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February 17, 2010

Grant Pryznyk
Interim Chair
Wek'eezhii Renewable Resources Board
Yellowknife Office
102A 4504-49th Avenue
Yellowknife, NT
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Dear Mr. Pryznyk

Please consider this letter as a letter of comment for the upcoming public hearing on the Joint Caribou Management Proposal. We have noted that the goals of the proposal include “to identify monitoring of the herd’s welfare and the effectiveness of recovery actions” and that:

The Diamond Mines’ Wildlife and Environment Monitoring programs (WEMP) will be redesigned to adjust for results and findings acquired through several years of data collection and new proposed monitoring will be presented to the Tl’ichô government and communities for their inputs.

The diamond mine monitoring bodies have participated in the review of the diamond mine wildlife effects monitoring program by attending meetings and a large workshop, and by providing follow-up correspondence (see the attached joint letter as an example of our contribution to date). We also interact with the companies on a regular basis to discuss wildlife issues.

The only written response to date after the September 2009 workshop is a December 17, 2009 joint letter from BHP Billiton and Diavik announcing the suspension of the aerial survey program for caribou for 2010 around the Ekati and Diavik mine sites and a further February 11, 2010 letter from BHPB on its 2010 wildlife monitoring programs. The letters offer a vague assurance to “working cooperatively with the Agencies, communities and Government to review impact predictions, objectives and methodologies for monitoring the influence of mining activities on caribou”. We have not been informed of any further plans, schedules or studies to restart this important work.

While the Joint Caribou Management Proposal contains a number of important proposals for your consideration, it is equally important that we better understand the effects of the diamond mines on caribou so that appropriate steps can be taken to mitigate the effects and reduce the size and magnitude of their respective zones of influence. If we understand what causes the avoidance we can better design and implement measures to reduce footprints and the stresses on the Bathurst caribou. This understanding can be gained by reanalyzing the currently collected caribou distribution data to look for trends through time and space that may be related to changes in mining activities. It will also be important to redesign behavioural studies so we better understand how caribou react to mine infrastructure and how to mitigate any adverse effects through better mine design.

We are concerned that the current monitoring programs need to be made more compatible and help contribute useful data to the cumulative effects monitoring and management efforts in the area and for future development. We recognize that this is a shared responsibility and request that GNWT take on a stronger coordination role as the regulator for the wildlife research activities carried out by the mines. The diamond mines can also improve their performance by better coordinating their respective monitoring and management in relation to caribou for all three diamond mines, and properly engaging all interested parties in a timely fashion. Caribou monitoring and management of diamond mine effects should simply become more of a priority for the government and the companies.

We are prepared to assist in this ongoing process and look forward to guidance from your Board in this important effort to protect and preserve caribou for future generations.

Sincerely,



Bill Ross
IEMA

Doug Crossley
EMAB

Rachel Crapeau
SLEMA

- cc. IEMA Society Members
EMAB members
Parties to the Environmental Agreement for the Diavik Diamond Project
Lindsay Cymbalisky, INAC
Dave Abernethy, BHP Billiton Diamonds
Colleen English, Diavik Diamond Mines
Dee McCallum, De Beers Canada