SLEMA November 2011 Environmental Update

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Outline

1. Mine Update
2. Inspection Update
3. Regulator Update
4. Stakeholders' Update
5. Reviews

Acronyms

- AANDC – Aboriginal Affairs and Northern Development Canada (previous INAC – India and Northern Affairs Canada)
- AEMP – Aquatic Effects Monitoring Program
- ARD – Acid Rock Drainage
- DFO – Fisheries and Oceans Canada
- DKFN – Deninu Kue Fisrt Nation
- DO - Dissolved Oxygen
- EC – Environment Canada
- ENR – Department of Environment and Natural Resources, GNWT
- GNWT – Government of the Northwest Territories
- MVLWB – Mackenzie Valley Land and Water Board
- PK – Processed Kimberlite
- SLEMA – Snap Lake Environmental Monitoring Agency
- SNP – Surveillance Network Program
- TDS – Total Dissolved Solids
- WEMP – Wildlife Effects Monitoring Program
- WTP – Water Treatment Plant
- WMP – Water Management Pond

1.1 Mine Update – October 2011

- Production rate: 59.6% of its capacity (58,232 tonnes of kimberlite processed)
- 2,332 m^3 of water withdrawn from Snap Lake
- 812,238 m^3 of treated water discharged into Snap Lake
- 51,441 tonnes of coarse reject and 42,630 m^3 of slimes deposited in the North Pile
- 5 spills (3 reportable)
- Water sampled in 9 monitoring stations
  - The monthly average for all parameters met compliance except for
    - Ammonia and nitrate in SNP 02-09.4 and 02-09.5
    - Fecal coliform in SNP 02-16i
    - Total Zinc in SNP 02-17
- One site visit by AANDC and EC inspectors for the spill 11-391
- Construction of the East and deposition of PK grits for the rib-berms continued in the East Cell

1.2 Anglo American Takes Control of De Beers

- CBC News on November 4, 2011
  - “Mining company Anglo American is gaining a controlling interest in De Beers, paying $5.1 billion US for the 40 per cent of the company's shares held by the Oppenheimer family.
  - The deal announced Friday marks a historic change for the South African industrial dynasty, which has had a leading role in both companies for nearly nine decades.
  - The transaction potentially raises Anglo American's stake in De Beers to 85 per cent.”

1.3 De Beers Responses to Interventions

- Dated November 21, 2011
- Responded to the Interventions of North Slave Métis Alliance, Deninu Kué First Nation, Fisheries and Oceans Canada, Environment Canada, and Aboriginal Affairs and Northern Development Canada, and to the submissions of the Snap Lake Environmental Monitoring Agency, and EcoMetrix Incorporated

1.4 Report on Potential Blasting Impact on Local Fish Populations in Snap Lake

- Dated November 16, 2011
- Prepared by Golder Associates Ltd. for De Beers
- “Present blasting operations are unlikely to exceed the Fisheries and Oceans Canada (DFO) guideline value for peak particle velocity of 13 mm/s or the instantaneous water overpressure limit at the nearest water body (50 kPa). Since mining will continue to dip down, future blasting will be at a greater distance from the nearest lake/land interface and the potential for impacts will continue to decrease.”

2. Inspection Update

- INAC Inspector – Tracy Covey
- No inspection reports received
  - Another inspector has been investigating the spills took place in October 2011. Tracy did not inspect the mine in order not to compromise the ongoing invetigation

3. Regulator Update

- MVLWB
  - On November 10, 2011 distributed interventions from AANDC, DFO, EC, NSMA and DKFN and requested De Beers to respond by November 21
  - De Beers responses to interventions distributed on November 22
  - Pre-hearing conference held on November 28
  - Public hearing agenda distributed on November 29

4. Stakeholders' Update

- Water Licence Renewal
  - NSMA's Intervention on November 6, 2011
  - DFO's Intervention on November 7, 2011
  - AANDC's Intervention November 7, 2011
  - DKFN's Intervention November 7, 2011
  - EC's Intervention November 9, 2011

4.1 NSMA's Intervention

- Dated November 6, 2011
- "Community concerns which were expressed in our December the 8th, 2010 letter with respect to the renewal of land use permit MV2010D0053 are still relevant, as are our comments of July 29th, 2011 with respect to the renewal of the water licence."
- The NSMA endorses the submission provided by SLEMA (dated October 18, 2011)

NSMA's Recommendations

- Water quality objectives should be developed in collaboration with Aboriginal Communities including their Traditional Knowledge Holders.
- Water quality objectives should be site specific and not unduly reliant on guidelines or criteria developed in other jurisdictions with different ecology (i.e. climate, Ph, hardness, adapted species, etc).

