



Diavik Diamond Mines (2012) Inc.
P.O. Box 2498
Suite 300, 5201-50th Avenue
Yellowknife, NT X1A 2P8 Canada
T (867) 669 6500 F 1-866-313-2754

Erin Kelly, Ph.D.
Deputy Minister, Environment and Natural Resources
Government of Northwest Territories
PO Box 1320
600, 5102 50th Avenue
Yellowknife, NT X1A 2N2

8 November 2021

Dear Ms. Kelly:

Subject: DDMI Tier 3 Wildlife Management and Monitoring Plan for the Diavik Mine

Diavik Diamond Mines (2012) Inc.'s (DDMI) is pleased to submit its final Tier 3 Wildlife Management and Monitoring Plan (WMMP or the Plan). This final WMMP reflects changes made by DDMI in response to reviewer comments and recommendations received by DDMI from the Government of Northwest Territories (GNWT), the Environmental Monitoring Advisory Board (EMAB), and Environment and Climate Change Canada (ECCC) following their review of the draft Plan submitted by DDMI on April 1, 2021.

The WMMP was developed in accordance with Section 95 of the NWT Wildlife Act. The concordance table in Section 1.5 of the Plan demonstrates compliance with the Environmental Agreement, applicable Acts and regulations, and GNWT WMMP Guidelines.

Changes included in the final Tier 3 WMMP in response to reviewer comments/recommendations on the draft Tier 3 WMMP are highlighted in Tables 1,2, and 3 in Appendix C of the Plan.

If you have any questions regarding the attached submission, please contact the undersigned or Kyla Gray (kyla.gray@riotinto.com) at your convenience.

RioTinto

Yours sincerely,



Kofi Boa-Antwi
Superintendent, Environment

Cc: Kari VanGeffen, GNWT-ENR
James Hodson, GNWT-ENR
Lee Ann Malley, GNWT-ENR
John McCullum, EMAB
Jean-Francois Dufour, ECCC

Attachment: Diavik Tier 3 Wildlife Management and Monitoring Plan

RioTinto



TIER 3 WILDLIFE MANAGEMENT AND MONITORING PLAN FOR THE DIAVIK DIAMOND MINE

Prepared for: Diavik Diamond Mines (2012) Inc.

Prepared by: Golder Associates Ltd.

November 5, 2021

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Abbreviations

Abbreviation	Definition
AEMP	Aquatic Effects Monitoring Program
BBOP	Business and Biodiversity Offset Programme
CMA	Conference of Management Authorities
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
CRP	Closure and Reclamation Plan
CWS	Canadian Wildlife Service
DDMI	Diavik Diamond Mines (2012) Inc.
Diavik mine	Diavik Diamond Mine
DNA	deoxyribonucleic acid
Dominion Diamond	Dominion Diamond Ekati Corporation
EAQMP	Environmental Air Quality Monitoring Plan
ECCC	Environment and Climate Change Canada
ECG	Ecosystem Classification Group
EER	Environmental Effects Report
Ekati mine	Ekati Diamond Mine
ELC	Ecological Land Classification
EMAB	Environmental Monitoring Advisory Board
ENR	Environment and Natural Resources, Government of the Northwest Territories
GIS	Geographical Information System
GNWT	Government of the Northwest Territories
GNWT-DoL	Government of Northwest Territories - Department of Lands
HSI	habitat suitability index
HU	habitat unit
IFC	International Finance Corporation
IQ	Inuit Qaujimajatuqangit
KIA	Kitikmeot Inuit Association
MSES	Management and Solutions in Environmental Science
Mine	Diavik mine
NWT	Northwest Territories
QA	quality assurance
QC	quality control
SAR	Species at Risk
SARA	Species at Risk Act
SARC	Species at Risk Committee
spp.	multiple species
TK	Traditional Knowledge
VEC	Valued Ecosystem Component
WHMIS	Workplace Hazardous Materials Information System
WLWB	Wek'èezhìi Land and Water Board
WMMP	Wildlife Management and Monitoring Plan
WMP	Wildlife Monitoring Program
WRSA-NCRP	Waste Rock Storage Area North Country Rock Pile
WTA	Waste Transfer Area
ZOI	zone of influence
ZOITTG	Zone of Influence Technical Task Group

Units of Measure

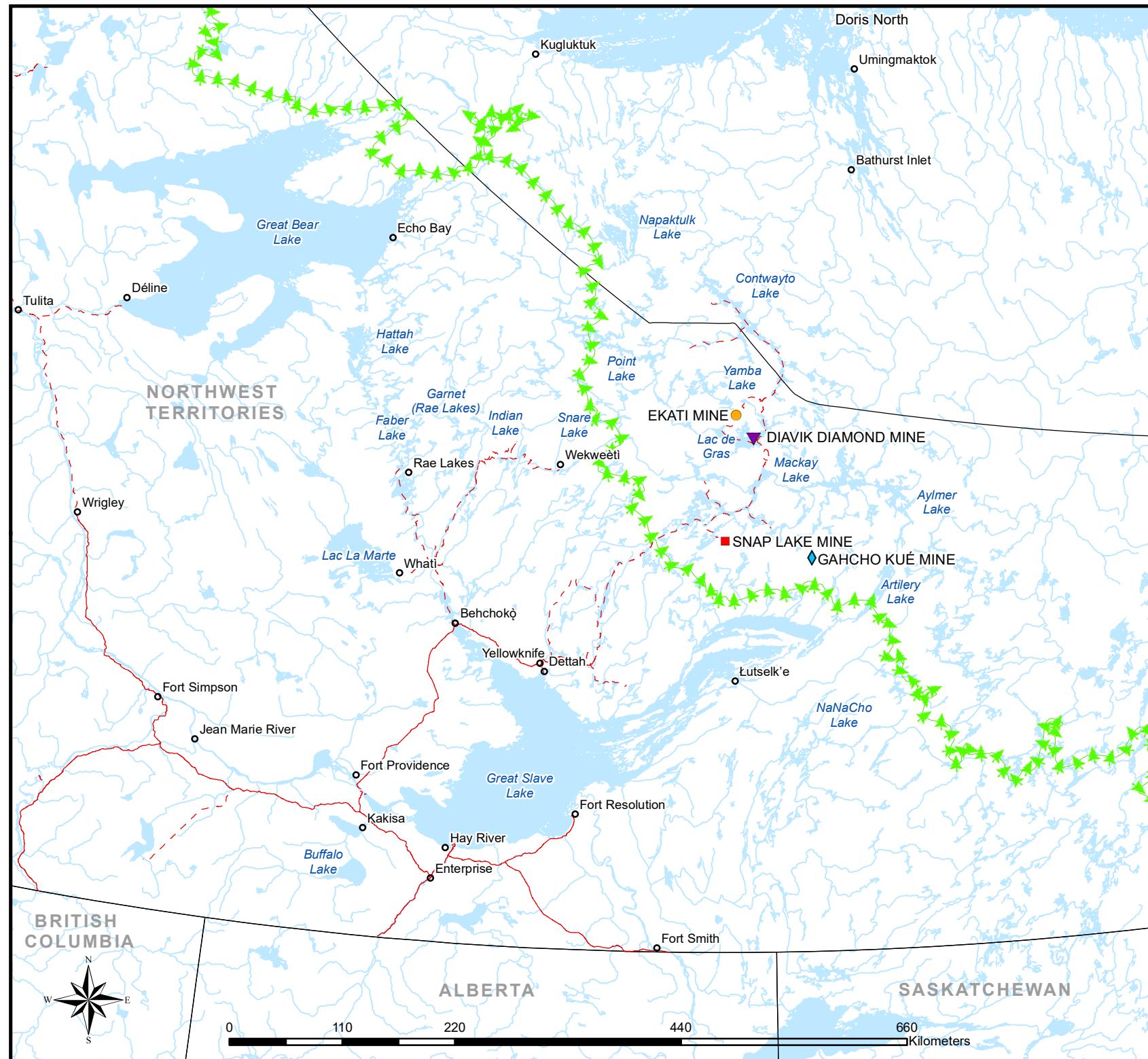
Unit	Definition
%	percent
>	greater than
<	less than
°C	degrees Celsius
cm	centimetre
km	kilometre
km/h	kilometres per hour
km ²	square kilometre
m	metre
mm	millimetre

1 INTRODUCTION

1.1 The Diavik Diamond Mine

The Diavik Diamond Mine (also referred to as the Diavik mine or Mine) is located on East Island, a 17 km² island in Lac de Gras, NWT, approximately 300 km northeast of Yellowknife (64°31' North, 110° 20' West) (Figure 1.1-1). The area is remote, and major freight is trucked over a seasonal winter road from Yellowknife. Worker access is by aircraft. The Diavik mine involves the mining of four diamond bearing kimberlite pipes. The pipes, designated as A154N, A154S, A418 and A21, are located directly offshore of East Island (Figure 1.1-2). All mining, diamond recovery, support activities and infrastructure (roads, pipes, water and waste management facilities, accommodation complex and airstrip) are located on the East Island (Figure 1.1-2). At full development, the Mine is predicted to have a physical footprint of 12.76 km².

The Diavik Diamonds Project Environmental Assessment documents were formally submitted to the Federal Government in September 1998, and in early November 1999 the federal Minister of the Environment approved the Diavik Diamonds Project for permitting and licensing. On March 8, 2000, the Environmental Agreement was signed and the Department of Indian Affairs and Northern Development, now Crown-Indigenous Relations and Northern Affairs Canada, issued permits to allow Diavik Diamond Mines (2012) Inc. (DDMI or Diavik) to begin construction activities. The Mine started production in January 2003, producing approximately 3.8 million carats in 2003. Full production began in 2004 with a production target of 7 to 8 million carats. It is expected that the Mine will produce approximately 107 million carats of diamonds over a 16- to 22-year mine life.





1.2 Background to Wildlife Monitoring

Diavik conducted wildlife baseline studies from 1995 to 1997. The information was used to describe ecological conditions in the Lac de Gras area in support of the Project Description and Environmental Assessment (DDMI 1998a,b). A Wildlife Monitoring Program (WMP) was developed as part of the Environmental Agreement for the Diavik Diamond Mine (DDMI 2000). Documents that were used in developing the WMP included the following:

- Comprehensive Study Report, Diavik Diamonds Project (The Canadian Environmental Assessment Act; Government of Canada 1999);
- Environmental Assessment Overview, Diavik Diamonds Project (DDMI 1998c);
- Environmental Effects Report, Wildlife, Diavik Diamonds Project (EER; DDMI 1998b); and
- Wildlife Baseline Report, Diavik Diamonds Project (Penner 1998).

Table 1.2-1 summarizes the Environmental Agreement provisions and compliance by the WMP.

Table 1.2-1 Provisions of Environmental Monitoring Programs Under Section 7.1 of the Environmental Agreement

Section 7.1 Provision	Wildlife Monitoring Program Compliance
(a) Meet the monitoring requirements of all Regulatory Instruments.	Compliant with the NWT <i>Wildlife Act</i> , and <i>Species at Risk Acts</i> (Federal and Territorial).
(b) Verify the accuracy of the environmental assessment of the Project.	An objective of the WMP (Section 1.4).
(c) Determine the effectiveness of measures taken to mitigate any adverse environmental effects of the Project.	An objective of the WMP (Section 1.4).
(d) Consider Traditional Knowledge.	A recent example includes the grizzly bear hair snagging program and the identification of high quality habitat for hair snagging station deployment. Selection of wolverine winter track survey locations and collection of data is another example.
(e) Establish or confirm thresholds or early warning signs.	For wildlife, ecological quantitative thresholds are not available. However, the WMP provides predictions such as Mine-related mortality rates (Section 5.3).
(f) Trigger action by adaptive mitigation measures where appropriate.	Programs have been adaptively managed over time (Section 2.2), which includes changes to mitigation such as early versus more current waste management practices, based on pre-defined triggers. Possible outcomes of adaptive management related to mitigation include more, less, or unchanged mitigation depending on effectiveness. Past scope and improvements are noted in component monitoring sections.
(g) Provide opportunities for the involvement or active participation of each of the Aboriginal Peoples in the implementation of the monitoring programs.	Communities participated in caribou, wolverine, and grizzly bear studies (Section 3.2).
(h) Provide training opportunities for each of the Aboriginal Peoples.	Training is provided each time communities participate (Section 4.4).

Implementation of the WMP by DDMI from 2002 to 2019 (i.e., during construction and operation of the Mine) has been used to test effects predictions in the EER (DDMI 1998a,b), evaluate the effectiveness of mitigation, and provide feedback for adaptive management. The WMP also considers wildlife issues of concern identified by communities and regulatory agencies. The WMP is aligned with the Environmental Agreement, which states that monitoring programs contained within the management plans shall include activities designed to:

- measure compliance with regulatory requirements;
- determine the environmental effects of the Mine;
- test impact predictions; and,
- measure the performance of operations and effectiveness of impact mitigation.

Section 7.2 of the Environmental Agreement requires that wildlife, including caribou and grizzly bears, be among the environmental components or valued ecosystem components (VECs) monitored. The Environmental Agreement also required the establishment of the Environmental Monitoring Advisory Board (EMAB), which operates independently from Diavik and the GNWT and national regulators (e.g., Environment and Climate Change Canada). Indigenous communities of the Northwest Territories and Nunavut, and the governments of the Northwest Territories, Nunavut, and Canada are members of EMAB. A main role of the EMAB is to serve as a public watchdog of the regulatory process and the implementation of the Environmental Agreement.

1.3 Evolution of the Wildlife Monitoring Program

The Diavik WMP is based on evaluating the assumed success of implemented mitigation and associated predicted residual effects to wildlife and wildlife habitat provided in the EER (DDMI 1998b), but has evolved through time with input from the communities, government regulators, and EMAB. Knowledge of the effects of mining on wildlife from monitoring undertaken at the Diavik mine, other diamond mines, and research in the NWT (e.g., wolverine and grizzly bear hair snagging) has also influenced the components, objectives, study designs, and sampling methods in the WMP. Over time, the content of the WMP was also modified to meet the requirements of the Draft Wildlife and Wildlife Habitat Protection Plan and Wildlife Effects Monitoring Program Guidelines provided by the Government of Northwest Territories, Department of Environment and Natural Resources (GNWT-ENR 2013). More recently, the GNWT-ENR has provided Wildlife Management and Monitoring Plan Guidelines (GNWT-ENR 2019a) for the process and content of wildlife monitoring programs. As a result, the structure and content of the WMP has evolved into the Wildlife Management and Monitoring Plan (WMMP) presented in this document to be consistent with the GNWT-ENR (2019a) Guidelines.

Diavik Mine Environment roles and responsibilities are provided in ENVI-444-0415: Description of Employee Responsibilities (Appendix A). The Diavik mine employs Environment Supervisors to manage and guide the Environment Technicians who implement the WMP; hereafter the WMMP. The Environment Department is led by a superintendent who oversees regulatory concordance, reporting and engagement associated with the WMMP and provides the resources necessary to implement the WMMP, which is also intended to engage interested parties and solicit feedback. Standard operating procedures are provided in Appendix A, and associated data forms are provided in Appendix B.

Consistent with the principles of adaptive management and revisions to the WMP, the WMMP is a living document that will be updated as needed. Because the Diavik mine has been operating for 17 years, multiple environmental monitoring programs and management plans are in place, and have been effectively improved over time through adaptive management (Section 2.2). The Diavik mine environmental monitoring programs and management plans include:

- Ammonia Management Plan (DDMI 2020a)
- Aquatic Effects Monitoring Program (Golder 2020a)
- Closure and Reclamation Plan (DDMI 2019a)
- Contingency Plan (DDMI 2017a)
- Engagement Plan (DDMI 2020b)
- Environmental Air Quality Monitoring Plan (DDMI 2019b)
- North Inlet Water Treatment Operations Plan (DDMI 2020c)
- Processed Kimberlite Containment Facility Plan (DDMI 2018)
- Waste Rock Management Plan (DDMI 2020d)
- Waste Management Plan (DDMI 2017b)
- Water Management Plan (DDMI 2020e)

1.4 Objectives of the Wildlife Management and Monitoring Plan

The WMMP describes how DDMI intends to monitor the effects to wildlife that may occur within and beyond the Mine footprint, and contribute to regional monitoring initiatives. The WMMP also details the mitigation policies, designs, practices, and procedures that will be implemented to avoid and minimize direct and indirect Mine-related effects to wildlife and wildlife habitat.

The global objectives of the WMMP were developed considering the requirements of the Environmental Agreement, and the remaining key residual environmental risks to wildlife identified in the EER (DDMI 1998b). The global objectives include the following:

- incorporate Traditional Knowledge (TK) and provide opportunities for the involvement and active participation by communities in the implementation of the WMMP;
- documenting Mine-related effects and test impact predictions made in the EER;
- implement operational practices that mitigate disturbance to wildlife and wildlife habitat including migratory birds and their nesting areas, species at risk, and caribou;
- evaluate the accuracy of key predictions regarding the effects of the Mine directly on wildlife and wildlife habitat and adjust environmental management and monitoring practices accordingly; and,
- design studies and data collection techniques that are consistent with, and will contribute to, understanding and managing cumulative effects that can be shared across the NWT mining sector.

The specific objectives associated with each component of the WMMP are summarized below in Table 1.4-1.

Table 1.4-1 Specific Wildlife Management and Monitoring Program Components and Objectives

Management and Monitoring Program Components		Objectives
Direct Wildlife Habitat Loss		<ul style="list-style-type: none">Determine the amount of direct habitat loss due to development of the Diavik mine.
Waste Management	Landfill and Waste Transfer Area Inspections	<ul style="list-style-type: none">Determine the effectiveness of waste management policies and procedures and provide feedback for improvement to reducing attraction and access by wildlife to food and other wastes, including potential contaminants.
	Waste Bin Inspections	
All Wildlife	Wildlife Incidents and Mortalities	<ul style="list-style-type: none">Document and mitigate wildlife incidents and mortalities.Reduce risks to both wildlife and people.Determine the effectiveness of mitigation and test EER predictions about direct Mine-related mortalities.
Caribou	Incidental Observations	<ul style="list-style-type: none">Identify the composition of caribou groups moving through the study area.Document the seasonal timing of caribou movement through the study area to determine possible annual trends.Document possible annual trends in the number of caribou moving through the study area.
	Zone of Influence Monitoring Behaviour	<ul style="list-style-type: none">Determine whether the zone of influence changes in relation to mine activity.Determine if caribou behaviour changes with distance from the mines.
Grizzly Bear	Incidental Observations	<ul style="list-style-type: none">Avoid and minimize bear-human interactions.Determine the level of grizzly bear activity within the study area.
Wolverine	Incidental Observations	<ul style="list-style-type: none">Avoid and minimize wolverine-human interactions.Determine the level of wolverine activity within the study area.
	Snow Track Monitoring	<ul style="list-style-type: none">Provide estimates of relative wolverine activity and distribution in the study area.
Raptors	Pit Wall Nest Monitoring and Incidental Observations	<ul style="list-style-type: none">Determine if pit walls or other infrastructure are utilized as nesting sites for raptors.Determine nest success in areas of development and document effectiveness of deterrent efforts used.
	Regional Falcon Surveys	<ul style="list-style-type: none">Support ENR in regional monitoring of raptor nest occupancy and productivity to determine long-term population trends.
Waterbirds	Presence	<ul style="list-style-type: none">Determine if the Mine affects the presence of waterfowl and shorebird species in the study area.
Rare or Uncommon Species	Incidental Observations	<ul style="list-style-type: none">Document trends in the detection of rare or uncommon species in the study area.

In 2009 and 2010, workshops were organized to with the goal of improving and standardizing wildlife monitoring at all diamond mines (Diavik mine, Ekati mine, and Gahcho Kué mine). The first was in September 2009 and attended by representatives of the three operating diamond mines, governments, monitoring agencies, and communities. The workshop focussed on general results from the monitoring programs (Marshall 2009). A technical workshop in 2010 resulted in specific recommendations for the mining companies to consider incorporating into the objectives, study designs, and methods of their monitoring programs, with an interest in standardizing approaches and regional monitoring objectives across all the mines (Handley 2010). Additional workshops were held in 2013, 2018, and 2021. The standardized regional monitoring objectives from this workshop for each VEC are provided in Section 5.

1.5 Concordance

The WMMP serves to meet DDMI's obligations to a range of authorities. This includes various Acts and regulations relevant to wildlife in the NWT (Table 1.5-1). The WMMP also meets the requirements of the GNWT Wildlife Management and Monitoring Plan Guidelines (GNWT-ENR 2019a). The sections of the WMMP that pertain to the NWT Acts and regulations, and the guidelines for wildlife and wildlife habitat protection and monitoring are also identified in Table 1.5-1.

Table 1.5-1 Concordance of Legislation/Regulation Requirements and Wildlife Management and Monitoring Plan

Legislation/ Regulation/ Agreement	Requirement	Corresponding Section in WMMP	Responsible Regulatory Agency
Environmental Agreement	<ul style="list-style-type: none"> Measure compliance with regulatory requirements Determine the environmental effects of the Mine Test impact predictions Measure the performance of operations and effectiveness of impact mitigation 	Entire Document	Government of Canada, GNWT
Migratory Birds Convention Act, Migratory Bird Regulations	The taking of nests or eggs of migratory game or insectivorous or nongame birds shall be prohibited, except for scientific or propagating purposes under such laws or regulations as the High Contracting Powers may severally deem appropriate.	Section 5.7	CWS (ECCC)
NWT Wildlife Act	<p>A wildlife management and monitoring plan must include:</p> <p>(a) a description of potential disturbance to big game and other prescribed wildlife, potential harm to wildlife and potential impacts on habitat;</p> <p>(b) a description of measures to be implemented for the mitigation of potential impacts;</p> <p>(c) the process for monitoring impacts and assessing whether mitigative measures are effective; and,</p> <p>(d) other prescribed requirements.</p>	Entire Document. Examples include: Section 4.0 and 5.0 describe potential effects to wildlife and habitat, mitigation and monitoring. Section 4.1 describes effectiveness of mitigation. Section 2.2 describes adaptive management process for mitigation effectiveness. Compliance with NWT WMMP guidelines captures other prescribed requirements (see GNWT-ENR 2019a).	GNWT-ENR
Species at Risk Act and Species at Risk (NWT) Act	Diavik Diamond Mines (2012) Inc. will adhere to requirements of all applicable Regulations or Recovery Plans that may be developed over the duration of the Mine.	Section 2.4	CWS (ECCC) GNWT-ENR
NWT Wildlife Act	Guidelines for the preparation of a Tier 3 wildlife management and monitoring plan, dated June 2019.	Section 1.0	GNWT-ENR
	Purpose of and Objectives of the WMMP		
	Measures, conditions, and developer commitments concordance table	Section 1.5	
	Engagement	Section 3.0	
	Mention of associated operational or management plans	Section 1.3	
	Project description	Section 1.0	
	Project map	Section 1.0	
	Affected species or habitat features	Section 2.3	
	Potential impacts to wildlife and wildlife habitat	Section 4.2	
	Employee wildlife awareness education and training	Section 4.4	
	Infrastructure design and camp layout for bear safety and/or to prevent denning, nesting and roosting	Section 4.3	

Table 1.5-1 Concordance of Legislation/Regulation Requirements and Wildlife Management and Monitoring Plan

Legislation/ Regulation/ Agreement	Requirement	Corresponding Section in WMMP	Responsible Regulatory Agency
NWT Wildlife Act	Management of camp waste and other wildlife attractants	Section 5.2	GNWT-ENR
	Timing restrictions and/or set back distances to protect wildlife and wildlife habitat features	Section 4.3.1	
	Direct habitat loss – minimizing the project's physical footprint	Section 4.2.1	
	Habitat alteration – minimizing physical manipulation of habitat that would decrease its value to wildlife	Section 4.2.1	
	Indirect habitat loss – minimizing functional habitat loss due to sensory disturbance, dust, etc.	Section 4.2.2	
	Management of hazards to wildlife (e.g., open pits, tailings ponds, roads, airstrips, spills)	Section 4.3.1	
	Wildlife deterrence procedures	Section 4.3.4	
	Habitat restoration	Section 4.2.1	
	Description of the role of community wildlife monitors in implementing aspects of the plan	Section 3.0	
	Offsetting or compensatory measures	Sections 4.0, 5.4.5, 5.7.2	
	Mitigation monitoring	Section 5.0	
	Wildlife effects monitoring	Sections 5.4, 5.5, 5.6	
	Project footprint size reporting	Section 5.1	
	Support for cumulative effects assessment, monitoring, or management	Sections 5.4, 5.7	
	Description of approach to adaptive management	Section 2.2	
	Formal response frameworks with action levels	Section 2.2	
	Reporting protocols	Section 7.0	
	Roles and responsibilities	Section 1.3	
	Literature cited	Section 8.0	
	Glossary	Glossary	
	SOPs	Appendix A	
	Monitoring forms and data sheets	Appendix B	
	Reporting form templates	Appendix B	
	WMMP revisions tracking table	page iv	

CWS = Canadian Wildlife Service; ECCC = Environment and Climate Change Canada; GNWT=Government of Northwest Territories; GNWT-ENR = Government of Northwest Territories, Department of Environment and Natural Resources; WMMP = Wildlife Management and Monitoring Plan.

2 DEVELOPMENT OF THE WILDLIFE MANAGEMENT AND MONITORING PLAN

2.1 Wildlife Study Area and Setting

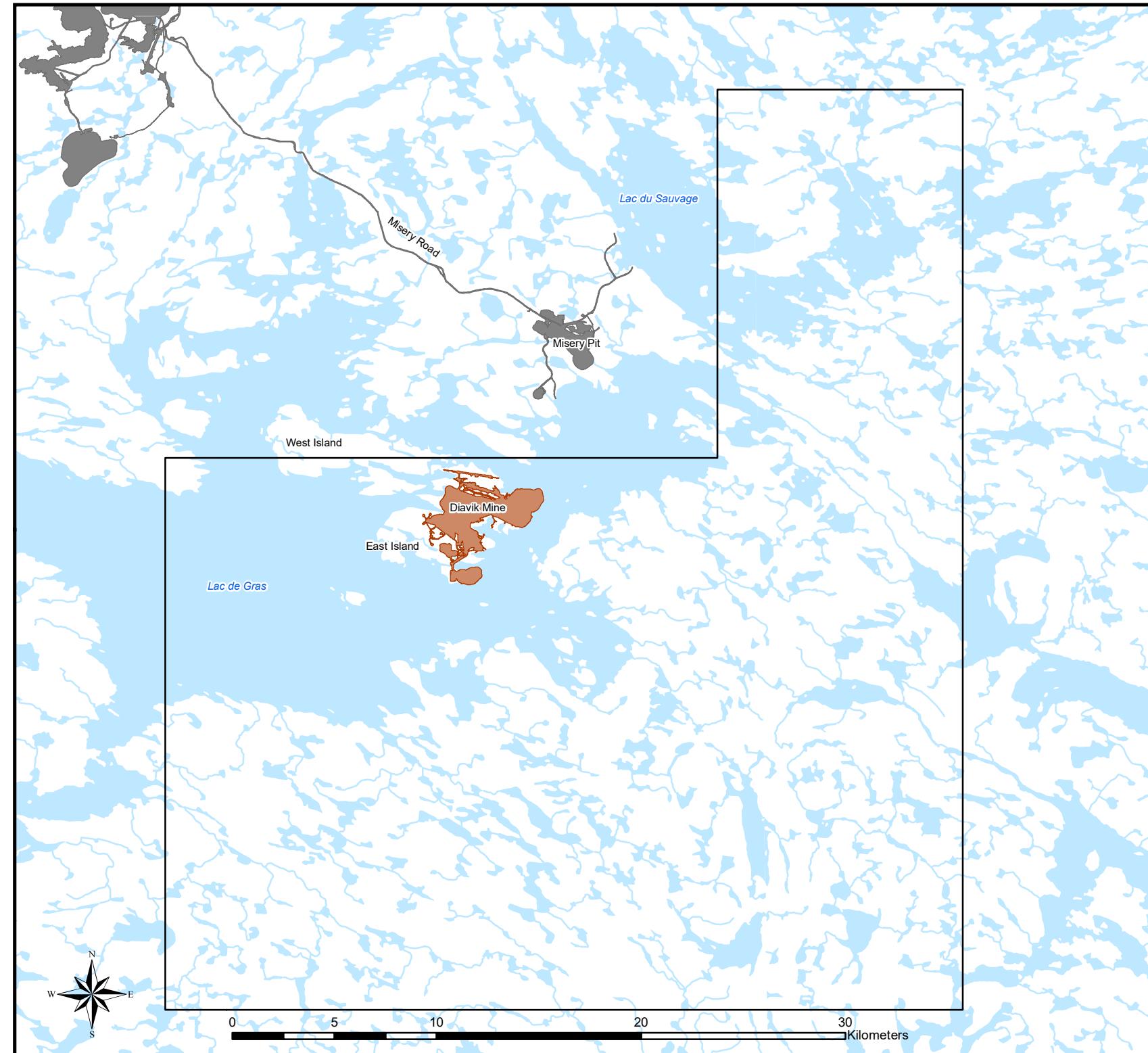
Beginning in 2002, wildlife monitoring was conducted in a study area of approximately 1,200 square kilometres (km^2) surrounding the Diavik mine (Figure 2.1-1). For caribou, a larger aerial survey study area was expanded to 1,870 km^2 in 2006, and then 2,867 km^2 during 2007 and 2008. In August 2009, the Diavik and Ekati mines collaboratively expanded the aerial survey study area to 5,930 km^2 after consultation with regulators and permission from the ENR. The study area was expanded south so that an effective buffer around the Diavik mine was surveyed to accurately assess caribou distribution relative to mine development.

The Diavik mine is located approximately 200 km south of the Arctic Circle and 300 km northeast of Yellowknife in the NWT, Canada. The Mine is located within the headwaters of the Coppermine River drainage basin, which flows north to the Arctic Ocean in the Level III Tundra Shield Low Arctic (south) Ecoregion in the Level II Tundra Shield Ecoregion as defined by the Ecological Classification Group (ECG 2012). This Ecoregion is characterized by short, cold summers, very cold, long winters. The annual average temperature in the Tundra Shield Low Arctic (south) Ecoregion is -9 degrees Celsius ($^{\circ}\text{C}$), ranging from $+10^{\circ}\text{C}$ to $+12^{\circ}\text{C}$ in July to -30°C in January. Average annual precipitation is from 200 to 300 millimetres (mm) with approximately 60 percent (%) occurring as rain and 40% occurring as snowfall (ECG 2012).

The topography of the region is relatively flat, with the local area characterized by undulating to rolling terrain with northwest to southeast trending ridge features known as eskers and exposed bedrock outcrops. The local terrain is characterized by boulder fields, tundra, and wetlands, and by numerous lakes with interconnecting streams. Permafrost is continuous, typically extending to a depth of 300 metres (m), and is overlain by an active layer, which thaws during the summer and refreezes during the winter. The active layer is typically within 1 to 2 m of the ground surface. The lakes and streams of the area are characterized by clear, soft, and low-nutrient waters, typical of northern aquatic environments. The biological productivity and biomass of plants and animals in streams and lakes are low compared to streams and lakes in southern Canada.

Characteristic vegetation of the Tundra Shield Low Arctic (south) Ecoregion includes continuous to discontinuous low-shrub complexes and erect dwarf-shrub tundra (ECG 2012). The terrestrial vegetation community around the Diavik mine is composed mainly of heath tundra. Characteristic species are Labrador tea, bog cranberry, bearberry, black crowberry, and dwarf birch. Lichen-dominated communities are found on the crests and upper slopes of eskers where the snow does not accumulate and on bedrock or boulder complexes where exposed rock outcrops support these communities. Shrubs, such as willows and dwarf birch, are found in sheltered riparian areas along streams, seeps, and lakeshores associated with poorly drained soils. The vegetation characteristics of the sedge wetlands and tussock hummock plant communities occurring in depressions are dominantly sedges, cotton grasses, and peat mosses (DDMI 1998b).

Despite the harsh climate, the area supports many species of mammals and birds. Most of these animals are migratory (e.g., caribou, peregrine falcon, upland birds, and waterfowl), others are non-migratory (e.g., grizzly bear, wolverine, Arctic fox, red fox, Arctic hare, and raven). Although uncommon, moose and muskox have been observed in the Lac de Gras region (Dominion Diamond 2014).



LEGEND

- DIAVIK WILDLIFE STUDY AREA BOUNDARY
- DIAVIK FOOTPRINT
- EKATI FOOTPRINT

Diavik Diamond Mines (2012) Inc.
Environnement Department
Lac de Gras, Northwest Territories

Created: May 21, 2020

Base data obtained from geographics,
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Coordinate System: NAD 1983 UTM Zone 12N
Projection: Transverse Mercator
Datum: North American 1983



2.2 Monitoring Framework and Adaptive Management

Adaptive management is a structured process of decision making to deal with uncertainty. The objective of adaptive management is to reduce uncertainty through monitoring, or “learning by doing” (WLWB 2010). In the case of wildlife monitoring, the “doing” is the environmental monitoring, and the “learning” is continual improvements to environmental management and the monitoring programs. This requires the monitoring program to be adaptive and flexible. The monitoring program must be flexible enough to incorporate comments, suggestions, and information based both on science and local and TK. The Diavik mine WMMP has and will continue to include adaptive management.

The process of developing a WMMP is collaborative and requires input from communities, EMAB, government and other regulators. As indicated in Section 1.2, the overall objectives of monitoring include:

- testing effects predictions (action levels), which can be related to measuring the response of the environment or VEC population to Mine stressors and/or testing the assumptions associated with the predictions;
- testing the effectiveness of mitigation;
- contributing to the assessment and management of regional cumulative effects; and,
- meeting and fulfilling regulatory requirements.

Results from local (i.e., Mine-specific) and regional collaborative monitoring programs are used to provide feedback to Diavik mine operations to determine if the objectives are being met (Figure 2.1-1). Modification and/or implementation of additional mitigation may be required as determined through monitoring results and the adaptive management process. Similarly, changes to the objectives and/or study methods for local and regional monitoring programs may be required if it is determined that the measurement indicator for the associated effects pathway has a low sensitivity to detect Mine-related changes or that the scale of the response does not match the objective. For example, long-term monitoring of caribou distribution by aerial survey methods recently demonstrated that caribou distribution is explained more by habitat availability than mine-related effects (Golder 2020b) so zone of influence (ZOI) monitoring using aerial surveys will discontinue and an accepted alternate method will be applied (GNWT-ZOITTG 2015).

Alternately, the data and results may be sufficient to demonstrate that Mine-related effects on the VEC are negligible, confirming the objective and supporting the decision to stop monitoring that component of the program (Figure 2.1-1). For example, a decade of monitoring showed little effects from the Diavik and Ekati mines on falcons relative to natural factors occurring at larger regional scales (Coulton et al. 2013). Through discussions and engagement with communities, monitoring agencies, and government, the decision was made to remove annual monitoring of raptor nests from mine-specific objectives of the monitoring programs. Instead, mine sites were to contribute to regional data through the North American Breeding Bird Surveys and the Canadian Peregrine Falcon Survey (Marshall 2009; Handley 2010).

In some cases, even when Mine-related effects are determined to be negligible, monitoring may be continued because it can increase the confidence of impact predictions in future environmental assessments and contributes to the assessment and management of cumulative effects by government (Figure 2.1-1). For example, the WMMP has provided regional data on caribou, grizzly bear, wolverine,

and raptors, and will continue ZOI monitoring on caribou and support regional studies on raptors that can be used to better understand the potential cumulative effects on these species. This information has contributed to increased knowledge of the tundra ecosystem. In other cases, public concern may be the key reason to continue monitoring even after years of detecting negligible effects (Figure 2.1-1).

Diavik has and will continue to actively seek input from regulatory authorities and communities through engagement activities and other regional programs led by the GNWT. Annual reports and meetings are ways that DDMI will present the results of the monitoring program, and the basis for communities and regulatory agencies to provide feedback and direction. In accordance with the concept of adaptive management, monitoring programs and mitigation policies, practices, and actions in the WMMP have and will continue to be adaptively managed over the life of the Mine.

The objective of adaptive management is to reduce uncertainty through monitoring, or 'learning by doing' (WLWB 2010). Adaptive management is generally considered to include four themes (Greig et al. 2008; WLWB 2010):

- learning to reduce management uncertainties;
- using what is learned to change policy and practice;
- focussing on improved management; and,
- basing adaptive management on a structured and systematic approach.

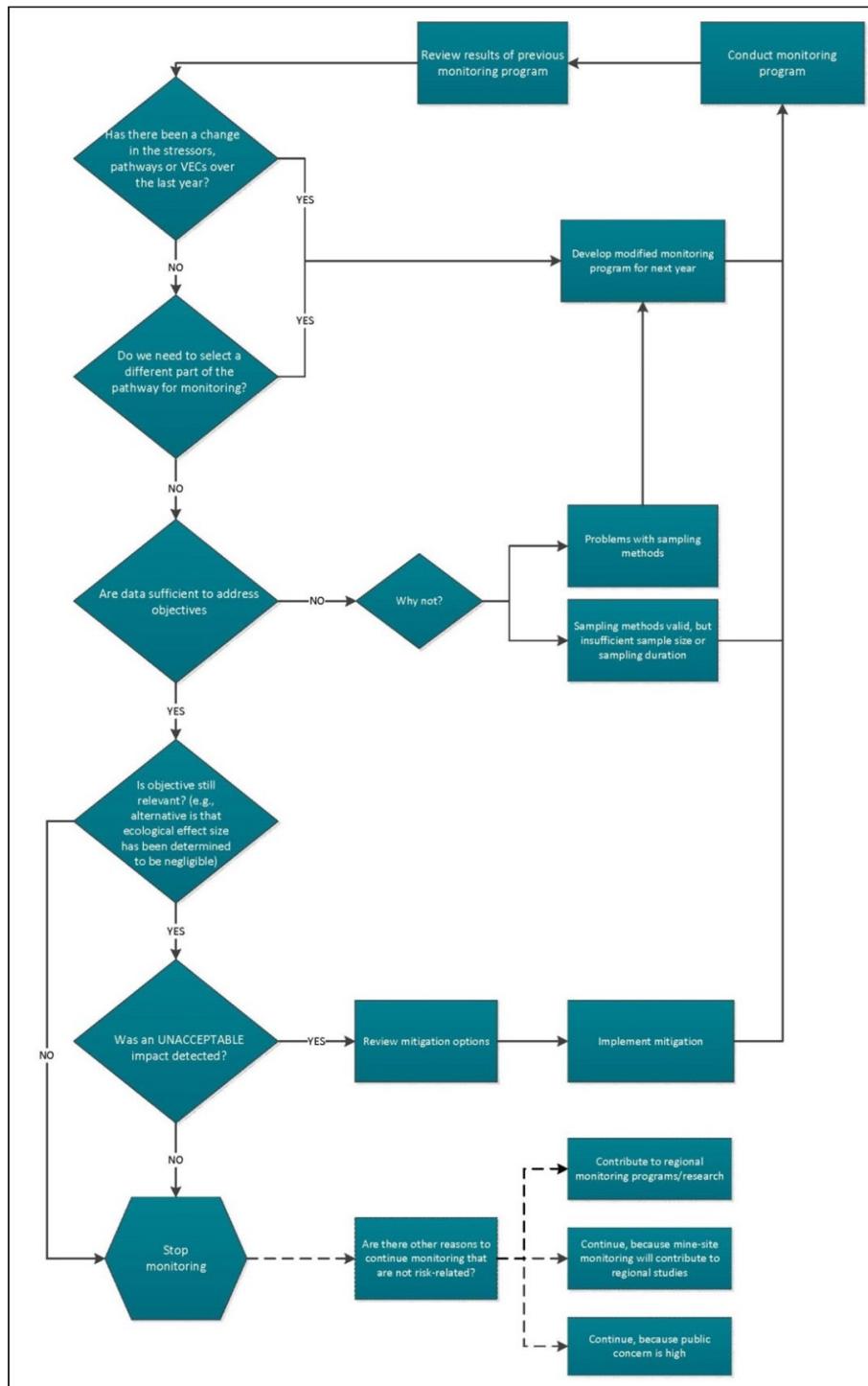
Monitoring programs must be flexible enough to incorporate comments, suggestions, and information based both on science and local and TK. There are no regulator established guidelines for wildlife critical values, threshold conditions, or action levels. If changes to the receiving environment are determined to be greater than the predictions in the EER, then the most suitable course of action will be determined by DDMI, in discussion with communities and regulatory agencies. This type of process has been used successfully in the past (e.g., Marshall 2009; Handley 2010) and may include discontinuation of some monitoring components and/or activities.

