

GENERAL INSTRUCTIONS FOR EXCEL TEMPLATE:

1. Do not leave blank rows above or between comments.
2. Do not modify or delete the instructions or the column headings (*i.e.* the grey areas).
3. Each comment must have an associated topic and recommendation.
4. All formatting (*i.e.* bullets) will be lost when this file is uploaded to the Online Comment Table.
5. If necessary, adjust the cell width and height in order to view all text.
6. Cutting and pasting comments from WORD documents cannot include hard returns (spaces between paragraphs).
7. If you would like to create paragraphs within a single cell, please use a proper carriage return (ALT & ENTER).

<u>TOPIC</u>	<u>COMMENT</u>	<u>RECOMMENDATION</u>
<i>Be as specific as you think is appropriate; for example a section or page of the document, a recommendation #, general comment, etc.</i>	<i>Comments should contain all the information needed for the proponent and the Board to understand the rationale for the accompanying recommendation.</i>	<i>Recommendations can be for the proponent or for the Board. Recommendations should be as specific as possible, relating the issues raised in the "comment" column to an action that you believe is necessary.</i>
Section 2.1, pages 4 to 5, non-essential buildings	A list of select non-essential buildings to be decommissioned is provided, but no figures showing the buildings' location are presented.	It will be helpful to provide figures of buildings location for reviewers to understand the decommissioning shedule.
Section 2.1, page 5, decommissioning vs. removal	It is noticed that process complex is listed as non-essential building. It is also stated that "removal of non-essential buildings is a typical progressive reclamation activity". Will the process complex be put to sleep or removed from the Mine? "Removal" is used interchangeably as "Decommissioning" in the report. However, there appear to be different ways of disposing of buildings for decommissioning, as described in the Snap Lake Mine 2017 Community Update (page 4), "(N)on-essential infrastructure and services will be secured and "put to sleep" or modified to conserve energy and maintenance requirements. Any infrastructure that will deteriorate over time will be removed from the Mine".	For the list of non-essential buildings, it will be helpful to clarify what will be secured and put to sleep, what will be modified to conserve energy and maintenance requirements, and what else will be removed from the Mine. It will be even better to visualize them as De Beers did for the Snap Lake Mine Closure Sequence in the Snap Lake Mine 2017 Community Update (pages 35 to 50).

Appendix I, Closure Criteria, page 21, in general	Slater Environmental Consulting (SEC) reviewed the closure criteria for the Diavik Diamond Mine on behalf of the Environmental Monitoring Advisory Board (EMAB). The following link is SEC's review document for De Beers' reference. https://www.emab.ca/sites/default/files/16-06-15-ddmi-closure-criteria-review-emabv2.pdf	The review approach SEC adopted and some specific comments SEC made, in SLEMA's opinion, may also apply to the review of the Snap Lake Mine's closure criteria. It is recommended that De Beers take efforts to answer the following review questions while refining the closure criteria for the coming ICRP Update due in January 2018: 1. Effective Indicators: For each objective, do the criteria rely on indicators that are relevant for evaluating the desired outcome, and are there indicators to address all important facets of the desired outcome? 2. Measurable: Is the performance of indicators measurable, and can results be verified independently? 3. Thresholds: Do the criteria for each objective establish thresholds that define acceptable performance conditions for the closure objective and its associated valued components? 4. Timely Response: Will monitoring of performance with respect to closure criteria allow for timely response to any failure to achieve closure objectives?
Appendix 1, Closure Criteria	Physical Stability Criteria for Site Wide (SW) Objectives 2 and 4, North Pile (NP) Objectives 1 and 2, Underground (UG) Objective3, and Infrastructure (I) Objectives 2 and 3 are related to design, construction or inspection by a professional engineer. Chemical Stability Criterion for SW1 and Physical Stability Criterion I2 refer to the post-closure wildlife risk assessment by a qualified person. These proposed criteria are important monitoring methods, but they appear not to define what conditions must be met.	It is recommended that De Beers propose more specific and clear criteria for closure performance. If the description (inspection/assessment) listed in the Appendix I is inevitable, references are requested for the evaluation criteria used by the qualified person or professional engineer in their assessment or inspection.
Appendix I, Closure Criteria, page 23	Chemical Stability Criterion for SW3 is said to be proposed at a future date. However, the site-specific objectives for in-lake water quality were well discussed during the Water Licence Amendment Application Processes (Dec 2013 and Nov 2014).	The SSWQOs described in the Water Licence Amendment Decision by the MVLWB could be considered. In addition, no acute and chronic toxicity for specific aquatic life should be considered for SW3 during the closure criteria refinement process.

[illegible]