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September 3, 2008

Martin Haefele, Manager Environmental Impact Assessment  
Mackenzie Valley Environmental Impact Review Board  
200 Scotia Centre  
Box 938, 5102-50th Ave  
Yellowknife, NT X1A 2N7

Dear Mr Haefele:

**WWF submission to MVEIRB re: “Revised draft MVEIRB Guidelines for considering Wildlife At Risk (including SARA species) in EIA in the Mackenzie Valley”.**

WWF-Canada is pleased to have this opportunity to offer comments on the revised draft guidelines for consideration of wildlife at risk in EIA in the NWT, as issued on July 4<sup>th</sup> by MVEIRB. On the attached Excel form/table, we set out a number of specific comments and suggestions, and hope that you will get back to us if you need further clarification or discussion.

This is a very important and timely initiative, and we applaud MVEIRB in this undertaking.

The most important aspect that we feel still needs to be better covered and satisfactorily addressed in the guidelines concerns the main driver of at-risk status for wildlife species in Canada – cumulative effects of human development activities. In the NWT at this point in time, ahead of major industrial development pressures which will undoubtedly induce, and are already doing so, further incremental development, any effective EA regarding species and habitats at-risk, or not, must consider a range of foreseeable development scenarios.

It is ultimately in reflection of this reality that the Environment Canada 2004 EA Best Practice Guide for Wildlife At Risk in Canada emphasizes (on page 2) that:

“The conservation of biodiversity requires major shifts in the way in which natural habitats and species are used and managed. It requires the elimination or reduction of adverse effects on biodiversity that result from human activity”. The EC 2004 Best Practice Guide goes on at various points to specify the need for consideration of direct and indirect cumulative effects in EIA of projects.

Clearly to be effective, MVEIRB must throughout all its work in the NWT, in the context of the NWT CEAMF and other initiatives, properly address such plausible scenarios of induced and cumulative

development, and the cumulative effects on biodiversity, including species/populations already assessed as being 'at-risk'.

Thank you for this opportunity, and I hope you find these comments helpful.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ray Griffith', written over a horizontal line.

Ray Griffith, Manager Mackenzie River Basin