NSMA's Recommendations

- A risk assessment and/or special study of the design and operation of the North Pile and Starter Cell should be completed with the participation of Traditional Knowledge Holders.
- The Board should re-consider the size of the buffer required between Snap Lake and all mining related activity. The buffer size is less than what was committed to during environmental assessment.
- More care should be taken to stockpile overburden and topsoil for use in future restoration.

NSMA's Recommendations

- The NSMA would support a term of 5 or 6 years, for the same reasons that SLEMA notes, but in addition prefers that the water licence and land use permit should be renewed at the same time. We anticipate that within the next 5 or 6 years there might be a single, unified "development authorization" that is capable of regulating all uses of land, water or air to protect all the values that are contemplated by the MVRMA (ecological, social, economic, cultural, etc.). We also expect that inspectors will then have an expanded authority to enforce all terms and conditions of authorizations as recommended during environmental assessment. This regulatory reform would increase efficiency and transparency.

NSMA's Recommendations

- NSMA participation is required in all heritage, burial, cultural or archaeological site identification, assessment and management.
- Full implementation of the Socio-Economic and Environmental Agreements should be required, with a focus on promotion of social equity and respect for human rights – including aboriginal human rights.
- Submission of annual environmental reports should have deadlines specified in the water licence so they could be tracked, and enforced. All regulatory submissions could be combined to make tracking and review more efficient.

NSMA's Recommendations

- De Beers should be required to retain one empty seat on all planes coming or going from site, and should always retain one empty room on site, in case the AANDC inspector decides to do an inspection. AANDC inspectors should NOT have to ask permission from De Beers or make an advance appointment with De Beers to inspect the Snap Lake mine, and AAND inspectors should not have to report to a superior who is in a "relationship" with senior staff at De Beers.

4.2 DFO's Intervention

- Dated November 7, 2011
- 17 recommendations provided for MVLWB's consideration in the renewal of the Water Licence
  - Term of Licence
  - Adaptive Management Plan
  - Inclusion of TDS Limits around Compensatory Habitat Sites
  - Inclusion of DO monitoring
  - Best Available Technology
  - AEMP
  - Closure

DFO's Recommendations

- DFO recommends that the licence term be no longer than 5-7 years. A five year term would ensure that a renewal occurs before DBCI has projected that the TDS limit of 350mg/L will be exceeded.
  - In addition to developing an effects based threshold, it is recommended that DBCI assess alternative solutions to reduce the TDS concentrations at the source(s), to reduce the TDS in the effluent, and ultimately in Snap Lake. These solutions should be identified and provided to reviewers well in advance of the next licence renewal.

DFO's Recommendations

- DFO recommends that an adaptive management/response framework plan continues to be required for the Snap Lake Diamond Mine. The adaptive management/response framework plan should be prepared for the site and include all monitoring programs. It should describe the process of adaptive/response management, how action levels are determined and what types of management actions may be taken. The action levels for specific monitoring programs should be included in those monitoring programs. Annual results should be compared to these action levels and results from management actions used to inform the periodic redesign of the program. Action levels and management actions should be approved by the Mackenzie Valley Land and Water Board.

DFO's Recommendations

- Currently, DBCI reports TDS and DO results to both DFO and the MVLWB, in two separate reports. In order to reduce duplication, DFO recommends that the intent of these conditions be incorporated into the Water Licence and be reported upon annually within the water quality chapter of the Aquatic Effects Monitoring Program (AEMP).

DFO's Recommendations

- DFO recommends that the requirement for the re-evaluation of Best Available Technologies for the treatment of the effluent discharged to Snap Lake be maintained and that this condition is altered to require DBCI to demonstrate how BATs are re-evaluated on a frequency that is acceptable to the MVLWB.

DFO's Recommendations

- DFO recommends that the AEMP be reviewed, updated and approved by the MVLWB, at an appropriate frequency (3 years).
  - Annual reporting of trends, interaction between aquatic ecosystem components, and reporting against the adaptive management/response framework action levels
  - Continuing cyanotoxin and chlorophyll-a monitoring, and using a phosphorus-loading model
  - Fish community monitoring plan
  - The plume characterization

DFO's Recommendations

- DFO recommends that
  - DBCI is required to have an updated and board approved closure and reclamation plan at various points during mine life, in preparation for final closure.
  - each iteration of the Closure and Reclamation plan should be in accordance with current standards and best practices.
  - closure measures required by the Board continue to include alternatives.

