

## Comment Form for Draft Guidelines

WWF-Canada inputs. At sept 4th, 2008

Please submit comments in this Excel spreadsheet.

Page	Section	Comment
1	1.1	in preamble,it is very important to stress that cumulative effects must be addressed satisfactorily, including in the context of the NWT CEAMF for VECs. Cross-referencing to the realities experienced across Canada in the past, with many/most species at risk being listed ultimately due to the cumulative impacts of cumulative/multiple human development activities, especially regarding natural habitats. Need to quote/reference the EC 2004 best practice guide here.
1	1.1	s.79 of SARA does not specify Cumulative Effects, CEA etc, but since CEAA(and all the peer-reviewed literature) does, this is very logically the broad approach that must be taken, and hence captured in the contextual/preamble sections.
3	1.3	The 'designatable unit' issue needs to be sorted out here - such that regionally differentiated subpopulations ARE adequately addressed in NWT EIAs. COSEWIC is frankly yet to catch up on the DU front - and there are plenty examples of how their current spatial criteria are inadequate. MVEIRB can do better, especially given the nature of NWT ecosystems across vast areas.
7	2.2	Cumulative Effects context needs to be specified here, within focus on "likely to affect" and realities of foreseeable induced development scenarios in NWT.
7	2.3	Also, under bullet #3, mention should be made of thresholds if proponents are being asked to elaborate measures taken to "avoid or lessen" effects. Only in this way can credible measures/objectivity be achieved. sentence 2 should read: "Any impact to habitat, including from foreseeable induced developments, that is important... etc."
8	3.1	Throughout this sub-section, text should be modified to include/specify cumulative effects also must be identified and addressed.
11	3.2	in step 7, paragraph 3, mention should be made of effects likely, as identified by running of a series (3-5 minimum) of foreseeable/plausible development scenarios for the region within which the specific project is proposed.

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4 Add to suggested steps for Developers, revised #2 bullet, perhaps as follows:

"Identify all possible effects, positive and negative, on wildlife at risk, of the proposed development in the context of other current and foreseeable/induced developments in the region". (this would make the steps better aligned with both CEAA and CEAMF).

The Env. Canada 2004 Best Practice guide for Wildlife At Risk in Canada incorporates clear guidance for project proponents regarding identification and assessment of Cumulative Effects, both direct and indirect (e.g., Table 1, point #6, on page 7; and Table 2, section #7, on page 18). Therefore, WWF urges MVEIRB to follow this lead, and preferably build on this in the context of CEAMF, and so state prominently in the final guidelines just how cumulative effects in the region relating to a specific project

General re CEA: should be identified, addressed, monitored and mitigated.