagement Plan (Plan) submitted by Dominion Diamond and we provide the following comments for your consideration.

The Plan effectively outlines all the engagement with affected parties. It defines the affected parties as:

- Tłı̨chǫ Government;
- Hamlet of Kugluktuk and Kitikmeot Inuit Association;
- Yellowknives Dene First Nation and Lutsel K'e Dene First Nation; and,
- North Slave Metis Alliance.

Dominion Diamond has also committed to engaging with the community of Fort Resolution, specifically the Deninu Kue First Nation and the Fort Resolution Metis Council, as "affected parties" moving forward.

While the Plan is well written for engagement within their definition of affected parties (i.e., Aboriginal groups and communities), it lacks information about engagement practices with the Agency and other regulators which are required under the Environmental Agreement. There is no description on how they consult with other "stakeholders" in concert or in addition to the Water Board processes, with environmental reporting (EIR), and on amendments to environmental management plans and programs.

Recommendation: Dominion Diamond include in the Plan how engagement will be conducted with all stakeholders.

While Dominion Diamonds has committed to substantive steps to improve the TK Framework toward greater transparency and consistency, the engagement plan does not indicate where and how it

documents the implementation, successes, and lessons learned from Traditional Knowledge studies and how it is incorporated into environmental management at Ekati Mine.

Recommendation: Dominion Diamond should make the engagement record of how it has used Traditional Knowledge available to the public.

The section on the Culture Camp presents a watered down version of the intended purpose of the camp. EA Measure 7-2 states that the purpose of the Culture Camp is to "establish a connection with disturbed areas of land and restore TK transfer between generations about the area disturbed by diamond mining". So the strong implication is that the focus of the camp would be to apply the community users TK to monitoring mine-caused disturbances to the land and wildlife using Aboriginal methods of information gathering. But the Plan states solely that the camp's purpose is as mitigation for acknowledged disruption of cultural land use by encouraging intergenerational connection to the land. The environmental monitoring component is left out of the discussion of this important initiative.

Recommendation: Dominion Diamond reword the Culture Camp section to accurately capture the intent of EA Measure 7.2 to include that the focus of the camp is to apply the community users TK to monitoring mine-caused disturbances to the land and wildlife using Aboriginal methods of information gathering.

Should you have any questions concerning these comments, the Agency is pleased to discuss these at your convenience.

Sincerely,



Jaida Ohokannoak

Chairperson

Cc: Dominion Diamond – April Hayward
 Tlicho Government – Jessica Hum
 Yellowknives Dene First Nation – Alex Power
 Lutsel K'e Dene First Nation – Ron Griffith
 North Slave Metis Alliance – Nicole Goodman
 Kitikmeot Inuit Association – Geoff Clark
 Government of the Northwest Territories – Laurie McGregor
 Indigenous and Northern Affairs Canada – Michael Roesch