4.3 AANDC's Intervention

- Dated November 7, 2011
- AANDC retained Brodie Consulting Limited and MacDonald Environmental Services Limited in the preparation of this intervention.
- 21 recommendations provided for MVLWB's consideration in the renewal of the Water Licence
  - Water Quality Objectives and Effluent Quality Criteria
  - Reclamation Security
  - North Pile Management
  - Water Licence

AANDC's Recommendations

- AANDC recommends that the MVLWB review the current EQC contained within the existing water licence to ensure they reflect WQOs and EA predictions; including any revisions or improvements to WQOs made during this renewal process.
- AANDC recommends that the MVLWB maintain the mixing zone within Snap Lake (200 m from the diffuser);
- AANDC recommends that water quality at the edge of the allocated mixing zone (or IDZ) be assessed against WQOs established for Snap Lake;
- AANDC recommends that monitoring at the edge of the allocated mixing zone (or IDZ) be used to assess the need for Adaptive Management in accordance with Recommendations 8 and 9 from MVEIRB Report of Environmental Assessment (July, 2003); and,
- AANDC recommends that the MVLWB require assessments of whole lake average TDS, calcium and chloride concentrations in accordance with the Surveillance Network Program (SNP). The MVLWB should consider moving the five SNP stations closer to the diffuser string, consistent with locations and predictions made in the EA.

AANDC's Recommendations

- AANDC recommends WQOs and EQCs for Snap Lake for the consideration of the MVLWB
- AANDC recommends that the following chronic toxicity test be added as part of the SNP to evaluate the toxicity of effluent discharges to aquatic organisms after mixing with receiving waters (i.e., using water samples collected at the edge of the initial dilution zone):
  - Early life stage toxicity test with rainbow trout, Oncorhynchus mykiss (Run as staticrenewal test once per year; Endpoints: viability of eggs, alevins, and fry: Method EPS/1/RM/28).

AANDC's Recommendations

- AANDC recommends that the Board set the total liability associated with the Snap Lake mine at $75,373,336. This is comprised of a water related liability of $33,240,546 and a land related liability of $42,132,790. The water related liability should be placed within the water licence and the land related liability within land use or other appropriate authorizations

AANDC's Recommendations

- AANDC recommends that DBCMI install an adequate number of piezometers in the North Pile dykes to confirm the phreatic surface. The piezometeric installation information (location, depth, etc.) and all readings should be reported as part of the annual geotechnical submissions to the MVLWB.
- AANDC recommends that DBCMI provide an updated water management plan and tailings containment water balance. This plan must be calibrated to the current situation and be able to predict future conditions within the North Pile. The updated water management plan should include a contingency plan and a plan for increased accumulation of contaminated water.
- AANDC recommends that DBCMI characterize the range of existing thermal conditions and the physical and chemical properties of the materials within the Starter Cell of the North Pile; and,
- AANDC recommends that DBCMI update the thermal and freezing model using existing moisture conditions within the North Pile.

AANDC's Recommendations

- *AANDC recommends that the term of the water licence be 5-7 years. AANDC considers that 5 years (2017) may be more appropriate since worst case TDS predictions suggest that the TDS concentration identified in the EA may be exceeded in 2018.*

AANDC's Recommendations

- AANDC recommends that MVLWB provide clear definitions of Adaptive Management terms such as "action level", "management response", etc. and use consistent wording within the licence when referring to Adaptive Management concepts;
- AANDC recommends that MVLWB link Adaptive Management Action Levels to WQOs established for the edge of the IDZ;
- AANDC recommends that the MVLWB set Action Levels as part of the AEMP for aquatic effects, as recommended in AANDC's AEMP guidelines, based upon the findings from the EA;
- AANDC recommends that the MVLWB include language more directly linking expected Management Responses to Action Levels within the AEMP; and,
- AANDC recommends that the MVLWB explicitly include the concepts of adaptive management within other plans, such as: Domestic Waste and Sewage Management Plan, Water Management Plan, Groundwater Quantity and Quality Monitoring Program, Aquatic Effects Monitoring Plan, TDS-Calcium-Chloride Sampling Plan, OSWRPK Management Plan and Closure and Reclamation Plan.
- AANDC recommends that MVLWB include metals analysis (ICP-MS Metal Scan (total and dissolved)) as a requirement of SNP Section B, Item 10 b).

