

Snap Lake Environmental Monitoring Agency



COMMENTS FROM THE SLEMA SCIENCE PANEL ON THE WILDLIFE SAFETY PLAN

February 2007

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WILDIFE SAFETY PLAN COMMENTS:

Overall comment: Given the Plan's goal is based on EA Article VI Section 6.3f, the document structure should more closely fit the EA's specific requirements – for example there should be a heading – Caribou Protection Plan (which should include more than just herding caribou). The Plan reads as a generic plan with no specific reference to Snap Lake site's particular characteristics; MVEIRB's specific recommendations and what has been learnt from wildlife management at the other diamond mines.

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“The Environmental Agreement requires that a Wildlife Management Plan be developed for the Project. “

1. Comment: Given that the EA specifies a Wildlife Management Plan, it seems a 'spin' to change the plan name from management to safety – the two words are not interchangeable. Throughout the document 'management' is used.

“The overall objective of the Wildlife Safety Plan is to meet the requirements of Article VI, Section 6.3f in the Environmental Agreement. To achieve that goal this document will:”

2. Comment: The document should explain what the EA states so the reader can see what the goal is and how it relates to the objectives. And incidentally, an overall objective is not the same as a goal – the above quote uses them interchangeably which is wrong.

3. Comment: The objectives should be numbered (easier to refer to through the report) and need some re-wording. For example objectives should be measurable – so what does “address” really mean? (first objective) Or what does “highlight” mean for an objective?

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4. Comment: Given how specific Article VI Section 6.3f is (as given in the Section 1.2.2 Scope), the objectives should be re-worded to more closely related to them.

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“but most impacts and associated adaptive management strategies for caribou are also applicable to many wildlife species in the area. Therefore, impacts and mitigation strategies for caribou protection also apply to other species. Caribou are not mentioned specifically in this document unless an impact or adaptive management strategy applies solely to caribou.”

5. Comment: Given the importance of caribou to Aboriginal people and that most other medium or large-bodied wildlife species at Snap Lake are carnivores (thus a very different suite of management and mitigation practices), so it is unhelpful to restrict mentions of caribou. It also seems at odds with MVEIRB's requirement for a Caribou Protection Plan which does suggest an emphasis on caribou based on the levels of concerns raised during the hearings.

6. Comment: The list of potential effects should include effects on wildlife health as well as mortality.

Page 11 Section 3.1 Facilities

7. Comment: How will the wildlife corridors be made functional and how will they be located? How will De Beers use elders to help them design the corridors.

Page 11 Section 3.2 Roads

8. Comment: Given aboriginal concerns raised during the hearings, it seems a deficiency that mitigation actions for the roads do not include stipulations about the road surface and shoulders – types of materials should reduce chance of foot and leg injuries. More details need to be created on mitigation for ice road berm heights. Use of data from the Misery Lake project should be used as a guide for berm heights.

Page 16 Caribou herding

9. Comment: It is not clear how the herding is scaled according to how many caribou are involved – there is a big difference between moving a few versus a few thousand. The management plan should clarify how the herding will be scaled and what methods will be used. Why will bedded be caribou moved unless there is traffic or aircraft present – sounds like unnecessary herding?

How will caribou be moved out of fenced areas? Will the fenced areas be designed (type of corners and gate placement with caribou removal in mind?) Which fenced areas (waste transfer and water management pond – what about the tailings?).

Why no reference to BHP's experience – that herding was ineffective at the airstrip and they use an electric fence?

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10. Comment: What are the dust control measures besides water on the roads? Why is the experience at other mines (for example, Cominico's Red Dog mine) on dust sources and management not included?

Page 20 Section 5 On-site education

Comment: This section should refer to the need to show 'respect' for wildlife and De Beers should consider involving aboriginal elders in the education of Snap Lake staff to help with explaining the need for respect.