Following the principles of adaptive management, wildlife monitoring has undergone changes since the initial development of the WMP in 2000 (DDMI 2000). These changes have been implemented following the results of monitoring and effectiveness of mitigation, recommendations, and suggestions from communities, EMAB, and government agencies.

Adaptive management will be an ongoing process throughout the life of the Diavik mine and may include the outcome of no change. If changes are required to the WMMP, they will occur as monitoring results are analysed and assessed over time with respect to pre-defined triggers or action levels, where applicable. If negative effects are detected, the actions available to DDMI include the following:

- increase monitoring effort;
- implement special studies to further understand the effects; and/or,
- implement additional mitigation to reduce the effects.

Figure 2.2-1 Adaptive Management Decision Tree for the Diavik Mine



2.3 Valued Ecosystem Components

Valued ecosystem components represent physical, biological, cultural, social and economic properties of the environment that are considered to be important by society. The rationale for choosing the VECs selected for monitoring in the WMMP included the following:

- species are present in sufficient numbers to collect meaningful information;
- monitoring initiatives already exist that DDMI can contribute to;
- monitoring is important to communities, wildlife managers, and regulators;
- species can be monitored effectively with practical and efficient measurement indicators;
- measurement indicators are sensitive enough to detect Mine-related effects; and,
- species of concern (i.e., listed species) are located within the study area and should be monitored.

The VECs included in the WMMP are provided in Table 2.3-1.

Table 2.3-1 Valued Ecosystem Components for the Wildlife Management and Monitoring Plan

Valued Ecosystem Component	Rationale
Barren-ground caribou	Barren-ground caribou is a species of concern, seasonal migrants to the area, are an important component of the culture and economy of the NWT.
Grizzly bear	Grizzly bear is a species of concern, and Mine-site monitoring is being undertaken.
Wolverine	Wolverine is a species of concern, and Mine-site monitoring is being undertaken.
Raptors	Peregrine falcon and short-eared owl are species of concern. Peregrine falcons are known to nest on cliffs in the Mine regional study area. However, based on technical workshops with government, monitoring agencies and Aboriginal communities, monitoring of raptor nest occupancy and success was removed from the WMMP, and DDMI now supports ENR in regional nest monitoring.
Waterbirds	Waterfowl and shorebird species are seasonal migrants to the area. Presence monitoring during operations was removed in consultation with ECCC and will resume during the closure period of the Diavik mine.

NWT = Northwest Territories; ENR= Department of Environment and Natural Resources; ECCC = Environment and Climate Change Canada.

Incidental observations of other wildlife species during monitoring, such as rare or uncommon species will also be recorded (Section 5.9). Following the principles of adaptive management, the VECs and monitoring objectives may be periodically reviewed and changed as necessary.

2.4 Species of Concern

The intent of the federal *Species at Risk Act* (SARA) and the *Species at Risk (NWT) Act* is to prevent wildlife species from becoming extirpated or extinct, to provide for the recovery of extirpated, endangered or threatened species, and to manage species of special concern to prevent them from becoming at further risk. This legislation may be used to prohibit the killing, harming or harassing of listed species, the damage and destruction of their residences, and the destruction of critical habitat. The *Species at Risk (NWT) Act* applies only to birds not already covered by the *Migratory Birds Convention Act*. In the NWT, the Species at Risk Committee will assess species, and the Conference of Management Authorities will prepare the List of Species at Risk, providing legal protection.

For the purposes of the WMMP, species may be considered of concern as a result of their national or territorial status, or their status under the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). As the *Species at Risk (NWT) Act* is implemented, the NWT Species at Risk Committee will make further assessments, and the Conference of Management Authorities will prepare the List of Species at Risk, providing legal protection for these species, and possibly leading to changes in the species at risk considered for the Mine and the WMMP.

There are eleven wildlife species of concern with ranges that are known to overlap or likely overlap with the Mine (Table 2.4-1). For migratory birds, only those birds that breed or winter near the Mine were included; other species that may migrate through the area were not included. Each of the species of concern will be monitored through the WMMP to mitigate direct impacts from habitat loss and mortality as part of the adaptive management process. Mitigation and monitoring strategies will be consistent with any final and applicable COSEWIC assessment report, SARA recovery strategy, action plan, and management plan that may become available during the life of the Mine.

Table 2.4-1 Species of Concern at the Diavik Mine

Species	NWT List of Species at Risk	NWT Species at Risk Committee	COSEWIC Assessment	Federal Species at Risk Act	Potential Mine Impacts	WMMMP
Barren-ground caribou	Threatened	Threatened	Threatened	Under consideration	<ul style="list-style-type: none"> • may be affected by habitat loss • may be sensitive to disturbance and human activity • risk of harm or mortality 	Habitat loss Site monitoring Zone of influence monitoring Behaviour monitoring
Grizzly bear (western population)	No status	Special Concern	Special Concern	Special Concern	<ul style="list-style-type: none"> • may be attracted to developments if food is available • sensitive to disturbance particularly when accompanied by young or during denning • long generation time means one individual may be affected by disturbance seasonally over multiple years, resulting in potential regional population effects 	Habitat loss Site monitoring
Wolverine	No Status	Not At Risk	Special Concern	Special Concern	<ul style="list-style-type: none"> • may be attracted to developments if food or shelter are available 	Habitat loss Site monitoring Snow track surveys
Barn swallow	Not Applicable	Not Applicable	Special Concern	Threatened	<ul style="list-style-type: none"> • may nest on Mine infrastructure (risk of mortality) 	Habitat loss Site monitoring (particularly for nesting activity)
Bank swallow	Not Applicable	Not Applicable	Threatened	Threatened	<ul style="list-style-type: none"> • may build nesting colonies on Mine infrastructure (risk of mortality) 	Habitat loss Site monitoring (particularly for nesting activity)
Harris's sparrow	Not Applicable	Not Applicable	Special Concern	Not listed	<ul style="list-style-type: none"> • may nest on Mine infrastructure (risk of mortality) 	Habitat loss Site monitoring (particularly for nesting activity)

Table 2.4-1 Species of Concern at the Diavik Mine

Species	NWT List of Species at Risk	NWT Species at Risk Committee	COSEWIC Assessment	Federal Species at Risk Act	Potential Mine Impacts	WMMP
Lesser yellowlegs	Not Applicable	Not Applicable	Threatened	Not listed	<ul style="list-style-type: none"> loss of shoreline habitat for breeding birds that use Mine-altered waters may be harmed 	Habitat loss Site monitoring (particularly for nesting activity)
Peregrine falcon (anatum-tundrius complex)	No Status	Not Assessed	Not at risk	Special Concern	<ul style="list-style-type: none"> peregrines have been known to nest on Mine infrastructure and in open pits, where they may be at risk of harm or may cause delays to operations 	Habitat loss Site/pit monitoring (particularly for nesting activity) Regional nest occupancy and productivity monitoring (support ENR)
Red-necked phalarope	Not Applicable	Not Applicable	Special Concern	Special Concern	<ul style="list-style-type: none"> loss of shoreline habitat for breeding birds that use Mine-altered waters may be harmed 	Habitat loss Site monitoring (particularly for nesting activity)
Rusty blackbird	Not Applicable	Not Assessed	Special Concern	Special Concern	<ul style="list-style-type: none"> may nest on Mine infrastructure (risk of mortality) experiencing population declines as a result of changing environmental conditions on breeding and overwintering habitats 	Habitat loss Site monitoring (particularly for nesting activity)
Short-eared owl	Not Applicable	Not Assessed	Threatened	Special Concern	<ul style="list-style-type: none"> may be affected by habitat loss sensitive to noise and disturbance and human activity during nesting 	Habitat loss Site monitoring (particularly for nesting activity)

Source: NWT SAR (2021).

COSEWIC = Committee on the Status of Endangered Wildlife in Canada; NWT = Northwest Territories; WMMP = Wildlife Management and Monitoring Plan; ENR = Department of Environment and Natural Resources.

3 ENGAGEMENT AND INCORPORATION OF TRADITIONAL KNOWLEDGE

As part of their commitment to the environment, DDMI is mandated under their Environmental Agreement to incorporate available TK in environmental monitoring programs. Wildlife monitoring uses scientific methods and is informed by TK regarding local wildlife and wildlife habitat and ecology, when available.

The WMMP focusses on wildlife species and habitats identified as being of social or economic importance, or of particular ecological or conservation concern (i.e., VECs). Each year the program is refined as a result of previous information collected and input from government and non-government agencies, Aboriginal communities and EMAB. With the assistance of community experts, land users, and/or TK holders during wildlife and habitat surveys, TK has been used to help understand monitoring results and provide ways of preventing and reducing impacts to wildlife. The WMMP will continue to evolve as DDMI explores further options to improve the program through community and regulatory workshops, community assistant participation, and site visits.

Part of the intent of DDMI's Engagement Plan is to demonstrate and provide hands-on experience for community members (Elders, adults, and youth) so that they may gain a general awareness on how the Diavik mine Environment Department conducts its day-to-day, site-based, environmental monitoring programs. To accomplish this, DDMI utilizes several different methods, including:

- A TK Panel (community Elders and youth representatives);
- TK monitoring programs; and,
- Community assistance with environmental monitoring programs.

The methods follow guiding principles for integrating TK at the Mine, which are provided in Table 3.0-1. The guiding principles were developed on the basis of respect, integrity and to demonstrate a willingness to learn from experience.

Table 3.0-1 Diavik Mine Guiding Principles of Traditional Knowledge Integration

Principle	Integration at Diavik Mine
Wildlife programs benefit most when TK is applied at the development stage. Scientific methods are then used to collect data.	Grizzly bear hair snagging program, wolverine snow track program, and vegetation and lichen sampling (caribou habitat)
TK is used throughout operations to check in and update programs.	Recommended new caribou behaviour monitoring categories
TK monitoring programs will be considered that have a clear objective directly linked to testing EER predictions or mitigation effectiveness and are reproducible.	Vegetation and lichen monitoring program (e.g., Tł'chǫ Government 2013).
Communities including Elders should participate in monitoring.	Caribou monitoring up to 2013 when caribou were abundant in the study area Wolverine snow track monitoring
TK Panel Sessions will be the primary source of TK.	Recommended new caribou behaviour monitoring categories Numerous recommendations have been made for Mine closure

The TK Panel is the primary way that DDMI gathers TK for the Mine and the TK Panel meets at least once per year. The TK Panel is comprised of DDMI and TK holders from the five different communities involved in the Environmental Agreement. While Diavik may recommend discussion topics, the TK Panel has the freedom to develop its own agenda. To date, the TK Panel has primarily focussed their wildlife recommendations on closure aspects of the Mine. Recommendations associated with the Mine closure phase are outside of the scope of the WMMP but will be considered by DDMI for the Closure and Reclamation Plan.

Diavik is committed to engaging with communities to explain proposed changes to the WMMP, to listen to comments, respond to questions and consider suggestions to improve components of the WMMP. Diavik will consider proposed TK monitoring programs that have a clear objective and will lead to measurable and reproducible results that relate to EER predictions or inform on mitigation effectiveness.

3.1 Support of Community-Based Traditional Knowledge Studies

The Diavik mine has a strong history of supporting community-based TK projects that extends back to the mid-1990s which is described below.

Diavik became a funding partner to the On the Land Collaborative in 2016. Through the On the Land Collaborative, Diavik is able to ensure communities across the north are supported for land-based activities. The NWT On the Land Collaborative brings together government, charitable, corporate, and other partners to combine efforts and make it easier for communities in the Northwest Territories to access money and resources for land-based projects. The Collaborative supports projects that:

- get people out on the land;
- connect community members to their land, culture, and traditions;
- build or strengthen partnerships;
- enhance community capacity; and,
- are sustainable.
- For more information, visit www.nwtontheland.ca.

In addition to support for land-based projects, the Diavik mine hosted numerous site visits and community meetings to discuss archaeology, wildlife, habitat, water and waste management at the Mine site. Representatives from the communities have also helped design project activities and components in an effort to minimize potential impacts. Other site-based TK and community engagement programs related to the wildlife monitoring programs have included:

- TK Camp for Elders and youth;
- survey transect design used for wolverine snow track monitoring 2003 through 2006;
- community participation in caribou behaviour, grizzly bear hair snagging and wolverine snow track monitoring;

- annual TK Panel sessions;
- annual visits from community leadership and representatives;
- annual community participation in group workshops and site visits to demonstrate and discuss air quality, dust, and vegetation monitoring, and other specific topics of interest; and,
- periodic Winter Road tours.

Diavik mine staff also regularly participates in community-based meetings and workshops to discuss questions and concerns about ongoing mining activities and monitoring programs in conjunction with the Engagement Plan.

3.2 Incorporation of Traditional Knowledge in Monitoring

With the assistance of community experts, land users and/or TK holders during wildlife and wildlife habitat surveys, TK has been applied to help with monitoring study design, understand the results, or provide ways of preventing or reducing impacts to wildlife. In particular, TK has been an important part of wildlife monitoring program development. In general, TK is not applied as a separate line of evidence; scientific methods have been the source of data collection to provide repeatable results and comparison with the EER predictions. Diavik is committed to providing communities with the opportunity to participate in mitigation and monitoring study designs and programs. Up to 2013, communities, including Elders, were regular participants in caribou monitoring. Participation has decreased since then because of the Bathurst caribou herd decline and subsequent low numbers of caribou in the study area. Inclusion of local and TK in the monitoring of caribou, wolverine, and grizzly bear is listed in Table 3.2-1 with further description in the subsequent sections.

Table 3.2-1 Traditional Knowledge and Wildlife Monitoring at Diavik Mine

VEC	Traditional Knowledge Contributed	Monitoring Program	Program Application	WMMP Section
Barren-ground caribou	<ul style="list-style-type: none">• preferred habitat• migration• traditional land use• caribou behaviour categories	Vegetation and Lichen (habitat) Caribou Behaviour	<ul style="list-style-type: none">• selection of sampling locations (study design)• variables measured• interpretation of results	3.2.1
Wolverine	<ul style="list-style-type: none">• preferred habitat	Snow tracking	<ul style="list-style-type: none">• selection of sampling locations (study design)• monitoring participation	3.2.2
Grizzly bear	<ul style="list-style-type: none">• preferred habitat	Grizzly bear hair snagging	<ul style="list-style-type: none">• scale of monitoring (study design)• selection of sampling locations (study design)• monitoring participation• species samples	3.2.3

3.2.1 Caribou

Elders and holders of TK are regularly invited to site to participate in monitoring programs and to share their knowledge about caribou behaviour, diet, health and body condition, and migration movements. For example, Diavik and the Tłı̨chǫ Government carried out a TK study in the summer of 2013 through a series of workshops and site visits where four participating Elders from Tłı̨chǫ and Lutsel K'e shared stories and knowledge about caribou migration, preferred habitats (vegetation communities and landscape features) and traditional land use (Tłı̨chǫ Government 2013). The guidance provided by the Elders resulted in selection of specific sampling sites for the vegetation and lichen monitoring program that were appropriate for caribou use. In addition to influencing the study design, TK shared in this study has also been considered in the interpretation of monitoring results (see Appendix I of Golder 2017a). Elders in the 2013 TK study noted that caribou will avoid using the areas close to the Mine during migration because dust on forage will alter its taste or smell.

Traditional Knowledge was incorporated into caribou behaviour surveys in the fall of 2012 and 2013. Participating Elders added an additional behaviour “curious” for caribou that approached. Traditional Knowledge has also been incorporated into the caribou scan surveys through means of a questionnaire. Observed caribou are commented on from an animal health and traditional use perspective. For example, during 2019 caribou behaviour scans, Earnest (Patty) Lockhart from Lutsel K'e Dene First Nation and Lisa Marie Zoe from Whatí participated and commented that the caribou being observed appeared healthy.

3.2.2 Wolverine

Diavik has completed long-term monitoring of wolverine using snow track methods. From 2003 to 2006, the study design and data collection for wolverine snow track monitoring was based on the experience of Inuit Qaujimajatuqangit (IQ) to locate transects and record wolverine snow tracks in the study area. In 2008 the study design was revised and the final locations of snow track survey transects were the result of a stratified random sampling process of potential locations in the study area, but some transects were relocated from Lac de Gras to areas of preferred wolverine habitat (based on IQ). Snow track surveys are often completed with support from community members.

3.2.3 Grizzly Bear

At technical and community workshops held in 2010, regulators, monitoring agencies and community members recommended that the mining industry collaborate on a large scale regional grizzly bear program to assess population status and monitor trends over the long term (Handley 2010). In response, DDMI and Dominion Diamond agreed to work together on a large scale, grizzly bear mark-recapture study surrounding their diamond mine properties in the central barrens of the NWT (ERM Rescan 2014).

A hair snagging pilot study was completed jointly by Diavik and the Ekati mine in 2010 and 2011 (DDMI 2012; Rescan 2012). Elders, land users and youth from Kugluktuk, Łutselk'e Dene, Yellowknives Dene, and the North Slave Métis Alliance participated in site visits during the initial planning phases of the program and helped identify habitat locations for establishing hair snagging devices for the grizzly bear DNA Program (ERM Rescan 2014). Surveys were completed by a biologist and a community assistant. Hair samples collected from the barbed wire were identified to species by a community assistant and archived for possible DNA fingerprinting to validate species identification (ERM Rescan 2014). Program partners agreed to discontinue the grizzly bear hair snagging program at the Diamond Mine Wildlife Monitoring Meeting in February 2021.

3.2.4 Traditional Knowledge Inclusion in Effects Mitigation and Deterrents

Since 2011, the TK Panel has guided DDMI to appropriately and meaningfully consider TK in operations and closure planning and management of the Mine. The TK Panel is made up of Elders and youth from Diavik's Participation Agreement communities selected by their respective communities (Kitikmeot Inuit Association, Łutselk'e Dene First Nation, North Slave Métis Alliance, Tłı̨chǫ Government and Yellowknives Dene First Nation). Panel members have been meeting since 2012 and continue to gather at least once a year to review closure plans for various areas of the Mine, share their knowledge in relation to each topic, and present recommendations to Diavik. In this way, they are continually building their understanding of the Mine site and the closure challenges, while also directly influencing closure plans. To date, the TK Panel has provided a total of 206 detailed recommendations for consideration by DDMI and other parties. For example, the TK Panel sessions made the following resloping recommendations to encourage safe passage of wildlife through and around the Mine site and which have been incorporated into operational and closure mitigation:

- TK Panel #10 (Watching/Monitoring and the WRSA-SCRP, 14-18 September 2017): incorporate a re-sloped (3:1) pathway on the South Country Rock Pile to facilitate safe movement of wildlife across the pile
- TK Panel #9 (Focus on Caribou, 13-16 May 2016): ensure that the closure design for the Waste Rock Storage Area North Country Rock Pile (WRSA-NCRP) would be sloped to minimize the amount of water that would pool on top of the pile minimizing wildlife attraction
- TK Panel #7 (Re-vegetation Report, 14-18 August 2014): design the WRSA-NCRP final closure slope to be neutral to wildlife and vegetation, mimicking the approach taken at the Test Piles

4 MITIGATION

The environmental design features and mitigation policies, practices, and procedures that DDMI has and will continue to implement to avoid and minimize or limit effects to wildlife and wildlife habitat are collectively referred to as mitigation. The WMMP includes a large number of mitigations implemented on a hierarchy of intensity (action) levels and spatial and temporal scales to protect wildlife and wildlife habitat. Standard mitigation hierarchy includes the following classifications (IFC 2012; BBOP 2021):

- Avoid: actions taken to completely avoid creating impacts from the outset, such as careful spatial or temporal placement of elements of infrastructure and engineered designs of facilities (e.g., waste rock storage areas).
- Minimize: actions taken to reduce the duration, intensity and/or spatial extent of impacts that cannot be avoided.
- Reclaim: actions taken to rehabilitate degraded ecosystems or restore ecological function following exposure to impacts that cannot be completely avoided and/or minimized (e.g., revegetated areas).
- Offset: measures taken to compensate for any residual significant, adverse impacts that cannot be avoided, minimized and/or rehabilitated or restored. Offsets are achieved once compensation is sufficient that the outcome is no net loss or a net gain for the feature (e.g., VEC) for which compensation was developed. Offsets can take the form of positive management interventions, such as restoration of degraded habitat, arrested degradation or averted risk, and protecting areas where there is imminent or projected loss.

Adverse effects from a mine or development should be mitigated as much as possible using avoidance, followed by minimization, and reclamation. This is because effects that are avoided entirely or minimized mean that the effects from a development prior to implementing reclamation are reduced.

The Diavik mine uses mitigation that avoids, minimizes, and reclaims adverse effects associated with environmental risks or effects pathways. The results of the environmental assessments for the Diavik mine (DDMI 1998b; Government of Canada 1999) concluded that there were no significant residual effects to wildlife and wildlife habitat, therefore offsetting is not required.

Mitigation at the Diavik mine is applied and intensified or reduced within an adaptive management framework (Section 2.2). For example, the frequency with which wildlife deterrents are applied may increase or decrease, depending on results of monitoring (Section 2.2; Figure 2.1-1). Similarly, if monitoring demonstrated that wildlife-vehicle collisions were high or increasing, then the scope or frequency of driver training, speed limits, or other mitigation can be managed adaptively in a way that is intended to reduce the effect. Adaptive management can also include increasing monitoring, applying different mitigation, or implementing a special study to better understand an effect.

4.1 Mitigation Effectiveness at the Diavik Mine

Various mitigation designs, policies, practices, and procedures have been implemented, monitored, and evaluated at the Diavik mine and other operating mines such as the Ekati, Snap Lake, Gahcho Kué and Jericho (now dormant) mines. The WMMP assesses the effectiveness or success of different mitigations implemented at the Diavik mine and incorporates the lessons learned through adaptive management. Some of the improvements include modified landfill practices, construction of skirting around buildings, employee education, and monitoring site nesting activity by raptors. A qualitative assessment of the effectiveness of mitigation is provided below.

4.1.1 Vehicle-Wildlife Collisions

Mitigation efforts to avoid and minimize vehicle-wildlife collisions, such as speed limits, giving animals the right-of-way, radio communication of wildlife presence, and temporary road closures have been successful. No caribou, grizzly bear, or raptors have been killed at the Diavik mine from vehicle collisions. One wolverine (2007) was killed by a vehicle (DDMI 2007). Most vehicle-wildlife collisions involve fox, Arctic hare, ptarmigan, and Arctic ground squirrel.

Radio communications about the presence of wildlife have limited vehicle-wildlife collisions. The placement of wildlife crossing signs is re-assessed when necessary, when habitat around the Mine changes due to operational or reclamation activities, or as new information about habitat use by wildlife becomes available. The Diavik mine provides employee training about the wildlife right-of-way policy, including how the Environment Department responds to the calls.

Diavik has implemented several mitigation practices to minimize potential interactions between Mine-related traffic and wildlife:

- caribou advisory;
- wildlife always have the right-of-way;
- speed limits of 15 km/hr to 60 km/hr are posted based on human safety and are enforced;
- reduced speed limits relative to caribou proximity from roads are also enforced (Table 4.1-2);
- vehicles encountering wildlife on roads are required to stop and communicate the presence of wildlife on the road(s) to the Environment Department and others in the area (Table 4.1-2);
- traffic patterns may be altered and are communicated site-wide when wildlife are in the vicinity of the road (Table 4.1-1); and,
- visual inspections at the airstrip for wildlife are completed prior to take-off and landing of all aircraft.

Table 4.1-1 outlines how approaching caribou will be detected, trigger levels to initiate action, and tiered mitigations to avoid and reduce sensory disturbance to caribou, and avoid or minimize impacts to caribou from sensory disturbance and mortality or injury risks.

Table 4.1-1 Tiered Caribou Mitigation and Monitoring Levels

Action Level	Caribou Mitigation	Caribou Monitoring
Throughout the year	<ul style="list-style-type: none"> Employee education Observations of caribou on east island will be communicated to the Environment Department and other drivers in the area 	<ul style="list-style-type: none"> Collared caribou monitoring Incidental caribou sightings. Behavioral scans on observed caribou.
Caribou collared data shows caribou within 5 km of east island	<ul style="list-style-type: none"> Side wide notifications that caribou may be encountered on site Employee education 	<ul style="list-style-type: none"> Collared caribou monitoring Incidental caribou sightings.
Caribou sightings are reported on east island	<ul style="list-style-type: none"> Site wide notifications of caribou presence. Speed limits decreased and posted in notifications 	<ul style="list-style-type: none"> Collared caribou monitoring Incidental caribou sightings. Behavior observation scans on observed caribou.
Caribou on Mine areas and roads	<ul style="list-style-type: none"> Observations of caribou on roads will be communicated to the Environment Department and road users Site wide notifications of caribou presence. Caribou have right of way Temporary road closures by environment to minimize disruptions to caribou movement. Deter caribou from hazardous areas 	<ul style="list-style-type: none"> Collared caribou monitoring Incidental caribou sightings Behavior observation scans Environment Technicians dispatched to monitor traffic and ensure caribou safety.

Speed limits enforced based on distance of caribou from roads are identified in Table 4.1-2.

Table 4.1-2 Speed Guidelines Based on Distance of Caribou from Site Roads

Distance of Caribou from Site Roads ¹	Speed Guideline
Less than 100 m	<ul style="list-style-type: none"> Driver to stop. If caribou are travelling away from road driver can continue at reduced speed 20 km/h. If caribou are approaching road the driver is to remain stopped.
100 – 200 m	<ul style="list-style-type: none"> Driver to proceed at 20 km/h
200 – 500 m	<ul style="list-style-type: none"> Driver to proceed at 40 km or posted speed limit if less than 40 km/h
500 m or more	<ul style="list-style-type: none"> Driver to proceed at posted speed limit

1) Applies to caribou in line of sight from the road.

4.1.2 Blasting

Blasting has potential to cause sensory disturbance, injury, and mortality to wildlife. Current practices limit potential wildlife disturbance, injury, or mortality, and no wildlife injuries or mortalities related to blasting at Diavik have been reported to date.

Diavik will implement a 500 m exclusion zone to blasting for caribou as per the Northern Land Use Guidelines for Northwest Territories Seismic Operations (GNWT-DoL 2015). Blasting currently takes place 100 m below the surface within a 12 m deep charge hole. Overpressure (perceived as noise) from blasting will be directed upward and not outward and vibration propagates through subsurface material such as rock and water prior to reaching the surface where caribou occur. Blasting activity also occurs at a low frequency and short duration and DDMI uses stemming technique in boreholes to reduce noise and ground vibration potential during blasts.

4.1.3 Waste Management

Mitigating the attraction of carnivores and scavengers (e.g., gulls and ravens) to food garbage, petroleum products, contaminants, and potential shelter is a concern at all operating mines. There are indications that improved and continual employee education has resulted in a decrease in the presence of scavengers and food waste items at the Waste Transfer Area (WTA) and Landfill over time at the Diavik mine (Golder 2020b). Specifically, training and education is provided for each department and new employees on the importance of following waste management policies and practices, and wildlife awareness to reduce interactions with wildlife. Changes in the operations of waste management practices, in addition to the education and awareness programs for new and current employees and contractors include:

- more frequent burning of camp waste to reduce chance of wildlife encounters;
- littering and feeding of wildlife is prohibited;
- signs have been added in lunchrooms and additional labels have been added to waste bins to indicate proper waste disposal; and,
- recyclable waste materials generated on-site are shipped off-site using winter road backhauls.

4.1.4 Open Pits

Open pits may lead to wildlife injury or mortality through the presence of steep sides, fly rock, and traffic. No caribou or other wildlife mortalities from animals entering the open pits at the Diavik mine have been reported (Golder 2020b).

Diavik has implemented several mitigation practices to minimize potential interactions between wildlife and hazardous areas of the Mine-site:

- caribou advisory;
- wildlife always have the right-of-way;
- caribou and other wildlife will be deterred from areas of risk; and,
- specific caribou deterrent procedures.

4.1.5 Pit Infilling

Infilling open pits with processed kimberlite and water from Lac de Gras during closure can result in injury or mortality to wildlife. Prior to infilling open pits, surveys of the pit and dike area will be completed for caribou and other wildlife, including raptor nests. Wildlife will be deterred from the open pit and/or dike area, if present. If raptors are nesting in the pit, infilling will not occur until young have fledged or adults have abandoned the nest. Active nests will be buffered from other activities by 250 m (J. Hodson [pers. comm.]). The pit and dike area will be monitored during infilling and approaching wildlife will be deterred from the area.

4.1.6 Dust

The Mine produces dust through various sources including blasting and crushing rock, haul truck and light vehicle traffic, and the take off and landing of aircraft. Fugitive dust emissions are mitigated through the application of water and chemical suppressants on roads and the airstrip during summer or the non-frozen period. Diavik waters roads to suppress dust as frequently as possible when they are dry during the summer. The action trigger for application of suppressants is visual observation of fugitive dust. Monitoring of dust deposition is completed through the Environmental Air Quality Monitoring Plan (EAQMP) and the Comprehensive Vegetation and Lichen Monitoring Program, which assesses the effects of dust on plant species, and changes to lichen and soil chemistry (Section 4.2.2). Dust has resulted in limited and small adverse effects to plant communities/wildlife habitat (Golder 2017a).

4.1.7 Health Effects from Contaminants

Diavik completed a risk assessment of caribou exposure to metals in lichen from dust deposition and found that potential health effects to caribou were negligible (Golder 2011a). Caribou exposure to metals from dust deposition and associated health risks continue to be evaluated during Mine operations as part of the Comprehensive Vegetation and Lichen Monitoring Program, which indicated metal concentrations were within safe levels for caribou (Golder 2017a). The next cycle of the Comprehensive Vegetation and Lichen Monitoring Program is schedule for 2021.

Water quality on site (e.g., water management ponds) and in the receiving environment is systematically monitored through the Aquatics Effects Monitoring Program (AEMP) and through the Surveillance Network Program. The results provided input into the caribou risk assessment (Golder 2011a) and current information on the potential risks of exposure of contaminants to wildlife that occur within and adjacent to the Mine. The importance of environmental effects to the aquatic environment are evaluated by comparing annual AEMP results to Action Levels, which are defined as part of the AEMP Response Framework. The Response Framework and associated adaptive management strategies are described in the approved AEMP Design Plan (Golder 2017b).

4.2 Mitigation of Key Environmental Risks or Pathways

The WMMP provides specific mitigation for each of the following key environmental risks or pathways:

- direct habitat alteration and loss;
- indirect habitat alteration and loss; and,
- protection of caribou and other wildlife from direct Mine-related mortality.

4.2.1 Direct Habitat Alteration and Loss

Direct habitat loss refers to the physical disturbance and immediate loss of wildlife habitat (e.g., upland and riparian vegetation, wetlands, and water) within the footprint of the Diavik mine. Direct habitat loss is monitored in the WMMP. Mitigation for direct habitat loss is implemented so that the physical footprint of the Diavik mine does not exceed that authorized in the Land Use Permits and includes the following.

- soil disturbance will be limited to only those areas required for construction and operation of the Diavik mine;

- use progressive reclamation when areas of the Mine site are no longer required; and,
- conditions will continue to be monitored over time to evaluate the success of the Closure and Reclamation Plan (CRP) and, using industry best practice, adaptive management, and newer proven methods as available, to adjust the CRP as necessary and appropriate.

4.2.2 Indirect Habitat Alteration and Loss

Indirect habitat loss is a result of a decrease in the perceived quality of habitat by wildlife and subsequent changes in movement and behaviour of individuals that occurs outside of the Mine physical footprint. The decrease in habitat quality can be a function of sensory disturbance from Mine-related dust, noise, lights, human presence, and animal memory of previous encounters with development. Changes in movement and behaviour from sensory disturbance can affect the local abundance and distribution of animals within an area or ZOI of mining activity. Thus, sensory disturbance can reduce habitat quality for wildlife even where vegetation remains intact.

Currently, it is expected that indirect habitat alteration and loss for caribou (i.e., the ZOI) will be monitored through analysis of GPS collar data (Section 5.4.3), and regional programs in collaboration with ENR (e.g., the Barren-ground Caribou Recovery Strategy; Section 5.4.5). Potential mechanisms for the ZOI will be monitored through the WMMP and other programs such as the EAQMP and Comprehensive Vegetation and Lichen Monitoring Program.

Mitigation policies and actions to minimize indirect habitat loss includes the following:

- regular maintenance of equipment to limit noise and particulate matter emissions;
- dust suppression is applied as appropriate to roads, airstrip, and laydown areas;
- speed limits are posted and limit fugitive dust emissions;
- wildlife always have the right-of-way; and,
- education and environmental sensitivity training will be provided to employees and contractors.

4.3 Protection of Caribou and Other Wildlife

Occasionally, mining operations have contributed to the mortality or injury of wildlife. This may be either accidental (such as vehicle collisions with wildlife), or the deliberate removal (re-location or intentional destruction) of problem wildlife to protect worker safety. Deterrent actions always start with the least intrusive method and then increase with intensity as needed. An effective way to reduce wildlife mortality has been to establish and enforce low speed limits on Mine roads. Reducing the availability of food and shelter for wildlife, thus limiting the attraction and presence of animals within the Diavik mine, is also highly effective at preventing mortality or harm to wildlife. Incidents and mortalities, and effectiveness of mitigation for the protection of caribou and other wildlife are monitored in the WMMP.

4.3.1 Direct Mine-Related Mortality and Injury

Mitigation to avoid and limit direct Mine-related mortality and injury to caribou and other wildlife from collisions with vehicles or aircraft, physical hazards (e.g., pits, blasting), interaction with potential contaminants, destruction of migratory bird nests (i.e., incidental take), and pit infilling includes the following:

- current mitigation policies and practices for safety of wildlife on roads, airstrip, and other areas of the Diavik mine will be continued (Section 4.1). These practices include reporting of wildlife sightings by all employees, and control of encounters by Environment staff;
- site Environmental Staff will investigate all caribou and other wildlife incidents and mortalities, and will report to the appropriate government agency GNWT-ENR: responsible North Slave Regional Officer or ECCC (Environment and Climate Change Canada): cwsnorth-scfnord@ec.gc.ca and dalfnord-wednorth@ec.gc.ca, and recommend follow-up;
- systematic monitoring of different areas of the Diavik mine will be conducted, including the waste management and transfer areas, and Landfill. Information collected will be used for adaptive management;
- caribou and other wildlife will be deterred from areas of risk;
- wildlife always have the right-of-way;
- speed limits of 15 km/hr to 60 km/hr are posted based on human safety and are enforced;
- reduced speed limits are enforced based on distance of caribou from roads (Table 4.1-2);
- mitigation is currently in place to minimize human-wildlife interactions, including awareness training;
- pit wall monitoring procedures for raptor nests, includes a buffer of 250 m around active nests (J. Hodson [pers. comm.]);
- birds showing nesting activity in areas of critical risk will be actively deterred. Diavik will not deter birds from nesting in inactive pits;
- monitoring and deterrent procedures for infilling of pits, includes caribou, raptors, and other wildlife;
- although Diavik Mine is at full development, any additional land clearing will take place outside the migratory bird breeding season. If this is not possible, bird nest surveys will be completed following Standard Operating Procedures for Pre-Land Disturbance Bird Sweeps (May 1 to August 31; Appendix A, ENVI-1242-0921).
- visual airstrip inspections for wildlife are completed prior to take-off and landing of all aircraft;
- vehicles encountering wildlife on roads are required to stop and communicate the presence of wildlife on the road(s) to the Environment Department and others in the area (Section 4.1.1).

4.3.2 Management of Toxic Substances

The following mitigation policies and procedures are intended to decrease the risks to caribou and other wildlife from ingestion of toxic substances or encounters with toxic spills on the Diavik mine site:

- regular equipment maintenance (e.g., regular checks for leaks);
- drip trays are used during servicing and refuelling;
- hazardous substances are stored and handled on site in accordance with applicable regulations;
- fuel is stored at a central bulk fuel area and fuel tanks are housed within bermed areas;
- follow Diavik's Contingency Plan in the event of a spill (spill response training is provided and updated);
- soil and snow affected by hydrocarbon spills are handled in accordance with the existing Contingency Plan and soil will be remediated in the landfarm or the Type III waste rock zone of the WRSA-NCRP.
- dewatering and minewater management is managed by the Water Management Plan and Processed Kimberlite Containment Facility Plan;
- minewater and fine processed kimberlite slurry pipelines are monitored and inspected throughout the life of Mine. Additional mitigation is applied, if required; and,
- any leaks or spills identified along the pipelines are addressed and clean-up, following the existing Contingency Plan;
- wildlife are deterred from the landfarm and Type III waste rock zone of the WRSA-NCRP following methods outlined in Standard Operating Procedures for Wildlife Monitoring (Carnivores) and Caribou Management/Observation On and Off East Island (Appendix A, ENVI-911-0119, ENVI-914-0119).

