



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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December 19, 2008

David Livingstone
Director, Renewable Resources and Environment
Indian and Northern Affairs Canada
P. O. Box 1500
Yellowknife, NT
X1A 2R3

Re: De Beers 2007 Environmental Agreement Annual Report

Dear Mr. Livingstone,

Snap Lake Environmental Monitoring Agency (SLEMA) reviewed De Beers 2007 Environmental Agreement Annual Report (2007EAAR) and found it to be acceptable for the purpose of the Environmental Agreement.

SLEMA identified no major deficiencies but a few minor ones.

- It is stated that “there were slight increases in water levels in Snap Lake” in the Plain Language Summary. This is inconsistent with the description in the Streamflow and Lake Elevation Monitoring Program 2007 Annual Report, where Snap Lake water levels were reported to be lower in 2007 than that in 2006.
- Section 5 (Compliance) only referred to INAC inspection. SLEMA requested DE Beers include a comprehensive summary of compliance in its EAAR last year. De Beers responded to the request, and committed to doing so in the 2009 annual reporting. It is not understood why De Beers could not report the “comprehensive compliance” in the 2007 and 2008 annual reporting.
- INAC inspector identified the potential leachate off the storage pad of bulk explosive materials on July 5, 2007 (Table 5-1). His observation was supported by the monitoring data of SNP 02-07 and 02-09 (elevated concentrations of both Ammonia-N and Nitrate-N from June to August 2007, which in 31 events exceeded the water licence limits of either Ammonia-N or Nitrate-N parameter for SNP 02-17). These events were not reported in Section 5, and the measures De Beers taken to mitigate the impacts were not yet reported in either Section 7 (Mitigative Measures) or Section 8 (Adaptive Measures). It is recommended that De Beers re-assess its reporting criteria about compliance, mitigative measures, adaptive measures, and public concerns.
- The gasoline taste detected by some tasters in the first fish tasting event in 2007 may belong Public Concern.



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The comments SLEMA made on 2006 EAAR are still tenable. It is recommended that De Beers focus its EAAR on its environmental performance and compliance, the concerns from the communities such as nutrient loading, water level change, TDS increase, fish health, and wildlife safety, and present the information in a visualized way as SLEMA recommended last year.

SLEMA would be pleased to discuss the above comments with De Beers and others to ensure improved annual environmental reporting.

Sincerely,

Original signed by

Johnny Weyallon
Chairperson