



Snap Lake Environmental Monitoring Agency
Main Floor, Lahm Ridge Tower
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Phone: 867-765-0961 FAX: 867-765-0963
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December 16, 2010

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

Re: De Beers 2009 Environmental Agreement Annual Report

Dear Ms. Joudrie,

Snap Lake Environmental Monitoring Agency (SLEMA) reviewed De Beers 2009 Environmental Agreement Annual Report (2009 EAAR) and would like to provide the following comments.

The submission follows the 2008 EAAR template, which was accepted by stakeholders, but no further improvement in detailed trend analysis and better visualization of monitoring results such as photos and charts. It is recommended that De Beers further improve the report presentation.

Based on Section 3.2, the following management plans should be reviewed or updated in 2010, but SELMA did not receive any of them until now. Clarification is requested.

- Adaptive Management Plan,
- Best Management Practices Plan for Ammonia Source Control,
- Interim Mine Closure and Reclamation Plan,
- Emergency Response Plan, and
- Quality Assurance/Quality Control Management Plan.

De Beers responses to Inspection Report in Table 5-1 appear to be too simple, and should be detailed instead of "N/A".

In addition, some editorial problems were identified (see the attachment), and careful proofreading is recommended before the submission of future annual reports.

In general, the submission provides reasonable details on the mine site environmental monitoring and management in 2009, and it is acceptable for the purpose of the Environmental Agreement.



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If you have any questions whatsoever please feel free to contact the undersigned or David White at 867-765-0961 / dwhite@slema.ca.

Sincerely,

Johnny Weyallon
Chairperson



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Editorial Problems identified in 2009 EAAR

- Page xi: Table 5-1 appears twice in the List of Tables.
- Page 2: Figure 1-1 is missing.
- Table 3-1 summarizes the compliance reports. Some of the dates in the Table appear to be wrong, for example, "current submission date" - March 2009 for Aquatic Effects Monitoring Program, March 2006 for Hazardous Materials Management Plan and November 2008 for Ore Storage, Waste Rock and Processed Kimberlite Management Plan; "approval date" - November 2009 for Vegetation Monitoring Program. Correction is required.
- Page 31: Section 3.2.4 should be titled Interim Mine Closure and Reclamation Plan
- Page 42: It should be 2009 rather than 2007 in line 4 of the first paragraph.
- Page 42: The number of 2009 report submissions is said to be 18, which is inconsistent with the number in Table 4-1 (9) and the number of report summaries (14). Consistency is requested. Table 4-1 should be revised.
- Page 51: The summary of the Wildlife Effects Monitoring Program 2008 Report should be separated from the Vegetation Monitoring Program 2008 Report as an independent section. The Table of Contents should also be updated.
- Page 80 to 82: title of Table 5-1 should be Summary of Compliance, 2009
- The description in Section 7 (Summary of Mitigative Measures, page 85) and Section 8 (Summary of Adaptive Measures, page 86) is inconsistent with the Executive Summary. Correction is required.