4.3.3 Management of Attractants

The following mitigation and management plans are intended to limit the numbers of predators and scavenging wildlife (such as carnivores, gulls and ravens) attracted to the Diavik mine, and avoid and minimize human-wildlife interactions and changes to predator-prey relationships.

- apply the Waste Management Plan;
- separate bins located throughout the accommodations complex, shops, and other facilities on-site for immediate sorting of domestic wastes, including recycling;
- food wastes are collected in specific bins for transport directly to the WTA for incineration;
- incinerator is enclosed and camp waste is burned regularly;
- littering and feeding of wildlife is prohibited;
- raised, heated buildings are skirted to prevent wildlife access to shelter under the buildings, and monitored regularly;
- wildlife activity will continue to be monitored at WTA and Landfill, and provide feedback into adaptive management;

- the Landfill site, WTA and waste management areas are regularly inspected for mis-directed waste;
- the efficiency of the waste management program will be reviewed as needed and improved through adaptive management; and,
- education and reinforcement of proper waste management practices and issues surrounding wildlife habituation is provided to all workers and visitors to the site.

4.3.4 Deterring Wildlife

The goal of wildlife deterrent action is to respond to situations using humane methods that keep both humans and wildlife safe. Wildlife will only be deterred when there is a risk to either humans or wildlife, as judged by the environment staff. All deterrent actions start with the least intrusive method, and then increase in intensity as needed, following Standard Operating Procedures for Wildlife Monitoring (Carnivores) (Appendix A, ENVI-914-0119). Each deterrent action will stop as soon as the animal moves away from the potentially hazardous site and no longer poses a threat to humans. Deterrents may be used to remove wildlife from the airstrip and potentially hazardous sites and activities, such as infilling of pits. All deterrent actions will be documented and reported to ENR. Specific deterrent actions for caribou include the following:

- all incidents involving interactions, use of deterrents or potential injury of caribou will be documented and evaluated; and,
- caribou will only be moved away from roads or the airstrip under specific circumstances, such as when there are incoming flights or if there is an emergency, following Standard Operating Procedures for Caribou Management/Observation On and Off East Island (Appendix A, ENVI-911-0119).

4.4 Education

Environmental education is part of every employee's and visitors mandatory training upon starting at the Diavik mine. The Diavik Safety Training System for environmental education training includes:

- review of Environmental Management System;
- wildlife awareness (Incidental Reporting Requirements);
- wildlife right-of-way policy (Diavik Wildlife Management Policy);
- no feeding wildlife policy (DDMI Policy: No Feeding of Wildlife);
- no hunting or sport fishing policy (Diavik Wildlife Management Policy);
- spill reporting;
- wildlife reporting policy;
- Workplace Hazardous Materials Information System (WHMIS); and,
- waste management.

The Environment department also provides role and department-specific training and presentations based on seasonal environmental issues. For instance, departmental staff will be given presentations on waste management practices if a trend is identified from monitoring.

4.5 Mitigation Review

The mitigation in the WMMP stems from current practices at Diavik and existing mines; however, an annual review system is required to evaluate the mitigation. A review will be undertaken to evaluate the following:

- which mitigation has been implemented;
- which mitigation is perceived to be or shown to be successful;
- if new mitigation has been implemented in response to new issues; and,
- if some mitigation has become redundant or ineffective.

The mitigation review will be provided in the annual WMMP report.

5 MONITORING

5.1 Direct Wildlife Habitat Loss

Diavik has monitored the cumulative amount of direct habitat loss from construction through current operation of the Mine since 2000. The quantity of loss (total of 12.67 km²) was predicted in the EER (DDMI 1998b) and approved through the Environmental Assessment process. In addition, Diavik conducts ongoing monitoring to determine if dust from the Mine is affecting vegetation communities, and lichen and soil chemistry (i.e., Comprehensive Vegetation and Lichen Monitoring Program). Permanent vegetation plots are assessed for plant species cover (relative abundance) and richness at Mine and reference sites. Metals concentrations are analyzed in lichen and soil samples near and far from the Mine. A Comprehensive Vegetation and Lichen Analysis Report is generated every three years, which was last completed in January 2017 (Golder 2017a). The frequency of vegetation monitoring was recommended to increase from three to five years (i.e., next cycle in 2021) because dustfall since 2016 has not exceeded a trigger determined from the reference site.

Past Scope and Improvements

Studies conducted by Epp and Matthews (1998) and Matthews et al. (2001) classified the entire Slave Geological Province into 15 units or habitat associations. Since 2000, this 15 unit Ecological Land Classification (ELC) system has been used to assess the amount of loss per habitat association at the Diavik mine.

Objectives

The objective for this component of the WMMP is to:

- determine the amount of direct habitat loss due to development of Diavik mine.

Methods

A satellite image is used to update the area of the current Mine footprint. The image is laid over the ELC (Matthews et al. 2001) (Table 5.1-1). Each ELC type disturbed by the Mine is selected and calculations are made to determine the area (km²) of each habitat type replaced by the Mine footprint. Values provided for ELC unit loss are estimates based on the predicted Mine extent (DDMI 1998b), the actual Mine footprint, and the ELC.

Table 5.1-1 Description of Habitat Types within the Diavik Study Area

Habitat Type	Description
Bedrock complex (>80% rock)	Exposed bedrock with very little vegetative cover.
Birch seep/riparian shrub	Vegetation in areas of active water seepage through boulder fields and boulder streams. Moist and well drained areas of low shrub with continuous vegetation cover. Birch and willow species dominate these areas.
Boulder complex (>80% rock)	Large areas of boulder fields including boulder outcrops, boulder streams, and drainages. This land cover type supports very little plant growth.
Deep water (>2 m)	Deep, clear lakes and major river systems with water depths greater than 2 m.
Esker complex	Linear structures of sand and gravel, formed by glacial rivers that provide significant topographic relief. Eskers support a number of plant communities and are important to wildlife. Esker tops are wind-swept and accumulate very little snow during winter.
Heath tundra (<30% rock)	Closed mat plant community that grows on moderate to well drained soils, covering most of the upland areas. Plants generally belong to the heath family (<i>Ericaceae</i>) and vegetation covers at least 70% of the ground surface.
Heath tundra (30-80% bedrock)	Sparse heath tundra and bedrock outcrops are exposed; vegetation is discontinuous and described as open mat heath tundra.
Heath tundra (30-80% boulder)	Open mat plant community with heath tundra and boulder fields.
Lichen veneer	Flat islands, low peninsulas, and esker tops are covered with a continuous mat of lichen that appears as "veeeneer." Sites are windswept and dry, allowing very little plant growth.
Riparian tall shrub	Linear plant associations of birch, willow, and alder that follow active stream courses, usually with a cobble or boulder substrate. Under-storey plant species may include dwarf raspberry, dwarf marsh violet, cloudberry, grasses, sedges, club mosses, and common horsetail.
Sedge wetland	Wet sedge meadows and other sedge associations of non-tussock plant species. Sedge species such as <i>Carex aquatilis</i> and <i>C. bigelowii</i> , and cotton grass (<i>Eriophorum angustifolium</i>) are dominant vegetation types within wet, low lying sites where standing water is present throughout much of the growing season.
Shallow water (<2 m)	Waterbodies that contain submergent or emergent vegetation with water depths less than 2 m.
Spruce forest	Spruce-lichen woodland in lowland, sheltered areas such as river valleys. Typically clumped forest in a predominantly tundra landscape.
Tussock/hummock	Plants belonging to the sedge family (<i>Cyperaceae</i> spp.) are dominant, and tussock cotton grasses such as <i>Eriophorum vaginatum</i> and <i>E. russeolum</i> are common. These sites are drier and less frequently flooded than sedge wetlands.
Unclassified	Pixels (the smallest sub-division of the mapped area) that could not be successfully assigned to one of the above classes are considered to be unclassified.

Source: Matthews et al. (2001).

m = metre; % = percent; >= greater than; <= less than; spp = multiple species.

Frequency

Mine footprint updates and associated habitat (ELC) loss will be provided annually.

Data Analyses

Analyses will be completed in a Geographical Information System (GIS) platform to compare predicted and observed cumulative area of ELC units altered due to Mine activities, including revegetated areas. The area of each habitat type directly disturbed by the Diavik mine will be included in the annual WMMP report.

5.2 Waste Management

The Waste Management Plan outlines requirements so that the collection, storage, transportation and disposal of all wastes generated by mining and support activities at the Diavik mine are conducted in a safe, efficient and environmentally compliant manner. The plan also incorporates waste minimization. The main objectives of the Waste Management Plan are to:

- create a system for proper disposal of waste;
- minimize potentially adverse impacts on the physical and biological environment; and,
- comply with Federal and NWT legislation.

5.2.1 Waste Inspections

Past Scope and Improvements

The Diavik mine site has two key areas of concern relating to waste storage, handling, and disposal. The WTA is a disposal and staging area for wastes generated on site, both hazardous and non-hazardous. The approved inert Landfill is for disposal of materials such as glass, plastic, steel and styrofoam, and is located in the WRSA-NCRP

Objectives

The objective of this component of the WMMP is to:

- determine the effectiveness of waste management policies and procedures, and provide feedback for improvement to reducing the attraction and access by wildlife to food and other wastes.

Methods

Standard Operating Procedures for Waste Management (ENVI-913-0119) are provided in Appendix A. The survey involves visual investigations of the WTA, recycling areas, and Landfill on foot (Appendix A, ENVI-913-0119: Standard Operating Procedures for Waste Management). The amounts and types of animal attractants (e.g., food, food packaging, oil products, and oil-contaminated wastes) and other misdirected wastes (e.g., batteries and aerosol cans) will be recorded. All attractants and other mis-directed wastes will be safely removed and properly discarded. Diavik also monitors waste segregation (Appendix A, ENVI-913-0119: Standard Operating Procedures for Waste Management).

The presence of wildlife and wildlife signs (such as tracks and scats) will be recorded during surveys. Photographs will be taken of most wildlife sighted, and behaviour of animals will be observed and recorded to determine if animals are habituated.

Frequency

Waste inspections at the WTA and Landfill will be completed twice per week during the winter and once per week in the summer. A site-wide compliance inspection is completed on a weekly basis.

Data Analyses

Data analyses will be completed to identify the number of wildlife attractants and wildlife sign observed at the WTA and Landfill. Results will be used to identify any further mitigation that would improve the effectiveness of the Waste Management Plan with respect to wildlife, if necessary. As noted in the methods, all attractants are other mis-directed wastes are immediately and safely removed and properly discarded. This is either completed at the time of the inspection or actioned to the personnel responsible for the area. Other actions may include follow-up training and presentations on proper disposal of wastes.

5.2.2 Recycling Initiatives

Past Scope and Improvements

During 2008, DDMI implemented an employee-driven recycling program for plastic bottles and aluminium cans generated on site. Cash from refundable recycling is donated to charity. In addition, a number of other recyclable waste materials generated on-site are shipped off-site using winter road backhauls. Items shipped off-site include:

- used oil, oil filters and grease;
- used glycol;
- aerosol cans;
- batteries (lead-acid and dry cell);
- expired/waste fuel (e.g., Jet B);
- oil-based paint; and,
- absorbents.

Recycling is mitigation to reduce misdirected waste that is deposited in the landfill at site. Recyclables that are found at the landfill and WTA are counted and reported during waste monitoring inspections. Reporting materials recycled and money donated is monitoring and is relevant to the effectiveness of waste management at the Mine, minimizing impacts to the environment and providing benefits to the community of Yellowknife.

Objectives

The objective of this component of the WMMP is to:

- Reduce the number of waste items generated on site by recycling.

Methods

Diavik collects and stores recyclable materials for shipment off-site during winter road back hauls. The materials are delivered to recycling facilities for further processing.

Frequency

Recycling initiatives occur annually.

Data Analyses

Data analysis of recycling initiatives are not completed but annual amounts recycled will be provided in the annual WMMP report.

5.3 Wildlife Incidents and Mortalities

Past Scope and Improvements

Direct Mine-related impacts to wildlife survival and reproduction are monitored through incident (e.g., deterrent action, injuries and relocations) and mortality reporting and investigations. Environment staff report wildlife concerns or issues to the GNWT. Except in the event of an emergency, the GNWT is consulted on decisions to relocate or destroy wildlife or wildlife dwellings. For migratory birds, Environment and Climate Change Canada (ECCC) is consulted. Mine-related mortality predictions in the EER (DDMI 1998b) included:

- Mine-related caribou mortality is expected to be low (i.e., less than 1% change from baseline conditions [DDMI 1998b]);
- Mortalities associated with mining activities are predicted to be 0.12 to 0.24 grizzly bears per year; and,
- Mine-related mortalities, if they occur, are not expected to alter wolverine population parameters in the Lac de Gras area.

Objectives

The objectives for this component of the WMMP are to:

- document and mitigate wildlife incidents and mortalities, including raptors (Handley 2010);
- reduce risks to both wildlife and people; and,
- determine the effectiveness of mitigation and test EER predictions about direct Mine-related mortalities.

Methods

Wildlife incidents and mortalities observed by Diavik mine staff will be reported immediately to the Environment Department (Diavik Wildlife Management Policy). Incidents include observations of wildlife-Mine and wildlife-human interactions where there is a potential risk of harm to people, wildlife, and/or Mine infrastructure. A description of management responses will be recorded for all incidents and entered into a database. Inspection by Environment staff will be made to determine the probable cause of the incident or mortality. Obvious injuries, the position of the animal, and anything considered unusual will be photographed and recorded. Further information such as time, date, location, estimated time of death, and any sightings of other wildlife in the area will also be recorded.

Wildlife mortality details will be reported to either ENR or ECCC each time an animal is found dead anywhere in the Diavik study area. In all of the above circumstances, the regulating organization will be consulted regarding carcass disposal. Unless otherwise directed by government, carcasses found close to the Mine will be incinerated or moved away from any work areas (i.e., further out onto the tundra) to prevent attraction of carnivores and other scavengers to the Mine site. Carcasses found in an area where they do not pose any threat to wildlife or human safety will be left where found.

Frequency

Wildlife incident and mortality monitoring will be undertaken as required, continuously throughout the life of the Diavik mine. All mortalities will require follow-up to determine if anything can be done to prevent similar mortalities from occurring in the future. All wildlife mortalities will be reported to either ENR or Environment Canada as soon as possible, depending on the applicable regulatory authority.

Data Analyses

Data analyses will be completed to identify trends over time in the number of Mine-related mortalities. Analyses will also attempt to determine the cause of mortality and identify any further mitigation that would improve the effectiveness of wildlife safety. Numbers of incidents and mortalities will be included in the annual WMMP report.

5.4 Caribou

Bathurst caribou movements through the area surrounding the Diavik mine have historically occurred from July through October annually, but the timing has varied by year. Results from aerial surveys indicate that Bathurst caribou tend to move through the Diavik mine area in pulses where large numbers of caribou are present for approximately two weeks. From 1998 to 2005, when herd size was likely greater than 100,000 individuals (Adamczewski et al. 2009), peak numbers of caribou were typically observed during July. Since then, peak caribou movements have occurred later from September to mid-October. Currently caribou are observed near the Mine during winter months (Golder 2020b).

Caribou in the Diavik mine area are typically from the Bathurst herd, and some seasonal patterns are evident in their behaviour and distribution. The first caribou arrivals of the year are typically cows on their way from the wintering grounds south of the treeline to the calving grounds near Bathurst Inlet. These caribou travel quickly, feed little, and have a clear directional movement northward regardless of lakes and topography. Their presence in the Diavik mine study area is typically confined to a few weeks in May. Bulls begin to arrive from the wintering grounds in July. The bulls typically move less, feed frequently, and are solitary or in small groups.

Nursery groups (cows with calves) begin to arrive in the study area during summer to autumn. They usually travel in groups and frequently stop for feeding, but development, large lakes, insect abundance, and other environmental factors influence their movement and behaviour. As the rut begins in late September, and as the caribou begin to leave the barren lands for the forest for winter, groups become mixed with cows and bulls.

The Bathurst caribou herd is one of six barren-ground caribou herds in the NWT, previously considered the only herd with a range that included the Diavik study area. Information from satellite collared cows collected by ENR indicates that both the Bathurst herd, and to a lesser extent the Beverley and Ahiak herds, have seasonal ranges that overlap with the Diavik study area. The most recent population estimate determined

by ENR in June 2018 was 8,200 animals (GNWT-ENR 2020a). The last census for the Ahiak herd was in June 2011 and estimated 71,000 individuals (GNWT-ENR 2020b). The population of the Beverly herd was estimated to be 103,372 in 2018. Similar to the Bathurst caribou herd these herds are believed to also be in decline as are a number of other circum-Arctic herds (Festa-Bianchet et al. 2011; Gunn et al. 2011). Both traditional and scientific knowledge indicate that caribou herd size cycles relatively regularly with climate patterns (GNWT-ENR 2005, 2006). Caribou herds also exhibit periodic changes in seasonal migration routes and in calving and winter ranges (Gunn et al. 1997; Gunn and D'Hont 2002; Boulanger et al. 2004; Bathurst Caribou Management Planning Committee 2004).

In 2019, ENR developed a Bathurst Caribou Range Plan (GNWT-ENR 2019b), which proposes development limitations and hierarchical management actions for different areas in the Bathurst annual range. The Mine is located in Area 2 of the Bathurst Caribou Range Plan, which has a proposed moderate development level and status of cautionary. Mitigation included in the WMMP is consistent with mitigation prescribed in the Bathurst Caribou Range plan for developments for Area 2. For example, Tables 4.1-1 and 4.1-2 include hierarchical mitigative actions relative to caribou proximity to the Mine and roads speed limits which are consistent with the concepts of Mobile Caribou Conservation Measures and Road Planning and Management Actions in the Bathurst Caribou Range Plan.

Barren-ground caribou (*Rangifer tarandus groenlandicus*) were listed as threatened by the NWT Species at Risk Committee on 11 July 2018 (NWT SAR 2018). The COSEWIC assessed barren-ground caribou in November 2016 as Threatened (COSEWIC 2016). A Recovery Strategy for Barren-ground Caribou in the Northwest Territories was issued by the Conference of Management Authorities in 2020 (CMA 2020).

5.4.1 Incidental Observations

Incidental caribou observations in the study area are monitored and recorded to minimize potential risks associated with human-caribou interactions, caribou injury/mortality due to encountering Mine site hazards (Section 5.3), and to identify Mine structures that are acting as potential barriers to caribou movement. Furthermore, recording incidental caribou observations provides anecdotal information on the composition (e.g., age and sex), timing, and number of caribou moving through the study area.

Past Scope and Improvements

Since 2002, incidental caribou sightings of individuals and groups have been recorded by Diavik mine staff. Caribou presence and group size has been recorded on an ongoing basis at the Diavik mine to better assess caribou habitat use in and around the Mine site and has not changed.

Objectives

The objectives of this component of the WMMP are to:

- identify the composition of caribou groups moving through the study area;
- document the seasonal timing of caribou movement through the study area to determine possible annual trends; and,
- document possible annual trends in the number of caribou moving through the study area.

Methods

Standard Operating Procedure for Caribou Management/Observation On and Off East Island (ENVI-911-0119) is provided in Appendix A. Incidental caribou observations in and near the Diavik study area will be reported by helicopter operators, ground-based field workers, other Mine personnel, and people from visiting communities. Other information recorded with caribou observations will include location, group size and composition, dominant behaviour, and distance to Mine infrastructure, when achievable.

Caribou observations reported on the Mine site in close proximity to roads, personnel, or Mine structures will be investigated and the caribou visually monitored, as these are a potential concern to human and wildlife safety.

Frequency

Incidental sightings logs will be maintained at site throughout the life of the Diavik mine. Environment staff will review the logs weekly and respond to wildlife sightings or trends of concern when they occur.

Data Analyses

As incidental data are biased by observer effort and location (i.e., no standardized sampling design) no formal analysis of these data are proposed. Results will inform where and when additional monitoring or mitigation may be required (e.g., caribou advisory triggered) to avoid and minimize incidents. The composition, seasonal movement, and numbers of caribou in the area will be reported annually.

5.4.2 Habitat Loss

Anticipated changes in caribou summer habitat quality and quantity included direct physical alteration of habitat from the Mine footprint. The EER (DDMI 1998b) predicted that at full development, direct summer habitat loss from the Mine would be 2.965 habitat units (HUs).

Past Scope and Improvements

Caribou habitat loss on East Island is expressed in habitat units (HUs) for caribou summer habitat. A habitat unit is the product of surface area and suitability of the habitat in that area to supply food for caribou and cover from predators (DDMI 1998b). To address how the change of habitat may affect caribou on East Island, a habitat suitability index (HSI) model was developed for DDMI for the EER (DDMI 1998b). The scope of monitoring caribou habitat loss has not changed since 2000.

Objective

The objective of this component of the WMMP is to:

- determine if direct summer habitat loss (in habitat units [HUs]) is greater than predicted.

Methods

Using the HSI model, habitats were rated on a scale of 0 to 1 for their capability to support use for caribou, with values >0.30 regarded as highly suitable habitat and values <0.25 rated as low suitability for caribou (Table 5.4-1). Using the ELC unit loss (Section 5.1), the area (km^2) of ELC lost is multiplied by its habitat suitability value (DDMI 1998b) to determine habitat units lost.

Table 5.4-1 Caribou Summer Habitat Suitability Values

ELC Type	Habitat Suitability Value
Heath Tundra	0.37
Heath Boulder	0.40
Riparian Shrub	0.46
Bedrock Complex	0.27
Tussock/Hummock	0.30
Sedge Wetland	0.28
Esker Complex	0.30
Birch Seep and Shrub	0.11
Boulder Complex	0.21
Heath Bedrock	0.23

Frequency

Caribou habitat loss will be monitored annually.

Data Analyses

The total amount of caribou habitat loss will be compared to the EER prediction. Cumulative caribou habitat loss will be included in the annual WMMP report.

5.4.3 Zone of Influence Monitoring

The Diavik mine has participated and contributed to regional wildlife monitoring initiatives intended for conservation and management including the GNWT's Barren-ground Caribou Recovery Strategy (CMA 2020) and the Bathurst Range Plan Working Group. One initiative that is supported in part by DDMI is the purchase of high frequency geo-fenced satellite collars that have been deployed on Bathurst caribou since 2015. Geo-fenced collars are designed to increase location frequency once a geo-referenced and imaginary "fence" has been crossed to provide finer scale information about caribou distribution and movements around developments.

Past Scope and Improvements

Information on the distribution of caribou around both the Diavik and Ekati mines has been collected since 1998. A number of alterations in the design of aerial surveys for monitoring changes in the distribution of caribou have occurred (Golder 2011a, 2020b). Changes include increasing the aerial survey transect spacing from 4 km to 8 km and expanding the size of the study area. In addition, continued monitoring of the northern migration was no longer required as agreed at the 2010 Wildlife Monitoring Workshop (Handley 2010).

Recent analyses of the Diavik-Ekati caribou aerial survey data (1998 to 2009, and 2012) indicates that caribou exhibit a spatial distribution that corresponds with habitat quality (Golder 2020b; ERM 2021). These analyses did not support the presence of a ZOI around the combined Diavik-Ekati mine footprint. These results are in contrast to analyses indicating ZOI presence (Boulanger et al. 2012, 2021). As aerial survey data have not been collected since 2012, Diavik will continue ZOI monitoring using alternative methods and data presented by the ZOI Technical Task Group (GNWT-ZOITG 2015). As well, indications from the Diamond Mine Wildlife Monitoring Meeting in February 2021 were that aerial surveys of caribou can be discontinued from annual WMMP monitoring.

Objectives

The objective of this component of the WMMP is to:

- determine whether the ZOI changes in relation to mine activity.

Methods

Satellite and GPS collared caribou location data provided by the GNWT will be used for ZOI monitoring.

Frequency

The GNWT monitors caribou locations by satellite and GPS collars annually.

Data Analyses

Diavik will carry-out regression or other statistical models to evaluate the presence of a ZOI in relation to mining activity and natural factors based on guidance provided by the Zone of Influence Technical Task Group (GNWT-ZOITG 2015). Diavik will also explore individual geo-fenced caribou movement paths in relation to the Mine. Mechanism(s) causing a ZOI are uncertain and likely related to sources of sensory disturbance operating simultaneously. Therefore, ZOI monitoring does not directly inform on mitigation or operations. Diavik will complete analysis of collar data in 2022, at the end of the closure, and once during post-closure.

5.4.4 Behaviour: Activity Budgets

Caribou behaviour can be influenced by industrial development (Bradshaw et al. 1997). Adult female caribou with calves may be more sensitive to disturbances than other caribou groups. Roads and traffic may affect caribou behaviour, as roads can act as perceived barriers to movement. In response to traffic, caribou may run, move away, and/or increase vigilance behaviour (Wolfe et al. 2000). In some situations, the Mine and associated activities can inhibit normal caribou behaviours such as feeding and resting (Nellemann and Cameron 1996).

Mine-related stressors expected to potentially influence caribou behaviour include aircraft activity, vehicle traffic, blasting, dust, lights and smells. The WMMP provides results of monitoring initiatives aimed at documenting such influences on caribou in the Diavik mine study area.

Past Scope and Improvements

Information on the activity budgets of caribou has been collected since 1998. Observations of caribou groups at various distances from Mine infrastructure have been made and group behaviours at specified time intervals have been recorded (scan sampling methods, as in Altmann 1974). In 2001, the study was expanded to collect information on the responses of caribou groups to stressors. From 2001 to 2009, the scope of the behaviour work had remained the same, including data collection on both the stressor and activity budget studies.

In 2004 and 2005, increased effort was made to collect samples greater than 7 km from the Mine. This effort was maintained through 2008. In 2009, Environment Department staff at Diavik and Ekati mines worked collaboratively to increase the effort at sites farther away from the two mines. Diavik focussed their effort in areas greater than 14 km from either mine (outside of the estimated ZOI for caribou distribution), and Ekati focussed effort at distances close to the Mine. The data were shared between DDMI and

Dominion Diamond. These analyses are provided in the 2010 comprehensive analysis report. While historically, caribou were present in the study area during summer-fall period, more recently caribou are present during winter months. Extreme cold temperatures during winter have limited far-field monitoring effort. Cold temperatures would either require a helicopter to run more frequently and cause greater disturbance to caribou and/or result in an increased risk to human safety. During winter, monitoring will be completed on caribou near the Mine site.

The results of a power analysis completed on summer to autumn monitoring data indicated that to detect a 15% change in feeding behaviour with an $\alpha=0.10$, would require 55 caribou groups in each of two distance strata. Factors of year, habitat, group composition, and season would increase sample size requirements.

Objectives

The standardized objective of caribou behaviour studies (Handley 2010) is to:

- determine if caribou behaviour changes with distance from the mines.

Methods

Scan sampling (Altmann 1974) will be used to record the behaviour of groups of caribou (Appendix A, ENVI-911-0119: Standard Operating Procedure for Caribou Management/Observation On and Off East Island). When first arriving at the sampling location, the observers will wait five minutes before commencing the surveys. During that time, information on group location and insect harassment will be recorded, and a composition count conducted.

Scan samples will distinguish between nursery and non-nursery groups. Observations will be conducted during the northward migration/calving (May/June), post-calving (July/August), and autumn/rut (September/October) periods. For groups of up to 30 animals, all individuals will be included in the scan. For larger groups, a sub-sample of 20 to 30 animals will be observed. There may be multiple observations from a single large group, consisting of several consecutive scans on different sub-groups. Data may be supplemented with the use of video recordings. Caribou groups are scanned every eight minutes for a minimum of four observations and a maximum of eight observations. In the event that a stressor occurs during a scan observation, the observers will record the immediate response of caribou to stressors as either exhibiting no reaction, or a reaction (caribou look towards disturbance; caribou walk away; caribou trot or run away). Estimated distance from the stressor will also be recorded. Stressors include aircraft (helicopter and airplane), three categories of vehicles (light [e.g., pick-up truck], medium [e.g., water truck], and heavy truck [e.g., haul truck]), blasts from pits, human presence and predators (wolf or grizzly bear). The methods for this monitoring are described by ENVI-911-0119: Standard Operating Procedure for Caribou Management/Observation On and Off East Island (Appendix A).

Frequency

Monitoring will be completed every year and depends on the presence of caribou in the study area. Large numbers of observations are required to detect differences in caribou behaviour, which is strongly affected by environmental conditions such as wind, temperature, and insect abundance (Weladji et al. 2003). Diavik will implement this component of the WMMP when caribou are detected in the study area. The goal will be to obtain as many observations annually as possible to statistically analyze the data at various distances from the Mine footprint.

Data Analyses

Depending on the amount of data available, analyses will be performed to test for the effects of year (Mine activity), habitat, group composition, and distance from the Mine on the proportion of time caribou spend feeding, resting, and moving. Environmental variables such as wind speed, rainfall, and level of insect activity may be included as factors in the statistical models. Monitoring results of a given year are reported annually. More formal statistical analysis is completed every three years, sufficient data permitting.

5.4.5 Regional Monitoring Efforts

The Bathurst Caribou Range Plan (GNWT-ENR 2019b) suggests that financial and in-kind contributions to science and TK research and monitoring (guardianship programs) are a form of offsetting even though this form of compensation cannot be demonstrated to result in no net loss or a net gain. Diavik has a history of contributions that can be considered compensatory measures. Diavik has made financial contributions to the GNWT's caribou collaring program that has supported increases in the number of collars deployed and deployment of high resolution geo-fenced collars that will inform management and the ecology of caribou. Diavik has completed ZOI monitoring and analysis, which contributes to understanding cumulative effects to caribou (Golder 2020b). Diavik has also analyzed collar data to describe several Bathurst caribou range attributes (e.g., autumn range size and fidelity), which informs on the broad-scale ecology of the herd (Golder 2020b).

In addition, DDMI will maintain its commitment throughout the life of Diavik mine to doing what is reasonable to contribute to and support GNWT-led regional programs to improve the state of the Bathurst caribou herd. This will include working with the GNWT towards identifying and undertaking mutually acceptable actions that will support regional processes and programs such as those outlined in the Cumulative Effects Assessment Mitigation and Management Framework (GNWT 2015), and revising its WMMP to include this commitment and resulting activities. By definition, the WMMP is focussed on Diavik mine-specific mitigation and monitoring, and any collaboration with the GNWT (and other agencies, communities, and mines) on regional programs for the assessment and management of cumulative effects is outside the scope of analysis and reporting in the WMMP.

5.5 Grizzly Bear

Grizzly bear (western population) are listed as Special Concern under the SARA and by COSEWIC. This species currently has no status in the NWT, but has been classified as Special Concern by the NWT Species at Risk Committee (NWT SAR 2021). Diavik has contributed to DNA hair snagging studies for grizzly bear that provide demographic information on this species and have informed species at risk assessments by the NWT Species at Risk Committee (NWT SARC 2017) and inform cumulative effects assessments and management by the GNWT.

Waste from Mine sites may potentially act as wildlife attractants, increasing the likelihood of human-wildlife interactions and wildlife habituation. Bears moving through the Mine site area are a concern from the perspective of both human and wildlife safety. In response to these concerns, barren-ground grizzly bears are included in the WMMP.

5.5.1 Incidental Observations

The recording of incidental grizzly bear observations in the study area allows bear activity to be identified and monitored, which can help locate and eliminate bear attractants, minimize human-bear interactions, and risks to grizzly bear mortality (Section 5.3). Incidental observations can also be used to monitor changes in bear activity near the Mine over time and to assess potential attraction or avoidance of the Mine area by different demographic (e.g., age, sex) groups.

Past Scope and Improvements

The presence of grizzly bears, incidents and mortalities at the Mine site has been monitored since 2002. Mine-related incidents and mortalities are reported to the Environment Department for documentation in a detailed incident investigation for immediate follow-up. All grizzly bear mortalities are reported immediately to ENR, and ENR is consulted for follow-up mitigation and disposal procedures. If wildlife had to be deterred to reduce the risk of a wildlife-human incident, then all effort is made by the Environment staff to start with the least intrusive method available, and all deterrent actions are recorded.

Objectives

The objectives of this component of the WMMP are to:

- avoid and minimize bear-human interactions; and,
- determine the level of grizzly bear activity within the study area.

Methods

Incidental observations of grizzly bears in the vicinity of the Diavik study area will be reported to the Environment Department. This includes all grizzly bear observations from helicopter, field workers, and by other DDMI staff. Each bear observation includes the date, number of individuals, location, behaviour, and presence or absence of a collar.

Standard Operating Procedures for Wildlife Monitoring (Carnivores) (ENVI-914-0119) are provided in Appendix A. All grizzly bear observations reported in close proximity to roads, personnel, and Mine structures will be investigated, as these incidents pose a threat to human and wildlife safety. When necessary, grizzly bears will be deterred from the Mine site area through the use of vehicles, helicopter, bear bangers, screamers, bean bags, and rubber bullets. During helicopter deterrent efforts, the health and safety of the grizzly bear is of primary concern. Bears observed within the Mine site that do not pose an immediate potential threat to human and bear safety will be visually monitored until the bear moves out of the area.

Grizzly bear activity that is a potential concern for human and wildlife safety, or that requires deterrent efforts, will be documented and recorded as incidents (Section 5.3). All deterrent activities will be reported to ENR.

Frequency

Incidental sightings logs will be maintained at site throughout the life of the Diavik mine. Environment staff will review the logs weekly and respond to wildlife sightings or trends of concern when they occur.

Data Analyses

As incidental data are biased by observer effort and location (i.e., no standardized sampling design) no formal analysis of these data are proposed. Instead results will inform where and when additional monitoring or mitigation may be required, and trends in the occurrence of grizzly bears in the area.

5.5.2 Habitat Loss

Grizzly bears use a wide variety of vegetation and habitats types. Studies of grizzly bears in the NWT have led to understanding their seasonal habitat preferences (McLoughlin et al. 2002; Johnson et al. 2005). Loss of habitat may result in negative effects on grizzly bears. The EER (DDMI 1998b) predicted that at full development, direct terrestrial habitat loss for grizzly bear from the Mine would be 8.67 km².

Past Scope and Improvements

Anticipated changes in grizzly bear habitat quality and quantity included direct physical alteration of habitat by the Mine footprint. The scope of monitoring grizzly bear habitat loss has not changed since 2000.

Objective

The objective of this component of the WMMP is to

- determine if direct habitat loss is greater than predicted.

Methods

Methods used to determine grizzly bear habitat loss are similar to that described in Section 5.1; grizzly bear habitat is assumed to include all terrestrial habitats (i.e., all ELC landscape types in Table 5.4-1 except for deep water, shallow water and disturbed area).

Frequency

Grizzly bear habitat loss will be monitored annually.

Data Analyses

The total amount of grizzly bear habitat loss will be compared to the EER prediction. Cumulative grizzly bear habitat loss will be included in the annual WMMP report.

5.6 Wolverine

Wolverine are listed as a species of Special Concern by the SARA and by COSEWIC. This species currently has no status in the NWT, but has been classified as Not at Risk by the NWT Species at Risk Committee (NWT SAR 2021). Diavik has contributed to DNA hair snagging studies for wolverine that provide demographic information on this species and have informed species at risk assessments by the NWT Species at Risk Committee (NWT SARC 2014) and inform cumulative effects assessments and management by the GNWT.

Wolverine are curious animals and will investigate human-made structures and food caches when humans are not present (COSEWIC 2014b). Wolverine prefer undisturbed areas, but home ranges may overlap with human-caused disturbances (COSEWIC 2014b). However, human activity, including mining, hunting, trapping, and major transportation routes, may displace or alter wolverine travel routes and lead to increased human-caused mortalities (Weir 2004).

Wolverines moving through human occupied areas are a potential cause for concern with regards to wildlife and human safety. Food and food waste may potentially act as wolverine attractants, increasing the possibility of wolverine habituation, and risk of adverse human-wolverine interactions.

5.6.1 Incidental Observations

Monitoring and recording incidental wolverine observations in the Diavik study area minimizes the potential risks associated with human-wolverine interactions, and risks to wolverine removal and mortality (Section 5.3). Once a wolverine is sighted within the Mine site area, DDMI staff that are potentially at risk of encountering the wolverine will be notified, and work activities will be adjusted accordingly.

Past Scope and Improvements

Incidental wolverine observations, incidents and mortalities have been formally recorded by DDMI staff since 2002.

Objectives

The objectives of this component of the WMMP are to:

- avoid and minimize wolverine-human interactions; and,
- determine the level of wolverine activity within the study area.

Methods

Standard Operating Procedures for Wildlife Monitoring (Carnivores) (ENVI-914-0119) are provided in Appendix A. Incidental observations of wolverines will continue to be reported to the Environment Department. This includes all wolverine observations made from helicopter, field workers, and other DDMI staff. Each wolverine observation will include the date, number of individuals, location, and behaviour.

All wolverine observations reported in close proximity to roads, personnel, and Mine structures will be investigated, as these are of particular concern with regard to human and wildlife safety. When necessary, wolverines will be deterred from the Mine site through the use of vehicles and/or bear bangers.

Wolverine activity will be recorded as an incident if it is of potential concern to human or wolverine safety, could cause damage to Mine infrastructure, or requires deterrent efforts. Wolverine observed within the Mine site that do not pose an immediate potential threat to human and wildlife safety will be visually monitored until the wolverine moves out of the area.

Frequency

Incidental sightings logs will be maintained at site throughout the life of the Diavik mine. Environment staff will review the logs weekly and respond to wildlife sightings or trends of concern when they occur.

Data Analyses

As incidental data are biased by observer effort and location (i.e., no standardized sampling design), no formal analyses of these data are proposed. Instead results will inform where and when additional monitoring or mitigation may be required, and trends in the occurrence of wolverine in the area.

5.6.2 Snow Tracking

Snow-track surveys are a common non-invasive method for surveying mammalian communities with better detectability than alternative methods (Bayne et al. 2005). Snow tracking has been successful for monitoring wolverine over large spatial scales (Magoun et al. 2007). Wolverine are more frequently observed at Diavik mine during winter months, presumably because winter is a time of nutritional stress.

Past Scope and Improvements

Snow track surveys began in 2003 and have been conducted with the assistance of a community member, when available. From 2003 to 2006, the study design and data collection used the experience of IQ to locate transects and record wolverine snow tracks. This included surveys of 23 transects of variable length and distance from the Mine within a 1,270 km² area for wolverine tracks. In 2008, DDMI revised the wolverine track survey to increase statistical power to detect changes in wolverine occurrence in the study area. Design changes included the placement of 40 survey transects of equal length (4 km long, total length = 160 km) located in areas of preferred wolverine habitat including heath tundra and heath boulder habitat. The final locations of snow track survey transects were the result of a stratified random sampling process of potential locations in the study area, but some transects were relocated from Lac de Gras to areas of preferred wolverine habitat (based on IQ), including heath tundra and heath tundra boulder habitats.

