

Reviewer Comments and Proponent Responses

Project: Pine Point Mining Ltd. - Confirmation and Exploration Program
 Board: GNWT - ECC
 Proponent: Pine Point Mining Limited

File Number: MV2020C0017
 Review Comments Due: September 13, 2024
 Proponent Responses Due: October 14, 2024

No.	Topic	Reviewer Comment	Reviewer Recommendation	GNWT Response
Denínu Kúę First Nation (DKFN) - Dr. Marc d'Entremont				
1	Cover Page	Submission date of July 11, 2024	<p>The WMMP does not stipulate the timeframe when the annual report must be submitted. This is an oversight in the plan. Submission of the annual report >6 months after the conclusion of the annual wildlife management and monitoring activities creates a highly inefficient framework where recommendations to modify the plan, based on the annual results (in this case 2023), would only be implemented one year or more after the end of the report year. We recommend the WMMP annual reports be submitted by March 31 of the subsequent year to allow a timely review and the imposition of recommendations during the subsequent year.</p> <p>We made a similar recommendation on the 2022 report, which PPML responded by stating "PPML will endeavour to provide the annual reports by March 31 of each year." This clearly did not happen. We request a response from both PPML and the GNWT on this recommendation.</p>	GNWT agrees with DKFN's recommendation that PPML provide annual WMMP reports by March 31 of the following calendar year. If PPML is unable to meet that deadline in a given year, GNWT requests that PPML provide advanced notice and an estimated date for when the annual report will be provided instead.

2	Appendix II	Clearing surveys completed	<p>The inclusion of the Caribou Biophysical Attributes, recorded as Yes or No to indicate presense, in the results of the clearing surveys is questionable. There are several instances where lichens and pine forest were documented as habitat, but were not identified as caribou biophysical attributes.</p> <p>It is worth noting that in the Recovery Strategy for Woodland Caribou, Boreal Population, critical habitat includes biophysical attributes required by boreal caribou to carry out life processes. These biophysical attributes are partly described as open coniferous forests (black spruce and pine) that provide adequate cover with abundant lichens.</p> <p>Members of the DKFN, including its technical support and subject matter expert, have directly observed drilling and clearing activities within highly suitable boreal caribou habitat around the Pine Point property. It appears that PPML has understated the quality and value of these habitats. As previously mentioned in DKFN's comments on the WMMP, we recommend PPML, MVLWB, GNWT, DKFN and other Indigenous groups work together to understand the structure and function of the local boreal caribou population (and its habitat) before more habitat is altered by the proposed mine-related activities (which includes exploration).</p>	<p>GNWT staff from the Department of Environment and Climate Change (ECC) corresponded and met with PPML and their consultants (WSP) on several occasions in fall 2023 and early winter 2024 to discuss plans to collaborate on an aerial boreal caribou abundance survey to take place in the Pine Point area in February 2024 to provide additional baseline information in support of the Environmental Assessment for the proposed mine project (EA2021-01). Note that this survey would be additional to GNWT-ECC's ongoing collar-based monitoring of boreal caribou in the Pine Point area.</p> <p>Unfortunately, due to limited availability of aircraft and poor snow conditions in the South Slave region in winter 2024, PPML decided to postpone the survey until winter 2024/25. GNWT-ECC and PPML have not had further meetings to discuss plans for re-attempting the survey this coming winter. GNWT encourages PPML to share information and seek feedback from DKFN and other Indigenous governments and Indigenous organizations in the region about the proposed boreal caribou abundance survey through the required Wildlife Research Permitting process.</p>
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			We request a response from both PPML and the GNWT on this recommendation.	
3	2.3.3 Collar Locations with Cautionary Zones	Caribou reporting	<p>We recommend more detailed reporting in this section. It is preferable to see the maps of collar location and the corresponding drilling activities.</p> <p>From the current reporting, it is unclear if the maps of collar locations were provided daily, weekly or monthly. We also note that drilling occurred in January, February, March, April and May, prior to receiving maps of collar locations from ECC (June 21, 2023), which unfortunately overlooked the critical later winter, pre-calving and calving periods. For these types of measures to be effective there must be timing coordination of information.</p> <p>We request a response from both PPML and the GNWT on this recommendation and our comments.</p>	<p>As noted in GNWT's comment #3 to PPML on the 2023 annual WMMP report, GNWT-ECC started sending boreal caribou collar location maps to PPML on February 15, 2023, and every 2 days thereafter (143 maps were sent to PPML by ECC in total). GNWT also used the list of drilling locations and start/end dates provided in Appendix 1 of the 2023 annual WMMP report to compare against the collar data maps to verify PPML's statement that "none of the collar locations indicated a caribou presence within the 2km cautionary zone during the time that activities were planned and none of the clearing surveys observed a caribou."</p> <p>GNWT has attached a map of the drilling locations for 2023 provided by PPML in the annual report as well as the location of exploration areas provided to GNWT by PPML for inclusion on the collar data maps. GNWT has also attached an example of the collar data maps that it provides to PPML every 2 days. The example map is from September 13, 2023.</p>
4	2.3.4 Unpredicted Disturbances to Wildlife Habitat	Two areas, east and west of the existing Tailings Management Facility (referred to as TMFE and TMFW), were not predicted when the WMMP was prepared.	<p>We request maps of these two areas. We can confirm that the TMFE area (i.e., those drilling holes labeled as TSFE in Appendix I) are within highly suitable boreal caribou habitat. As mentioned in the previous comments, we recommend timely engagement and communication occur with the DKFN, MVLWB, GNWT, and other Indigenous groups to ensure PPML fully understands the structure and function of boreal caribou habitat, prior to undertaking these destructive</p>	<p>See GNWT's responses to DKFN #2 and #3.</p> <p>GNWT expects PPML to provide the maps of the two areas requested by DKFN.</p>