4.4 DKFN's Intervention

- Dated November 7, 2011
- "DKFN feels that the changes taking place because of this mine currently has and will have significant impacts on our members and our traditional territory; These impacts will impact us environmentally. economically, spiritually and culturally"
- "We are concerned with cumulative impacts. climate change, biomagnification, human resources turnovers, company best practices, company policies and Protocols, board inspections, monitoring, mitigation measures, emissions, water quality and quantity"

DKFN's Recommendations

- "the DKFN is concerned with the uptrend in the concentration of total dissolved solids (TDS) being released into Snap Lake. We acknowledge that modeling indicates current TDS limits will be exceeded within the life of the mine based current trends. As a result. we recommend that higher standards be enforced as a condition of the license renewal. Furthermore, this example of increasing the risk to the aquatic environment highlights the importance of having a short term license as mentioned above."
  - e.g. 5 years

4.5 EC's Intervention

- Dated November 9, 2011
- 9 recommendations provided for MVLWB's consideration in the renewal of the Water Licence
  - Effluent Discharge
  - Adaptive Management Plan
  - Term of Water Licence

EC's Recommendations

- TDS limit: EC recommends that the current whole-lake limit of 350 mg/L (of) remain as a licence limit until additional information is provided by the Proponent, no later than 2013. All other parameters should be regulated such that edge-of-mixing zone concentrations meet the assessed water quality objectives. In addition, Environment Canada also recommends further evaluation of the reverse osmosis treatment option (or any other appropriate treatment system), that would be effective at treating major ions, TDS, and also effective in removing ammonia and nitrate. Such an evaluation should consider all life-cycle costs and benefits of treatment, including an assessment of the risks associated with not treating effluent.

EC's Recommendations

- Nitrate EQC: EC recommends lowering the EQC to 15 (Average Monthly Maximum) and 30 (Grab) mg/L NO3-N; this should be achievable under currently predicted conditions.
- Ammonia EQC: EC recommends setting the EQC for ammonia at 10 mg/L as NH3-N (Grab).]
- Annual Average Loadings for Ammonia and Nitrate: EC requests that DeBeers demonstrate that the licenced loading limits are appropriate given the remodeled discharge quality, and that they are not likely to be harmful if realized in the discharges.

EC's Recommendations

- Phosphorus Loading: EC recommends that ultra-low detection limits be used for analysis of phosphorus in the treated effluent and lake receiving environment. Analysis should include the various forms of dissolved, particulate and organic species of phosphorus, which will also better inform future modeling exercises.
- Sulphate: EC recommends that DeBeers review the sources of sulphate, and determine any steps that can be taken to reduce inputs to the water treatment plant. It is also recommended that DeBeers model future sulphate concentrations in effluent and lake water. A water quality objective for sulphate should be identified that takes into account recent research, guidelines in other jurisdictions, and ambient hardness. At this tim EC recommends sulphate remain a monitored rather than a regulated parameter.

EC's Recommendations

- AEMP Toxicity Test Results: EC recommends that the early life stage bioassay test with rainbow trout *Oncorhynchus mykiss (egg/alevin/fry) be done annually on whole effluent and samples from the edge of* the mixing zone, using Method EPS/1/RM/28
- Adaptive Management Plan/Response Framework: EC recommends that the Water Licence include a condition that requires the Proponent to provide an Adaptive Management Plan (AMP) - Response Framework for AEMP.

EC's Recommendations

- EC recommends a Water Licence term of no longer than 6-8 years.
  - TDS concentrations have increased in Snap Lake at a faster rate than predicted in the EAR
  - Numerous compliance performance issues with improvements needed in operation, reporting and overall environmental management

5. Reviews

- Snap Lake Spill 11-391 and11-398 Monitoring Program
- De Beers Responses to Interventions

Location of Spill 11-391 and 11-398

5.1 Snap Lake Spill 11-391 and11-398 Monitoring Program

- Dated November 17, 2011
  - Prepared by Golder Associates for De Beers
- The seepage resulted from two spills on Ocober 2 and 11 flowed overland to the Snap Lake shoreline and intermittently to Snap Lake itself
- “On the basis of the data from October 2 to October 24, the spills had the potential for a short-term, localized effect on the water quality in the area immediately surrounding the spills in the northwest basin of Snap Lake
- There are insufficient data at this time to evaluate the potential effect on the water quality in Snap Lake should the spills persist.”