Historically, each transect was driven once by a snowmobile in March or April and all wolverine tracks and other sign (e.g., digs and dens) are recorded. Since 2015, each transect was surveyed twice so that detection probability could be estimated and incorporated into analyses of relative activity and distribution.

Objectives

The objective of wolverine snow track monitoring is to:

- provide estimates of relative wolverine activity and distribution in the study area.

Methods

Standing Operating Procedures for Wolverine Snow Track Surveys (ENVI-912-0119) are provided in Appendix A. Two observers on two snowmobiles spaced approximately 25 m apart drive each survey transect twice in late March to April and all wolverine tracks and other sign (e.g., digs and dens) are recorded. Detection of snow tracks can be obscured by wind and/or recent snowfall events. A wind speed of 7.7 m/s is sufficient to move dry snow along the ground (Li and Pomeroy 1997). The number of days to the survey since wind or snowfall events is recorded. The methods for wolverine snow track monitoring are described in ENVI-912-0119: Standing Operating Procedures for Wolverine Snow Track Surveys (Appendix A).

Frequency

Snow track monitoring occurs annually during late spring (late March to April).

Data Analyses

For each transect, a track density index is calculated as the number of wolverine tracks per transect length per number of days since recent snowfall or threshold wind speed. Additional analyses completed include estimates of occupancy and detection, and analyses to detect ZOI (Mackenzie et al. 2002). Depending on the amount of data available, occupancy analyses will be performed to test for the effects of year (Mine activity), habitat and distance from the Mine. Environmental variables such as wind speed and snowfall may be included as factors in the statistical models. Monitoring results of a given year are reported annually. More formal statistical analysis is completed every three years, sufficient data permitting.

5.7 **Raptors and Migratory Birds**

Raptors are birds of prey, such as, falcons, eagles, hawks, and owls. Raptor species observed frequently nesting with the Mine study area include peregrine falcon, gyrfalcon, and rough-legged hawk. Short-eared owls (*Asio flammeus*), snowy owls, and northern harriers have been observed in the Lac de Gras area (Dominion Diamond 2014). The peregrine falcon (*anatum-tundrius* complex) and the short-eared owl are classified as species of Special Concern by the federal SARA.

Other bird species of concern with potential to occur at the Mine site include barn swallow (*Hirundo rustica*), bank swallow (*Riparia riparia*), Harris's sparrow (*Zonotrichia querula*), lesser yellowlegs (*Tringa flavipes*), red-necked phalarope (*Phalaropus lobatus*), and rusty blackbird (*Euphagus carolinus*). Federal and provincial status of these species are summarized in Table 2.4-1.

5.7.1 **Pit Wall Nest and Site Infrastructure Monitoring**

In northern environments, raptor species such as peregrine falcons, rough-legged hawks, gyrfalcons, and common ravens nest on ledges and cliff faces. In landscapes with human-made structures, cliff-nesting birds have been observed to nest on human-built ledge structures such as cairns, buildings, towers, mining dredges, and bridges (Kessel 1989). Open pit walls at Diavik mine resemble steep-sided ledges and offer attractive nesting locations for falcons and other cliff-nesting birds.

Monitoring of cliff-nesting birds on pit walls is a priority at Diavik. The eggs, nests, and individuals of gyrfalcon, peregrine falcon, and other raptor species (e.g., rough-legged hawk, golden eagle) are legally protected under the NWT *Wildlife Act, Section 38*. Potential pit wall nesting species likely to be found at Diavik include peregrine falcon, gyrfalcon, rough-legged hawk, and common raven (a functional raptor).

Other species of concern may use various habitats at the Mine site. Of these species of concern, only Harris's sparrow and lesser yellowlegs have been documented at the Mine site. Bank swallows and barn swallows are aerial insectivores that forage over wetlands and open habitats. Bank swallows typically create colonies on riverbanks, and may use waste rock piles or stockpiles as nesting habitat at the Mine site. Barn swallows typically use anthropogenic nest sites including buildings, bridges, and stationary equipment. Lesser yellowlegs and red-necked phalarope are shorebirds that may use shoreline habitats and mine-altered waters at the Mine site. Harris's sparrow use a variety of upland habitats, and may use tundra habitat adjacent to infrastructure and reclaimed areas at the Mine site. Rusty blackbirds are associated with forested areas near wetlands, and may use habitats adjacent to Mine-altered waters. Short-eared owls use open habitats, and may use open areas and reclaimed areas of the Mine site.

Past Scope and Improvements

Detection and monitoring of raptor nesting activity on pit walls began in 2004 (DDMI 2005) and has continued. Deterrent actions have been used to reduce the suitability of pit walls in active pits as nesting habitat (DDMI 2005).

Objectives

The standardized monitoring objectives for raptors at diamond mines (Handley 2010) are to:

- determine if pit walls or other infrastructure are utilized as nesting sites for raptors; and,
- determine nest success in areas of development and document effectiveness of deterrent efforts used.

Methods

Standard Operating Procedures for Raptor Pit Inspection and Bird Monitoring (ENVI-897-0119) is provided in Appendix A. Pit walls will continue to be monitored at the Diavik mine. Visual surveys for nesting activity will occur at all open pits, and other infrastructure areas (i.e., mine-altered waterbodies, stockpiles, waste rock piles, and buildings) between May and August (Appendix A, ENVI-897-0119: Standard Operating Procedures for Raptor Pit Inspection and Bird Monitoring). Pit wall/infrastructure inspections are completed at nine locations on the Mine: A21 Pit area (Lookout #1, #2, #3, A21 South Ramp, and A21 North Ramp), A154 Pit area (Lookout #1 and #2), A418 Pit area (Lookout #1 and #2), South Tank Farm, Process Plant, Powerhouse (Lookout #1 and #2), Site Services Building, Boiler House, and Backfill Plant.

Observations of birds, nests, and nesting activity (i.e., nest construction, perching, and incubation) will be recorded by Environment staff. If nests are observed in an active pit, ENR will be contacted immediately for advice on mitigation. If nesting evidence of other species of concern (e.g., bank swallow colonies) are observed, ECCC's CWS (Canadian Wildlife Service) will be contacted for advice on mitigation.

Incidental raptor observations in the Diavik study area will be reported by helicopter operators, ground-based field workers, and other Mine personnel. Each raptor observation will include the date, number of individuals, location, and behaviour. Raptor interactions and mortalities at the Mine will also be documented and reported to ENR. Active nests will be buffered from activities by 250 m (J. Hodson [pers. comm.]).

Frequency

Visual surveys for nesting activity are completed at least once per week at all open pits and other infrastructure areas (i.e., mine-altered waterbodies, stockpiles, waste rock piles, and buildings) between May and August, and at other infrastructure areas. Nests detected on pit walls and on other Diavik mine infrastructure will be monitored annually. Incidental sightings logs will be maintained at site throughout the life of the Diavik mine. Environment staff will review the logs weekly and respond to wildlife sightings or trends of concern when they occur.

Data Analyses

Data analyses will be completed to identify the success of pit nests. Nests detected on infrastructure will be analysed for trends in use and productivity. Nesting activity is reported annually.

5.7.2 Regional Falcon Surveys

Gyrfalcon and peregrine falcon breeding activity is monitored as part of the WMMP because falcon species are legally protected under the NWT Wildlife Act (GNWT-ENR 2013), and because they are valuable indicators of environmental change (Holroyd and Banasch 2003). For example, the population trends and breeding success of peregrine falcon have been used as indicators of pollution loads because of the recognized effects of pesticides and contaminants on eggshell thinning in falcons (White et al. 2002; Wegner et al. 2005). Moreover, because falcons are top predators, their population dynamics may also reflect changes in prey populations (Nystrom et al. 2005).

Past Scope and Improvements

Gyrfalcon and peregrine falcon nest monitoring began in 1995 with visual surveys conducted by ENR at least once during the summer to determine falcon species occupancy at identified breeding sites. Starting in 1998, methods were formalized to include a spring and summer survey. For all years after 1998 (except 1999), two surveys were conducted; the first generally occurring in late May or early June and the second in late July. Timing of the surveys varied among years; 1998 was the most atypical year for timing of surveys, as both the spring and summer surveys were conducted much later in the season (on June 28 and August 13, respectively) relative to other years. Since 2000, spring surveys were conducted between May and June. The timing of summer surveys has generally ranged from July 22 to July 28.

Over a decade of sampling showed little effects from the Diavik and Ekati mines on nesting raptors relative to natural factors operating on a regional scale (Coulton et al. 2013). Through discussions and engagement with communities, monitoring agencies, and government, the decision was made to remove this VEC from Mine-specific objectives of the monitoring program and contribute to regional data through the Canadian Peregrine Falcon Survey (Marshall 2009; Handley 2010). Currently, the Canadian Peregrine Falcon Survey is not being conducted from Yellowknife. Instead, regional falcon (and other raptors) data are collected and stored by ENR for distribution.

Objectives

The standardized monitoring objective for raptors include is to:

- support ENR in regional monitoring of raptor nest occupancy and productivity to determine long-term population trends.

Methods

Falcon nest sites are monitored at least twice during the breeding season. Sites accessed by helicopter are monitored once during the spring and once during the summer. The spring occupancy survey (June) assesses occupation of historically occupied gyrfalcon and peregrine falcon territories. The summer productivity survey (July) determines the number of chicks produced at each site. Nest productivity is evaluated on the basis of a single site visit; therefore, reported productivity may not reflect the final status of each site.

Frequency

Following recommendations from technical sessions held in 2010, the regional falcon survey will occur every 5 years. The last survey was conducted in 2020, and the next scheduled survey is for 2025.

Data Analyses

Data from raptor nest monitoring will be provided to ENR to support regional monitoring initiatives. It is assumed the ENR or other wildlife managers will assess the spatial and temporal trends in raptor nest use and productivity across the NWT. As raptor monitoring is no longer required to test impact predictions (Handley 2010), no analyses of these data are anticipated to be completed by DDMI. Results will be summarized in the WMMP report, when available.

5.8 Waterbirds

Presence

The Lac de Gras area is located within the central flyway migration route for migratory waterbirds, which include waterfowl and shorebirds travelling to their nesting grounds in the high Arctic. Many waterfowl (ducks, geese, swans and loons) and shorebird (sandpipers and plovers) species use the Lac de Gras area for feeding, reproduction, and/or staging during migrations. A number of habitats surrounding East Island were identified as important for waterfowl and shorebirds, including shallow bays, melt water ponds, mudflats, and shorelines (DDMI 1998c). Three species that occur in the Lac de Gras area are currently listed federally: red necked phalarope, lesser yellowlegs, and horned grebe (*Podiceps auritus*). Red-necked phalarope and horned grebe are listed as Special Concern under SARA and COSEWIC (2009, 2014a). Lesser yellowlegs is listed as threatened by COSEWIC (NWT SAR 2021).

Mine activities had a negligible influence on waterfowl and shorebird communities on East Island based on monitoring annual changes in species richness and diversity indices (DDMI 2009; Handley 2009; Golder 2014). There was little variation in species richness of waterbirds from 1996 to 2013 at the East and West bays. Sixteen species of shorebirds and 24 species of waterfowl were detected.

Past Scope and Improvements

Monitoring of waterbirds on and around East Island occurred in 1996, 1997, and 2000 to 2013. The prediction in the EER (DDMI 1998b) was that the Diavik mine is not predicted to cause a measurable change in waterfowl presence in the study area. After demonstrating negligible changes to waterfowl and shorebird richness and diversity indices, the value of continued monitoring was discussed by Diavik and consultants to EMAB (MSES 2010). Further, during a workshop to discuss wildlife monitoring at all Northwest Territories diamond mines, it was the consensus that development and activities of the mines have not had any significant impacts on the habitat or abundance and distribution of waterfowl or shorebirds in the areas around the Diavik and Ekati mines (Marshall 2009). In 2013, DDMI consulted with ECCC about whether monitoring of waterbird species abundance and diversity at the East and West bays should be continued given the negligible effects detected (Golder 2014). Following their review of the results, ECCC agreed that monitoring of waterbirds during operation should be discontinued and recommended this monitoring be implemented again at closure when there would be a change in surface activity (Environment Canada 2014).

Objectives

This objective of this monitoring program is to:

- determine if the Mine affects the presence of waterfowl and shorebird species in the study area.

Methods

During closure, East Island shallow bays and Mine-altered water bodies will be surveyed for waterbird presence daily for 5 weeks during peak migration, late May to late June. Shallow Bays surveys will be completed by Environment personnel walking the perimeter of the bays. Given the unique nature of the Shallow Bays in the region around the Mine, no control site was identified or monitored during baseline, construction, and operation of the Mine.

All birds observed will be identified to species, weather conditions permitting, counted and recorded. Species observations, from both the Shallow Bays and Mine-altered water bodies, will be categorized into guilds based upon easily identifiable characteristics and similarities (i.e., shorebird, geese, dabbling duck and diving duck). Birds that are unidentifiable to species during surveys are recorded as unidentified within each group.

Frequency

Following recommendations from ECCC, the waterbird surveys will resume during Mine closure for the first three years.

Data Analyses

Specific details on the statistical methods or techniques used to analyze waterbird data collected during closure have not been determined, but will likely include evaluating patterns of species presence, richness, and evenness. Similar measures were calculated during previous analyses (Golder 2014).

5.9 Rare or Uncommon Species

Diavik will record all incidental observations of rare or uncommon species (e.g., species that have expanded or shifted their range so that they occur more frequently in the study area) that are observed within the Diavik mine study area. If bird species at risk that have not previously been documented at the Mine site (e.g., barn swallow, bank swallow) are observed on the mine site, ECCC's CWS will be notified. Observations of rare or uncommon species will be reported in the annual monitoring report. The objective is to document trends in the detection of rare or uncommon species in the study area. The WMMP may be expanded to include rare or uncommon species depending on the frequency of observations and likelihood and severity of potential effects from the Mine. Diavik will make the final decision whether or not to include a rare or uncommon species based on discussions with communities and relevant government agencies.

6 QUALITY ASSURANCE/QUALITY CONTROL PROCEDURES

Quality assurance (QA) refers to plans or programs encompassing internal and external management and technical practices designed so that data of known quality are collected, and that such collections match the intended use of those data (Environment Canada 2012). Quality control (QC) is an internal aspect of quality assurance. It includes the techniques used to measure and assess data quality and the remedial actions to be taken when QC assessment criteria are not met. The QA/QC procedures are implemented so that field sampling, laboratory analyses, data entry, data analysis, and report preparation produce technically sound and scientifically defensible results.

All components of the WMMP, study designs, field methods, and data collection techniques will be reviewed on an ongoing basis by DDMI and their environmental consultant. These QA/QC procedures will provide consistency and integrity of study designs, field protocols, and data collection techniques. Furthermore, continuous evaluation of study methods and results will be used to identify elements for modification or implementation of new techniques. In addition, raw data can be available for review by EMAB, community organizations and government. This approach is intended to provide a WMMP that generates feedback for adaptive management, which concurrently complies with the terms and conditions in the Environmental Agreement for the Diavik mine.

7 REPORTING

Data analysis and reporting will continue to focus on the analysis and meeting of objectives and providing results that can be used in a timely manner to adjust mitigation as necessary. The use of adaptive management as a scientific framework for the WMMP is integral to its effectiveness as a monitoring and mitigation tool. Adaptive management enables mitigation to be properly focussed on those areas where the greatest potential for impacts exist and where the greatest reduction in risk can be achieved. Adaptive management is an ongoing process based on a consistent and well-founded framework that continually adjusts according to new information. In this way, the success and effectiveness of mitigation can be reliably monitored.

At the conclusion of the monitoring season, all data will be analyzed in preparation of reporting. The annual monitoring report will be produced and distributed to communities, EMAB, and government (GNWT-ENR, ECCC) to provide feedback. The annual report will summarize monitoring results for the previous season and make comparisons to previous years. It will briefly describe methods and related objectives. A discussion and interpretation of results will be presented. The report will use plain English as much as possible and make effective use of graphics and photographs.

The annual monitoring report will include the following information:

- any updates or recommended changes to mitigation, environmental design features, and component-specific objectives, study designs and sampling methods required to meet the global objectives of the WMMP;
- occurrences of human-wildlife interactions, incidents, accidents, injuries or mortalities involving wildlife;
- records of disturbances to wildlife habitat that were not predicted;
- documentation of all monitoring activities that occurred during the previous calendar year; and,
- reference to communities participating in monitoring programs, and contributing Traditional or Local Knowledge.

At a frequency of every three years, a more comprehensive analyses of indirect effects will be completed if sufficient data has been collected. The last comprehensive analysis was completed in 2020 (Golder 2020b). The next comprehensive analysis is scheduled to occur in 2023.

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Appendix A

Standard Operating Procedures

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Description of Employee Responsibilities

1. Environment Superintendent:

It is the responsibility of the Superintendent to ensure that:

- All legal requirements are in place and met for the required task(s),
- Environment Supervisors have the necessary resources and support to meet lab quality objectives,
- Instituting, maintaining and communicating all SOP's for the applicable task(s),
- Technical best practice requirements are properly incorporated into all SOP's,
- The responsibilities for health, safety environment and quality are communicated to all Personnel,
- The risks associated with remote field activities are managed effectively,
- Appropriate information, instruction, resources and training are provided to all Personnel, and
- Corrective action is administered for failure to adhere to Company and/or Legal Standards/Requirements.

2. Environment Supervisor:

It is the responsibility of the Supervisor to ensure that:

- All legal requirements are in place and met for the required task(s) and all lab quality objectives are met,
- All new Personnel receive an orientation of the applicable work area (office, laboratory, field lab, hanging tree) and understand the hazard of each applicable area,
- All Personnel have read and understand the appropriate SOP's,
- Contractors understand and adhere to the Companies Standards/Regulations when on site,
- Proper tools are used for risk management (CCCs, JHAs, Take 5's, Team Based Risk Assessments),
- All equipment and PPE required for the task(s) are available, appropriate and have had the scheduled maintenance and repairs completed,
- The appropriate quality control/quality assurance practices are followed,
- All Personnel have completed the required training before completing the task(s) assigned,
- All required permits are reviewed and signed off prior to commencement of the task(s),
- Data / laboratory sheets / MP5 imports are reviewed for accuracy and completion, and
- The Company Non-Conformance, Incident and Action Management Policy is followed, as required.

3. Environment Technicians and All Other Personnel:

It is the responsibility of all other Personnel working within the Environment Department to ensure that:

- They comply with all standard operating procedures and lab quality systems,
- They complete all required permits and receive appropriate signoff from the Environment Supervisor, or their delegate, prior to commencing the task(s),
- Proper controls are in place before commencing the task(s),
- Concerns are raised with the Environment Supervisor, or their delegate,
- They are engaged and attentive during required training,
- They reviewing and become familiar with all task related documents and reference material,
- They take action to eliminate, minimize, avoid, and report hazards,
- All safety devices and PPE are used properly,
- They do not place themselves, or others, at risk,
- All equipment is maintained and inspected prior to use and if required unsafe/damaged equipment is removed from service,
- All samples are collected, handled and stored following the SOP,
- Proper, legible documents are completed and saved, and
- Reporting all incidents to Environment Supervisor, or their delegate, as soon as possible.

Environment
STANDARD OPERATING PROCEDURE

Area No.: 8000 **Document #:** ENVI-897-0119

Revision: 6

Task Title: Raptor Pit Inspection and Bird Monitoring

Next Review: 1 Year from Final Approval in Documentum

Effective Date: Date on approved stamp in footer.

1 REFERENCES/RELATED DOCUMENTS

- 1.1 **Bird Species of Lac de Gras** – Located in: P:\DDMI Environment\10.0 Operational Control\10.2\Forms\Archive Forms\2013 - FORMS
- 1.2 **Peterson Field Guide Western Birds Reference book** - Environment Office Library
- 1.3 **Smithsonian Handbooks Birds of North America Western Region** - Environment Office Library
- 1.4 **The Sibley Field Guide to Birds** - Environment Office Library

Revision History

Revision	Revision Description	Date of Revision	Author
0	Original Issue	17-May-2012	D. Bourassa
1	New Format	10-Dec-2014	K. Gray
2	New Format	05-Nov-2016	S. Martin-Elson
3	Template, location map and area manager updated	20-Oct-2017	S. Skinner
4	Superintendent update	10-Mar-18	S. Skinner
5	Annual update	30 Mar-19	M. Nelson L. Case

Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring**

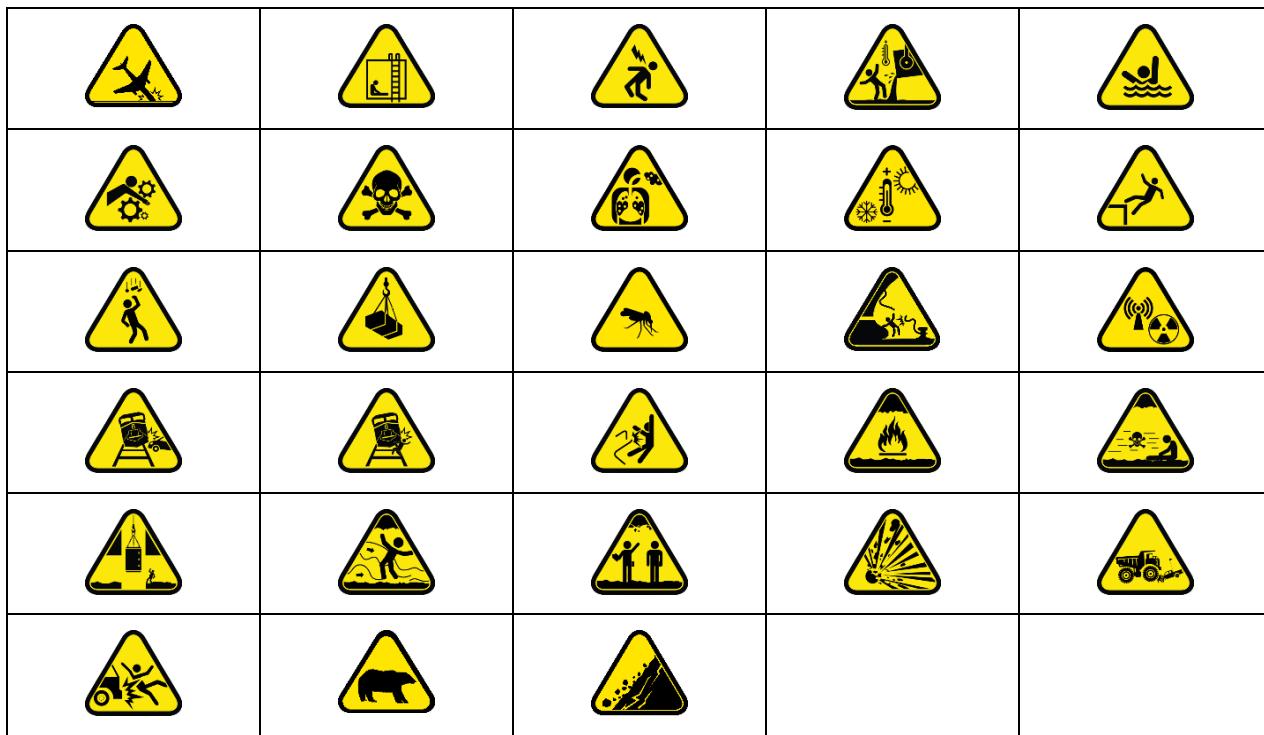
6	Update A21 Procedures	20-Oct-19	L. Case
7	Site bird monitoring update	29-Sep-21	K. Gray

Authorized Electronically in Documentum By:

Area Superintendent:	K. Boa-Antwi
Area Manager:	D. Patterson

Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring****CRITICAL RISKS**

Other potential critical risks not currently assessed as part of this SOP



Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring**

Peregrine Falcon



Rough-legged Hawk



Gyrfalcon

Figure 1. Raptors that may nest on Pit Walls at the Mine Site**Description**

This SOP outlines the procedure for conducting Pit Wall and Infrastructure inspections for raptors, and migratory bird monitoring at the Mine Site.

Environment

STANDARD OPERATING PROCEDURE

Raptor Pit Inspection and Bird Monitoring



Bank Swallow



Barn Swallow



Harris's Sparrow



Lesser Yellowlegs

Environment

STANDARD OPERATING PROCEDURE

Raptor Pit Inspection and Bird Monitoring



Red-necked Phalarope



Rusty Blackbird



Short-eared Owl

Figure 2. migratory bird species at risk that may occur at the Diavik Mine Site.

Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring****2 PURPOSE**

The main objective of these surveys is to monitor the Diavik Mine Site for federally listed bird species, and active raptor nesting sites, and to implement mitigation actions, such as deterrence, to ensure nest developments are not located in areas at the mine site with potential for adverse impacts to these birds. Deterrent activities are intended for raptor species; if evidence of nesting of other migratory bird species is identified, Environment and Climate Change Canada should be contacted (cwsnorth-scfnord@ec.gc.ca) as soon as possible to ensure adequate mitigation and monitoring measures are put in place.

Raptor species that have potential to nest at the Mine Site include peregrine falcon (*Falco peregrinus*), gyrfalcon (*Falco rusticolus*), and rough-legged hawk (*Buteo lagopus*). Nesting sites for these raptor species on the Mine Site include Pit Walls.

The peregrine falcon anatum/tundrius subspecies (*Falco peregrinus anatum/tundrius*) is listed as Special Concern under the *Species at Risk Act* (SARA). Other birds that are federally listed under SARA or designated by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) that have potential occur at the Mine Site are outlined below. Although surveys should focus on federally listed bird species and nesting raptors; non-listed bird species, including nesting evidence, should still be recorded during surveys.

Common Name	Scientific Name	SARA	COSEWIC	Habitat	Potential Mine Site Infrastructure
Bank swallow	<i>Riparia riparia</i>	Threatened	Threatened	Colonies nest on banks, waste rock piles; forages over open habitats	Stockpiles, waste rock piles
Barn swallow	<i>Hirundo rustica</i>	Threatened	Special Concern	Nests on anthropogenic structures; forages over wetlands and open habitats	Buildings, bridges, stationary equipment
Harris's sparrow	<i>Zonotrichia querula</i>	N/A	Special Concern	Variety of upland habitats,	Tundra adjacent to

Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring**

				generally associated with coniferous forest	infrastructure, reclaimed areas
Lesser yellowlegs	<i>Tringa flavipes</i>	N/A	Threatened	Wetlands and waterbodies	Mine-altered waters
Red-necked phalarope	<i>Phalaropus lobatus</i>	Special Concern	Special Concern	Wetlands and waterbodies	Mine-altered waters
Rusty blackbird	<i>Euphagus carolinus</i>	Special Concern	Special Concern	Forested areas near wetlands	Mine-altered waters and adjacent habitats
Short-eared owl	<i>Asio flammeus</i>	Special Concern	Threatened	Open habitats, including tundra and reclaimed areas	Reclaimed areas, open areas of Mine Site

3 SCOPE**3.1 Scope of Procedure**

This SOP describes the responsibilities and processes for undertaking Pit Wall and Mine Infrastructure Inspections and monitoring of bird nesting locations. All findings during these inspections will be recorded in the electronic field sheet in iAuditor and will be transferred to an electronic excel sheet.

3.2 Scope of Activities

All findings during these inspections will be recorded in the electronic field sheet in iAuditor and will be transferred to an electronic excel sheet.

4 DEFINITIONS

Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring****Definitions**

ACTS		Groundwater		PROVE		SOP	
AEMP		JHA		QA		TSS	
COC		NTU		QC		TSP	
DI water		PAL		Remote work		WHMIS	
DO		PFD		SDS		WLWB	
ELT		PPE		Seepage			
GPS		Problem bear		SNP			

See: ENVI-443-0415 - Environment Term Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

5 RESPONSIBILITIES

See: ENVI-444-0415 - Environment Roles and Responsibilities - Located in: Diavik Intranet – SOPs – Environment Folder

6 PROCEDURE

6.1 Key HSEQ Aspects

Task Hazards

Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring**

Aircraft		Extreme Weather		Line of Fire		Snowmobile Operation	
Burns		Fall into Water		Manual Labour		Spills	
Chemical Contact		Falling	✓	Noise		Sprain / Strain	
Confined Space		Fire		Overhead Objects		Stored Energy	
Cuts Scraps		Firearms / Deterrents		Perception	✓	Uneven Terrain / Ground	✓
Dehydration		Fumes / Gases		Pinch Points		Unfamiliar Area	✓
Electrical		Glass		Risk to Wildlife		Visibility	
Entanglement		Heavy Equipment	✓	Rotating Parts		Watercraft Operation	
Equipment Loss or Damage		Lifting		Sample Loss or Damage		Wildlife	✓
Ergonomics		Light Vehicle	✓	Slip, Trip, Fall	✓	Working Remotely	

See: ENVI-445-0415 - Environment Hazard Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

6.2 CRM Critical Risks

Critical Risk	Critical Control
Wildlife	Scans, Means of egress

Environment**STANDARD OPERATING PROCEDURE****Raptor Pit Inspection and Bird Monitoring**

Vehicle collision or rollover	Seatbelt, Segregation, Defensive driving
Vehicle impact on person	Seatbelt, Segregation, Defensive driving/walking
Fall from heights	Stay away from edge

6.3 Tools Required**Supplies, Tools and Equipment**

Tool / Equipment	Quantity	Supplies	Quantity
GPS	1	iPad	1
Binoculars	1	PPE (required for travel around site)	1 per person
Field Identification Bird Guides	1	Radio	1
Digital Camera	1	A21 Field Sheet	1

6.4 Procedural Steps

Open iAuditor on a field iPad and start a Bird Survey audit.

6.4.1 A418 and A154 Pit Walls Inspection Procedure

During the nesting season, typically May through August, conduct weekly inspections of the A418 and A154 Open Pits.

Gather all equipment necessary to complete inspection and drive to the pit and dike areas.

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STANDARD OPERATING PROCEDURE
Raptor Pit Inspection and Bird Monitoring

Drive to the lookout locations being mindful of any raptor activity on the dikes. See Figure 2 below. Proceed to lookout and scan pit walls and skies above pit for a minimum of 15 minutes

Record any findings in iAuditor; take photos and obtain GPS coordinates of nesting location (if possible).

Repeat procedure at all four lookouts around the A418 and A154 pits.



Figure 2. A154 and A418 Lookout Locations

Environment

STANDARD OPERATING PROCEDURE

Raptor Pit Inspection and Bird Monitoring

6.4.2 Infrastructure Inspection Procedure

During the nesting season, typically May through August, conduct weekly inspections of site infrastructure to document raptor species and other bird species. Site infrastructure includes mine-altered waterbodies, stockpiles, waste rock piles, pits and buildings.

Gather all equipment necessary to complete inspection. Drive to and stop at areas where infrastructure can be easily and completely scanned. Ensure all areas listed on the field sheet are visited. Radio communication is required when entering restricted areas (e.g., Process Plant, Backfill Plant).

Scan area infrastructure looking for bird species and signs of nesting. Infrastructure that federally listed birds have potential to interact with are identified in Section 2.

Record any findings in iAuditor, take photos, and obtain GPS coordinates of nesting location (if possible).

6.4.3 A21 Inspection Procedure

Print A21 Pit Wall Monitoring Field Sheet (ENVI-951-0319) (Located in 13.4 Wildlife>2019 Wildlife>A21 Pit Wall)

During the nesting season, typically May through August, conduct daily inspections of the A21 Open Pit.

Gather all equipment necessary to complete inspection and drive to the A21 Dike areas. Contact Pit Supervisor on Channel 7 for access and notify that you are going to be around the dike area conducting a Raptor Survey. Drive to the first lookout location being mindful of any raptor activity on the dikes (Figure 3). Proceed to lookout and scan pit walls and skies above pit for a minimum of 15 minutes. Record any findings on field data sheet; take photos and obtain GPS coordinates of nesting location (if possible). Repeat at second lookout.

Environment
STANDARD OPERATING PROCEDURE
Raptor Pit Inspection and Bird Monitoring

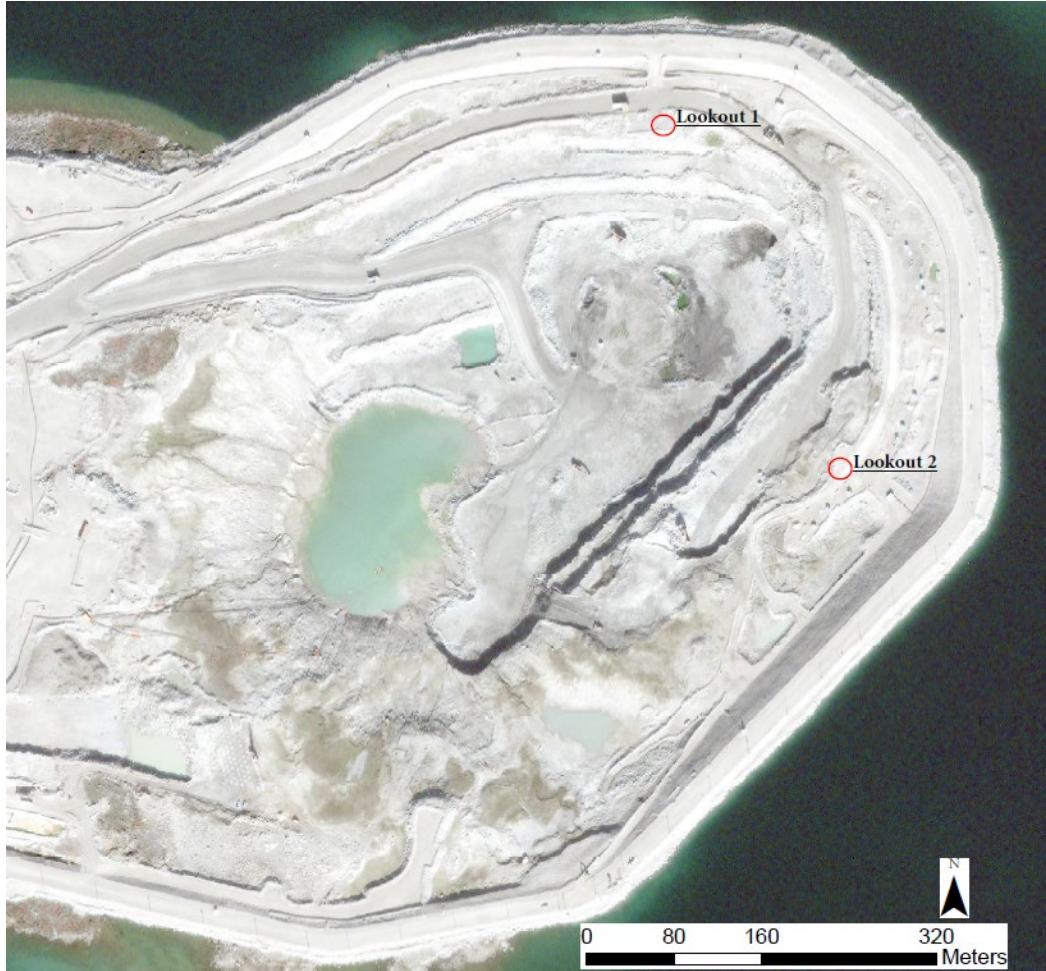


Figure 3. A21 Lookout Locations

6.4.4 A21 Deterrence

Deterrence described in the following section is intended for nesting raptor species i.e. prior to the nests being considered active (contains eggs or fledglings)

Technicians will not bring bear bangers with them for A21 pit inspections. If a raptor or raven appears to be nesting in the pit area, the Environment Supervisor and Pit Supervisor will need to approve the use of bear bangers in the pit.

If bear bangers are approved by both the Environment Supervisor and Pit Supervisor, Print A21 Pit Wall Deterrence Field Sheet (ENVI-950-0319) (Located in 13.4 Wildlife>2019 Wildlife>A21 Pit

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Raptor Pit Inspection and Bird Monitoring

Wall). The details of deterrent use will be recorded on the field sheet along with the Response Index of the Raptors. Request Pit Supervisor arrange an escort for you into the pit to fire bear bangers up towards the bird(s). If possible, record video of bird's reaction to banger. Do not fire banger directly at bird to avoid injuring it.

A combination of passive visual and auditory deterrence will be deployed in the active A21 open pit. Deterrents include:

- Scarecrows
- Wetland Wailer (aka Screaming Bird Machine)
- Decoy ground and air predators

6.4.5 Deterrence During Open Pit Flooding

Deterrence described in the following section is intended for nesting raptor species.

Prior to initiation of flooding an open pit make an assessment on the potential for active nests in the pit. Assess if the fill rate will cause the nest to be within 250 m of the water level by the time the raptors are fledged (typically end of August).

During the nesting season, typically May through August, conduct daily inspections of the open pit being flooded. If there is a suspected nest, assess if the fill rate will cause the nest to be within 250 m of the water level by the time the raptors are fledged (typically end of August).

If the nest is reasonably going to be within 250 m of the fill line by the end of August deter the raptors from nesting by using methods outlined in 6.4.4.

6.4.6 Follow-up on Deterrence

If any potential raptor nesting activity is noted on the pit walls or on any infrastructure, the Environment Supervisor should be notified who in turn will contact ENR. If the nest is still being constructed every effort will be taken to deter continued construction of the nest and actions to destroy the nest and incinerate the nest material will be implemented. Dependent on location and stage of nest production, ENR may request DDMI to attempt to relocate the nest. If relocation is not an option; continued monitoring will be conducted by DDMI Environment Staff.

7 QUALITY OUTCOMES AND EXPECTATIONS

To safely complete the tasks outlined in this SOP, without incident.

Producing quality, accurate and repeatable results.

ENVIRONMENT
STANDARD OPERATING PROCEDURE

Area No.: **8000** Document #: **ENVI-911-0119**

Revision: **6**

Task Title: **Caribou Management/ Observation On and Off East Island**

Next Review: **1 Year from Final Approval in Documentum**

Effective Date: **Date on approved stamp in footer.**

1 REFERENCES/RELATED DOCUMENTS

- 1.1 ENVR-501-0112- SOP Remote Field Safety** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.2 ENVI-135-0112-Remote Field Safety Permit** - Located in: P:\DDMI Environment\10.0 Operational Control\10.2 Forms\Current Forms\Approved\Remote Field Safety Plans
- 1.3 ENVR-601-0112- SOP Helicopter** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.4 ENVI-243-0912- Caribou Scanning (Activity Budget)**: Located in: P:\DDMI Environment\10.0 Operational Control\10.2 Forms\Current Forms\Approved\Wildlife Forms\Caribou

Revision History

Revision	Revision Description	Date of Revision	Author
0	Original Issue	16-Sep-12	D. Grabke
1	Update template and combined all caribou SOP's into one	25-May-14	K. Moore
2	Format update	19-July-15	G. Reid
3	Updated Template including CRM Critical Risks	06-Nov-16	E. Neba
4	Template and area manager updated	20-Oct-17	S. Skinner
5	Superintendent update	10-Mar-18	S. Skinner

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island**

6	Annual Review Removed reference to Caribou Advisories, clarified scanning procedures	16-Jan-20	N. Goodman
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Authorized Electronically in Documentum By:

Area Superintendent:	K. Boa-Antwi
Area Manager:	D. Patterson

(Document owners will be prompted annually to update content; however, changes may or may not result.)