			activities. We request a response from both PPML and the GNWT on this recommendation.	
No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Environment and Climate Change Canada (ECCC) - Mrs. Stephinie Mallon				
1	ECCC Cover Letter	ECCC Cover Letter	N/A	
2	Topic: Whooping crane Aerial Surveys: Adjustments Made for Caribou Calving Areas and Resulting Reliability of Data Collected References: - 2023 Annual Wildlife Management and Monitoring Plan Report, July 11, 2023	The '2023 Whooping Crane Aerial Survey Field Summary Memo', dated July 5, 2023, included in the 2023 Annual Wildlife Management and Monitoring Plan (WMMP) report, indicates that there is a procedure for deciding to fly/not fly over whooping crane transects that are influenced by caribou and their calving grounds. It is unclear if any adjustments to survey protocols were needed due to caribou encounters.	ECCC recommends that the Proponent clarify if their whooping crane survey protocol was adjusted for caribou presence in 2023. ECCC further recommends that the Proponent comment on the implications to, and confidence in, the data collected, and if adjustments must be made to whooping crane survey transects (in 2023 or future years) to avoid caribou.	
3	Topic: Recommendation to Improve on the Accuracy of Future Surveys for Migratory Bird Species References: - 2023 Annual Wildlife Management and Monitoring Plan Report, July 11,	Federally listed Species at Risk and/or species listed on Schedule 1 of the Migratory Birds Convention Act Regulations 2022 (e.g., pileated woodpeckers) should be identified to species-level wherever possible, rather than just a general grouping (e.g.: "woodpecker" is used in Appendix III: Clearing Survey Wildlife Observations, of the WMMP report). This will help ensure appropriate mitigations can be put in place to prevent harm and be in compliance with the federal Species at	ECCC recommends that the Proponent conduct appropriate training to ensure staff can identify Federally listed Species at Risk and migratory birds of conservation concern (to the species level) that could be present in the project area. Modifications could also be made on the 'Pre-Clearing Wildlife Survey Procedure' and 'Pre-Clearing Wildlife Survey' form, located in version 2.2 of the WMMP, so that official naming conventions for these species are used in the surveys.	

