

Reviewers comments on the "Draft WWHPP and WEMP Guidelines" (Comments from IEMA)

Please return completed comment sheet to kate_witherly@gov.nt.ca by **January 30, 2015**

Reviewer Name and Organization: _____

<u>Topic</u>	<u>Page number</u>	<u>Section and/or Line Number</u>	<u>Comment</u>	<u>Recommendation</u>
Please indicate generally or what part of the document (e.g. guidelines, Appendices, or general comment) the comment is in reference to.	Please provide just the page number (or the first page number, if commenting on a range)	Please provide the section and/or line number (s) that your comment is in reference to.	Comments should provide sufficient information so that GNWT can understand the rationale for the comment and should be specific to the "Draft WWHPP and WEMP Guidelines" and supporting documents.	Recommendations should directly address the comment and be specific to the "Draft WWHPP and WEMP Guidelines" and supporting documents.
Applicability of the Guidelines to Existing Mines	Pages 6-7, 9, 13		It is not clear whether the Guidelines will be applied to existing mines, including the Ekati Mine. It is also not clear how the Guidelines would be applied to existing WEMPs or other wildlife management plans for an existing operation. The Guidelines appear to have been prepared to assist developers proposing new, greenfield projects but there seems to be no consideration how they would be applied to existing operations and updates ore revision cycles. It is the position of the Agency that the Guidelines should explicitly apply to existing operations such as the Ekati Mine.	ENR should make explicit statements that the Guidelines will apply to existing operations and how this would occur. For example, by specifying a regular review and update cycle requirement for wildlife management plans and monitoring programs for existing operations, that would require the use of the Guidelines within a specified timeframe.

WEMP Definition	Page 12	415	Typographical error in this line as there is no "Appendix 6". It should probably read "Appendix 3".	ENR should correct this error.
Descriptions of Projects	Page 13	422-423	It is not clear what the relationship is between the Guidelines and the regulations that are yet to be developed.	ENR should clarify what the relationship is between these Guidelines and the regulations to come. Will the Guidelines be mentioned in the regulations? Will the Guidelines need to be changed in light of the regulations?
Comparison of WWHPP and WEMP	Page 9	section 2	It would be very helpful if there were a table in this part of the text to compare and contrast the WWHPP and WEMP in terms of scales, scope, focus, and other factors.	ENR should include a comparative table to better explain the differences between the WWHPP and WEMP.
Comparison of WWHPP and WEMP	Pages 9-11	section 2	Both the WWHPP and the WEMP deal with monitoring of mitigation measures ("A WWHPP should clearly demonstrate how wildlife measures and proponent commitments will be implemented and how implementation (of mitigation) will be monitored", and "The WEMP will test impact predictions or the effectiveness of mitigation techniques"). The WEMP is supposed to encompass effects monitoring at a larger spatial scale, but impact predictions don't all deal with just one scale and sometimes overlap between local and larger scales. Greater clarity and further examples of the types of monitoring that each document covers would be helpful.	ENR should provide greater clarity on how the two documents address monitoring of mitigation measures, and should provide more example of which type of monitoring fits into each envelope.
Purpose of the Guidelines	Page 6	section 1.2	Although the stated purpose of the Guidelines is "to provide guidance to proponents", the ultimate or higher purpose is really to protect wildlife and wildlife habitat.	ENR should include the ultimate or higher purpose of the Guidelines, which is to presumably protect, preserve and enhance wildlife and wildlife habitat.

Study Area Definitions	Page 5	110-121	<p>The idea of LSAs and RSAs is, in principle, a sound one but the study areas must be different for different Valued Components. The RSA for a very local species would need to be different from that for the Bathurst herd, for example. Moreover, study areas tend to get defined by consultants or proponents and are often different from what the EIA regulators (panels, Review Boards and the like) would have directed. Study areas do not get determined by key decision makers and hence may not be defensible. Relying on these study areas "usually defined during the environmental assessment of a project" may not be wise. Determining the study area(s) for WEMPs and WWHPPs should be done by GNWT at the time of approving them.</p>	<p>GNWT should accept responsibility for making decisions around the selection of study areas and should indicate as much in this document.</p>
WEMP Definition	Page 11-12	section 2.2	<p>There does not appear to be anything in this section where GNWT may direct or require specific monitoring methods. In the interest of regional monitoring programs, and species management or ecosystem sustainability, GNWT may wish to direct how monitoring should be carried out to ensure compatibility of data and regional analysis. This is clearly the responsibility of GNWT and consistent with the current efforts to provide guidelines for wildlife monitoring by the diamond mines.</p>	<p>GNWT should clarify that it may require consistency in WEMPs or specific monitoring and analytical methods to assist with regional assessment and management.</p>

Adaptive Management in the WEMP	Page 12	396-402	Point 10 on page 12 refers to principles of adaptive management. It should probably also include mention of the importance of getting results in a timely manner so that any necessary adaptations can be implemented in time. Early warning indicators are very important in terms of avoiding significant effects.	GNWT should include mention of early warning indicators and the importance of getting results early enough to make changes, in the description of adaptive management.
Purpose of Monitoring	Page 11-12	section 2.2	Monitoring programs required for development projects should be to get more information about effects that meet both of the following requirements: (a) there is uncertainty and (b) the effect is potentially important (significant). We did not find this simple (but important) principle espoused in the document. This follows the related principle that required monitoring programs should be about getting information needed for management purposes.	GNWT should add that WEMP efforts should focus on areas of uncertainty where the effects are potentially significant.
Data Storage, Management and Public Availability	Page 24	section 4.2	For WEMPs, data storage and management is mentioned in section 4 on page 24, but suggests that public availability is up to each proponent. It is not clear where the raw data from wildlife monitoring should actually go and where it might be compiled for regional assessment and management. This is most likely the responsibility of GNWT, which should also make the data publicly available unless there is some reason not to (e.g., species at risk or where illegal harvesting is a concern). This also needs to be coupled with providing the data in a suitable form, not just in numbers in a report.	GNWT should clarify its role with regard to wildlife monitoring data, management and public availability of such data. GNWT may also wish to consider establishing standards for such data that could extend to monitoring methods to ensure consistency and compatibility.