ENVIRONMENT
STANDARD OPERATING PROCEDURE

Caribou Management/ Observation On and Off East Island

CRITICAL RISKS



Other potential critical risks not currently assessed as part of this SOP

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Caribou Management/ Observation On and Off East Island



ENVIRONMENT
STANDARD OPERATING PROCEDURE
Caribou Management/ Observation On and Off East Island

Description

Collecting information on caribou presence in and around Diavik area can be conducted by completing Caribou scanning. When caribou are observed in hazardous areas around the mine site additional measures are required to safely move them away.

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island****2 PURPOSE**

The Bathurst caribou herd frequently forages in and around the East Island where Diavik is located and this species is ranked as Threatened according to the Species at Risk Committee in April 2017. Diavik has developed this SOP to ensure proper action and response occurs with the presence of caribou in and around the Diavik area. The intent of caribou management at and away from Diavik site is to collect information on caribou activity in order to determine whether a change in behavior occurs in relation to distance from mining infrastructure. In addition to monitoring caribou behavior in response to mining activities, caribou movements are monitored so that mine personnel are aware of caribou presence and to ensure the animal safety near heavy work areas. The following SOP will outline the procedure on what to do when caribou are spotted on the East Island, what steps are to be followed when deterring actions are required to safely move caribou, notifying site personnel on caribou presence on east island and lastly the steps to follow when conducting caribou scanning (activity budgets) either away or at Diavik site.

3 SCOPE**3.1 Scope of Procedure**

This SOP outlines the step by step procedure for managing caribou observed at the mine site and away from site.

3.2 Scope of Activities

The activities involved in this SOP outline the Environment Department's role for managing caribou in and around the Diavik Area. This SOP outlines the specific response required for the caribou observation as well as the process for notifying employees of caribou presence around East Island.

4 DEFINITIONS**Definitions**

PPE	✓	GPS	✓	DO		NTU	
MSDS		SOP	✓	DI Water		ELT	
Problem Bear		JHA	✓	AEMP		WLWB	

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Caribou Management/ Observation On and Off East Island

QA		Groundwater		COC		PAL	
QC		Seepage		WHMIS		ACTS	
Remote Work	✓	SNP		TSS		PROVE	
TSP							

See: ENVI-443-0415 - Environment Term Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

5 RESPONSIBILITIES

See: ENVI-444-0415-R0- Environment Roles and Responsibilities - Located in: Diavik Intranet – SOPs – Environment Folder

6 PROCEDURE

6.1 Key HSEQ Aspects

Task Hazards							
Slip, Trip, Fall	✓	Chemical Contact		Rotating Parts		Uneven Terrain / Ground	✓
Sprain / Strain	✓	Fall into Water		Firearms / Deterrents	✓	Perception	✓
Working Remotely	✓	Overhead Objects		Dehydration		Risk to Wildlife	✓
Aircraft	✓	Visibility		Ergonomics		Unfamiliar Area	
Watercraft Operation		Fire		Glass		Falling	
Snowmobile Operation	✓	Line of Fire	✓	Fumes / Gases		Confined Space	

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Caribou Management/ Observation On and Off East Island

Light Vehicle	✓	Cuts Scrapes		Entanglement		Heavy Equipment	
Lifting		Pinch Points		Stored Energy		Extreme Weather	✓
Manual Labour		Noise		Burns		Electrical	
Wildlife	✓	Spills		Equipment Loss or Damage		Sample Loss or Damage	

See: ENVI-445-0415 - Environment Hazard Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

6.2 CRM Critical Risks

Critical Risk	Critical Control
Vehicle Collision or Roll Over	Seat belts, Segregation, Positive Communication/Defensive Driving, Follow road signs/rules
Vehicle Impact on Person	Positive communication/Defensive walking
Aircraft Transport	Safety Briefing, Seat belts, Trained, Follow Pilot Instructions
Wildlife	Scan, Truck or means of Egress

It is the responsibility of all personnel to adhere to the high health and safety standards used at Diavik. Personnel are required to complete all pre-task planning and safety checks. Queries about the appropriate permits and checks should be brought to the attention of the Supervisor or their delegate. Tasks should be executed to plan using the identified controls. Any deviations from plan should be assessed prior to proceeding with the remainder of the task. All incidents will be reported to the Supervisor or their delegate as soon as possible.

6.3 Tools Required

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island****Supplies, Tools and Equipment**

Tool / Equipment	Quantity	Supplies	Quantity
Light Vehicle	1	Field sheets	8-10
Helicopter (Caribou Location)	1	IPAD/camera	1-2
Radio/ Sat Phone	2	Field Work Permit	1
Field Kits to include: GPS, Binoculars, Personal Gear, Survival Gear, Deterrents	1		
Stop Watch	1		

6.4 Procedural Steps

Caribou observations at site are called in by site employee's, pilots or observed by Environment personnel conducting inspections in various areas around the mine site. Upon receiving the report of Caribou presence, ensure all pertinent information is collected from the caller - who is calling the report in, where is the animal spotted, what direction is the animal moving, are there people working in that general area. This information should be documented in the Wildlife Incidental Sheet on the P:Drive.

Caribou monitoring is triggered when caribou are spotted on East Island or spotted during remote field work. The caribou monitoring required at the mine site will depend on the location of the caribou. If the caribou are not in a hazardous area of the mine site then caribou scanning can occur if any caribou are present, this will be the same action required if a herd of caribou is present away from the mine site. The caribou deterring procedures are to be applied under three specific locations and circumstances, or where Environmental site personnel identify additional hazard areas or situations during ongoing monitoring and inspections.

6.5 Deterrent Action**6.5.1 Dikes**

The caribou deterrent procedures are to be applied when caribou move onto the dikes of mine pits, either traveling over land or by swimming to the dike, and where they are vulnerable to:

A. Injury from flying rock during blasting operations;

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island**

- B.** Severe behavioural response to blasting or other operational sensory stimuli;
- C.** Entrapment on the dike, hazardous terrain and behavioural response to sensory stimuli from construction or operational activities.

Any number of caribou present on the mining dikes will trigger caribou deterrent action. This threshold is established to prevent injury from flying rock and disturbance from severe adverse response to blasting or equipment operation.

- Caribou deterrent on dikes and confined corridors will use a combination of a small truck and/or foot patrol as most appropriate to the local situation and terrain. The direction of deterring will depend on their location on the dike or confined corridor relative to the escape routes to the shoreline buffer. The shortest escape route may not always be the most appropriate route.
- Maintain the necessary radio communication with the area supervisor, e.g., Surface Operations Supervisor on Channel 7, for timing of the deterring and personnel safety. Maintain the necessary radio communication with surface operations to facilitate any modification to traffic, and construction or operational activities where required to allow caribou escape to a shoreline buffer as planned in the previous step, and to announce the "All-Clear" at the completion of caribou deterring procedures.
- Deterring by vehicle and on foot will entail approaching caribou at a slow speed (i.e., < 5 km/hr for vehicles) and stopping when caribou show an alarmed response. When caribou stall, the patrol will slowly move forward to initiate a further alarmed response. Observation of caribou behaviour will provide cues on when to proceed. Deterring should never stimulate a Very Alarmed-Panic Escape Response.

6.5.2 Constricted Corridors

The caribou deterring procedures are to be applied when caribou are trapped in hazardous and constricted spaces such as corridors within the mine footprint where they are vulnerable to collisions with vehicles and severe behavioural response to sensory stimuli associated with vehicles and employee activities.

The criteria to trigger deterring of caribou in confined corridor or other hazardous sites are dependent on a combination of factors. Good judgment is required to avoid disturbance and caribou injury, but the following should be considered: number of caribou present, distance of caribou from roads or other stimuli, the nature of the confining feature, the effectiveness of traffic control, duration of entrapment, and behavioral response by caribou in the confined space.

The steps for undertaking deterring procedures in constricted corridors are the same as outlined in the section on Dikes, above.

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island****6.5.3 Airstrip**

The caribou deterring procedures are to be applied when caribou are on or near the airstrip or at the water crossing west of the airstrip during aircraft landing or take-off where they are vulnerable to collisions with aircraft or severe behavioural response to sensory stimuli associated with aircraft during landing or take-off.

Any number of caribou present on the airstrip or are located within 100 m of the airstrip will trigger caribou deterring action. This threshold is established to prevent any potential for caribou-aircraft collisions.

1. A small truck will be used for patrol, and, if necessary, to move caribou off the airstrip. Vehicle patrols should proceed from east to west to encourage caribou to move to escape routes leading to the west island and to avoid herding the caribou to active construction and mining operations. Maintain communication with air traffic control. Vehicles can travel at normal site speed limits unless caribou are visible.
2. When caribou are present on the airstrip, the vehicle will approach caribou at a slow speed (i.e., < 5 km/hr) and stop when caribou show an alarmed response. During airstrip patrols, the deterrer should wait no longer than 3 minutes for caribou to begin moving off the airstrip, before continuing the deterring procedure. If the caribou stall, the patrol may slowly move forward to initiate an alarmed response. If caribou travel along the airstrip ahead of the patrol, the vehicle may proceed to move caribou from the airstrip surface.
3. In the event that a herd of caribou remains within 100 m of the airstrip and exhibits behavior for returning or crossing the airstrip, the patrol may need to park at a push-out of the airstrip from where the patrol may proceed to continue the deter on foot. Environment personnel will be in contact with Diavik air traffic control if a delay in takeoff or landing must occur to ensure the animals are a safe distance from the runway.

6.5.4 Other Hazards or Entrapment Sites

The caribou deterring procedures may to be applied when caribou are trapped in hazardous and constricted spaces and situations that are identified by Environmental site personnel during ongoing monitoring and inspections. These spaces and situations will require additional communication and planning as there is potential to herd caribou toward the danger instead of away from it. The spaces and situations may include:

- Caribou trapped within the area of infrastructure and above-ground pipelines;
- Prolonged caribou entrapment in the area near the shallow bays;
- Caribou presence or entrapment on the islands adjacent to the mine pits during the brief period of thin ice hazard in October / early November; or
- Open pits.

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island****6.6 Determining Caribou Hazards**

When caribou are present on the east island, Environment site personnel or other designated personnel (i.e. contractors or site services) are responsible for conducting the following searches and communications:

1. Maintain radio contact with airport terminal operator and security personnel to receive reports of caribou on or near the runway and take management action if required. All Environment staff accessing the runway will need permission from Diavik Air traffic control in addition to completing the training to access this specific area.
2. Maintain radio communication with security personnel, truck drivers, contractors, helicopter pilots and other site operators to receive reports of caribou on the dikes and confined road corridors. Verify reports of caribou to determine numbers and appropriate management action.
3. Maintain communication and radio contact as necessary with area owners and/or air traffic controller as necessary to implement adjustments to vehicle traffic, construction and operations activities and/or aircraft traffic to expedite the deterring of caribou from hazard sites.

6.7 Caribou Scanning**Scan Sampling of Caribou Groups**

Scan sampling of caribou groups or individuals will be used to monitor caribou behaviour as a function of distance from the mine. Note: Include the direction and distance from Diavik on the field sheet in the space provided for location.

The method to be used is adapted from Curatolo and Murphy (1983). Individual caribou activities will be recorded as feeding, bedded, standing, alert, walking, trotting, or running. Individuals will be classified as feeding when they are actually foraging or searching for food (i.e., walking with head down).

GPS location will be recorded, and observations will be conducted when caribou are observed on-site or during remote field work, provided that scans can be completed in a safe manner. Group composition will be classified (see descriptor codes below), and the number of animals in the group will be recorded. Thus, response variable is caribou behaviour, while the potential stressors include distance from mine, season, and group composition. Habitat type and level of insect harassment will also be recorded.

The group will be scanned every 8 minutes for a minimum of 4 observations and a maximum of 8. For each scan, the number of animals exhibiting each type of behaviour will be recorded. The same group of caribou can be scanned multiple times over different days, but it is more valuable if the scans occur in different areas of the mine or in proximity to different disturbances (traffic, blasting, etc.). If the caribou are staying in the same area discuss with Environment Supervisor whether to continue with scans after the first few days.

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island****Response to Specific Stressors**

For all caribou groups, instantaneous observations will be used to assess the response of caribou to different potential stressors as a function of distance. These observations will occur during scan sampling. In the event that a stressor is introduced during scan sampling, the observers will note the time (in the comments box) and record the response of caribou to stressors as "no reaction" or "exhibiting a reaction" (i.e., alert posture, walking or running away from disturbance; see data sheet). The reaction of the majority of the group will be used in selecting the category. Estimated distance (m) from the stressor will also be recorded. Stressors include type of aircraft, type of vehicle, and blasts from pits.

The observers will then wait until the animals resume previous behaviour and begin scanning observations again.

Level of insect harassment will be recorded (if possible) for mosquitoes/black flies and for bot/warble flies. Bot and warble flies will be recorded simply as being present or absent during the observation period, based on observed reaction of caribou (sudden bolting, aberrant running, or rigid standing).

Analysis and Reporting

Data sheets will be transferred to the wildlife database. Data sheets and the database will also be checked for omissions and/or errors by Environment Supervisor to ensure accurate data entry. All data collected during caribou scanning will be used in the Annual Wildlife report that is released on March 31st of every year.

Description Codes

Habitat Codes	
BE	Bedrock (>80%)
BO	Boulders (>80%)
EC	Esker Complex
HT	Heath Tundra
RB	Riparian Birch
RS	Riparian Shrub
SW	Sedge Wetland

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island**

SF	Spruce Forest
SF/BE	Spruce Forest/Bed Rock
SW/HT	Wetland/Heath Tundra
HT/BE	Heath Tundra/Bedrock
HT/BO	Heath Tundra/Boulders
LA	Lake
IC	Ice

Composition Codes	
F	females
M	males
C	calf
Y	yearling
F/C	females and calves
F/M	females and males
F/M/C	females, males, calves

Activity Codes	
A	Alert
B	Bedded
F	Feeding

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Caribou Management/ Observation On and Off East Island**

R	Running
S	Standing
T	Trotting
W	Walking

7 QUALITY OUTCOMES AND EXPECTATIONS

The primary objectives for implementing this SOP are:

- To safely complete the tasks outlined in this SOP, without incident.
- To produce quality, accurate and repeatable results.

<u>Environment</u>	
STANDARD OPERATING PROCEDURE	
Area No.:	8000
	Document #: ENVI-912-0119
	Revision: 9
Task Title:	Wolverine Snow Track Survey
	Supersedes ENV SOP 521
FOR DOCUMENT CONTROL USE ONLY:	
Next Review: 1 year from Area Manager Authorized Signature Date below	
Effective Date: See Area Manager Authorized Signature Date below	

1 REFERENCES/RELATED DOCUMENTS

- 1.1 **ENVI-919-0119 - SOP Snowmobiles** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.2 **ENVI-907-0119 – SOP Remote Field Safety** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.3 **ENVI-601-0916 – Snowmobile Pre-Op Inspection** - Located in: P:\DDMI Environment\10.0 Operational Control\10.2 Forms\Current Forms\Approved\Check Sheets
- 1.4 **ENVI-135-0112 - Remote Field Safety Permit Form** - Located in: P:\DDMI Environment\10.0 Operational Control\10.2 Forms\Current Forms\Approved\Remote Field Safety Plans
- 1.5 **WL500353 – Wildlife Monitoring Permit** Located in: P:\DDMI Environment\2.0 Legal and Other Requirements\2.7 ENR (GNWT)\Wildlife Permits
- 1.6 **ENVI-362-0214 – Wolverine Snow Track Field Sheet** – Located in: P:\DDMI Environment\10.0 Operational Control\10.2 Forms\Current Forms\Approved\Wildlife Forms\Wolverine

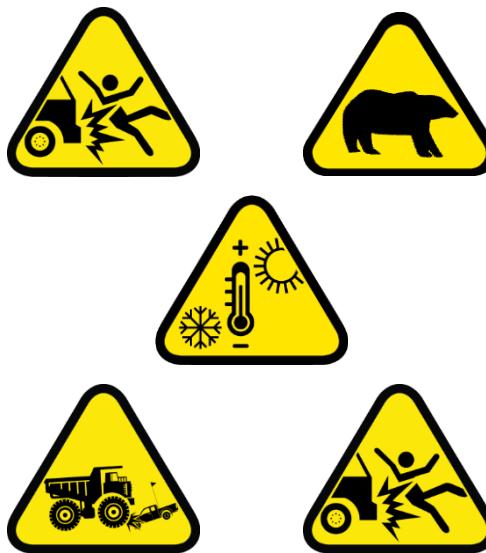
Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

Revision History			
Revision	Revision Description	Date of Revision	Author
0	Original Issue	07-Sep-12	D. Meredith
1	Annual Update	20-Mar-13	K. Moore
2	Annual Update, Added Snowmobile check list, Wildlife Permit, Picture, Definitions, Task Hazard & Supplies, Tools and Equipment Tables	20-Feb-14	D. Dul
3	Reference Documents, 6.3 & 6.4	20-Nov-14	D. Dul
4	WL Permit Number, Reference numbers for Responsibilities and Hazards, Title	16-Jan-16	D. Dul
5	Updated Template including CRM	05-Nov-16	E. Neba
6	Annual Update	21-Mar-17	S. Skinner
7	Update to template and area manager	21-Oct-17	A. Hehn
8	Superintendent update	10-Mar-18	S. Skinner
9	Annual update	18-Jan-20	M. Nelson A. Hehn

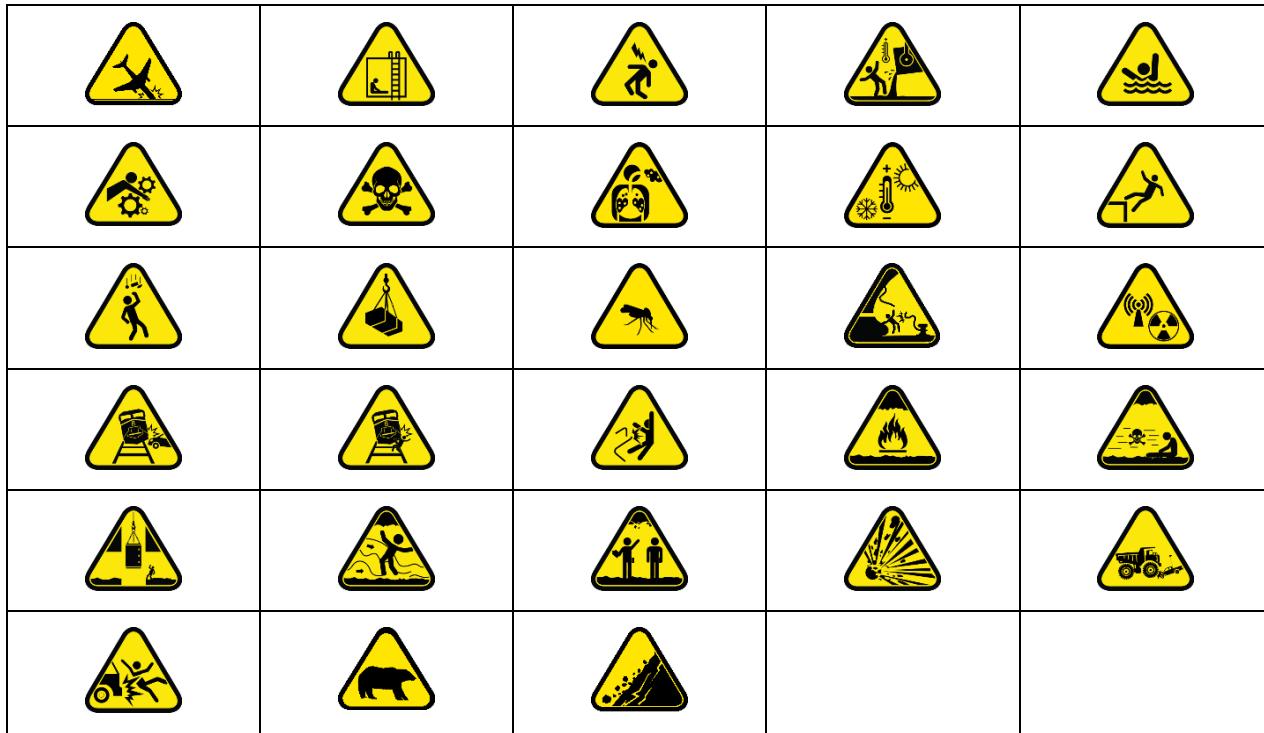
Authorized Electronically in Documentum By:	
Area Superintendent:	S. Sinclair
Area Manager:	D. Patterson

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

CRITICAL RISKS



Other potential critical risks not currently assessed as part of this SOP



Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey



Figure 1. DDMI Wolverine Track Survey (2004-Mar-16)

Description

This Standard Operating Procedure (SOP) provides guidelines on procedures to follow when carrying out the wolverine snow track surveys.

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

2 PURPOSE

The main objective for this program is to determine if mining activities are influencing the presence of wolverine in the wildlife study area. The Wolverine Snow Track survey will provide insight if wolverine activity is higher closer to the mine versus further away. Monitoring for these surveys generally takes place once per year with assistance from a community member/assistant.

3 SCOPE

3.1 Scope of Procedure

The Standard Operating Procedure (SOP) describes the responsibilities and processes for surveying the various wolverine track locations within the DDMI study area. This procedure applies to all Diavik Diamond Mine personnel and contractors.

3.2 Scope of Activities

This procedure has been developed to conduct wolverine surveys along 40 transects distributed among key habitats and landscape features throughout the DDMI study area, and at varying distances from the mine.

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

4 DEFINITIONS

Definitions							
ACTS	✓	Groundwater		PROVE		SOP	✓
AEMP		JHA		QA		TSS	
COC		NTU		QC		TSP	
DI water		PAL		Remote work	✓	WHMIS	
DO		PFD		SDS		WLWB	
ELT		PPE		Seepage			
GPS		Problem bear		SNP			

See: ENVI-443-0415 - Environment Term Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

5 RESPONSIBILITIES

See: ENVI-444-0415 - Environment Roles and Responsibilities - Located in: Diavik Intranet – SOPs – Environment Folder

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

6 PROCEDURE

6.1 Key HSEQ Aspects

Task Hazards							
Aircraft		Extreme Weather	✓	Line of Fire		Snowmobile Operation	✓
Burns		Fall into Water		Manual Labour		Spills	
Chemical Contact		Falling		Noise		Sprain / Strain	✓
Confined Space		Fire		Overhead Objects		Stored Energy	
Cuts Scraps	✓	Firearms / Deterrents		Perception	✓	Uneven Terrain / Ground	✓
Dehydration		Fumes / Gases		Pinch Points		Unfamiliar Area	✓
Electrical		Glass		Risk to Wildlife	✓	Visibility	✓
Entanglement		Heavy Equipment		Rotating Parts		Watercraft Operation	
Equipment Loss or Damage	✓	Lifting		Sample Loss or Damage		Wildlife	✓
Ergonomics	✓	Light Vehicle	✓	Slip, Trip, Fall	✓	Working Remotely	✓

See: ENVI-445-0415 - Environment Hazards Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

6.2 CRM Critical Risks

Critical Risk	Critical Control
Vehicle Collision or Rollover (between snow mobiles)	Positive communication, Defensive driving, Helmet
Vehicle Impact on Person	Positive communication, Defensive walking
Wildlife	Scan, Truck, Deterrents
Temperature extremes (cold)	Layers, Buddy check, Remote field safety permit

6.3 Tools Required

Supplies, Tools and Equipment

Tool / Equipment	Quantity	Supplies	Quantity
Snowmobile	per person	Winter Survival Gear (Set)	1
GPS/ Loaded Coordinates	per person	Spare Batteries	4
Satellite Phone	1	Personal Gear (per person)	1
Spot or Spot Tracker (per snowmobile)	1	Remote field safety permit	1
Camera	1	Map	2
Binoculars	1	Field Sheets	20
Radio with spare battery (per person)	1	Pencils and Pens	2

Environment**STANDARD OPERATING PROCEDURE**
Wolverine Snow Track Survey**6.4 Procedural Steps**

- Surveys are conducted once a year in the early spring by snowmobile. The surveys will be conducted twice per traverse - typically once in late March and once in mid April. Surveys are best conducted 2-6 days after a snowfall.
- Personnel will follow each transect from start to finish, using the GPS waypoints provided for each transect. **Drive the snowmobile slowly (between 10 km/h and 15 km/h) to ensure that all wolverine tracks are recorded.** The observer pair drives a distance of approximately 25 m apart with the transect line between them. This reduces the chance of missing any tracks.
- If weather conditions are deemed unsuitable for tracking (high winds or heavy snowfall) the survey should be postponed until conditions are favourable. The threshold for wind speeds capable of moving fallen snow is 27 km/h. If a survey needs to be postponed, personnel must wait at least 12 hours after unsuitable weather stops before resuming surveys. The effects of snow and wind will be estimated by determining the number of $\frac{1}{2}$ days since the most recent snow or wind event.
- Each day of survey should include transects from a variety of distances from site. Ensure you include near and far field sites each day, if conditions allow.
- For each wolverine transect observation, record:
 - Date survey completed, who the transect was sampled by, and departure and return times for the day
 - Weather (temperature, wind direction, maximum and average wind speed, days since snow, light conditions, days since last threshold wind and snow tracking conditions)

*****Excellent snow is characterized as being light/fluffy/easy to leave tracks and poor snow as being packed/hard to leave tracks*****

 - Transect Number
 - Number of wolverines: tracks within 200 m of each other are assumed to be a single individual unless tracks can be reliably distinguished as two separate individuals
 - Age of signs: did signs occur before or after the most recent snowfall or wind threshold event?
 - Waypoint
 - UTM coordinates
 - Photo of the sign/s with a reference object (i.e. GPS, pen, glove, etc.)

Environment**STANDARD OPERATING PROCEDURE**
Wolverine Snow Track Survey

- Other important comments such as:
 - Sex (male or female)
 - Observation type (tracks, scat, hair, etc.)
 - Has individual crossed transect before?
 - Direction of travel
 - Wolverine dens on or off transect, waypoint of den, whether the den is active or inactive and photographs
 - Other wildlife sightings or signs: note in comments only, waypoint not required
- If no wolverine tracks are observed on a given transect, record this on the field sheet.
- A local community member generally comes to site for one (1) week to help out with this survey. This participation is extremely valuable and should be maintained. If tracks are seen discuss and document comments from the community member.

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

Rio Tinto

<u>Wolverine Snow Track Field Sheet</u>		
Area:	8000	No: ENVI-362-0214
Effective Date:	22-Feb-2014	Revision: 4
Task:	Wolverine Snow Track Field Sheet	
	Supersedes ENV-WILD-02	Page: 1 of 3

DATE (yyyy-mm-dd): 2019-04-12 SAMPLED BY: 552 LC Pl Time Depart: 1154 Time Return: 1755

Air Temp: -5 °C Wind Direction: E Light Conditions (Circle One): Overcast Sunny Flat

Wind Speed (Max): NA Wind Speed (Avg): 10 Knots Snow Tracking Conditions: Excellent Good Fair Poor

Days since Snow (nearest half day): 5.0 cm Days since Wind Speed \geq 27 km/h (nearest half day): 5.5

Final Notes: For track aging in the following example, the wind threshold was exceeded more recently than recent snowfall, therefore tracks would have been cleared.

(>5 days old) or occurred after (<5 days old) this wind weather event.

Document #: ENVI-362-0214 R.
Effective Date: 22-Feb 2014

10.2 Forms\Current Forms\Approved\Wildlife Forms

Figure 2. Example: Wolverine Snow Track Field Sheet

Document #: ENVI-912-0119-R9

This is not a controlled document when printed

Effective Date: See Area Manager Authorized Signature Date on Page 1

Only documents located on the Djavik Intranet are deemed 'official'.

Template #: DCON-004-0610 R2

Page 11 of 14

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

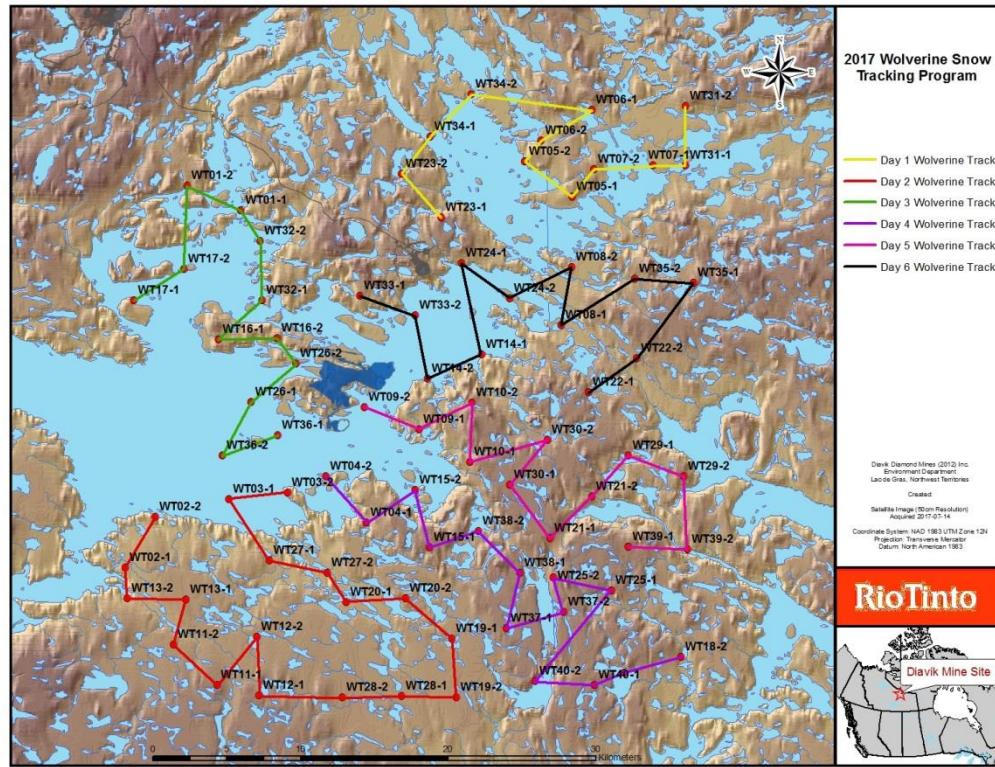


Figure 3. Wolverine Snow Track Routes

Table 1. Waypoint (UTM) for Wolverine Snow Track Survey

Snow Tracking Waypoints					
WT01-1	527154	7163751	WT21-1	548095	7141561
WT01-2	523512	7165406	WT21-2	550923	7144389
WT02-1	519342	7139565	WT22-1	550687	7151420
WT02-2	521368	7143014	WT22-2	553948	7153738
WT03-1	526328	7144222	WT23-1	540709	7163249

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

WT03-2	530303	7144664	WT23-2	538041	7166229
WT04-1	535664	7142603	WT24-1	542106	7160157
WT04-2	532915	7145764	WT24-2	545336	7157797
WT05-1	549587	7164671	WT25-1	552216	7138023
WT05-2	546387	7167072	WT25-2	548311	7138891
WT06-1	550907	7170519	WT26-1	527842	7150759
WT06-2	547487	7168446	WT26-2	530871	7153372
WT07-1	555053	7166771	WT27-1	529069	7140045
WT07-2	551061	7166521	WT27-2	532979	7139200
WT08-1	548820	7155990	WT28-1	538013	7130889
WT08-2	549549	7159924	WT28-2	534015	7130780
WT09-1	539233	7148932	WT29-1	553364	7147169
WT09-2	535527	7150438	WT29-2	557110	7145764
WT10-1	542646	7146716	WT30-1	545338	7145166
WT10-2	542813	7150713	WT30-2	547899	7148239
WT11-1	525536	7131632	WT31-1	557247	7166783
WT11-2	522605	7134354	WT31-2	557247	7170783
WT12-1	528374	7130906	WT32-1	528595	7157671
WT12-2	528241	7134904	WT32-2	528477	7161669
WT13-1	523442	7137411	WT33-1	535199	7157975
WT13-2	519443	7137516	WT33-2	538964	7156624
WT14-1	543434	7154009	WT34-1	539971	7168745
WT14-2	539789	7152362	WT34-2	542765	7171607

Document #: ENVI-912-0119-R9

This is not a controlled document when printed

Effective Date: See Area Manager Authorized Signature Date on Page 1

Only documents located on the Diavik Intranet are deemed 'official'.

Template #: DCON-004-0610 R2

Environment
STANDARD OPERATING PROCEDURE
Wolverine Snow Track Survey

WT15-1	539934	7140921	WT35-1	557801	7158832
WT15-2	538964	7144802	WT35-2	553810	7159099
WT16-1	525618	7154997	WT36-1	529663	7148505
WT16-2	529616	7155111	WT36-2	525904	7147138
WT17-1	519913	7157646	WT37-1	545145	7135483
WT17-2	523292	7159785	WT37-2	548999	7136553
WT18-1	553120	7132451	WT38-1	546054	7139224
WT18-2	556972	7133530	WT38-2	543225	7142052
WT19-1	541434	7134770	WT39-1	553388	7140989
WT19-2	541713	7130780	WT39-2	557384	7140815
WT20-1	534286	7137244	WT40-1	551067	7131638
WT20-2	538276	7137516	WT40-2	547074	7131880

6.5 Analysis and Reporting

Upon return from the field, check the data sheets for completeness and accuracy and enter the data into the Excel workbook in P:\DDMI Environment\15.0 Data & Records Management\15. Wildlife Database\Wolverine Track Survey.

7 QUALITY OUTCOMES AND EXPECTATIONS

- 7.1 Safely complete the tasks outlined in this SOP, without incident.
- 7.2 No or minimal safety or environmental incidents during program.
- 7.3 No or minimal error in conducting survey.
- 7.4 Thorough documentation of field data.

ENVIRONMENT
STANDARD OPERATING PROCEDURE

Area No.: 8000 **Document #:** ENVI-913-0119

Revision: 9

Task Title: Waste Inspection

Next Review: 1 Year from Final Approval in Documentum

Effective Date: Date on approved stamp in footer.

1 REFERENCES/RELATED DOCUMENTS

- 1.1 **ENVI-444-0415 R4 – Environment Roles and Responsibilities- Located in:** P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs\Current
- 1.2 **ENVI-445-0415 R3 – Environment Hazard Definitions – Located in:** P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs\Current
- 1.3 **ENVI-443-0415 R3 – Environment Term Definitions – Located in:** P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs\Current

Revision History

Revision	Revision Description	Date of Revision	Author
0	Original Issue	03-Mar-00	
1	Updated	Mar-05	R.Eskelson/S. Oystryk
2	Updated - related documents, review date	Oct-06	C. English
3	Biennial update, frequency amended	Jan-09	C. English
4	Updated - Format, Description, Pictures, 2, 3.1, 3.2, 6.2, 6.3	16-Oct-14	K. Gray
5	Format Update	08-Dec-15	G. Reid

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Waste Inspection**

6	Updated Template including CRM Critical risk	05-Nov-16	E. Neba
7	Update to template and area manager	21-Oct-17	A. Hehn
8	Superintendent update	11-Mar-18	S. Skinner
9	Annual update	30-Mar-19	M. Nelson

Authorized Electronically in Documentum By:

Area Superintendent:	K. Boa-Antwi
Area Manager:	D. Patterson

(Document owners will be prompted annually to update content; however, changes may or may not result.)

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection

CRITICAL RISKS



Other potential critical risks not currently assessed as part of this SOP

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection



Landfill



Waste Transfer Area burn pit



Waste Transfer Area waste storage

Figure 1. Landfill (top) and Waste Transfer Area Burn Pit/Waste Storage (bottom)

Description

This SOP covers the undertakings involved with weekly/semi-weekly monitoring visits to Diaviks Landfill and Waste Transfer Area to ensure that the collection, storage and disposal of all wastes are being done in a safe, efficient, and environmentally compliant manner. This is to avoid environmental contamination and wildlife occurrences /interactions, as some waste can be an attractant if not disposed of correctly.

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection

2 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide direction for monitoring the Waste Transfer Area (WTA) and the Landfill to ensure proper waste disposal, as well, for both attractants to wildlife and wildlife that may visit these sites. Wildlife can potentially be very dangerous by becoming habituated to human activity. This situation can pose a threat to the safety of both the personnel on site and to the animal itself

3 SCOPE

3.1 Scope of Procedure

This procedure applies to all Diavik Diamond Mines personnel and contractor personnel

3.2 Scope of Activities

This procedure describes the monitoring procedure of the waste piles/burn pit and storage areas for improperly disposed/stored waste and looking for presence or signs of wildlife.

4 DEFINITIONS

Definitions

ACTS		Groundwater		PROVE		SOP	✓
AEMP		JHA		QA		TSS	
COC		NTU		QC		TSP	
DI water		PAL		Remote work		WHMIS	
DO		PFD		SDS		WLWB	
ELT		PPE		Seepage			

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection

GPS		Problem bear		SNP			
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See: ENVI-443-0415- Environment Term Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

5 RESPONSIBILITIES

See: ENVI-444-0415 - Environment Roles and Responsibilities - Located in: Diavik Intranet – SOPs – Environment Folder

6 PROCEDURE

6.1 Key HSEQ Aspects

Task Hazards							
Aircraft		Extreme Weather		Line of Fire		Snowmobile Operation	
Burns		Fall into Water		Manual Labour		Spills	
Chemical Contact		Falling		Noise		Sprain / Strain	✓
Confined Space		Fire		Overhead Objects		Stored Energy	
Cuts Scrapes	✓	Firearms / Deterrents		Perception		Uneven Terrain / Ground	✓
Dehydration		Fumes / Gases		Pinch Points		Unfamiliar Area	✓
Electrical		Glass		Risk to Wildlife		Visibility	✓

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection

Entanglement		Heavy Equipment	✓	Rotating Parts		Watercraft Operation	
Equipment Loss or Damage		Lifting		Sample Loss or Damage		Wildlife	✓
Ergonomics		Light Vehicle	✓	Slip, Trip, Fall	✓	Working Remotely	

See: ENVI-445-0415 - Environment Hazard Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

6.2 CRM Critical Risks

Critical Risk	Critical Control
Vehicle collision or Rollover	Seatbelts, segregation, Positive communication/Defensive driving, follow road signs/rules
Vehicle Impact on Person	Positive communication/defensive walking
Wildlife	Scan, Truck

6.3 Tools Required

Supplies, Tools and Equipment			
Tool / Equipment	Quantity	Supplies	Quantity
iPad	1		

6.4 Procedural Steps

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection

Monitoring will be happen every three days in summer and twice per week in winter.

