



INDEPENDENT ENVIRONMENTAL MONITORING AGENCY

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December 16, 2010

Karl Schubert
Manager—Health, Safety, Environment and Community
BHP Billiton Canada Inc.
#1102, 4920 52nd Street
Yellowknife NT
X1A 3T1

Dear Karl

Re: Ekati Wildlife Monitoring and Management

The Agency has been engaged in the Diamond Mine Wildlife Monitoring Program Review since this initiative began in December 2008. While we have supported the efforts to make the wildlife monitoring and management programs coordinated and cost-effective, we also appreciate that there is no defined process for reviewing these matters for one mine, let alone three working together. However, we are becoming increasingly concerned about the slippage and lack of progress of this review.

We participated in what we thought was a useful technical session on June 28, 2010 where consensus appeared to be reached on modifying and improving objectives for a number of the wildlife monitoring programs, with some examination of methods to achieve the new focus. While the companies would not commit to accepting these new ideas, there was a commitment to bring them forward to an inclusive workshop that took place on October 5-6, 2010 where community representatives would play a prominent role.

It was our impression that the October workshop did little to move forward any changes or improvements to wildlife monitoring and management, other than some helpful comments and suggestions on how Traditional Knowledge might be used as an additional source of information. The results and recommendations from the June workshop were not discussed in any meaningful way and we have no idea what BHPB or the other companies intend to do in response to the work to date.

A report from the October workshop has not been released. We understand that it may be close. We urge you and the other diamond mines not just to release this report but to respond to the June and October workshop recommendations. We are very concerned that we and others will not be informed about any further changes to the Ekati wildlife monitoring program until we see the wildlife research permit application, likely early in 2011. We believe the research permit review is not an



appropriate mechanism to inform the Agency and others of how BHPB intends to respond to the aforementioned workshops.

We recommend to you that BHPB, and the other companies if possible, respond as soon as possible to all the recommendations from the June and October 2010 workshops. We will be looking for specific responses to the following:

- Revised monitoring program objectives for a number of species including caribou, grizzly bears, raptors, and others;
- Wolverine hair snagging and DNA analysis program descriptions that cover frequency, duration and coverage;
- Grizzly bear hair snagging and DNA analysis program descriptions that cover frequency, duration and coverage;
- Proposed caribou behavioural and other monitoring programs in lieu of the halt to the aerial surveys, and a concrete plan for when aerial surveys may be re-instated; and
- Proposed objectives and methodology to identify mechanisms and plans for better identifying the cause of the Zone of Influence in caribou (leading to more effective mitigation).

With the many changes that have taken place over the last couple of years with the Ekati wildlife monitoring programs, it is time for BHPB to revise its wildlife management plan. This should ensure that to that the wildlife monitoring programs are properly documented now and into the future.

We look forward to your response to our recommendations.

Sincerely,



Bill Ross
Chairperson

cc. Society Members

Colleen English, Diavik Diamond Mines Inc.
Jason Asch, DeBeers Snap Lake
Susan Fleck, GNWT Environment and Natural Resources
Doug Crossley, Environmental Monitoring Advisory Board
Johnny Weyallon, Snap Lake Environmental Monitoring Agency
Grant Pryznyk, Wek'eezhii Renewable Resource Board