



July 8, 2019

Gord Macdonald  
Diavik Diamond Mines Inc.  
5007-50<sup>th</sup> Avenue  
P.O. Box 2498  
Yellowknife, NT, X1A 2P8

Re: Review of the Draft 2018 Environmental Agreement Annual Report

Dear Gord,

The Environmental Monitoring Advisory Board (EMAB) wishes to thank Diavik Diamond Mines Inc. (2012) (hereafter referred to as Diavik) for the opportunity to review the Draft 2018 Environmental Agreement Annual Report (Report) and submit the following comments.

EMAB reviewed the Draft Report in terms of how adequately the commitments from the Environmental Agreement (EA) were addressed. EMAB is satisfied with this Report's continued improvement in quality and Diavik's effort to address our comments from previous years, but would like to draw your attention to the following as they relate to the EA:

#### **General Comment**

The plain language aspect of the Report is good. However, the Report could use a proof-read, which would make some sections more clear.

- Some examples:
  - Formatting between pages 52-55 seems off.
  - Typo (.97) at end of last paragraph on page 11.
  - Top of page 26 – (midges) seems to be inserted in the wrong part of the sentence

#### **Operational Activities and Compliance**

In accordance with the EA section 12.1 (c) v, Diavik should include a comprehensive summary of operational activities planned for next year.

#### **Environmental Monitoring Programs**

The bottom axes on Figure 8 do not line up. The age categories are not aligned with the bars on the graph, making it unclear what age each fish is.

The Caribou Behaviour section states that Diavik works with Ekati to collect and share caribou observation data. Please note how yearly analysis of behavioural data has been affected by data compatibility issues.

The Caribou Behaviour section states that there are insufficient numbers of group observations to detect a 15% change in behaviour. The section states 56 caribou groups were observed near the mine and 4 groups were observed far from the mine. Please include a summary of the numbers of near-mine and far-from-mine groups observed between 2011-2018. Additionally, the Report should include that insufficient collection of far-from-mine behaviour data was the limiting factor. An explanation of the logistical difficulties in collecting far-from-mine data could also be included.



The Grizzly Bear section and the Executive Summary seem to interchange the phrases 'stable and increasing' and 'stable or increasing', regarding grizzly populations. These two statements imply different things. It is unclear if the grizzly bear population has remained the same, or if it is increasing.

### **Traditional Knowledge**

The TK section of the Report and Appendix III lists the TK panel recommendations, but it does not include Diavik's responses to the recommendations. Diavik should include their responses.

### **Summary of Public Concerns and Responses to Public Concerns**

In accordance with the EA section 12.1 (c) x, Diavik should include comments of public concerns and Diavik's responses, in addition to listing community engagement events.

We trust these comments are useful and encourage you to give them full consideration. If you require further information, please contact John McCullum at the EMAB office.

Sincerely,

Charlie Catholique  
Vice Chair

Cc      EMAB members (by email)  
         EMAB alternates (by email)  
         EMAB Parties (by email)  
         Kofi Boa-Antwi, Diavik (by email)