Prior to leaving the office, download the “Waste Inspection” monitoring schedule from the MP-Field program on the iPad. Press: **Download Current Visits**.

Find and press the Waste Inspection visit for that day, the visit will automatically download onto the day's schedule (make sure to manually change date if inspection was completed on a different day, record reasoning in comments)

6.4.1 Landfill Inspection

Upon arrival, note time visited on iPad and use drop down menu to highlight Sample Taken.

***Note: If the inspection was not completed, select Sample Not Taken and leave reasoning in the sample comments.

Scan area for wildlife.

Identify new waste piles since last visit, inspect those first.

Inspect waste piles for any attractants such as food/food product/oil contaminated items/paints/gloves, as well for things such as batteries, bulbs containing mercury, chemicals, and aerosol cans that can be hazardous to the environment (Figure 2). Everything in the landfill should be inert and pose no risk to the safety of the environment, people, or wildlife.



Figure 2. These items do not belong in the Landfill

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection

Look for signs of wildlife i.e. scat/tracks/chewed garbage.

Record all findings on the iPad, example shown below (Figure 3).

Report any concern of improperly stored material to the Environment Supervisor. Provide pictures and coordinates if possible.

5:26 PM
mpweb.diavik.com
MP-Field
Back Environment Programs Waste Inspection - Landfill

Time: 10:12 AM

Sample Taken: Sample Taken:

Sample Comments:

(day) Since Turnover: 7

Aerosol Cans: 2

Batteries: 0

Completed Task: Yes

Food: 0

Food Packaging: 4

Oil Contaminated: 1

Oil Product/contains: 0

Other Waste: 3 cigarette packages , 12 work gloves

Sample Collected By: KG

Wildlife Present: No

Wildlife Sign: Fox tracks at waste pile

Previous Next

Figure 3. Screenshot of Landfill inspection in MP Field

6.4.2 Waste Transfer Area

Announce when entering/leaving Waste Transfer Area CH.5, the gate should remain closed all times to reduce the chance of wildlife entering the area. Contact the operator if gate is open.

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Waste Inspection

Note time visited on iPad and use drop down menu to highlight **Sample Taken**.

***Note: If the inspection was not completed, select Sample Not Taken and leave reasoning in the sample comments.

Inspect waste storage containers and drums alongside fence for anything out of place/leaking/broken. Placards on fence clearly mark what is to be stored in each section.

Visually inspect fence for any potential entry points for wildlife.

Inspect burn pit area. If burn pit is active with a fire do not enter. The burn pit should only contain burnable waste such as wood, paper, paper products, and cardboard.

Look for signs of wildlife i.e. scat/tracks/chewed garbage.

Record all finding on iPad.

Report any concern of improperly stored material, wildlife and entry points to the environment supervisor. Provide pictures if possible.

6.4.3 A21 and Underground Waste Bins

Note time visited on iPad and use drop down menu to highlight **Sample Taken**.

***Note: If the inspection was not completed, select Sample Not Taken and leave reasoning in the sample comments.

Check burn bin and note any materials present that are not burnable

Check non-burn bin and note any materials present that should not be reporting to the Landfill such as food and drink containers, PPE, and chemicals.

6.4.4 Uploading Completed Inspections

**Remember to check that date is correct before uploading. Once inspections are complete the Waste Inspection visit will read 100% and is now ready to upload to MP5 from the iPad. Connect to ddmiipad and press upload visit. The visit will disappear when upload is complete.

7 QUALITY OUTCOMES AND EXPECTATIONS

7.1 To safely complete the tasks outlined in this SOP, without incident.

7.2 Producing quality, accurate and repeatable results.

ENVIRONMENT
STANDARD OPERATING PROCEDURE

Area No.: 8000 **Document #:** ENVI-914-0119

Revision: 9

Task Title: Wildlife Monitoring (Carnivores)

Next Review: 1 Year from Final Approval in Documentum

Effective Date: Date on approved stamp in footer.

1 REFERENCES/RELATED DOCUMENTS

- 1.1 **ENVI-916-0119 - SOP Helicopter** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.2 **ENVI-919-0119 – SOP Snowmobiles** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.3 **ENVI-907-0119 – SOP Remote Field Safety** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.4 **ENVI- - SOP Firearms** - Located in: P:\DDMI Environment\10.0 Operational Control\10.1 SOPs\Working SOPs
- 1.5 **Wildlife Report Template** - Located in: iAuditor on iPad1 and iPad2
- 1.6 **Wildlife Awareness Presentation** - Located in: Diavik Intranet – HSEQ – Operational Control - Environment

Revision History

Revision	Revision Description	Date of Revision	Author
0	Original Issue	01-Aug-12	D. Grabke
1	Annual Review and Update	20-Aug-13	K. Moore
2	Template Update and Annual Review	17-May-14	K. Moore

INSERT DEPT NAME HERE**STANDARD OPERATING PROCEDURE****Copy the SOP title from the first page Header or type title here**

3	Format update	20-July-15	G. Reid
4	Format update	06-Dec-15	G. Reid
5	Updated template including CRM Critical risk	05-Nov-16	E. Neba
6	Security check-in at night	24-Sep-17	S. Sinclair
7	Update to template and area manager	21-Oct-17	A. Hehn
8	Superintendent update	11-Mar-18	S. Skinner
9	Annual update	2-Feb-19	M Nelson

Authorized Electronically in Documentum By:

Area Superintendent:	S. Sinclair
Area Manager:	J. Kozian

(Document owners will be prompted annually to update content, however, changes may or may not result.)

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Wildlife Monitoring (Carnivores)

CRITICAL RISKS



Other potential critical risks not currently assessed as part of this SOP

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Wildlife Monitoring (Carnivores)



Description

This SOP has been developed to provide guidance when responding to bear/wildlife calls at the Diavik site.

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Wildlife Monitoring (Carnivores)

2 PURPOSE

This Standard Operating Procedure (SOP) provides a guideline to follow when responding to wildlife (bears, wolves, wolverines, and foxes) at the Diavik (DDMI) site. This procedure applies to all DDMI personnel, contractors, and visitors' at the mine site. However, wildlife control is managed by trained Environment personnel. Grizzly bears and other carnivores are frequently sighted at the mine site; therefore, worker safety is a priority. There will be situations when management actions will be required to deter problem wildlife away from the mine site.

3 SCOPE

3.1 Scope of Procedure

This SOP outlines the step-by-step procedure for managing bear and other carnivores observed at the mine site.

3.2 Scope of Activities

The activities involved in this SOP outlines the Environment Department's role for deterring bears/ wildlife away from the mine site along with initiating site wide Wildlife Alerts to notify site employees of the animal presence. This SOP also outlines the responsibilities and accountabilities of updating crews on wildlife locations. Activities covered by the SOP include monitoring, deterrence, relocation, and destruction.

4 DEFINITIONS

Definitions

ACTS	✓	Groundwater		PROVE	✓	SOP	✓
AEMP		JHA		QA		TSS	
COC		NTU		QC		TSP	
DI water		PAL		Remote work		WHMIS	

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Wildlife Monitoring (Carnivores)

DO		PFD		SDS		WLWB	
ELT		PPE	✓	Seepage			
GPS	✓	Problem bear	✓	SNP			

See: ENVI-443-0415 - Environment Term Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

5 RESPONSIBILITIES

See: ENVI-444-0415-R0- Environment Roles and Responsibilities - Located in: Diavik Intranet – SOPs – Environment Folder

6 PROCEDURE

6.1 Key HSEQ Aspects

This SOP references the use of helicopters and snowmobiles as potential deterrents or options for remote relocation. These critical risks and hazards are not routine for this task and the appropriate SOPs should be consulted to address hazards and risks associated with those modes of transportation.

Task Hazards

Aircraft		Extreme Weather		Line of Fire	✓	Snowmobile Operation	
Burns		Fall into Water		Manual Labour		Spills	
Chemical Contact		Falling		Noise	✓	Sprain / Strain	
Confined Space		Fire		Overhead Objects		Stored Energy	

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Cuts Scrapes		Firearms / Deterrents	✓	Perception	✓	Uneven Terrain / Ground	✓
Dehydration		Fumes / Gases		Pinch Points	✓	Unfamiliar Area	✓
Electrical		Glass		Risk to Wildlife	✓	Visibility	✓
Entanglement		Heavy Equipment	✓	Rotating Parts		Watercraft Operation	
Equipment Loss or Damage		Lifting		Sample Loss or Damage		Wildlife	✓
Ergonomics	✓	Light Vehicle	✓	Slip, Trip, Fall	✓	Working Remotely	

See: ENVI-445-0415 - Environment Hazard Definitions - Located in: Diavik Intranet – SOPs – Environment Folder

6.2 CRM Critical Risks

Critical Risk	Critical Control
Uncontrolled release of energy (flares or firearms)	Scan, positive communication, training, ACTS and PROVE, lock-out mechanisms
Vehicle collision or rollover	Seat belts, segregation, positive communication, defensive driving
Vehicle impact on person	Positive communication, defensive walking
Wildlife	Scan, truck or means of egress, deterrents

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STANDARD OPERATING PROCEDURE
Wildlife Monitoring (Carnivores)

6.3 Tools Required

Supplies, Tools and Equipment

Tool / Equipment	Quantity	Tool / Equipment	Quantity
Light Vehicle	1	iPad with iAuditor	1
Aircraft (pending location/ behavior of bear)	1	GPS	1
Field kit equipped with deterrents	1	Camera	1
Shot gun and ammunition kit	1	Radio (Blue Stripe Antennae)	1

6.4 Procedural Steps

The following flow chart (Figure 1) outlines the steps to be taken when wildlife (carnivores) have been observed on site:

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Wildlife Monitoring (Carnivores)

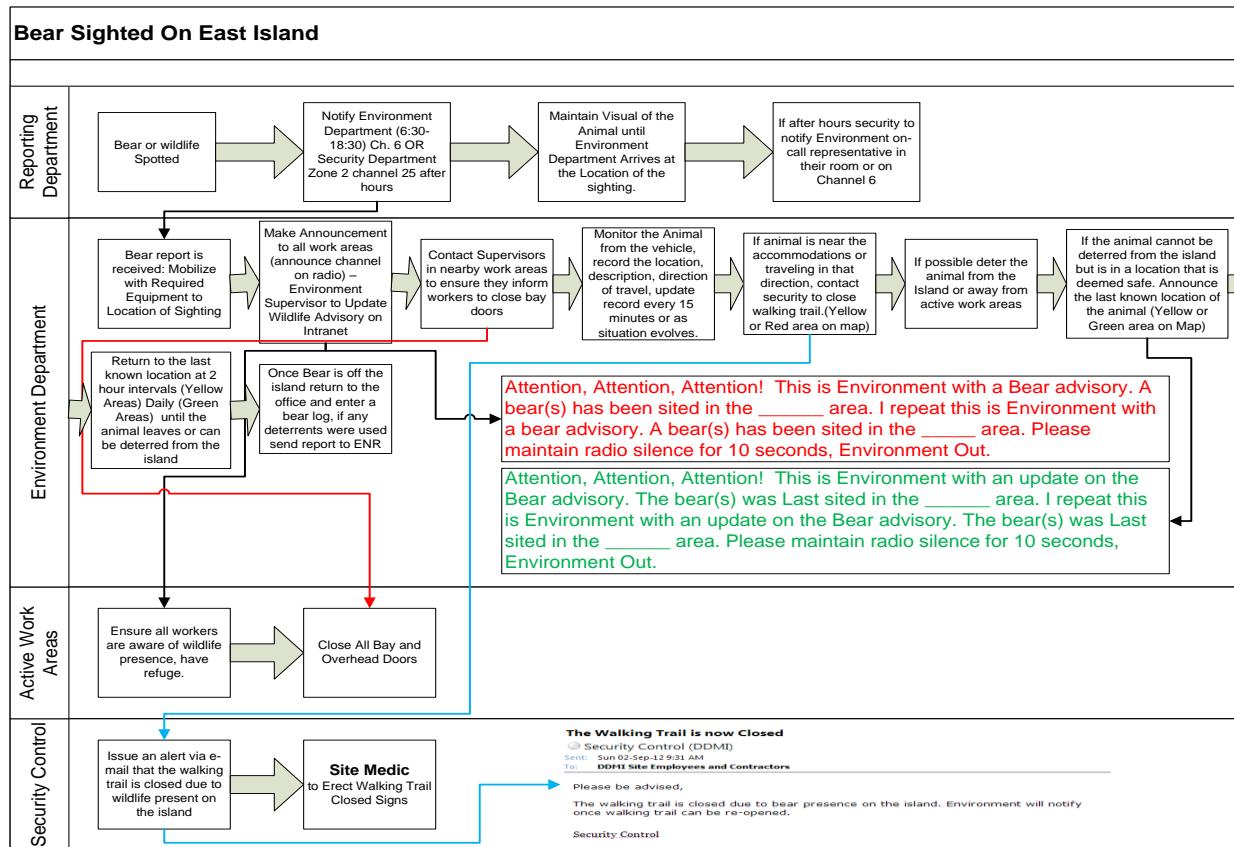


Figure 1: Procedural steps for wildlife monitoring

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Wildlife Monitoring (Carnivores)

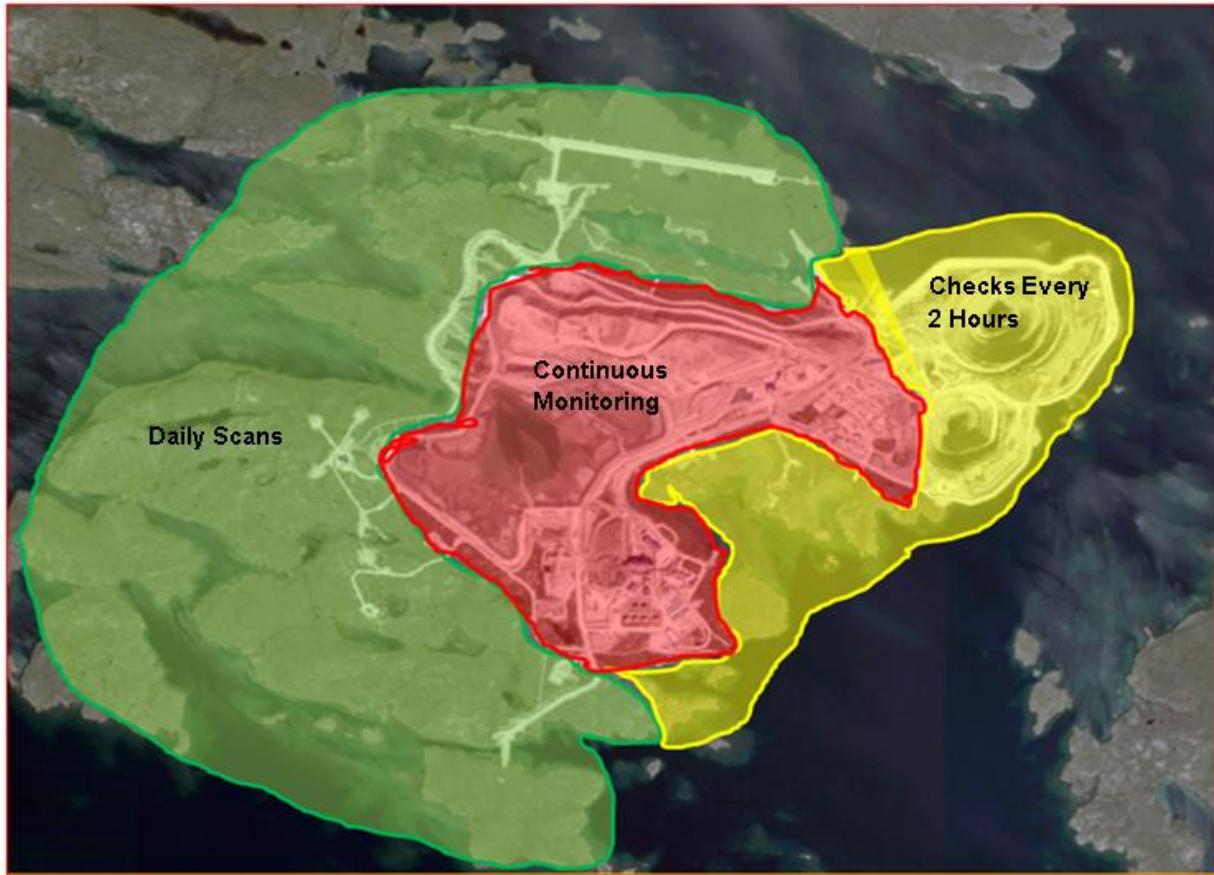


Figure 2: Monitoring Criteria for Problem Carnivores

6.4.1 Additional Information

Pertinent information to collect upon receipt of wildlife call

- Name and contact information of individual reporting the sighting;
- Number of animals; and
- Last known location and ask to maintain visual until Environment arrives at the scene.

Contact sequence for after hour callouts

- Environment Technician(s)
- Environment Term Technician(s)
- Environment Supervisor

NOTE: Environment staff who are on after hour callouts shall check in with security control every 2 hours and inform security control when the callout is complete.

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Wildlife Monitoring (Carnivores)****6.4.2 Controls to protect workers**

- Supervisors of work areas adjacent to the sightings need to be contacted to inform them to close any open doors to ensure the animals do not enter any mine infrastructure.
- The walkway between south camp and the main accommodations will remain open, unless Environment determines a need to close it. Environment will check with security to see if anyone is using the walkway. Environment will do a sweep of the walkway if there are people using the walkway. Environment will be responsible for arranging closure.
- If an alert occurs during shift change, Environment, with input from Site Services, will determine the need for buses to move personnel.

6.4.2.1 Wildlife Inside Buildings or Corridors

Special consideration should be taken if wildlife is reported inside buildings. Most wildlife will not remain in buildings and corridors; however, problem carnivores can become food conditioned and may seek to enter structures inhabited by workers.

When contacted by Security Control or individuals, the responding Environment personnel should ensure:

- The individual(s) reporting the animal have informed the area supervisor.
- People working in the structure have evacuated the building to the nearest vehicle.
- Where possible leave exterior structure doors open so that the wildlife can exit the structure and close and latch interior doors to prevent the animal moving into other areas of the structure, the idea is to provide the animal one or two obvious exits.
- Structure exits are monitored until Environment personnel arrive at the scene to understand when the animal has left the building.

After confirming that the reporting individual(s) are secure and structure doors are open and monitored the on-call Environment personnel should activate additional resources:

- At a minimum the Environment Supervisor or their designate should be made aware of the situation
- Emergency Response Team Advisor
- Security Control

As the problem carnivore is in a structure, deterrent options are limited to air horns and fire extinguishers. No bear spray, banger, or firearm should ever be used in a structure.

On arrival at the structure, Environment personnel will determine if there is a safe way to enter the structure and use air horns to encourage the animal to move toward an open exterior door. Personnel should never enter a building if entering the building would place the employee between the animal and the only open exit.

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Problem wildlife in structures can be trapped and relocated if they are reluctant to move on. DDMI should have two traps:

- A larger drum-style trap owned by the Environment Department, and
- A smaller cage trap owned by Underground Operations.

Depending on the trap style and the animal in the trap a minimum of two people are required to pick up and move the trap, in many instances three people are required. The style of trap used is dictated by the structure, the animal involved in the disturbance, and the availability of help to move the trap. Once set and baited the trap should be checked every hour; additionally, the structure exit should be monitored continually to know when the animal has left the building.

Once trapped the animal should be moved to the Environment Field Lab for temporary storage until ENR can be contacted and a plan for relocation generated – see relocation under remedial actions.

6.4.3 Duties of supervisors

- All supervisors are responsible to monitor the radio for changes or updates on the bear's movement on site.
- Supervisors are responsible to account for and notify their staff. If necessary, supervisors are responsible to restrict work in certain areas, depending on the problem carnivore's location.

6.4.4 Criteria for Lifting Advisory (See Figure 2):

6.4.4.1 Green

Bear/ problem carnivore can be left in this area, use discretion where the animal is close to infrastructure.

6.4.4.2 Yellow

Bear/ problem carnivore can be left at the discretion of the person monitoring the animal.

Things to consider:

- Is the bear moving around?
- Is the bear bedded down, if so for how long?
- Do you have a visual on the animal and how long have you had the visual for?
- How active has the animal been?
- What time of day is it?
- Are there people in the area?
- Have you assigned alternate monitor(s) (night...who???)
- What is the distance from active work areas?
- Have you contacted area supervisors to ensure they are aware a problem carnivore is close?

ENVIRONMENT**STANDARD OPERATING PROCEDURE****Wildlife Monitoring (Carnivores)**

- Can security monitor the animal with their cameras?

Ensure the alert has been updated.

6.4.4.3 Red

Bear/ problem carnivore needs to be monitored continuously while in the red zone.

- In the event there is an unconfirmed wildlife sighting (i.e., reported by workers but not seen by Environment), the search can be abandoned after 1 hour with no sighting.
- The alert will stay in effect until the bear or other carnivore has left the red zone.

6.4.5 Remedial Action for Problem Wildlife

Preventing the attraction for wildlife through proper food storage, garbage disposal and camp maintenance is the most effective way of avoiding problem carnivores in general. Management action will be carried out if bears or other carnivores pose a threat to people and/or property.

Occasional visitations by grizzly bears, wolverines, and wolves to the mine site are anticipated. Procedures for dealing with problem wildlife are outlined below.

The Environment Superintendent and the Environment Supervisor will work with Environment Natural Resources (ENR), GNWT to deal with problem wildlife at site. There is a hierarchy of options for control of problem wildlife that poses a nuisance or danger to human safety; the three levels of increased effort to deal with problem wildlife are:

- Level I: Deterrence
- Level II: Relocation
- Level III: Destruction

The Environment Supervisor will maintain effective communication with ENR in reporting problem carnivores and in evaluating options for wildlife control.

6.4.5.1 Level I: Deterrence

A method or device, either physical or chemical, designed to chase the animal away. This could involve one or a combination of the following approved and recommended methods by ENR:

- Use of vehicles
- Bear Bangers
- Noise crackers
- Rubber bullets
- Bean bag marking cartridge
- Aircraft
- Pepper spray

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STANDARD OPERATING PROCEDURE

Wildlife Monitoring (Carnivores)

Each member in the Environment Department has been trained and are responsible to ensure they have deterrents with them while on a wildlife call-out. Firstly, the Environment representative must do an inventory of the number of bangers, screamers, they have present in their field kits. They must keep track and log the number of deterrents they use on the animal (documented on the iPad in iAuditor and Ammunition Used Log). If any discrepancies are noticed (i.e., lost live bangers or other deterrents), notify the Environment Supervisor and an incident report will be generated. Each member in the Environment Department is accountable for their field kits containing bear bangers and screamers. The Technician must ensure kits are stored adequately for the duration of their shift. All discharged deterrents must be brought back to the environment office and placed in a zip lock bag with the technician initials and date of use. These bags will be stored in the firearms cabinet for periodic reconciliation.

Individuals using methods of deterrence must properly assess the situation that they are in and the following points must be considered:

- Vehicles are an acceptable method of deterring bears, wolves, wolverines, and foxes; however, ensure that the animal is moved away from project activities and not scared towards camp infrastructure or toward unsuspecting people. This is the preferred method of deterring wildlife as they move adjacent to the mine site, and for moving problem carnivores off site.
- Increase the level of deterrent accordingly, based on the behaviour of the animal: vehicles & their horns, air horns, bear bangers, cracker shells, rubber bullets, and helicopter.
- No shooting of a bear banger towards buildings or fuel sources.
- Ensure that the bear banger is shot between you and the problem carnivore so that the animal is not scared towards you. If using an air horn, ensure that it is directed towards the animal.
- If a helicopter is available on or near the site, it may be used to deter the problem carnivore off the island **if other methods of deterrents are unsuccessful**. Ideally, an attempt should be made to move the animal onto the small islands, west of the airstrip - thereby encouraging the animal to move off East Island onto the mainland. Note: This method of deterrence can only be conducted at the discretion of pilot and all DDMI personnel will follow the procedures laid out in the helicopter usage SOP (ENVI-916-0119). A qualified DDMI Environment personnel should be onboard the aircraft or on the ground with visual (and radio) contact to provide the pilot with guidance. Ground to air radio contact with the helicopter can be maintained using Zone 7 – Great Slave Helicopters Channel.
- The pilot should:
 - Stress the animal as little as possible. A stressed bear running for a distance can overheat and die.
 - Keep the helicopter well back from the animal. The minimum distance between the helicopter and the bear is 100 m (320 ft) back and 30 m (100 ft) up from the ground.

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Wildlife Monitoring (Carnivores)

- Keep the animal in visual contact. This should be done by taking the helicopter to a higher altitude rather than getting closer than the minimum distance.
- Only get close enough to the bear to make it move, not fly over it. A carnivore moving at a 'fast walk' can cover a lot of ground quickly and efficiently; there is no need to run the animal.
- DO NOT push a bear for more than 10 minutes or 3 km (2.2 miles).
- Documentation of all deterrent actions must be completed. This includes all notes made in the iPad iAuditor and uploaded to 15.3 Wildlife Database → Wildlife Deterrence Used → Year. In this final copy, be sure to include as much detail as possible. This includes the description of the animal (colour, build, stature and approx: age), behaviour of the animal, response to stressor (deterrent), the number of each deterrents used, location (coordinates) and any movement that occurred with the animal. Any additional pictures will be helpful to identify the animal in the future.

Note: If you are required to deter problem carnivores from the site, a deterrence report must be completed. This report should be e-mailed to Adrian Lizotte

Adrian_Lizotte@gov.nt.ca

6.4.5.2 Level II: Relocation

DDMI Environment will work with ENR; GNWT to determine if/when a problem carnivore should be relocated. A completed relocation permit is usually required by ENR prior to starting relocation. Relocation is completed under the authority of ENR, and would be supported by DDMI Environment. Relocation typically involves remote work (ENVI-907-0119) and helicopters (ENVI-916-0119) or snow machines (ENVI-919-0119). Prior to undertaking relocation the relevant SOPs should be reviewed and a JHA completed.

If a problem carnivore is trapped inside a structure the trap containing the animal will be stored in the Environment Field Lab until an action plan is formulated with ENR. The following are potential options:

- Smaller animals, e.g., foxes, can be relocated to Pond 3 or the Wind Farm
- If Lac de Gras is frozen or the winter ice road is open the animal can be relocated away from East Island, release of the animal should occur at least 75km from site and preferably in an environment that is attractive to the carnivore
- If it is summer the animal may have to be tranquilized and transported via helicopter as far as possible

If possible, relocation should be in an environment that is attractive to the carnivore (e.g., caribou herds for wolf and wolverine). Otherwise, it is recommended to relocate the wildlife to the north or northwest of the mine site as this region is typically upwind of the mine site.

Prior to releasing the problem carnivore an attempt should be made to mark the animal with a bright colour spray paint. This is to help identify repeat offenders.

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Wildlife Monitoring (Carnivores)

Individuals involved in the release of animals from traps at the relocation site should be as close to a means of safe egress as possible. The most likely response of a released animal is to run away from the trap; however, it could turn and attack.

If the problem carnivore repeatedly offends after relocation, contact ENR and discuss destruction options.

6.4.5.3 Level III: Destruction

The destruction of problem carnivores will only be implemented as a last resort deterrence method if all the above methods have failed. ENR wildlife officials will make this decision upon recommendation and discussions with designated biologists and DDMI Environment personnel. However, if an emergency arises where there is direct danger to an individual then it may be necessary to destroy problem carnivores immediately. **Note: Unless the wildlife poses an immediate threat to life or safety, approval to destroy an animal must come from ENR prior to destruction.**

Only Environment personnel holding a valid Possession and Acquisition License (PAL) are to handle any firearm or to destroy problem carnivores, if the situation arises. Direct permission must be obtained from **ENR using their 24-hr emergency contact phone number: (867) 873-7181**. Prior to destroying problem carnivores the responsible person will complete a JHA and will follow the firearm SOP (ENVI-920-0119) when performing the destruction. The one exception to this policy is if an indigenous trapper has been hired to trap and destroy the animal. In this instance, the trapper will hold a valid PAL and will only shoot the animal after it has been trapped.

If destruction of an animal occurs, a detailed incident report must be prepared and submitted to ENR officials. This report would also be included as an appendix in the annual wildlife monitoring report.

If an animal is destroyed, the hide must be preserved in such a manner that it will not be allowed to spoil. ENR will require the head along with any other requested samples which will change from year to year dependent on research priorities.

7 QUALITY OUTCOMES AND EXPECTATIONS

To safely complete the tasks outlined in this SOP, without incident.

Producing quality, accurate and repeatable results.

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Area No.: 8000 **Document #:** ENVI-1242-0921

Revision: 0

Task Title: Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

Next Review: 1 Year from Final Approval in Documentum

Effective Date: Date on approved stamp in footer.

1 REFERENCES/RELATED DOCUMENTS

- 1.1 **Bird Species of Lac de Gras** – Located in: P:\DDMI Environment\10.0 Operational Control\10.2 Forms\Archive Forms\2013 - FORMS
- 1.2 **Peterson Field Guide Western Birds Reference book** - Environment Office Library
- 1.3 **Smithsonian Handbooks Birds of North America Western Region** - Environment Office Library
- 1.4 **The Sibley Field Guide to Birds** - Environment Office Library
- 1.5 [**Northwest Territories – Wildlife Act**](#)
- 1.6 [**NWT Wildlife General Regulations: Schedule General**](#)
- 1.7 [**Migratory Birds Convention Act**](#)

Revision History

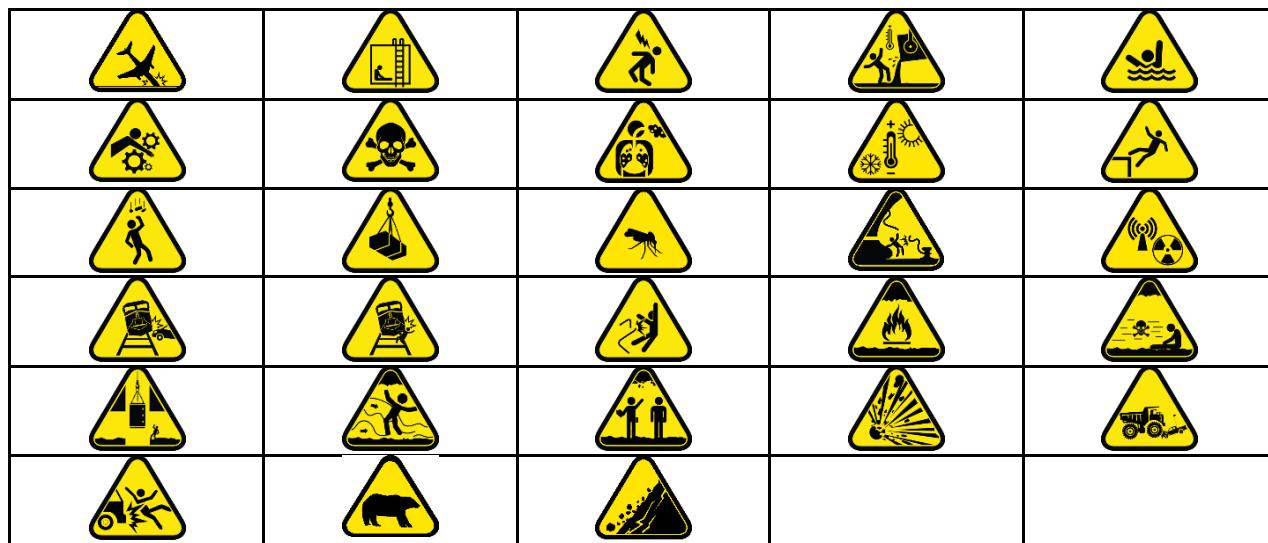
Revision	Revision Description	Date of Revision	Author
0	Original Issue	20-Sept-21	K. Gray

Authorized Electronically in Documentum By:

Area Superintendent:	Kofi Boa-Antwi
Area Manager:	David Patterson

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

CRITICAL RISKS



Description

This SOP describes procedures to be followed prior to commencement of land disturbance on undisturbed land, e.g. the tundra, in the Diavik area during the bird nesting season (May 1 to August 31) for resident and migratory birds.

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

2 PURPOSE

The purpose of this guideline is to provide efficient and standardized procedures to field operations staff conducting bird sweeps for protecting resident and migratory nesting birds in areas of planned tundra disturbance within the Diavik Project footprint during bird nesting season (May 1 to August 31). Pre-land disturbance surveys reduce the likelihood of incidental take of federal- or territorial-protected bird species during land disturbance activities.

3 SCOPE

3.1 Scope of Procedure

This standard operating procedure (SOP) describes the responsibilities and processes for protecting and communicating presence of nesting resident and migratory birds in areas of planned land disturbance activities, including on the tundra. This procedure is to inform Diavik Environment department personnel who are responsible to carry out bird sweeps in areas of planned land disturbance.

3.2 Scope of Activities

This procedure applies to all activities in undisturbed areas with the potential to affect or impact nests, eggs, or birds.

4 DEFINITIONS

- **Nest** – means the nest of a resident or migratory bird and includes parts of the nest. A broader definition includes any structure, ground scrape or part of the landscape (i.e., burrow, tree cavity, broken tree top, ground or floating vegetation) that a bird species uses for breeding, laying eggs or rearing young.
- **Active nest** – a nest is considered active if it contains viable eggs and/or chicks. If a nest is found but bird activity is not detected at the nest, professional judgment and expert knowledge must be used to determine whether the nest is likely to be in use or whether it has been abandoned. A nest is also considered active if its presence is suspected based on the behaviour of nearby birds, even if its precise location and condition cannot be verified. Nests for birds that re-use nests from one year to the next are generally protected year-round.
- **Inactive nest** – nests that are empty, contain non-viable eggs, or are being built but do not yet have an egg in them are considered inactive.

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Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

5 RESPONSIBILITIES

See: **ENVI-444-0415 - Environment Roles and Responsibilities** - Located in: Diavik Intranet – SOPs – Environment Folder

6 PROCEDURE

6.1 Key HSEQ Aspects

Task Hazards

Aircraft		Extreme Weather	✓	Line of Fire		Snowmobile Operation	
Burns		Fall into Water		Manual Labour	✓	Spills	
Chemical Contact		Falling		Noise		Sprain / Strain	✓
Confined Space		Fire		Overhead Objects		Stored Energy	
Cuts Scrapes		Firearms / Deterrents		Perception		Uneven Terrain / Ground	✓
Dehydration	✓	Fumes / Gases		Pinch Points		Unfamiliar Area	✓
Electrical		Glass		Risk to Wildlife	✓	Visibility	✓
Entanglement		Heavy Equipment		Rotating Parts		Watercraft Operation	
Equipment Loss or Damage		Lifting		Sample Loss or Damage		Wildlife	✓
Ergonomics	✓	Light Vehicle		Slip, Trip, Fall	✓	Working Remotely	

See: **ENVI-445-0415 - Environment Hazard Definitions** - Located in: Diavik Intranet – SOPs – Environment Folder

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Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

6.2 CRM Critical Risks

Critical Risk	Critical Control
Temperature extremes	Multiple layers, buddy checks, hydration, breaks
Wildlife	Scans, egress plan, deterrents
Vehicle interaction with person	Call into work area, positive confirmation

6.3 Tools Required

- Clipboard and field sheet (Appendix 1)
- Pencils
- Bird identification book
- GPS
- Camera
- Extra batteries
- Binoculars
- Flagging tape
- Drag line

6.4 Procedural Steps

Surveys should not be conducted at freezing temperatures, during steady drizzle or rain events, during fog, or when winds exceed 20 km/h. These conditions may interfere with breeding behaviour and compromise observer ability.

The best time for bird sweeps is early in the morning or late evening, when birds are most active. The most important thing is to avoid periods of low activity, such as during the heat of the day or in rainy weather.

The focus of the survey should be to search for birds exhibiting breeding behaviour, such as paired birds, birds carrying nesting material, birds carrying food, territorial singing, alarm calls, or distracting displays and to scan the area for signs of nesting and or active nests.

- Notify area owner that you will be in the vicinity conducting surveys in their work area.

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Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

- Observe the area planned for land disturbance from a distance to listen and watch for birds and bird behaviour for at least 30 minutes. Use of binoculars recommended.
- Record all activities during observation time in a field sheet (see Appendix 1).
- Working in a group of 3 and with a drag line (two people on each end of line and a third observer in the middle in a V formation), walk quietly and slowly North to South and then East to West in a grid pattern over the area, pausing intermittently to observe bird behaviour and study the ground for signs of nesting. A 30-meter buffer area outside of the planned disturbed area should be surveyed as well.
- Minimal conversation (noise) should be made between the observers
- If an active nest is located, record the following information (do not touch nests or eggs):
 - Species (or a description of type and behaviour of the bird)
 - UTM coordinates, date, time of day
 - Photos
 - Nest site description (vegetation type, nest height, type of nest)
 - Stage of nesting (construction stage, eggs including number, hatchlings, almost fledged)
 - Additional information on adult bird presence/absence, behaviour
- Cordon off the area with flag high visibility tape to ensure it remains undisturbed and report discovery to the Supervisor Environment.
- Supervisor Environment, to inform Superintendent Environment of nest.
- Superintendent Environment or a designate to engage regulatory authority(ies) (Government of the Northwest Territories Environment and Natural Resources [GNWT ENR] and Environment and Climate Change Canada [ECCC]) for guidance on how to proceed.
- Superintendent Environment to prepare instruction for area owner to commence work in the area, if applicable.

Based on advice from GNWT ENR/ECCC, some of the following actions may be required:

- Monitoring the nest under guidance from GNWT ENR/ECCC.
- Relocation of nest/nest materials
- Removal and destruction of nest/nest materials.
- Establishing setbacks or buffers until the nest is no longer active.
- Inclusion of results of bird sweep activities and mitigations for active nests in annual Wildlife Monitoring Reports.

7 QUALITY OUTCOMES AND EXPECTATIONS

- 7.1 To safely conduct the tasks outlined in this SOP without incident
- 7.2 To ensure the protection of birds nesting in areas of planned development.

