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Gordon Lennie
Chairperson
Mackenzie Valley Environmental Impact Review Board
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August 2, 2001

Dear Mr. Lennie,

World Wildlife Fund Canada (WWF) is providing comments on the draft Terms of Reference and Work Plan for the Environmental Assessment of the De Beers Canada Mining Inc. Snap Lake Diamond Project (TOR). The TOR appears to outline many areas for review with respect to mitigation of potential environmental impacts. Our other northern environmental partners are in a better position to identify gaps to reduce the environmental impact of project implementation, and we would recommend an extension of the August 3rd deadline for comments on the TOR in order to allow sufficient time to respond accordingly. However, there are clear gaps related to up-front conservation planning and the identification of appropriate benchmarks. Our comments focus on the need for the environmental assessment (EA) to take a broader, regional perspective in the absence of regional planning in the North Slave.

Furthermore, one of the most significant policy changes in the NWT following the development of the BHP Ekati diamond mine, and in the wake of the federal environmental assessment of that project, is the approval of the Protected Areas Strategy by the territorial and federal governments. We consider the absence of a reference to this policy in the ToR to be a significant oversight. I would also point out that there is a need to ensure an Environmental Agreement, as is the case with both BHP and DIAVIK.

And to repeat what we have said to the federal and territorial governments, WWF is not prepared to sit back and watch government or industry accelerate development within the NWT without giving equal support for the various environmental issues, including the identification and withdrawal of designated protected area as part of a planned network.

World Wildlife Fund Canada's Arctic Program

Safeguard healthy habitat for key Arctic wildlife species, through partnerships with regional governments and local communities, to achieve mutually supported new protected area networks, species management and recovery plans, and pollution reduction.

President: Monte Hummel

Registered as:
World Wildlife Fund Canada



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Thank you, in advance, for considering our comments.

Best regards,

A handwritten signature in black ink that reads "William Carpenter". The signature is written in a cursive, flowing style.

William (Bill) Carpenter
Regional Conservation Director, NWT
WWF-Canada

Cc

Pete Ewins, Director, Arctic Program, WWF-Canada;
CPAWS-NWT



Comments on the
Draft Terms of Reference for the Environmental Assessment
of the De Beers Canada Mining Inc. Snap Lake Diamond Project, NWT
Submitted by WWF-Canada, August 2, 2001

Regional Perspective

A regional perspective does not appear to be required in Section 5.5 (Environmental Assessment Methodology) of the TOR. Furthermore, Section 5.5.3 (Spatial Boundaries) notes that the developer is not required to provide a comprehensive baseline description of the environment. This would be appropriate if a completed environmental background study at the region scale (i.e. 10^4 to 10^5 square kilometers) provided an evaluation of baseline conditions and/or recommended land use categories from "no go" to "go" areas for development. In the absence of a regional land use plan undertaken in the claimant area that includes the identification of ecological benchmarks as a reference for baseline conditions, the onus is on the developer to ensure that the opportunity to identify and secure ecological benchmarks is not lost, in relation to the scope of the development project. A regional approach is required since this is a major development proposal with potential environmental impacts that extend beyond the mine site.

WWF recommends that Section 5.5.3 (Spatial Boundaries) of the ToR be amended to include direction to 1) provide an evaluation over a sufficiently broad geographic scope to confidently provide an assessment of environmental impact at the region scale, and 2) ensure that opportunities to identify ecological benchmarks as references for baseline conditions are not lost as a result of the development proposal. WWF proposes that the ToR refer to the ecoregion framework endorsed by the NWT Protected Areas Strategy (PAS) to provide the region scale. At a minimum, this includes an adequate assessment of the baseline conditions in the ecoregion where the proposed development is situated, and should consider extending the baseline evaluation to ecoregions impacted by activities in support of the mining project, such as road use and development. The proposed Snap Lake Diamond Project lies in the Coppermine River Upland ecoregion in the terrestrial ecoregion framework endorsed by the NWT government.

Ecologically Representative Areas and Benchmarks

The identification of ecologically representative areas is required for any adequate monitoring of impacts at a regional scale. These areas, withdrawn from developments that pose direct ecological impacts, are ecological benchmarks to monitor regional land use and assess cumulative impacts. The identification of ecologically representative areas should overlap sites of high conservation value, including sources of natural capital and critical wildlife habitat where wildlife build their numbers or improve their health.



WWF recommends that the TOR include specific reference to the identification of ecologically representative areas in Section 5.6.6 (Wildlife and Wildlife Habitat) and in Section 5.7.2 (Land and Resource Use). A specific reference to ecologically representative areas in the latter section should also be accompanied by a note that the community-based, NWT PAS is the policy mechanism for securing these sites.

Cumulative Infrastructure Development and Impact

There is a growing scientific literature on the ecological impact of cumulative infrastructure development. A recent example of cumulative impact analysis and forecasting in the Arctic is the Globio project undertaken by the United Nations Environment Programme, GRID-Arendal (<http://www.grida.no/prog/polar/globio/>). Ignoring forecasting models of cumulative impacts by constraining the EA to consider “developments within the regulatory process on the day these Terms of Reference are issues” as stated in Section 5.9 (Cumulative Impact) constitutes a significant gap in the proposed evaluation.

WWF recommends that Section 5.9 (Cumulative Impact) explicitly include a requirement to consider existing forecasting models of cumulative infrastructure development, where such models are available and can be calibrated to the regional ecosystem encompassing the proposed development.