



INDEPENDENT ENVIRONMENTAL MONITORING AGENCY

P.O. Box 1192, Yellowknife, NT X1A 2N8 • Phone (867) 669-9141 • Fax (867) 669-9145

Website: www.monitoringagency.net • Email: monitor1@yk.com

June 17, 2016

Violet Camsell-Blondin
Chair, Wek'eezhii Land and Water Board
#1-4905 48th St, Yellowknife, NT
X1A 3S3

Dear Ms. Camsell-Blondin,

Re: Agency Comments on the Fish Response Plan

The Independent Environmental Monitoring Agency (Agency) has reviewed the Fish Response Plan (Response Plan) and provides the following comments. These comments have also been posted in the review comment table.

The Agency supports Dominion Diamond Ekati Corporation's (DDEC) plan to wait until the results of their proposed studies can be analyzed and considered before a medium action level can be determined.

The Response Plan recommends the following actions be taken to address the low action level exceedance:

- 1) review of and reporting on the relevant fish toxicology literature (including consumption guidelines) for antimony, molybdenum, selenium, uranium, and EROD, and
- 2) Aquatic Ecology Synthesis Fish Growth Study (AES) - investigating individual juvenile fish growth rates from otoliths.

In regards to action 2 the Agency has the following concerns:

- 1) All data from Leslie Lake were considered an outlier and therefore will not be considered in the analysis. In our opinion the Response Plan does not provide enough rationale as to why the entire data set should be considered an outlier.
- 2) The study will use otoliths as part of their investigation. Otoliths were not collected as part of the 2012 fish study. Therefore, currently the 2012 fish monitoring data will not be included in the AES
- 3) Increased parasitism can be a sign of stress in fish and generally parasitism in harvestable fish is a concern for Aboriginal groups. Results from the Aquatic Effects Monitoring Reports (AEMP) have shown elevated parasitism in some lakes. The Agency encourages DDEC to include parasitism, in addition to growth, when considering fish biology metrics in determining the appropriate medium action level.

Recommendations:

1. DDEC provide greater rationale for the conclusion that all of the Leslie Lake data be deemed an outlier and excluded from analysis in the AES.
2. DDEC explain if there are other aging structures, such as scales, that could be used in conjunction with otoliths that would allow for the incorporation of the 2012 Fish Monitoring into the data set for the AES.
3. DDEC to consider including parasitism, in addition to growth, when selecting fish biology metrics in determining the appropriate medium action level.

Should you have any questions concerning these comments, the Agency would be pleased to discuss these at your convenience.

Sincerely,



Jaida Ohokannoak
Chairperson

Cc: DDEC – April Hayward
Tlcho Government - Sjoerd van der Wielen
Yellowknives Dene First Nation – Alex Power
Lutsel K'e Dene First Nation – Lauren King
North Slave Metis Alliance – Shin Shiga
Kitikmeot Inuit Association – Jared Ottenhof
Government of the Northwest Territories – Laurie McGregor
Indigenous and Northern Affairs Canada – Jennifer O'Neil