ENVIRONMENT
STANDARD OPERATING PROCEDURE
Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

Appendix 1

Field Sheet

Pre-Land Disturbance Bird Sweeps (May 1 to August 31)

Date (yyyy-mmm-dd):

Weather Conditions:

Precipitation (snow, rain, none):

Survey Area Description (topography, vegetation, etc.)

Observation Period (30 min)

Observation Notes (record all activity):

Ground Survey

GPS Coordinates Survey Area Perimeter (UTM):

Easting: _____ Easting: _____ Easting: _____ Easting: _____

Northing: _____ Northing: _____ Northing: _____ Northing: _____

Survey Start Time (includes observation period) (24:00): _____ Survey End Time (24:00): _____

Number of Individuals Conducting the Survey: _____ Surveyed By: _____

Species/nests found during survey:

UTM coordinates of nest/nest materials: Easting _____ Northing _____

Nest site description (vegetation type, nest height, type of nest)

Stage of nesting (construction stage, eggs including number, hatchlings, almost fledged)

Additional information on adult bird presence/absence, behaviour

Appendix B

Monitoring and Report Forms

Table of Contents

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ENVI-362-0214 R5 – Wolverine Snow Track Field Sheet	158
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Wildlife Report – 2020	171

Caribou Scanning Observations (Activity Budgets)

Area: Diavik Mine Site - Offsite
Effective Date: 31 October 2015
Task: Activity Budget Scans

No: ENVI-243-0912 R0
Revision: 03
By: L. Coe

DATE (yyyy.mm.dd): _____ SAMPLED BY: _____ GPS COORDINATES (UTM): _____ E _____ N 12W (datum) NAD 83

Diavik: _____ (km) N NE E SE S SW W NW Air Temp: _____ °C Wind Direction: _____ Wind Speed (knots): _____

Cloud Cover: 0%, 10%, 25%, 50%, 75%, 100% **Precipitation:** rain / mist / snow / n/a **Snow Cover:** 0%, 10%, 25%, 50%, 75%, 100%

Mosquito / Blackfly Harassment 0 = None to 4 = Severe: 0 1 2 3 4 Warble / Botfly: Present Absent Total Number Caribou in Herd: _____

Habitat Type: HT SW EC RS SF DS IC LA ST BO<80% BO>80% **Number of Stressors encountered during Observation:** _____

Caribou Activity Budget Observations

Caribou Sample Size: _____ **Sample Composition:** Females Females/Calves Males Females/Males Females/Males/Calves (#of Calves_____)

Behaviour Types		Bedded	Feeding		Standing	Alert		Walking	Trotting	Running
Stressor Types		Staff on Foot	Pickup in area		Haul Truck in area	Helicopter, Plane		Blast	Other Wildlife	Etc.
Response-Majority of Group		0=No Reaction	1=Mild – animals look towards disturbance		2=Moderate-animals walk away			3=Severe–animals trot or run away		
Habitat	HT=Heath Tundra	SW=Sage Wetlands	EC=Esker Complex	SF=Spruce Forest	RS=Riparian Shrub	ST=Snow Covered Tundra	LA=Lake	BO=Boulder	IC=Ice	

Caribou Scanning Observations (Activity Budgets)			
Area:	Diavik Mine Site - Offsite	No:	ENVI-243-0912 R0
Effective Date:	31 October 2015	Revision:	03
Task:	Activity Budget Scans	By:	L. Coe
		Page:	<u>2</u> of <u>3</u>

Questions for TK Component of Survey

Name of Participant : _____ Participating Agreement Community: _____

What features, plants and aspects of the landscape would attract caribou to this location? _____

Do you feel these caribou are healthy? _____ How did you determine this? _____

Based on your above answer would you harvest these caribou for human consumption? _____

Do you think the calves in this group have a good chance of survival? _____ Why? _____

Would this area be a good area to hunt in? _____ Would you consider this terrain to be easy, moderate or difficult to travel in? _____

Do you believe the change in weather patterns affected the caribou? _____ How? _____

Was the response to the stressor(s) one that you would consider normal? _____ Why? _____

Is there anything else you'd like to add? _____

I give my consent for the above information to be utilized in reports. _____ Name: _____

Signature: _____ Date: _____

Caribou Scanning Observations (Activity Budgets)				
Area:	Diavik Mine Site - Offsite	No:	ENVI-243-0912 R0	
Effective Date:	31 October 2015	Revision:	03	
Task:	Activity Budget Scans	By:	L. Coe	
			Page:	3 of 3

Revision #	Revision Description	Date of Revision	Prepared By	Approved By
00	Initial Release	05 May 10	L.Coe	S. Bourn
01	New format, revised parameter	22 May 11	K.Moore	S.Bohnet
02	New Format added list of questions for TK	29 Oct 15	D. Dul	S. Sinclair

Wolverine Snow Track Field Sheet

Area:
Effective Date:
Task:

8000
22-Feb-2014
Wolverine Snow Track Field Sheet
Supersedes ENV-WILD-02

No: ENVI-362-0214
Revision: 5
By: Nicole Goodman
Page: 1 **of** 3

DATE (yyyy-mmm-dd): _____ **SAMPLED BY:** _____ **Time Depart:** _____ **Time Return:** _____

Air Temp: _____ °C **Wind Direction:** _____

Light Conditions (Circle One): Overcast Sunny Flat

Wind Speed (Max): _____ **Wind Speed (Avg):** _____

Snow Tracking Conditions: Excellent Good Fair Poor

Days since Snow (nearest half day): _____ cm: _____

Days since Wind Speed ≥ 27 km/h (nearest half day): _____

Additional Notes: For track aging in the following example, the wind threshold was exceeded more recently than recent snowfall, therefore tracks would have been either present before (>5 days old) or occurred after (<5 days old) this wind weather event.

Transect Number	Species	Number of Individuals	Age of Tracks	Waypoint	UTM Easting	UTM Northing	Pic #	Comments (Direction of Travel, Crossed Transect Before, Sex, Snow Conditions)

Wolverine Snow Track Field Sheet

Area:
Effective Date:
Task:

8000
22-Feb-2014
Wolverine Snow Track Field Sheet
Supersedes ENV-WILD-02

No: ENVI-362-0214
Revision: 5
By: Nicole Goodman
Page: 2 of 3

TK Survey Questions

Participant Name _____

Participant Community _____

Does this area seem like good habitat for wolverines? What features of the landscape would attract wolverines to this location?

Based on the tracks you saw, how large are the wolverines in this transect? Bigger or smaller than average?

If you saw any wolverines (not just tracks) on this transect, how large were they? Did they appear healthy? How did you determine this?

Would this area be a good area for a wolverine to hunt or scavenge in? Would you consider this terrain to be easy, moderate, or difficult for a wolverine to travel in? Why?

If you saw any kills on this transect, how do you think they were killed? Has the kill been scavenged? By what animal?

Is there anything else you'd like to add?

I give my consent for the above information to be utilized in reports. _____ Name: _____

Signature: _____ Date: _____

<u>Wolverine Snow Track Field Sheet</u>			
Area:	8000	No:	ENVI-362-0214
Effective Date:	22-Feb-2014	Revision:	5
Task:	Wolverine Snow Track Field Sheet	By:	Nicole Goodman
	<u>Supersedes ENV-WILD-02</u>	Page:	<u>3</u> of <u>3</u>

Revision History			
Revision	Revision Description	Date of Revision	Author
0	Initial Release	22-Feb-2014	D. Dul
1	Changed formatting and Map	23-Mar-2015	D. Dul
2	Changed format and added 2016 Map	22-Feb-2016	D. Dul
3	Updated Content of Form	20-Mar-2017	D.Bourassa
4	Included wind threshold	15-Mar-2019	S. Skinner
5	Added TK questions, removed map	28-Feb-2020	N. Goodman

Raptor Inspection and Bird Monitoring

Raptor Inspection and Bird Monitoring

Complete

Score	0%	Failed items	0	Actions	0
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Title (YYYY-MM-DD Bird Survey)

Conducted on

Raptors and Birds of Concern

Private & Confidential | Protection of Environment and Natural Resources

For the duration of the nesting period (May 1st through August 31st), a weekly inspection is conducted to identify if species of concern are present at the Mine Site. This will be conducted in addition to the weekly Raptor Survey. Areas should be inspected throughout the week to ensure adequate time for all areas to be scanned for the presence or absence of birds. See following photos for bird species.

Peregrine Falcon



Rough-legged Hawk



Gyrfalcon



Bank Swallow



Barn Swallow



Harris's Sparrow



Lesser Yellowlegs



Red-necked Phalarope



Rusty Blackbird



Short-eared Owl



Weekly Raptor Survey

Surveyed By:

Pit Infrastructure (A154 and A418 Lookouts)

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

Collection Ponds and North Inlet

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

ERT Training Grounds, Watering Tree, Airport and Helipad

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

South Tank Farm, METCON Yard, and Seacan Alley

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

MAC, South Camp, Steel Yard, Cold Storage

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

Process Plant, Boiler House, Sewage Treatment, Powerhouse I and II

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

Truck Shop, Lube Storage, Site Services Line up, Carpentry Shop and

Environment Field Lab

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

Backfill Plant, Crusher ROM, North Country Rock Pile, Till Pile and Landfill

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

Batch Plant, SCAP Yard, Fabrication Shop, C Portal/UG Surface, FAR and

D1 Laydown

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

A21 Areas (Dike lookouts, A21 Muster, Laydowns, MUDX Pile)

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

Test Piles, PKC Muster, Process ROM, A21 Pit Shop and A21 Portal

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

AN/Emulsion Plant, Windfarm and South Country Rock Pile

Bird Species

Number of Birds (specify species)

Is there nesting activity?

Description of area and activity (location; flying, perched, etc)

Data Entered In P:Drive 13.4 Excel File?

Selected Sample Points

Environment Programs: Waste Inspection - A21
Environment Programs: Waste Inspection - Landfill
Environment Programs: Waste Inspection - Underground
Environment Programs: Waste Inspection - Waste Transfer Area

Selected Parameters

Sample Collected By:
Waste Inspection - Aerosol Cans (Qty.)
Waste Inspection - Batteries (Qty.)
Waste Inspection - Cigarette Butts (Qty.)
Waste Inspection - Cigarette Packaging (Qty.)
Waste Inspection - Drink Containers Recyclable (Qty.)
Waste Inspection - Food (Qty.)
Waste Inspection - Food Packaging (Qty.)
Waste Inspection - Gloves (Qty.)
Waste Inspection - Oil Contaminated Waste (Qty.)
Waste Inspection - Oil Products and Containers (Qty.)
Waste Inspection - Oily Rags (Qty.)
Waste Inspection - Other (Qty.)
Waste Inspection - Wildlife Observations (Qty.)
Waste Inspection - Wildlife Sign
Waste Inspections - Wildlife Observations (Type)

Wildlife Report - 2020

Wildlife Report - 2020

Complete

Score	0%	Failed items	0	Actions	0
-------	----	--------------	---	---------	---

Wildlife Report

Audit Title (Animal - yyyy-mm-dd - Location)

Document No. WildlifeReport000049

Completed On

11th Jun, 2020

Audit

0%

Wildlife Report

Type of Wildlife Report

Deterrent Reporting

Deterrent Report

0%

Enter Initial Time of Wildlife Sighting

Department/Individual Who Reported Wildlife:

Environment On Scene

Environment at Call-out Location

Animal Type

Description (eg. number of individuals, colour, age, size, etc.):

Photo (If Possible):

Chronological Events

Movement Map (Import NotePlus Site Map)

Deterrent Count

0%

Truck

0

From 0 to 40

Air Horn

0

From 0 to 40

C/F Bear Banger

0

From 0 to 40

C/F Pen Whistle

0

From 0 to 40

12GA Bear Banger

0

From 0 to 40

12GA Explosive

0

From 0 to 40

12GA B.B. Marker

0

From 0 to 40

12GA Rubber Bullet	0
	From 0 to 40
12GA Slug	0
	From 0 to 40
Helicopter	0
	From 0 to 40
Other	0
	From 0 to 40

Specify

Environment Off Scene

End of Environment Call-out

Final Location of Wildlife

Closure & Sign-off	0%
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Wildlife Report Complete

Appendix C

Response to Comments on 2021 WMMP

TECHNICAL MEMORANDUM

DATE 4 November 2021

GOLDER REFERENCE No. 21452119-2158-TM-Rev1-5000

DAVIK WORK PLAN No. 698 Rev. 0

DAVIK PO No. 3104601458

TO Kofi Boa-Antwi
Diavik Diamond Mines (2012) Inc.

FROM Dan Coulton and John Virgl

EMAIL Daniel_Coulton@golder.com;
John_Virgl@golder.com

RESPONSES TO COMMENTS ON DAVIK WMMP

On 5 July 2021, the Government of Northwest Territories Department of Environment and Natural Resources (ENR) issued 20 comments on the 2021 Wildlife Mitigation and Monitoring Plan (WMMP). The file provided by ENR also included 27 comments provided by the Environmental Monitoring Advisory Board (EMAB). Golder has prepared responses to the EMAB comments in Table 1 and ENR comments in Table 2.

On 28 July 2021, Environment and Climate Change Canada (ECCC) issued seven comments on the WMMP. Golder has prepared responses to ECCC comments in Table 3.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WWMP-1	Vegetation and Wildlife Habitat (Landscape Changes)	<p>Prediction: Determine if direct vegetation/habitat loss due to the Mine footprint exceeds the prediction of 12.67 km².</p> <p>Data Collected: Ecological Land Classification (ELC) unit loss (area km²).</p> <p>Collection Method: Landcover image analysis.</p> <p>Status: Conditions remain at or below predicted levels. Last tested in 2019.</p>	The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program	DDMI will continue this component of the monitoring program using current methods.	No change required.
EMAB-WMMP-2	Caribou Habitat Loss	<p>Prediction: At full development, direct summer habitat loss from the project is predicted to equal 2.965 Habitat Units (HU).</p> <p>Data Collected: ELC unit loss (area km²) X habitat suitability value.</p> <p>Collection Method: Landcover image analysis.</p> <p>Status: Conditions remain at or below predicted levels. Last tested in 2019.</p>	The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program	DDMI will continue this component of the monitoring program using current methods.	No change required.
EMAB-WMMP-3	Caribou Movement	<p>Prediction: To determine whether the zone of influence changes in relation to Mine activity (Handley 2010).</p> <p>Data Collected: Caribou presence from aerial surveys and locations of satellite-collared caribou.</p> <p>Collection Method: Aerial surveys of caribou and radio-collar monitoring/data collection.</p> <p>Status: A ZOI of 14km was detected using aerial survey data and a weaker 11 km ZOI was detected using the satellite-collar location data (Boulanger et al. 2012). Caribou aerial surveys have not been completed since 2012 because a request to omit the ZOI requirement for caribou monitoring in 2013 was approved by ENR. Aerial survey data was re-analyzed by DDMI in 2019 with a conclusion of no ZOI. The GNWT has provided their own comments and recommendations on a draft version of the WMMP (GNWT-ENR, 2020), and a study has been completed analyzing GPS collar data and aerial survey data around the Diavik and Ekati mines from 1998 to 2017 (Boulanger et al. 2021). The GNWT review of the WMMP raised several issues with the ZOI analysis presented by DDMI that suggested there is no ZOI around the mines. Further, the recent peer-reviewed publication by Boulanger et al. (2021) demonstrates that using a combination of GPS collar data and aerial survey data, analyses could detect a ZOI. In fact, the ZOI appears to vary in size from year to year.</p>	<p>ZOI Monitoring should continue as a component of the WMP. We recommend utilizing multiple lines of evidence (i.e., aerial survey, satellite collar data), including exploring new sampling methods (e.g., drones), to confirm the presence/absence and size of the ZOI over shorter time scales than currently proposed (i.e., every three years starting in 2022) so data can be used to not only estimate the size of the ZOI on an annual basis, but also evaluate and guide mitigation action to limit the size of the ZOI around the mines.</p> <p>We recommend that the ZOI Technical Task Group (TTG) reconvene to discuss and determine the approach to future ZOI monitoring, including the need for additional aerial surveys.</p> <p>We recommend DDMI, in collaboration with GNWT, identify and implement monitoring methods and analyses that will facilitate annual ZOI estimation and reporting to monitor the size of the ZOI around the mine and the effectiveness of any implemented mitigation measures.</p> <p>Should the TTG determine the need for additional aerial surveys, we recommend revising sampling methods to address some of the data analysis issues found using the old design (e.g. geometric phenomena (Golder 2020, pg.33)).</p>	<p>The WMMP includes ZOI monitoring based on collared caribou, which is consistent with discussions at the Diamond Mine Wildlife Monitoring Meetings in February 2021 (GNWT 2021). DDMI does not agree that this monitoring will inform mitigation since sources of sensory disturbance from Diavik Mine operate simultaneously. As well, the incremental effects of Ekati and Diavik mines may overlap due to the close proximity, such that the incremental effects associated with each mine cannot be separated. DDMI will not complete exploratory research on different sampling methods of ZOI monitoring but will consider different methods that have been demonstrated to work (i.e., satellite collar caribou). However, DDMI will not use different methods simultaneously because financial resources are limited. The ZOITTG already identifies several methods that can be used for ZOI monitoring including collared caribou (GNWT-ZOITTG 2015).</p> <p>DDMI does not intend to continue aerial surveys for several reasons. The data to date have been analysed numerous times and show ZOI presence (Boulanger 2012, 2021) and absence (Golder 2017, 2020; ERM 2021). Aerial surveys cost DDMI \$236,000 annually to complete so they are a very expensive form of monitoring and communities have indicated aerial surveys disturb caribou. There are other ways to validate analysis predictions such as use of hold-out groups of data (e.g., Wiens et al. 2008).</p>	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-4	Caribou Behaviour	<p>Prediction: To determine if caribou behaviour changes with distance from the mines.</p> <p>Data Collected: Focal and group scan behaviour data.</p> <p>Collection Method: Ground-based behavioural observations.</p> <p>Status: Caribou groups with calves spend less time feeding and resting within 5 km of the mine than farther away. Last tested in 2011. DDMI continues to conduct group scan behavioural surveys in cooperation with the Ekati mine.</p> <p>The combination of walking with running and trotting in the 2011 behavioural analysis may be diluting the effect of trotting and running (higher energy activities).</p> <p>Although DDMI reported that "The 2021 Slave Geological Provincial Wildlife Workshop also concluded that caribou behaviour monitoring is no longer necessary." (2020 WMP Report, Section 4.7, Golder 2021b), we also attended the 2021 workshop and do not agree that there were conclusions or consensus regarding the continuation or discontinuation of caribou behaviour monitoring.</p>	<p>We recommend that DDMI continue their efforts to collect caribou behaviour data because the information could be useful in understanding the mechanism behind the ZOI and, subsequently, in developing associated mitigation measures. Ground-based behavioural data will also be needed for comparison against behaviour data collected during closure and post-closure phases to test predictions. The additional collar-based approaches to understanding caribou behaviour may also provide useful information.</p> <p>The methods for data collection currently being applied to this component are appropriate.</p> <p>Regarding caribou activities other than foraging, we recommend DDMI evaluate whether the data can be pooled and analyzed while considering covariates such as year, gender, and distance to the Mine.</p> <p>We recommend DDMI compare caribou running bouts as a function of distance. Please also consider grouping or separating running and trotting activities for the analysis. Statistical analyses should be completed once sufficient data are available and, data permitting, it may be informative to distinguish running from trotting from walking in future behavioural analyses.</p>	<p>Caribou behaviour monitoring does not provide insights into the different mechanisms of sensory disturbance that influence a ZOI and only provides information on distributions of behaviour activities as a function of distance from the mine(s). Behaviour monitoring may also provide insights into changes in caribou demography related to changes in caribou distribution (i.e., a ZOI). DDMI has elected to continue behaviour monitoring because of this linkage.</p> <p>Summary of available behavioural scan data from 1998 to 2019 is provided in Appendix D of the 2019 Wildlife Monitoring Report, including separate presentation of trotting and running averages within and beyond 15 km of the Mine (Golder 2020a). Sample sizes from behavioural scan data are unbalanced across monitoring year and distance from Mine, and therefore inappropriate to pool. Statistical analysis will be completed once sufficient data are available at the frequency identified in the WMMP.</p>	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP	
EMAB-WMMP-5	Caribou Distribution	<p>Prediction: During the northern (spring) migration, caribou would be deflected west of East Island and during the southern migration (fall), caribou would move around the east side of Lac de Gras.</p> <p>Data Collected: Locations of satellite-collared caribou.</p> <p>Collection Method: Radio-collar monitoring of cows and bulls (proportion travelling east vs. west of the mine).</p> <p>Status: The northern migration is following predictions; however, the southern migration deviates from predictions in the last several years of monitoring. DDMI evaluated the original predictions relating to caribou migration and determined the prediction for the southern migration was "not well developed and likely incorrect". DDMI has requested to remove this monitoring component from the WMP. We agree that monitoring west vs. east deflections is not very informative regarding impacts of the Project on caribou migration.</p> <p>DDMI has used GPS collar analyses to support their conclusion that observed changes in caribou migration can be largely attributed to natural range contraction (Virgil et al. 2017 use GPS data from 1996-2013; 2019 WMR (Golder 2020b Appendix C) graphed data from 1996-2018). The data show a contraction in autumn range size over time, high autumn range fidelity over time, and a northern shift in the autumn range location over time. While DDMI has committed to report on the composition, seasonal movement, and numbers of caribou in the area (Section 5.4.2; Incidental Observations), it is not clear what level of detail this reporting will include.</p> <p>It should be noted that the contraction and the northern shift of the autumn range could reflect chronic effects (avoidance) of the mine and that the influence of herd size on caribou range attributes should be quantitatively evaluated. Re-evaluation of these range attributes would also align with DDMI's statement that "In some cases, even when Mine-related effects are determined to be negligible, monitoring may be continued because it can increase the confidence of impact predictions in future environmental assessments and contributes to the assessment and management of cumulative effects by government." (p. 21; emphasis added).</p> <p>With respect to caribou energetics, DDMI does not propose to evaluate the energetic consequence of changes in the southern migration. Impacts to the southern migration were predicted by DDMI (loss of East Island route), but the energetic cost was likely overestimated because of the low amount of use of the east island route (baseline case). Caribou are roughly equally likely to use a west or east route in the absence of the east island route. Aside from existing mitigation measures in place relating to noise, dust, and light, impacts on caribou migration are likely only going to be reduced further through mine site reclamation. The value of completing an assessment of change in energetics at this point in time, if possible, would be to inform future project applications. An energetics model has already been completed for the Jay Project application, in which Dominion Diamond Ekati Corporation (Dominion) concluded that the Jay Project would cumulatively decrease caribou fecundity by 0.3% (MVRB 2016). Based on this information, we could assume that impacts from the Diavik Project would not exceed this cost in fecundity.</p>	<p>We agree with removing the caribou deflection component of the monitoring program.</p> <p>We recommend that DDMI re-evaluate caribou range attribute (e.g., autumn and winter range use and location) relationships through analysis of GPS collar data at the time of the next comprehensive analysis (2022). The analysis would verify that autumn range fidelity remains high and that the travel routes for the northern migration remain correlated with the location of the winter range (i.e., that the mine is having no measurable effect on the caribou migration).</p> <p>If changes in caribou range attributes are detected in future GPS collar data analysis that incorporates more recent data, this assumption regarding the extent of the energetic cost may need to be reconsidered.</p>	<p>DDMI previously committed to provide range attributes for Bathurst caribou in lieu of continued monitoring of caribou east-west deflections (Golder 2019). As described in Golder (2019) resulting changes in range attributes from mining activities would reflect cumulative effects from multiple overlapping developments and would not be solely attributable as an incremental effect from the Diavik Mine. As such, any such analysis provided by DDMI would reflect a contribution (at DDMI's discretion) toward cumulative effects assessment and management. While the mines are responsible for regional monitoring, cumulative effects assessment and management is a responsibility of the GNWT. EMAB's recommendation assumes that further contraction and northern shift of the autumn range would be attributable to Diavik Mine, which DDMI disagrees can be demonstrated. Figure 4.2-4 from Golder (2017) shows the decline of Bathurst caribou from 1986 to 2015, which corresponds with the contraction of, and northern shift in the autumn range. Figure 4.2-4 is provided in this document as Figure 3. The results in Tables 3 and 4 of Boulanger et al. (2021) show variable annual detection of ZOIs depicting attraction, avoidance and no ZOI. These results are not consistent with patterns of contraction and northern shift in the autumn range of Bathurst caribou.</p> <p>Of note is the Jay Project analysis included a number of conservatisms to overestimate energetic effects and subsequent costs to fecundity as a precautionary approach. For example, variation around each of the model parameter estimates was not propagated through the results so that conclusions were only based on point-estimates. Had variation of multiple model parameters been propagated through the model and confidence intervals provided, the 0.3% result reported would likely overlap zero (i.e., no measurable effect). Similar to the Jay Project, future environmental assessments may require energetic analysis.</p>		No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-6	Caribou Incidents and Mortality	<p>Prediction: Mine-related mortality is expected to be low.</p> <p>Data Collected: Number of incidents and mortalities reports.</p> <p>Collection Method: Incident and mortality reports.</p> <p>Status: No Mine-related mortalities were reported in 2019, and one natural mortality was reported on East Island. Conditions remain at or below predicted levels. Last tested 2019.</p>	<p>Please provide the definition of "low" with respect to caribou mortality.</p> <p>The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.</p>	<p>In the EER, the wildlife effects criteria for "low" magnitude was defined as a less than 1% change from baseline conditions (DDMI 1998, Appendix VI). Baseline would include all existing sources of caribou mortalities.</p> <p>DDMI will revise the WMMP to reference the definition from the EER (DDMI 1998).</p>	Section 5.3; Past Scope and Improvements; Page 5-5
EMAB-WMMP-7	Caribou Advisory	<p>Objective: The objective of the Caribou Advisory Monitoring program is to make certain that workers are aware of the approximate numbers of caribou on and near East Island, which is related to the potential for interactions between caribou and mining activities.</p> <p>Data Collected: Number of animals on the island and specific location.</p> <p>Collection Method: Incidental observations from pilots and workers, the use of satellite collar locations provided by ENR, and ground surveys.</p> <p>Status: No deterrent actions or elevation from "No Advisory" was required in 2019. Last completed in 2019.</p>	<p>The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.</p>	<p>DDMI will continue this component of the monitoring program using current methods.</p>	No change required.
EMAB-WMMP-8	Caribou Herding	<p>Objective: When caribou are present on East Island their movements are monitored so that Mine personnel are aware of their presence and location and so that caribou can be herded away from potentially hazardous areas.</p> <p>Data Collected: Location of caribou on East Island.</p> <p>Collection Method: slow advancement of personnel behind caribou to encourage movement in a safe direction.</p> <p>Status: There were no reported incidents involving caribou in 2019 and there was no need for herding of caribou away from hazardous areas. Last completed in 2019.</p>	<p>The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.</p>	<p>DDMI will continue this component of the monitoring program using current methods.</p>	No change required.
EMAB-WMMP-9	Grizzly Bear Habitat Loss	<p>Prediction: At full development, direct terrestrial habitat loss for grizzly bear from the project is predicted to be 8.67 km².</p> <p>Data Collected: ELC unit loss (area km²) for all terrestrial habitats.</p> <p>Collection Method: Landcover image analysis.</p> <p>Status: Conditions remain at or below predicted levels. Last tested 2019.</p>	<p>The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.</p>	<p>DDMI will continue this component of the monitoring program using current methods.</p>	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-10	Grizzly Bear Presence and Distribution	<p>Current Prediction: Provide estimates of grizzly bear abundance and distribution in the study area over time (GNWT 2013).</p> <p>Data Collected: Sex and number of individuals in the study area (DNA samples).</p> <p>Collection Method: Grizzly bear hair snagging.</p> <p>Status: There is a stable or increasing abundance of grizzly bears. Last completed in 2017. Results of the 2012 and 2013 hair snagging program can be found in ERM Rescan (2014) and results of 2012, 2013, and 2017 can be found in ERM (2018) (Appendix J of 2018 WMR).</p> <p>We continue to support DDMI's involvement in the GNWT hair snagging program but recognize that annual surveys may not be necessary given the stable regional grizzly bear populations and no apparent negative demographic effects associated with the presence of the Mines.</p> <p>At the February 2021 GNWT WMP Workshop, the issue of hair snag surveys was discussed. The GNWT indicated that results from the hair snagging program indicate that regional grizzly bear populations are stable to growing. While grizzly bear populations are stable at this time, they may not remain so in the future. DDMI has removed the hair snagging program from the WMMP (Golder 2021a), stating the program partners agreed to discontinue the grizzly bear hair snagging program during the 2021 SGP Wildlife Workshop. We concur that the program partners determined there was no longer a need for annual hair snagging surveys, but do not agree that a consensus was reached among program partners on the need for future surveys or what frequency of surveys might be sufficient.</p> <p>While annual hair snag surveys may not be required at this point to confirm population stability, given the number of reported bear observations at the mine and level of development in the region, ensuring grizzly bear populations in the area remain stable should be a goal of monitoring programs even if it is confirmed on a less frequent basis (e.g., once every five years instead of annually).</p>	<p>EMAB is reviewing the recently circulated notes from the 2021 workshop and will provide comments to GNWT with respect to grizzly bear hair snagging.</p> <p>We recommend development of a preferred frequency of grizzly bear hair snagging surveys moving forward.</p> <p>We recommend developing triggers for reinstituting future annual hair snagging at an increased frequency (e.g., annually), for example, if the number of mortalities associated with the mine increases substantially, or if mortalities are recorded for 3 years in a row.</p> <p>We recommend keeping the grizzly bear hair snagging as a component of the WMMP and defining its frequency based on triggers defined as requested and input from GNWT.</p>	<p>At the 2021 Diamond Mine Wildlife Monitoring Meetings program partners decided to discontinue the grizzly bear hair snagging program. Resuming this program requires agreement by all of the program partners as it cannot be implemented by one mine. DDMI would like to note that the Ekati and Snap Lake mines are currently in care and maintenance so mining activity in the region has decreased. DDMI would also like to note that Diavik's cost share to run this program was \$171,500 in 2012 and 2013 and \$217,300 in 2017. Grizzly bear mortalities and incidents will continue to be monitored at Diavik Mine and to date mine-related mortalities have been less than predicted in the EER (Golder 2021).</p>	No change required.
EMAB-WMMP-11	Grizzly Bear Incidents and Mortality	<p>Prediction: Mortalities associated with mining activities are predicted to be 0.12 to 0.24 bears per year.</p> <p>Data Collected: Number of incidents and mortalities reports.</p> <p>Collection Method: Incident and mortality reports.</p> <p>Status: There were zero bear mortalities in 2019, but there were 45 days that deterrent actions were used, which is an increase from 36 in 2018. Conditions remain at or below predicted levels. Last tested 2019.</p>	<p>The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.</p>	<p>DDMI will continue this component of the monitoring program using current methods.</p>	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-12	Wolverine Presence and Distribution	<p>Prediction: Provide estimates of wolverine abundance and distribution the study area over time (GNWT 2013).</p> <p>Data Collected:</p> <ul style="list-style-type: none"> • Wolverine site occupancy. • Sex and number of individuals in the study area (DNA samples). <p>Collection Method:</p> <ul style="list-style-type: none"> • Snow track surveys. • Wolverine hair snagging. <p>Status:</p> <ul style="list-style-type: none"> • Wind had the biggest effect on wolverine snow track detectability. There is a weak positive effect of habitat on wolverine track occurrence. Distance has a weak positive effect on the probability of wolverine occupancy, which suggests that transects closer to the Mines are less likely to be occupied. Larger sample sizes are required to allow for the simultaneous analysis of distance and habitat effects on wolverine occupancy. Last tested in 2019. • Stable wolverine population growth rate through time across study areas, except for Daring Lake, which showed a slight decline. Apparent survival was similar across study areas (Efford and Boulanger 2018). Last completed in 2014. <p>Given the findings of the MSOM which shows distance to the Mines effects wolverine occupancy, ongoing monitoring of population size and stability would be prudent to ensure negative impacts of the Mines on wolverines do not contribute to population extinction.</p> <p>We note that GNWT provided comment on the WMMP (GNWT-ENR, 2020). Their review questioned DDMI's approach to estimating a ZOI which relied upon the significance of a statistical interaction.</p> <p>At the February 2021 GNWT WMP Workshop, the issue of hair snag surveys was discussed. The GNWT indicated that results from the hair snagging program indicate that regional wolverine populations are stable. Analysis of the data collected between 2004 and 2015 showed that surveys could be repeated every four to six years to detect an annual population decline of 5% (Efford and Boulanger, 2018). DDMI has removed the wolverine hair snagging program from the WMMP (Golder 2021a). We agree that the program partners determined that there was no longer a need for annual hair snag monitoring (2021 GNWT WMP Workshop) but do not agree that a consensus was reached among program partners on discontinuing surveys all together.</p>	<p>The methods applied for the snow track component of the monitoring program are adequate except for the issue with use of a statistical interaction term to examine the occurrence and size of a ZOI. We recommend the continuation of the snow tracking program to monitor impacts of the mine on wolverine detectability, occupancy, colonization and extinction with a revised approach to use of the statistical interaction.</p> <p>EMAB is reviewing the recently circulated notes from the 2021 workshop and will provide comments to GNWT with respect to wolverine hair snagging.</p> <p>We recommend following the guidance of Efford and Boulanger (2018) who recommended repeating the hair snag surveys every four to six years to confirm regional wolverine populations remain stable. We continue to support DDMI's involvement in the GNWT hair snagging program at a reduced frequency determined in collaboration with program partners.</p> <p>We recommend developing triggers for reinstituting future hair snagging at an increased frequency (e.g., annually), for example, if the number of mortalities associated with the mine increases substantially, or if mortalities are recorded for 3 years in a row. Therefore, we recommend keeping the wolverine hair snagging as a component of the WMMP and defining its frequency based on the reports noted above, triggers defined as requested, and input from GNWT.</p>	<p>There is no evidence that current mine-related effects to wolverine from Diavik or other operating mines are trending wolverine populations toward extinction or negative population growth. In contrast, the NWT Species at Risk Committee assessed wolverine in the NWT as "not at risk" in 2014 (SARC 2014).</p> <p>Wolverine snow track monitoring is included in the WMMP.</p> <p>At the 2021 Diamond Mine Wildlife Monitoring Meetings program partners decided to discontinue the wolverine hair snagging program. Resuming this program requires agreement by all of the program partners.</p>	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-13	Wolverine Incidents and Mortality	<p>Prediction: Mine-related mortalities, if they occur, are not expected to alter wolverine population parameters in the Lac de Gras area.</p> <p>Data Collected: Number of incidents and mortalities reports.</p> <p>Collection Method: Incident and mortality reports.</p> <p>Status: Conditions remain at or below predicted levels. The 2019 WMR reported zero mortalities, two relocations, and seven deterrent actions for wolverine on-site. Last tested 2019.</p>	The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.	DDMI will continue this component of the monitoring program using current methods.	No change required.
EMAB-WMMP-14	Raptors Nest Occupancy	<p>Current Prediction 1: Determine if pit walls or other infrastructure are utilized as nesting sites for raptors.</p> <p>Data Collected: Nest location, species identification, activity status (presence of eggs or chicks).</p> <p>Collection Method: Pit wall/infrastructure inspections are completed twice weekly.</p> <p>Status: Two active peregrine falcon nests were observed, one was located at the Site Services Building and one at the Process Plant. No observations of fledglings were recorded. Last tested 2019.</p>	The methods applied for this part of monitoring are adequate. Document the fate (i.e., success or failure) of nests in the development area. We support DDMI's continued Pit Wall/Mine Infrastructure monitoring for nesting raptors. Keep this component of the monitoring program.	DDMI will continue this component of the monitoring program using current methods. Fate of nests (i.e., success or failure) in the development area will be documented in future reports.	No change required.
EMAB-WMMP-15	Raptors Nest Occupancy	<p>Current Prediction 2: Determine nest success in areas of development and document effectiveness of deterrent efforts that may be employed for nest relocations.</p> <p>Data Collected: Nest use and success (presence of hatchlings).</p> <p>Collection Method: Helicopter surveys of known nest sites in early and late summer.</p> <p>Status: Nest monitoring data contributed to ENR every 5 years. It was last completed in 2015 and next due in 2020.</p> <p>Comments from the GNWT on the WMMP noted the lack of data on nest success, which they note is one of the objectives of the raptor monitoring program. They recommend documenting the fate (i.e., success or failure) of nests in the development area.</p>	The methods applied for this part of monitoring are adequate. We support DDMI's continued contribution to regional nest monitoring. Keep this component of the monitoring program.	DDMI will continue this component of the monitoring program using current methods.	No change required.
EMAB-WMMP-16	Raptor SOP for Pit Infilling	The WMMP (Golder 2021a) includes a new section on pit infilling (Section 4.1.4, p. 4-3) and a new section in the Raptor Pit Inspection Standard Operating Procedure titled Deterrence During Open Pit Flooding (SOP; Section 6.4.5, p.11). Open pits will be filled with processed kimberlite (PK) and water from Lac de Gras during closure. DDMI intends to deter wildlife from the open pits, and specifically, if raptors are nesting in the pit, infilling will be postponed until young have fledged or adults have abandoned the nest. Active nests will receive a buffer of 250 m from mine activities. The SOP Section 6.4.5 describes the procedures for assessing and inspecting the open pit for nesting activity and applying the 250m setback.	The procedures outlined for raptors appear to be appropriate.	DDMI will continue use of current Raptor SOP for Pit Infilling.	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-17	Raptors Incidents and Mortalities	<p>Current Prediction 3: Document and determine the cause of direct Mine-related mortalities of raptors.</p> <p>Data Collected: Mine-related incidents.</p> <p>Collection Method: Incident reports submitted by mine staff.</p> <p>Status: No raptor incidents or mortalities were reported at the Mine in 2019.</p>	The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.	DDMI will continue this component of the monitoring program using current methods.	No change required.
EMAB-WMMP-18	Waste Management	<p>Objective: Create a system for proper disposal of waste, minimize adverse impacts on physical and biological environment, and comply with Federal and NWT legislation.</p> <p>Data Collected: Type and number of misdirected waste items and wildlife species and sign.</p> <p>Collection Method: Inspections of Waste Transfer Area (WTA) and the Landfill conducted twice weekly.</p> <p>Status: In general, the number of wildlife observations in the WTA and the Landfill were lower in 2019 than in 2018, and roughly the same in the A21 Area and the Underground. The overall outcome of waste management appears to be positive. Last evaluated in 2019.</p>	The methods applied for this part of monitoring are adequate. Keep this component of the monitoring program.	DDMI will continue this component of the monitoring program using current methods.	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-19	Waterbirds	<p>Objective: Determine if the Mine affects the presence of waterfowl and shorebird species in the study area.</p> <p>Data Collected: Species presence and count, categorized by guild.</p> <p>Collection Method: Surveys of East Island shallow bays and Mine-altered water bodies for 5 weeks during peak migration, late May to late June.</p> <p>Status: Surveys will resume during Mine closure for the first 3 years.</p> <p>The methods applied to determine if the Mine affects the presence of waterfowl and shorebird species in the study area are adequate.</p> <p>This program was discontinued in 2013.</p> <p>The Canadian Wildlife Service (CWS) recommended that DDMI restart the waterbird/shorebird monitoring program at the Mine reclamation stage.</p> <p>The WMMP (Golder 2021a) includes a new section on pit infilling (Section 4.1.4, p. 4-3). Open pits will be filled with processed kimberlite (PK) and water from Lac de Gras during closure. Although DDMI intends to deter wildlife from the open pits, no information specific to waterfowl deterrence was provided. DDMI committed to updating its SOP's to address deterrence as part of the PK to Mine Workings Water Licence Amendment proceeding.</p> <p>The WMMP (Golder 2021a) also includes new information regarding on-site water quality where they state that "water quality on site...and in the receiving environment is systematically monitored through the Aquatics Effects Monitoring Program (AEMP) and through the Surveillance Network Program (SNP)." (Section 4.1.6, p. 4-4). The results of this monitoring could inform on the risk of exposure of exposure of contaminants to waterfowl and other birds that may interact with the pit filled with processed kimberlite.</p>	<p>We concur with the CWS recommendation regarding reinstating the waterbird/shorebird monitoring program at the Mine reclamation stage.</p> <p>We recommend keeping this component of the monitoring program.</p> <p>We recommend that DDMI provide details regarding the specific measures they propose to employ to keep waterfowl out of the pit while it is being filled with PK and to keep waterfowl out of the pit if the results of water quality testing suggest there is potential for exposure to contaminants.</p>	<p>It is DDMI's understanding that the change from operations to closure will trigger development of a Tier 2 WMMP, as the GNWT directed to the Snap Lake Mine. DDMI included some aspects related to closure, such as in-pit filling because EMAB had made this request during their review of the Mine's ICRP. It is DDMI's understanding that De Beers' Snap Lake Mine is required to develop a Tier 2 WMMP to address closure. DDMI anticipates changes to mitigation or monitoring during closure will be reflected in Tier 2 WMMP submission in the future.</p>	No change required.
EMAB-WMMP-20	Adaptive Management	<p>Applies to all components of the WMP.</p> <p>It is unclear how monitoring data was collected and used to guide the implementation of, and test the effectiveness of, mitigation measures to reduce the ZOI.</p>	<p>We recommend that DDMI work with GNWT to identify and apply methods and analytical approaches that can estimate the ZOI and mitigation effectiveness on an annual basis during the remainder of operations and during closure of the mine.</p> <p>We recommend DDMI continue to discuss how the information gained from the various wildlife datasets could be used in terms of mitigation and adaptive management for the Diavik Mine in particular and for other future projects in the region in general</p>	<p>Please see response to EMAB-WMMP-3 for ZOI estimation and mitigation effectiveness. Information gained from various wildlife datasets in terms of mitigation and adaptive management has been previously discussed and appended to the 2019 WMP Report.</p>	No change required.
EMAB-WMMP-21	Traditional Knowledge		<p>Diavik should include TK monitoring components for all species studied under the WMP (caribou, grizzlies, wolverine, raptors). Diavik should use previous recommendations from the TK panel to inform where they can incorporate TK into the monitoring of each species.</p>	<p>DDMI responded previously to this comment (DDMI-WMP-36; Golder 2020b).</p>	No change required.

