



Independent Environmental Monitoring Agency

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Claudine Lee
Superintendent – Environmental Operations
EKATI Diamond Mine
BHP Billiton
1102 4920 52nd Street
Yellowknife NT X1A 3T1

Dear Claudine

Comments on NWT Wildlife Research Permit Application for 2012 Wildlife Monitoring Program at Ekati

Thank you for the opportunity to comment on BBCI's (BHP Billiton Canada Inc.) application for a Wildlife Research Permit (WRP) for the 2012-13 Ekati Wildlife Effects Monitoring Program (WEMP). The Agency was aware of most of the surveys proposed for 2012-13. However, we have the following comments on two of the monitoring programs:

- Remote cameras: The use of remote cameras is an interesting initiative that could potentially produce valuable information to feed into monitoring and mitigation. However, to date we have not seen a detailed proposal or study methodology, nor the results from 2011, and are unclear of the objectives of the program. Thus it is not clear how the cameras will “replace aerial ... surveys as a mechanism for onsite monitoring of caribou”. It is therefore difficult to comment on the initiative. Although we had some good discussions about the cameras during a recent site visit, we still look forward to the report on the remote camera program and its findings.
- Aerial surveys: We applaud BBCI and Diavik for apparently reinitiating the aerial caribou surveys in 2012, which provide information on the abundance and distribution of caribou relative to mine infrastructure. However, details such as survey frequency (“during the 2012 WEMP period” is a bit cryptic), study area size, and transect pattern are not provided in the WRP, thus it is impossible to determine whether the former design and methodology will be used. The WRP is somewhat equivocal in wording – the reference to a pending review of the combined aerial survey data and the need for further investigations in 2012 seem

to suggest that the aerial surveys may not start this summer. Again, difficult to comment on without the details as noted above.

We suggest that BBCI should consider providing more advanced notice of changes to the WEMP; this would provide more lead time and greater dialogue with communities, regulators and the Agency. These could be presented in the previous years' WEMP or as a notice earlier in the year. We reiterate an earlier suggestion we have made to schedule a regular review of the WEMP program, perhaps at a three-year interval.

Sincerely,

A handwritten signature in black ink, appearing to read "W. A. Ross". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Bill Ross
Chairperson

cc. Society Members

Nicole McCutcheon, GNWT-Environment and Natural Resources
Karin Clark, Wek'eezhii Renewable Resources Board
Mark Fenwick, Environmental Monitoring Advisory Board
David White, Snap Lake Environmental Monitoring Agency