Golder's Key Findings (I)

- The spills were not acutely toxic to fish or aquatic life
- There were no risks to humans from drinking the water in Snap Lake
- The total duration and volume of the spills is uncertain; however, the spills likely began sometime between Early September and October 3, 2011
- Site mitigation, such as construction of sumps and pumping water back to containment, reduced flows to Snap Lake
- The spill water contained elevated levels of salts (chloride and sulphate), nutrients (nitrates) as well some metals (aluminum, iron, manganese and nickel) typical of North Pile seepage water quality

Golder's Key Findings (II)

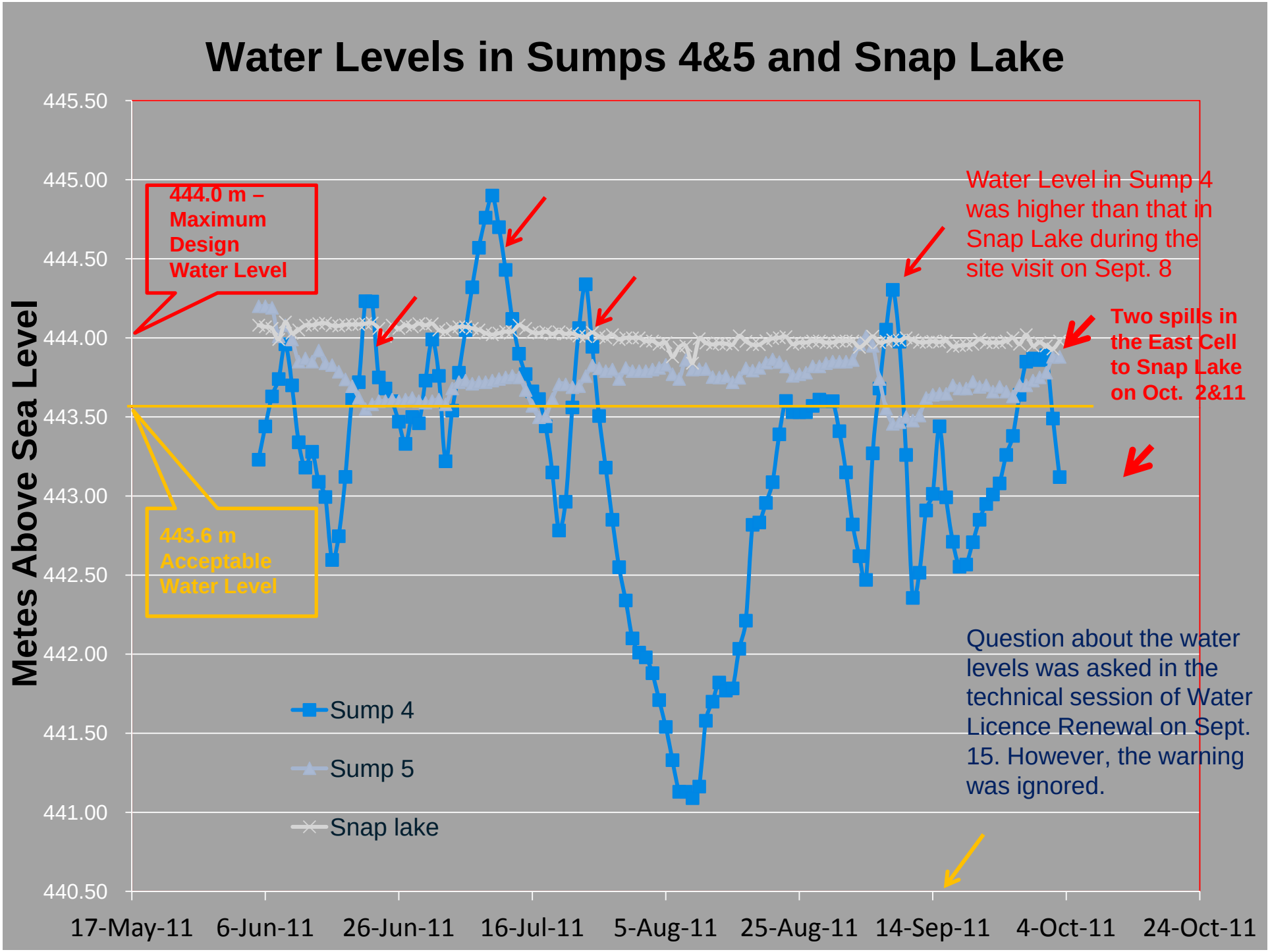
- On the basis of the available data, the release to Snap Lake was generally localized to less than 10 meters from the shoreline of Snap Lake
  - Levels of chloride, fluoride, iron, nitrate, manganese, nickel and chromium at the Snap Lake shoreline were elevated above pre-spill concentrations as well as guidelines for the protection of aquatic life and benchmarks set in the Environmental Assessment Report
  - Most exceedences occurred at the start of the spill and were localized to the shoreline area; very few parameters exceeded guidelines or benchmarks in the later period of the spill monitoring