Table 1: Responses to 2021 WMMP Comments by EMAB

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
EMAB-WMMP-22	Traditional Knowledge		Similarly to wolverine snow track monitoring, Diavik should regularly include community members in monitoring activities for caribou and grizzly-bear. Diavik should report on the individuals involved and the activities they were engaged in.	DDMI responded previously to this comment (DDMI-WMP-37; Golder 2020b).	No change required.
EMAB-WMMP-23	Traditional Knowledge		The TK Panel recommended that Diavik should hire TK holders on a seasonal basis to work with Diavik Staff on caribou monitoring. As a part of the response, Diavik indicated they would investigate options for behaviour monitoring by communities. EMAB recommends that Diavik include TK holders in caribou behaviour monitoring. Diavik should include a report on the results of the investigation of options for community behaviour monitoring in an appendix to the Program Description.	DDMI responded previously to this comment (DDMI-WMP-38; Golder 2020b).	No change required.
EMAB-WMMP-24	Traditional Knowledge		The TK panel made a number of recommendations for changes to caribou behavior monitoring that Diavik said it was reviewing. Diavik should report on this review as an appendix to the program description, and incorporate the recommendations from the TK panel into the WMP program description, or explain why they did not include them.	DDMI responded previously to this comment (DDMI-WMP-39; Golder 2020b).	No change required.
EMAB-WMMP-25	Traditional Knowledge		The TK Panel recommended that Diavik should use visual tools (e.g., taking pictures) as a part of caribou behaviour scans. Diavik's response indicated they took photos in 2012 and 2013 and are evaluating them. EMAB recommends that Diavik report on the results of the evaluation (as an appendix to the program description). Those results should be incorporated into the behaviour monitoring section of the Program Description, where appropriate.	DDMI responded previously to this comment (DDMI-WMP-40; Golder 2020b).	No change required.
EMAB-WMMP-26	Traditional Knowledge		Diavik should incorporate side-by-side comparison tables in the Program Description and future annual WMP reports. The tables should show where TK and Western Science are used in the Wildlife Monitoring Program. For Example: Column A Column B TK Wildlife Monitoring components: Scientific Monitoring Components: -List all TK monitoring under the WMP -List all scientific monitoring under the WMP	DDMI responded previously to this comment (DDMI-WMP-41; Golder 2020b).	No change required.
EMAB-WMMP-27	Traditional Knowledge		EMAB recommends that Diavik regularly consult with TK holders on wildlife monitoring methods, activities and results. Yearly consultations about annual WMP reports would be ideal. These consultations should include collecting feedback from TK holders about their thoughts on the results.	DDMI responded previously to this comment (DDMI-WMP-42; Golder 2020b).	No change required.

Table 2: Responses to WMMP Comments by ENR

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ENR-WMMP-01	Difficult to locate SOPs	SOPs are not consistently referred to in the text of the WMMP, and there is no list of SOPs available in the WMMP.	Please provide a Table of Contents or List of the SOPs as well as provide references within the text to the appropriate SOPs. ENR recommends referring to the appropriate SOP by name and number within the text of the WMMP for ease of reference.	DDMI will include a table of contents in the WMMP appendix that contains SOPs and will reference SOPs by name and number within the WMMP.	Appendix A; Page 1 SOP references updated throughout document
ENR-WMMP-02	Section 1.2, Page 1-4 - Thresholds and early warning signs / Mobile Caribou Conservation Measures. Also in Section 2.2, page 2-5	Provision 7.1 of the Environmental Agreement requires DDMI to "establish or confirm thresholds or early warning signs". This implies that if none are available through government regulation, that the developer should be establishing them. In response to ENR's recommendation GNWT-20-WMMP-1, rather than provide pre-defined triggers or action measures to guide adaptive mitigation, DDMI indicated that monitoring programs need to remain flexible to incorporate comments and suggestions and that in the absence of regulator-established guidelines for critical values, thresholds or action levels, the most suitable course of action will be decided on a case-by-case basis through discussion with regulators and that this is precautionary and reasonable. ENR disagrees that this is sufficient. For project-specific equivalents developed for larger operations, De Beers may refer to the Caribou Road Mitigation Plan which is Appendix C of the approved Jay Project WEMP at the Ekati Mine and Section 7.1.5.2 of the Wildlife Mitigation and Monitoring Plan for Sabina Gold & Silver Corp's Back River Project.	As required in the EA and to be consistent with the BCRP recommendations for Mobile Caribou Conservation Measures, ENR requires DDMI to develop a section in the WMMP to identify a) how approaching caribou will be detected, b) identify trigger levels to initiate action and c) tiered mitigations that may be undertaken to avoid and reduce sensory disturbance to caribou avoid or minimize impacts to caribou from sensory disturbance and mortality or injury risks.	DDMI thanks ENR for referencing other wildlife management plans as examples of Mobile Caribou Conservation Measures. DDMI will develop a section of the WMMP to identify: a) how approaching caribou will be detected, b) identify trigger levels to initiate action and c) tiered mitigations that may be undertaken to avoid and reduce sensory disturbance to caribou avoid or minimize impacts to caribou from sensory disturbance and mortality or injury risks.	Section 4.1.1; Page 4-2 to 4-3

Table 2: Responses to WMMP Comments by ENR

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ENR-WMMP-03	Section 2.2, Page 2-4	<p>In discussing how DDMI changes to objectives or study methods for monitoring programs based on determination that the measurement indicator has a "low sensitivity to detect Mine-related changes, they stated that " long-term monitoring of caribou distribution by aerial survey methods recently demonstrated that caribou distribution is explained more by habitat availability than mine-related effects (Golder 2020b) so zone of influence (ZOI) monitoring using aerial surveys will discontinue and an accepted alternate method will be applied (GNWT-ZOITG 2015). Include and acknowledge sources in the primary literature that offer different conclusions.</p> <p>While ENR is in agreement that regular aerial surveys can be discontinued as the primary data collection approach to monitoring ZOI, it is not because Golder 2020b concluded that there was no ZOI. Aerial surveys were discontinued initially because with the population decline, there were fewer caribou coming near the mines such that sample sizes were considered too small to provide conduct the necessary analyses. Since then, as the number of collars on the Bathurst herd has increased, ENR advocates using collar data when possible to conduct annual ZOI analyses. It would not be incorrect to say that Golder 2020b method was unable to detect a ZOI, however ENR's view is that the analysis provided in Golder 2020b was not a test of ZOI. Advancing that conclusion without citing and acknowledging the Boulanger et al studies in the primary literature that did detect ZOIs in some years, misrepresents the matter as closed. ENR maintains that monitoring of caribou movements and distribution round the mine continues to be warranted.</p>	Remove the statement that long-term monitoring of caribou distribution by aerial survey methods recently demonstrated that caribou distribution is explained more by habitat availability than mine-related effects (Golder 2020b) so zone of influence (ZOI) monitoring using aerial surveys will discontinue and an accepted alternate method will be applied (GNWT-ZOITG 2015). Include and acknowledge sources in the primary literature that offer different conclusions.	<p>DDMI, ENR and other mine operators agreed that there is no longer a need for aerial surveys as discussed at the Diamond Mine Monitoring Meetings in February 2021 (GNWT 2021). This was on consideration that the number of collars deployed on caribou are adequate for ZOI monitoring. Aerial surveys cost DDMI \$236,300 annually to implement and DDMI does not believe there is a benefit that justifies this large expense. DDMI will revise the WMMP to reference the discussions at the diamond mine meetings.</p> <p>DDMI will acknowledge the results of Boulanger 2021. DDMI would like to note that the primary literature does not mean that studies published in the peer-reviewed journals are flawless or infallible (see Wehausen 1984; Joly et al. 2006, Clark et al. 2020). The Golder (2020b) represents a scientifically defensible line of evidence that provides transparency about ZOI assumptions. DDMI's concerns are generally regarding a lack of validation of assumptions of GNWT-ZOITG (2015) methods. DDMI will include reference that ZOI monitoring and follow the GNWT-ZOITG (2015) guidance.</p>	Section 5.4.3; Past Scope and Improvements; Page 5-9 Section 5.4.3; Data Analyses; Page 5-10
ENR-WMMP-04	Section 3, Page 3-2	De Beers states that "To date the TK Panel has primarily focused their wildlife recommendations on closure aspects of the Mine. Recommendations associated with the Mine closure phase are outside of the scope of the WMMP but will be considered by DDMI for the Closure and Reclamation Plan." Please note that the WMMP determination letter required the scope of this WMMP to include closure. It is unclear if or how any of these mitigation or monitoring programs are expected to change as DDMI transitions from operations to closure.	Clarify throughout the WMMP whether any of the proposed measures or monitoring programs are expected to change.	A Tier 3 WMMP is required for Diavik Mine because it is in the operational phase. DDMI included some aspects related to closure, such as in-pit filling because EMAB had made this request during their review of the Mine's ICRP. It is DDMI's understanding that De Beers' Snap Lake Mine is required to develop a Tier 2 WMMP to address closure. DDMI anticipates changes to mitigation or monitoring during closure will be reflected in Tier 2 WMMP submission in the future.	No change required.
ENR-WMMP-05	Page 3-4, "2021 Slave Geological Province Wildlife Workshop"	Multiple locations in the document refer to the "2021 Slave Geological Province Wildlife Workshop". It was not an SGP workshop. It was a meeting of the diamond mines, government, their consultants and monitoring agencies. Usually the SGP workshops have a larger scope and has over time included more research and community sharings. This one stayed more focused due to COVID and the online platform.	Revise "2021 Slave Geological Province Wildlife Workshop" to read "diamond mine wildlife monitoring meeting in February 2021" anywhere it is included in the document.	DDMI will revise "2021 Slave Geological Province Wildlife Workshop" to read "Diamond Mine Wildlife Monitoring Meeting in February 2021".	Section 3.2.3; Page 3-4 Section 5.43; Past Scope and Improvements; Page 5-9

Table 2: Responses to WMMP Comments by ENR

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ENR-WMMP-06	Page 4-1, Offsets not applicable	DDMI has correctly stated that offsets are not required as residual impacts were deemed, through the EA, to be insignificant. The information provided after this statement, referring to DDMI's participation and contribution to regional monitoring and understanding of cumulative effects are not considered offsets and their placement in this location gives the impression that they are. This information is better placed in a section on regional monitoring or contributions to understanding of cumulative impacts.	Please remove information regarding regional monitoring programs and contributions to understanding cumulative impacts from the section discussing offsetting, and remove to a separate section, or sections.	DDMI will revise the WMMP to discuss contribution to regional monitoring under a separate section from offsetting.	Section 4; Page 4-1 Section 5.4.5; Page 5-12
ENR-WMMP-07	Section 4.1.1 - Wildlife-Vehicle Collisions	This section is one in which the application of monitoring, thresholds and triggers and intensifying mitigations in the spirit of Provision 7.1 of the Environmental Agreement which requires DDMI to "establish or confirm thresholds or early warning signs" to reduce sensory disturbance and collision risk can be easily applied.	Please restructure this section to identify how monitoring results trigger the need for increasing mitigations such as applying a caribou alert, slowing traffic, stopping traffic, closing roads, etc.	DDMI will structure this section of the WMMP to identify how monitoring during caribou advisory results trigger increasing mitigations. Mitigation approaches are outlined in response ENR-WMMP-02.	Section 4.1.1; Page 4-2
ENR-WMMP-08	Section 4.2.2 - Indirect Habitat loss and alteration.	DDMI states that "Currently, it is expected that indirect habitat alteration and loss for caribou (i.e., the ZOI) will be monitored through regional programs in collaboration with ENR, potentially through the Barren-ground Caribou Management Strategy (Section 5.8.1)." Please note that the Barren-ground Caribou Management Strategy (CMS) is no longer in force. The CMS that guided caribou management from 2015-2018 is no longer current. Instead of producing a CMS for the 2018-2022 period as a GNWT document, ENR put forward an updated plan to the Conference of Management Authorities which was collaboratively revised and adopted as the Recovery Strategy for Barren-ground Caribou in the Northwest Territories programming for barrenground caribou management and recovery is through the Barrenground Caribou Recovery Strategy.	Please remove the reference to the Barren-ground Caribou Management Strategy.	DDMI will revise the WMMP to avoid reference to the Barren-ground Caribou Management Strategy, and replace with reference to the Barren-ground Caribou Recovery Strategy.	Section 4.2.2; Page 4-6 Section 5.4; Page 5-7 Section 5.4.3; Page 5-9
ENR-WMMP-09	Section 4.3.2 - Management of Toxic substances	DDMI does not state how wildlife are kept out of the landfarm or Type 3 zone of the North Country Rock Pile.	Please state in the WMMP how wildlife are kept out of the landfarm or Type 3 zone of the North Country Rock Pile.	DDMI will include other deterrents of wildlife from site hazards.	Section 4.3.2; Page 4-8
ENR-WMMP-10	Section 4.4, Page 4-8, Education	DDMI lists a number of training points provided to employees.	Please elaborate on the Incidental Reporting requirements (what are they?). Please provide a copy of the Wildlife Management Policy shared with employees.	Reporting requirements for incidental observations are provided in Section 5.4.1 Incidental Observations.	No change required.
ENR-WMMP-11	Section 5.2.1, Page 5-3, Waste Inspections	ENR acknowledges (in DDMI's response to GNWT-20-WMMP-8) that the choice to conduct waste inspections on a once-weekly basis during summer (lower than twice-weekly in winter) was based on the monitoring results showing few wildlife signs at the WTA and inert Landfill in recent years. In the response, DDMI indicated that they would provide the Table that demonstrates this into the WMMP Section 5.2.1, but ENR notes that this has not been include. Please add. ENR also notes that it would be prudent for DDMI to reinforce the adaptiveness of its management by including a threshold in the WMMP to indicate under what circumstances the frequency of waste inspections in summer would be increased (amount of mis-directed waste types? sign of larger carnivores nearby? noted increase in wildlife sign overall?)	Add the table that demonstrates low levels of wildlife sign in the waste areas in Section 5.2.1. Add thresholds and accompanying actions to trigger increased monitoring frequency and other mitigation actions to reduce wildlife attraction to waste sites.	ENR had requested this table be added during their review of the 2019 WMP report. Please see Table 14 of the 2020 Wildlife Mitigation and Management Report (WMMP; Golder 2021) which provides the requested information. DDMI does not intend to include results of monitoring in the Tier 3 WMMP (i.e., the Plan document). The Data Analysis paragraph of Waste Management Inspections (Section 5.2.1) indicates that all attractants or other mis-directed wastes are removed at the time of inspection or actioned to the personnel responsible for the area. DDMI views these as triggers (all attractants or mis-directed waste) and mitigation actions (removal of these items) as already included in the WMMP.	No change required.

Table 2: Responses to WMMP Comments by ENR

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ENR-WMMP-12	Section 5.2.2, Page 5-4, Recycling Initiatives	Is it unclear why this section is included in the WMMP. For the purposes of the WMMP and managing attraction to waste, it is sufficient to include the recycling facility into waste stream inspections and continued wildlife surveillance that are applied to the WTA and North Pile. Reporting on the amount of recycled materials produced by the mine is outside of the scope of the WMMP report.	Revise the WMMP to include recycling facilities as locations where inspections of misdirected waste and wildlife sign occur and report misdirection and wildlife sign results. Omit separate Section on "recycling" from the revised WMMP. Omit reporting of amounts of recycled material in annual reports.	DDMI will include recycling areas in systematic surveys. DDMI will not remove recycling initiatives because recycling effort demonstrates that recycling (as mitigation) reduces the amount of waste entering the land fill and identifies the financial benefit (i.e., enhanced benefit) that the community of Yellowknife receives from the Mine and this program.	Section 5.2.1; Methods; Page 5-3
ENR-WMMP-13	Section 5.3, Page 5-7, Resources on Caribou information and References	When discussing population levels of the herd, GNWT-ENR 2020a and GNWT-ENR 2020b are cited and listed in the References. However, in the references, it shows that these web resources were accessed in March 2018. How can that be?	Update the information on date of access of web resources in the reference table.	DDMI will revise the WMMP references section to reflect dates web resources were accessed.	Section 8; Page 8-1 to 8-7
ENR-WMMP-14	Section 5.3, Page 5-7, Beverly herd	Current information on the Beverly herd should be added to this paragraph. The last population survey on the Beverly herd was in 2018 and the result was 103, 372.	Please include the most recent population information on the Beverly herd.	DDMI will revise the WMMP to include the most recent population estimate of the Beverly herd.	Section 5.4; Page 5-7
ENR-WMMP-15	Section 5.3, Page 5-7, Compliance with the Bathurst Caribou Range Plan	The statement that "The Diavik mine is in compliance with recommended mitigation described in the Bathurst Caribou Range Plan." is inappropriate, as implementation efforts are ongoing and it is pre-mature to determine conformity of individual operations with the range plan recommendations.	Remove the statement about compliance with the Bathurst Caribou Range Plan.	DDMI will revise to state that mitigation included in the WMMP is consistent with mitigation prescribed in the Bathurst Caribou Range plan for developments for Area 2.	Section 5.4; Page 5-7
ENR-WMMP-16	Section 5.4.1, Baren-ground Caribou Management Strategy	As stated in the comment on Section 4.2.2, the Caribou Management Strategy (CMS) for 2015-2018 is no longer current, and the 2020 Barren-ground Caribou Recovery Strategy has replaced it.	Remove Section 5.4.1 and replace it with a section to identify regional monitoring efforts or contributions to tracking and understanding cumulative effects as stipulated by Section 7.4d) of the Environmental Agreement and content requirements for a Tier 3 WMMP in the WMMP Guidelines. Diavik may also wish to highlight any additional voluntary contributions to barren-ground caribou recovery efforts.	DDMI will revise Section 5.4.1 to instead identify regional monitoring efforts or contributions to tracking and understanding cumulative effects, and highlight any additional voluntary contributions to barren-ground caribou recovery efforts.	Section 5.4.5; Page 5-12

Table 2: Responses to WMMP Comments by ENR

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ENR-WMMP-17	Section 5.4.4, Zone of Influence Monitoring	Zones of influence have been detected in some years around the Diavik mine (Boulanger et al 2021) using methods that account for habitat variability around the mine. Reference to the analysis completed in Golder 2020b is not considered by ENR to be an analysis of ZOI in the strictest sense, and should not be construed as such. DDMI is welcome to highlight salient results of their analyses, however, it would be more correct to say that their results were not consistent with the findings in the primary literature that a ZOI does exist but varies temporally and spatially. ENR acknowledges that DDMI stipulates that they will continue to monitor ZOI using collar data, which is consistent with discussions at the most recent mine wildlife monitoring meetings, however, ENR recommends that methods used to analyze those data be consistent with the recommendations in the revised ZOI Guidance Document.	DDMI should revise the text in this section to acknowledge that the results produced in Golder 2020b were not necessarily consistent with published findings of temporally and spatially variable ZOIs around the Ekati - Diavik complex in the primary literature, and that their analysis was not actually a ZOI analysis in the strictest sense. ENR recommends that methods used to analyze those data be consistent with the recommendations in the revised ZOI Guidance Document. DDMI's proposal for frequency of analysis (at the end of 2022, once during closure and once during post closure) should be moved to the frequency section.	DDMI disagrees that Boulanger et al. (2021) demonstrate a ZOI around Diavik mine in some years. The results reflect the cumulative effect of the Ekati and Diavik mines and the incremental effect of each mine cannot be measured due to these mines being in close proximity to one another. Diavik Mine is located on East Island, which is surrounded by deep water that caribou avoid (Boulanger et al. 2012). DDMI will acknowledge the results of Boulanger et al. (2012, 2021) and that there is uncertainty about ZOI effects since there are now two studies (Golder 2020a; ERM 2021) that indicate ZOI absence. Differing results should be viewed as healthy and often further push the science, rather than unquestioned acceptance of results. DDMI will consider analytical recommendations of the ZOI Technical Task Group. Disagreement about past ZOI analyses is not relevant to whether the WMMP satisfies the requirements of the <i>NWT Wildlife Act</i> per WMMP guidelines (GNWT 2019) since ZOI analyses are not prescribed. The frequency section reflects the frequency of data collection, which can be different than frequency of analysis and reporting. GNWT (2019) only reference the frequency of reporting so the WMMP is consistent with the WMMP guidelines.	Section 5.4.3; Data Analyses; Page 5-10 Section 5.6.2; Data Analyses; Page 5-17
ENR-WMMP-18	Section 5.4.5 - Behaviour: Activity Budgets	Despite stating in the Executive Summary that behaviour monitoring is being discontinued, in this section, it appears that DDMI is proposing to continue conducting behavioural group scans in much the same way as before, despite frequent inability to meet sample size requirements and the questionable utility of the data given that coordination of behavioural studies with other partners has been intermittent at best. While DDMI has highlighted its contribution to ENR's collaring program for the purchase of higher resolution geofencing collars (start of Section 5.4.5), it is unclear how DDMI intends to make use of the higher resolution data in its analyses.	Clarify DDMI's approach to behaviour monitoring, in consideration of the comment provided in the Executive Summary. ENR recommends that more focused analyses of individual movement pathways of caribou in proximity to the mine(s) would be one way to investigate behaviour that might provide insights for mitigation.	The DDMI Tier 3 WMMP does not include an executive summary section. This comment appears to reference the WMMP. DDMI has included behaviour monitoring for caribou in the Tier 3 WMMP. It should be noted that the EER did not make predictions about caribou behaviour activities and that the predictions were an outcome of past wildlife monitoring meetings (Handley 2010). At this time DDMI intends to continue to collect caribou behaviour data (i.e., group scans) as done historically. DDMI believes the behaviour data is important to evaluate a demographic effect linkage (i.e., energetics) associated with a mine-related change in caribou distribution (i.e., a ZOI). To inform on mitigation would require mitigation data on the same temporal scale as the collar movement paths. The mitigation data would also have to be variable enough to measurably influence collar movements. This type of analysis would be part of ZOI monitoring (Section 5.4.3 of the WMMP), and should be considered as exploratory.	Section 5.4.3; Data Analyses Page 5-10

Table 2: Responses to WMMP Comments by ENR

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ENR-WMMP-19	SOPs	ENR notes that the WMMP does not include a SOP for site surveillance monitoring, which is a basic level of monitoring required to identify wildlife onsite, prevent human-wildlife conflicts, prevent injury to wildlife, and ensure mitigations are effective. How will the need to increase alertness and potentially apply mitigations be identified? Paragraph 95(2)(c) of the Wildlife Act requires that a WMMP identify processes for monitoring impacts and assessing whether mitigative measures are effective.	Include an SOP that details how, where and how often site surveillance monitoring occurs.	DDMI believes that the essence of "surveillance" monitoring is already reflected in the WMMP. For example, monitoring of the Mine site is completed by Incidental Observations (Section 5.4.1; Section 5.5.1; Section 5.6.1), Waste Management monitoring (Section 5.2) and Incident and Mortality monitoring (Section 5.3), which include various ways of monitoring of wildlife and wildlife sign across the entire Mine site. The frequency of these monitoring programs is provided in their corresponding sections. They range from daily (Wildlife Incidents and Mortality Monitoring and Incidental Observations) to twice-weekly (Waste Management Inspections).	No change required.
ENR-WMMP-20	Blasting and MCCM	ENR notes that there is limited information regarding how caribou are protected from sensory disturbance from blasting. No blast exclusion zones have been identified, within which blasting would be delayed if caribou were present. A 1-km buffer is deemed appropriate in that it is an intermediate level between the 500 m buffer recommendation in the Northern Land Use Guidelines for Northwest Territories Seismic Operations, which were primarily developed for forested environments and the 4km discussed during regulatory processes for mines in more sensitive habitats in Nunavut (calving, post-caving).	Include details on how DDMI reduces sensory disturbance and increases the safety of caribou when blasting is occurring in the section developed to address the need for thresholds, triggers and tiered mitigation akin to Mobile Caribou Conservation Measures.	DDMI will implement a 500 m buffer or exclusion zone for blasting as per the Northern Land Use Guidelines for Northwest Territories Seismic Operations (GNWT-DoL 2015). Blasting activity at Diavik mine currently takes place 100 m below the surface within a 12 m deep charge hole. Overpressure (perceived as noise) from blasting will be directed upward and not outward and vibration would propagate through subsurface material such as rock and water prior to reaching the surface where caribou occur. Blasting activity also occurs at a low frequency and short duration and DDMI uses a stemming technique in boreholes to reduce noise and ground vibration potential during blasts.	Section 4.1.2; Page 4-3

Table 3: Responses to WMMP Comments by ECC

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ECCC-WMMP-01	Species of Concern Table 2.5-1 Species of Concern at the Diavik Mine	<p>Table 2.5-1 should be updated to include lesser yellowlegs and harris's sparrow, which have been observed on site in the past.</p> <p>Lesser yellowlegs was recently assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as "Threatened" in November 2020.</p> <p>Harris's sparrow was assessed by COSEWIC as "Special Concern" in April 2017.</p> <p>The Proponent should also include bank and barn swallow to Table 2.5-1. Barn swallow are regularly observed outside the reported range, especially in areas with anthropogenic structures for nesting. Bank swallow has recently been documented outside the reported range, at a nearby diamond mine site – see related ECC comments below.</p>	<p>ECCC recommends that Table 2.5-1 be updated to include lesser yellowlegs and harris's sparrow, including the mitigation and monitoring measures to avoid or lessen effects of the Project.</p> <p>ECCC also recommends the inclusion of bank and barn swallow to Table 2.5-1, including associated mitigation and monitoring measures, in anticipation of the detection of these species at the Project site.</p>	<p>DDMI will revise Table 2.5-1 of the WMMP to include lesser yellowlegs, Harris's sparrow, barn swallow, bank swallow, and associated mitigation and monitoring measures.</p>	Section 2.4; Table 2.4-1; Page 2-9 to 2-10
ECCC-WMMP-02	Bank and Barn Swallows Section 5.9 Rare or Uncommon Species	<p>ECCC notes that an existing objective of the management and monitoring program is to document trends in detection of rare or uncommon species. ECC is advising the Proponent that DDMI Environment Staff should remain vigilant for the presence of bank and barn swallows during all wildlife monitoring conducted during the general bird nesting period (early May – mid August).</p> <p>Both bank and barn swallow are listed as "Threatened" under the <i>Species at Risk Act</i> since November 2017.</p> <p>Although the Project is located outside the recognized breeding ranges for both species, migratory birds can travel great distances relatively easily. The Project might inadvertently attract bank and barn swallows by creating suitable habitat. It is important to note that ECC was notified recently of a bank swallow colony (~53 burrows) in the coarse processed kimberlite (CPK) waste rock pile at the De Beers Gahcho Kue mine, which is also located outside the breeding range.</p> <p>Bank and barn swallows have very specific habitat preferences. Areas and structures at the Project site containing suitable attributes or features should be targeted for regular site monitoring and surveillance during the general bird nesting period (early May – mid August).</p> <p>All operational mine staff should also be made aware of the potential occurrence of these species as part of the Project's general wildlife awareness training and education. This could help ensure that appropriate measures are put in place before any impact occurs.</p> <p>ECCC refers the Proponent to the Species at Risk registry (https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html) for more general information on these species, including habitat preferences, residence descriptions and the proposed recovery strategy (bank swallow only).</p>	<p>ECCC recommends that areas and structures at the Project site containing suitable attributes or features attractive to bank and barn swallows be regularly monitored (i.e. at least 2 times per week) during the general bird nesting period (early May – mid August) and that a methodology is developed and identified within the WMMP in anticipation of the arrival of these species.</p> <p>ECCC recommends that if bank and barn swallow are detected, they be reported to ECC's Canadian Wildlife Service (cwsnorth-scfnord@ec.gc.ca) as soon as possible to ensure adequate mitigation and monitoring measures are put in place.</p> <p>ECCC recommends that all mine staff be familiarized on the potential occurrence of these species through the general wildlife awareness training and education program.</p>	<p>Bank swallow and barn swallow nesting evidence has not been detected on site. DDMI will inform staff of potential occurrence of these species and nesting behaviours as part of wildlife awareness training. The SOP for raptor monitoring will be expanded to include monitoring for the presence (and nesting activity) of migratory birds (e.g., bank and barn swallows during the general bird nesting period (early May – mid August) and surveys of Mine areas (e.g., mine-altered waters, stockpiles, waste rock piles, pits, buildings). If bank swallow or barn swallow are detected, they will be reported to ECC's Canadian Wildlife Service as soon as possible.</p>	Section 5.7; Page 5-17 to 5-18

Table 3: Responses to WMMP Comments by ECC

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ECCC-WMMP-03	Distribution List Section 2.2 Monitoring Framework and Adaptive Management Section 7 Reporting	The Proponent states that "the annual report and meetings are ways that DDMI will present the results of the monitoring program, and the basis for communities and regulatory agencies to provide feedback and direction" and "the annual monitoring report will be produced and distributed to communities, EMAB, and government to provide feedback." ECCC has jurisdiction for wildlife under the <i>Migratory Birds Convention Act</i> and federal <i>Species at Risk Act</i> but is not included on DDMI's annual report distribution list.	ECCC recommends that the Proponent update their annual distribution list to include ECCC. Annual reports can be sent to ECCC at EANorthNWT@ec.gc.ca	DDMI will update the annual distribution list to include ECCC.	Section 5.9; Page 5-21 Section 7; Page 7-1
ECCC-WMMP-04	Reporting Section 4.3.1 Direct Mine-Related Mortality and Injury Section 5.3 Wildlife Incidents and Mortalities	The Proponent states that "site environmental technicians will investigate all caribou and other wildlife incidents and mortalities, report to government, and recommend follow-up". The WMMP does not contain a section on who to contact to report wildlife incidents and/or mortalities.	ECCC recommends that a section identifying who to contact to report wildlife incidents and/or mortalities be added to the WMMP and reviewed periodically to ensure that the appropriate contacts are reached directly and to reduce potential delays in receiving advice. ECCC's Canadian Wildlife Service and Wildlife Enforcement can be contacted at cwsnorth-scfnord@ec.gc.ca and dalfnord-wednorth@ec.gc.ca , respectively.	DDMI will revise the WMMP to include contact information in the event of wildlife incidents and/or mortalities.	Section 4.3.1; Page 4-7
ECCC-WMMP-05	Migratory Birds Section 4.3.1 Direct Mine-Related Mortality and Injury	The Proponent states that "although Diavik Mine is at full development, any additional land clearing will take place outside the migratory bird breeding season. If this is not possible, nest surveys will be completed and active nests avoided." ECCC recognizes that the Proponent's need for additional land clearing may be minimal at this stage of the Project's life and acknowledges their intent to avoid the general bird nesting period, if any vegetation clearing is needed. However, ECCC would like to ensure that the Proponent is aware of the associated risks with "nest surveys" and conditions under which these types of surveys may be appropriate. ECCC refers the Proponent to our guidance on how to avoid harm to migratory birds (https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html) for more information.	ECCC recommends that the Proponent carry out all phases of the Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account ECCC's guidance on how to avoid harm to migratory birds (https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html) while planning their activities.	DDMI will revise the WMMP to include nest monitoring and nest setback procedure if land clearing activities during the migratory bird breeding season cannot be avoided.	Section 4.3.1; Page 4-7

Table 3: Responses to WMMP Comments by ECCC

2021 WMMP Comment Identifier	Topic	Comment	Recommendation	DDMI Response	Location in Revised WMMP
ECCC-WMMP-06	Site Monitoring Table 2.5-1 Species of Concern at the Diavik Mine	<p>"Site monitoring" is listed as a monitoring measure for all species in Table 2.5-1. Standard Operating Procedures (SOPs) were developed for caribou (ENVR-517-0912), grizzly bear/wolverine (ENVI-914-0119), and peregrine falcon (ENVI-897-0119 and ENVI-951-0319).</p> <p>These SOPs describe in more detail the period when monitoring will take place, the frequency of the monitoring, the areas the monitoring will focus on, how the data will be collected/entered, and when the Department of Environment and Natural Resources will be contacted.</p> <p>ECCC notes that details and/or SOPs of the "site monitoring" relevant to red-necked phalarope, rusty blackbird, short-eared owl are absent from the WMMP.</p> <p>Given potential monitoring similarities between these species (i.e., monitoring period, frequency, methods and data collection), a new simplified SOP could be developed for all migratory birds that also highlights project components most likely to interact with bird species of concern based on their habitat preferences</p> <p>(e.g., mine-altered waters, stockpiles, waste rock piles, pits, buildings, etc.). Development of a migratory bird specific SOP would have the added benefit of fewer required adjustments to the WMMP, as bird species are assessed by COSEWIC or listed under the <i>Species at Risk Act</i> in the future.</p>	ECCC recommends that details of site monitoring be provided or developed as an SOP in the WMMP for all other species of concern, including those recommended by ECCC for addition to Table 2.5-1. Site monitoring results should also be provided in the annual WMMP reports.	Please see response ECCC-WMMP-02.	No change required.
ECCC-WMMP-07	Cumulative Effects Monitoring	<p>ECCC notes that one of the global objectives of the WMMP is to contribute to the understanding and managing of cumulative effects that can be shared across the Northwest Territories (NWT) mining sector and that an overall objective of the monitoring includes contributing to the assessment and management of regional cumulative effects.</p> <p>ECCC has encouraged the Proponent to participate in the Arctic Program for Regional and International Shorebird Monitoring (PRISM) program in the past. ECCC collaborates with 12 industry partners on the Arctic PRISM program in the NWT and Nunavut (NU), including nearby Gahcho Kue, to collect data that can be used to inform cumulative impacts on arctic nesting birds and which could be shared across the NWT and NU mining sector.</p> <p>Implementing the standardized protocols of the Arctic PRISM program can result in the added benefit of having experienced bird biologists regularly onsite to aid in the detection of bird species of concern – see ECCC's previous comment on bank and barn swallows.</p>	ECCC recommends the Proponent consider participating in the Arctic PRISM program to contribute to data collection on cumulative effects monitoring that could inform the larger mining sector. Implementing this program could also meet objectives for detection of bird species at risk at the Project site and nearby.	DDMI will discuss future opportunities to participate in PRISM with ECCC.	No change required.

CLOSURE

The reader is referred to the Study Limitations section, which follows the text and forms an integral part of this memorandum.

We trust the above meets your present requirements. If you have any questions or requirements, please contact the undersigned.

Golder Associates Ltd.



Dan Coulton, Ph.D., R.P.Bio.
Senior Wildlife Biologist



John Virgl, Ph.D.
Principal, Senior Ecologist

DWC/CDM/JAV/hp

[https://golderassociates.sharepoint.com/sites/140080/project files/6 deliverables/issued/2158-tm-Rev1-5000-responses to comments on wmmp/21452119-2158-tm-Rev1-5000-responses to comments on wmmp 04nov_21.docx](https://golderassociates.sharepoint.com/sites/140080/project%20files/6%20deliverables/issued/2158-tm-Rev1-5000-responses%20to%20comments%20on%20wmmp/21452119-2158-tm-Rev1-5000-responses%20to%20comments%20on%20wmmp%2004nov_21.docx)

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STUDY LIMITATIONS

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