	2023 - Wildlife Management and Monitoring Plan, Pine Point Mining, V2.2	Risk Act and Migratory Birds Convention Act.		
4	Topic: Absence of Some Wildlife Surveillance Monitoring Forms References: - 2023 Annual Wildlife Management and Monitoring Plan Report, July 11, 2023 - Wildlife Management and Monitoring Plan, Pine Point Mining, V2.2	Section 7.2: Annual Reporting, of version 2.2 of WMMP states that “records of all surveys completed and wildlife observed” will be included in annual reports. Based on this statement, it is unclear why no completed copies of the 'Wildlife Surveillance Monitoring Form' or 'Bird Nesting/Bat Roosting Activity Monitoring Form' (presented in Appendix C: Protocols and Datasheets of version 2.2 of the WMMP) were included in the 2023 WMMP report. Activities that would trigger the need for surveys and the completion of these forms include: activities around the camp and waste management areas; vegetation clearing; activities around project buildings, stationary equipment or exploration sites; disruptions around quarries, soil stockpiles, overburden slopes or borrow pits.	ECCC-CWS recommends that the Proponent: - Confirm that no activities took place on site in 2023, including appropriate rationale for their omission, that would trigger the surveys required for the 'Wildlife Surveillance Monitoring Form' or 'Bird Nesting/Bat Roosting Activity Monitoring Form'; or - Include any completed forms from 2023 for review in the 2023 WMMP report, and for future reports.	
No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
GNWT-ECC - James Hodson				
1	General comment	While ECC appreciates the detail provided in the Appendices of the annual WMMP report, it would be beneficial to provide a more detailed summary of them in the main body of the annual WMMP report. ECC also noted that information about other	1) For future annual WMMP, ensure that PPML reports on whether or not PPML implemented all of the monitoring programs required under the WMMP. 2) For future annual WMMP reports, please provide a tabular or graphical summary of the number of tracks/scat or	

		surveys required under the WMMP is not provided in the report, making it difficult for ECC to assess compliance with the WMMP.	visual sightings of different wildlife species observed during pre-clearing surveys, wildlife surveillance surveys, and bird nesting/bat roosting surveys. Including some representative photos of the traks/scat observed during these surveys would also be helpful, as would photos of some of the drilling operations, clearings for new access roads/trails, etc. to give readers a better sense of what the operations looked like on the ground.	
2	Section 2.1 - Summary of Project Activities	A total of 45.8 km of new trails/roads were constructed to access drill locations.	1) Please clarify at what time of year these new roads and trails were cleared, and indicate whether any pre-clearing for bird nests/bat roosts was undertaken as per section 6.4 of the WMMP. 2) Please provide a map indicating where these new trails/roads occurred.	
3	Section 2.3.3 Collar Locations and Cautionary Zones	This section of the report states that "Maps of collar locations were received from ECC/ENR from 21 June 2023 until end of the year"; however, ECC has records of collar data maps being sent to PPML starting February 15, 2023 (143 maps were sent to PPML by ECC in total). PPML also states that "none of the collar locations indicated a caribou presence within the 2km cautionary zone during the time that activities were planned and none of the clearing surveys observed a caribou." ECC used the list of drilling locations and start/end dates provided in Appendix 1, along with the collar data maps provided to PPML	1) Please clarify whether PPML received collar data maps from ECC beginning in February 2023, not June 2023. 2) In future weekly reports provided to ECC, please include photos of tracks and sign of species recorded during pre-clearing surveys so that ECC can confirm the species identified. 3) ECC would like to meet with PPML to discuss ways to improve the weekly reporting of exploration sites where PPML has been active, and sites where they plan to begin drilling in the coming week, so that these areas can be highlighted on the collar data maps provided by ECC.	