Golder's Key Findings (III)

- Within 250 meters from the release area, water quality in Snap Lake was similar to pre-spill conditions
- A portion of the spill plume settled in a deeper basin north of the spill location in the northwest arm of Snap Lake; it is unlikely that the plume was wide-spread in the northwest arm of Snap Lake

Comments from the Environmental Analyst (I)

- The report provide great details in the monitoring of post-spills and the analysis of the potential effects
- The spills reaffirm SLEMA's concern about the management systems in place at the mine site, particularly as they pertain to addressing identified and emerging issues
  - Previous examples: Ammonia Nitrate (AN) storage and AN pad reclamation, and malfunctioning diffuser
  - Current example: spills to Snap Lake
- As stated in October 18, 2011 SLEMA letter, "It is SLEMA's opinion that current management practices are reactive; not proactive. This creates unnecessary environmental risk."


Water Levels in Sumps 4&5 and Snap Lake
Metes Above Sea Level
445.50
445.00
444.50
444.00
443.50
443.00
442.50
442.00
441.50
441.00
440.50
17-May-11
6-Jun-11
26-Jun-11
16-Jul-11
5-Aug-11
25-Aug-11
14-Sep-11
4-Oct-11
24-Oct-11
444.0 m – Maximum Design Water Level
443.6 m Acceptable Water Level
Water Level in Sump 4 was higher than that in Snap Lake during the site visit on Sept. 8
Two spills in the East Cell to Snap Lake on Oct. 2&11
Question about the water levels was asked in the technical session of Water Licence Renewal on Sept. 15. However, the warning was ignored.
Sump 4
Sump 5
Snap lake

Water Monitoring Station Bog PS3 North

- Monitoring data in Bog PS3 North indicate that there may have been seepage inflow to the bog around September 10, 2011

Parameter	June 6, 2011	September 10, 2011
Nitrate, mg/L	12.2	157
TDS, mg/L	111	1230

- It may take a few days for the monitoring data to feed back to the mine site and not to provide a timely direction to the site water management
  - Specific conductivity is recommended for daily field monitoring
    - Strong correlation between TDS and Specific Conductivity

Comments from the Environmental Analyst (II)

- Further investigation report (root cause analysis) is required.
- Environmental Management System (EMS) at the mine site has room to improve. The EMS audit reports should be considered as part of the reporting requirement of Water Licence Annual report.
- Current practices of water level control in the East Cell sumps appear to be deficient. Real-time water level control is recommended. It includes, but is not limited to, real-time water level monitoring and related dewatering schedule.

Comments from the Environmental Analyst (II)

- Bog stations between the East Cell and Snap Lake shoreline of the Aquatic Effects Monitoring Program (AEMP) are important for timely seepage control of the East Cell. It is recommended to enhance field monitoring in these stations and add them into the Surveillance Network Program (SNP). Specific conductivity, pH and turbidity should be measured daily if applicable.
- Lessons learned from the spills should be incorporated into an updated Water Management Plan and the Monitoring Response Plan that is being developed.

5.2 De Beers Responses to Interventions

- Dated November 21, 2011
- Responded to the Interventions of North Slave Métis Alliance, Deninu Kué First Nation, Fisheries and Oceans Canada, Environment Canada, and Aboriginal Affairs and Northern Development Canada, and to the submissions of the Snap Lake Environmental Monitoring Agency, and EcoMetrix Incorporated

Brief Summary of Responses to Interventions (I)

- De Beers recommended that the WQOs and EQCs in the water licence remain unchanged and did not recommended the inclusion of WQOs and EQCs proposed by stakeholders
  - The Snap Lake Mine could not continue operating if reverse osmosis were required for the treatment of effluent
- The North Pile is functioning to design
  - No new conditions are required in the water licence to ensure the stability of the North Pile
  - A risk assessment of the North Pile will be completed in 2012, and the Water Management Plan will be updated

Brief Summary of Responses to Interventions (II)

- Adaptive Management Plan will be re-named “Management Response Framework”, and submitted for approval by the end of 2012
- A licence term of 8 years is proposed for reasons similar to those previously provided in the context of a 15 year term
- De Beers agrees with the majority of recommendations made in the DFO intervention

Brief Summary of Responses to Interventions (III)

- De Beers does not agree with AANDC's security estimate of $&5,373,336
  - De Beers submits that the MVLWB should adopt De Beers' security estimate of $49,932,130
  - At this time, De Beers is not requesting that the MVLWB decrease the total land and water-related security amount for the Snap Lake Mine, which is currently set at $60,101,922

De Beers Responses to SLEMA Comments on Water Licence Renewal (I)

SLEMA Comment / Recommendation	De Beers Response
•Add both Chloride and Fluoride into the list of WQOs to be developed, and consider the BC guidelines for Chloride and CCME guideline for Fluoride during the development •Add SNP 02-20 into the list of compliance points	No new or amended Water Quality Objective (WQOs) or Effluent Quality Criteria (EQCs) are required in the water licence at this time
Reactivate SNP 02-03 in the new Water Licence	Agreed
Add DO into the measurement list of SNP 02-17 in the new Water Lincence	Agreed
A clear definition of SNP 02-18 and clarification of the calculation of whole lake average of TDS at SNP 02-18 in the new Water Licence	This is a level of detail which is unnecessary in the water licence. De Beers' response to Information Request #8 clearly describes the detail

De Beers Responses to SLEMA Comments on Water Licence Renewal (II)

SLEMA Comment / Recommendation	De Beers Response
De Beers to assess the changes to the aquatic community of Snap Lake based on the MVEIRB criteria in the AEMP annual reports	Disagreed. Effects should be measured against possible functional changes that could adversely affect the Snap Lake aquatic ecosystem. The MVEIRB standard was based on structure, which, as stated at the technical sessions, is less important than function when it comes to measuring possible adverse effects
More stringent requirements for the North Pile operation, especially monitoring of water level in the sumps and collection ditch, and water pumping from the sumps to the WMP, in the new Water Licence	The current water license provisions are adequate to ensure the ongoing stability of the North Pile. The North Pile is functioning to design. No new conditions are required in the water license to ensure the stability of the North Pile

De Beers Responses to SLEMA Comments on Water Licence Renewal (III)

SLEMA Recommendation	De Beers Response
A special study or risk assessment of the North Pile should be included as a requirement in the new Water Licence	Agreed. De Beers commits to completing this assessment in 2012. A workshop with Communities of Interest could follow to discuss the results of the assessment and De Beers encourages proposals regarding how Traditional Knowledge Holders could participate in this assessment
De Beers to take confirmatory soil samples to demonstrate the success of the cleanup of the historic ammonia nitrate pad, and the MVLWB to consider a term in the water license regarding confirmatory soil sampling for any sites at the mine following reclamation	De Beers does not agree that SLEMA's recommendations are appropriate conditions for a water license. De Beers will be sampling the surrounding environment of the historic ammonia nitrate pad next year. De Beers will do the same for any other sites reclaimed in the future. This is standard practice. De Beers is committed, and legally obligated, to ensuring that spills are effectively remediated
A term of 5 years	A term of 8 years for the new Water Licence

De Beers Responses to SLEMA Comments on Water Licence Renewal (IV)

SLEMA Comment / Recommendation	De Beers Response
A special study of the recently replaced diffuser for the purpose of assessing the performance of the outfall diffuser and the distribution of the diffuser plume in Snap Lake.	Agreed
The submission of electronic raw data for Water Licence Annual Reports and AEMP Annual Reports in Microsoft Excel format.	Agreed
The MVLWB to retain the term or condition about incorporation of Traditional Knowledge into the environmental management.	Agreed

Comments from the Environmental Analyst

- De Beers responses to SLEMA comments are acceptable