		<p>throughout the year, and verified that this statement is correct. Although collared boreal caribou movements did not seem to overlap temporally with active drilling locations, there were many instances where caribou movement paths would have traversed areas where drilling occurred during the year. ECC is surprised that no caribou tracks or scat (even old ones) were ever observed during pre-clearing surveys. Appendix III indicates that moose tracks and sign were recorded frequently, and even deer tracks on one occasion. While PPML has been providing the completed pre-clearing survey forms to ECC with their weekly updates, ECC has not been able to verify the species identification of tracks recorded during these surveys as no photos are provided with the reports.</p>		
4	Wildlife Surveillance Monitoring	<p>The WMMP - Appendix C - Page 9 - Wildlife Surveillance Monitoring Procedure - states that: "PPML staff will undertake systematic tours of the Project camp and waste management areas to record all wildlife observations or recent wildlife sign (e.g., tracks and scat). Surveys will be completed at least once per week."</p> <p>The annual WMMP report does not provide evidence of whether these surveys were completed as required. Appendix III of the report summarizes the pre-clearing survey wildlife</p>	<p>1) Please clarify whether PPML conducted weekly surveillance surveys of the camp and waste management areas as required under the WMMP, and if not, provide justification for why they were not completed.</p> <p>2) Please provide copies of the completed surveillance monitoring forms from 2023</p> <p>3) If the wildlife surveillance surveys were not completed in 2023, PPML should implement them in the remainder of 2024 and future years and provide a summary and detailed appendix of the results (similar to that</p>	

		<p>observations, but there is no information or data provided from wildlife surveillance monitoring. ECC made a similar comment on PPML's 2022 WMMP report, to which PPML responded "The site crews were continuously active in the area of the camp and waste disposal sites daily. Any wildlife observed would be reported in the Wildlife Surveillance Form in accordance with section 6.3 however, none were observed." This approach to implementation of the WMMP does not align with ECC expectations of PPML. The approved WMMP clearly states that these surveys are to occur at least once per week. ECC expects PPML to undertake these surveys at this minimum frequency, and to document that they have undertaken the surveys by completing the Wildlife Surveillance Forms, regardless of whether wildlife or wildlife sign is seen on any given survey. Absence of wildlife/wildlife sign should be noted on the survey forms, as should the area surveyed (camp, waste management facility, etc.).</p>	<p>provided for pre-clearing surveys) from weekly surveillance monitoring surveys in the next annual WMMP report.</p>	
5	Bird Nesting and Bat Roosting Activity Procedure	<p>The WMMP - Appendix C - Page 13 - Bird Nesting and Bat Roosting Activity Procedure states that: "PPML staff will undertake systematic monitoring of Project buildings, stationary equipment, and active exploration sites to detect bird nesting activity and potential bat roosts. PPML staff will document avian nests and nesting behaviour, as well as</p>	<p>1) Please clarify whether PPML conducted weekly /daily Bird Nesting and Bat Roosting Activity surveys as required under the WMMP, and if not, provide justification for why they were not completed. 2) Please provide copies of the completed Bird Nesting/Bat Roosting Activity Monitoring forms from 2023</p>	

		<p>potential little brown myotis and northern myotis maternal roosting sites." and "To limit effects on bank swallows during the breeding season, daily inspections must be completed at all active quarries, soil stockpiles, overburden slopes, and borrow pits ahead of disruptive activities occurring within these areas."</p> <p>Again, the annual WMMP report provides no evidence that these surveys were being completed as required under the WMMP. ECC made a similar comment to PPML on their 2022 annual WMMP report, to which PPML replied that "Bird nesting and bat roosting surveys were conducted as part of the clearing surveys. No bird nesting or bat roosting was observed.". The Bird Nesting and Bat Roosting Activity Procedure in the approved WMMP clearly states that these surveys do not only apply to vegetation clearing, but also to site facilities that may provide nesting/roosting structures, soil stockpiles, borrow pits, stationary equipment, etc.</p>	<p>3) If the Bird Nesting/Bat Roosting Activity Monitoring surveys were not completed in 2023, PPML should implement them in the remainder of the migratory bird nesting season in 2024 and in future years and provide a summary and detailed appendix of the results (similar to that provided for pre-clearing surveys) from the Bird Nesting/Bat Roosting Activity Monitoring surveys in the next annual WMMP report.</p>	
6	Appendix IV - Whooping Crane Aerial Survey	<p>Providing a map of the area surveyed would be helpful. Were results of this survey also shared and/or confirmed with ECCC staff who have been conducting whooping crane surveys in the region for the past several years?</p>	<p>1) Please provide a map of the area surveyed including the survey transects flown and locations of incidental wildlife sightings.</p> <p>2) Please confirm whether the results from this survey have been shared with ECCC.</p>	