

NSBA Membership:

At the request of the Saskatchewan Mining Association, the NSBA is providing support regarding a critical issue that has developed with respect to the Species At Risk Act, Woodland/Boreal Caribou, and mining in northern Saskatchewan. We believe this support could be bolstered by our membership, with a series of letters from our respective member companies. If you are so inclined, links to a form letter are provided below. We would appreciate any support you could provide. Please note that comments are due October 25th, 2011.

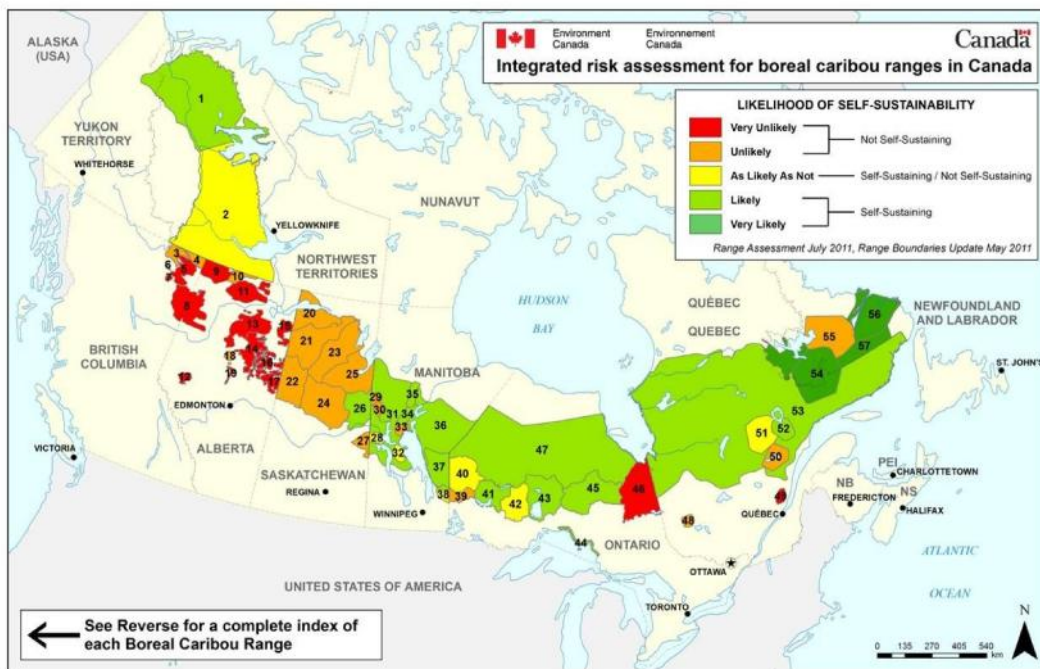
[Letter for Companies with Operations in Northern Saskatchewan](#)
[General Membership Letter](#)

Below please find background information. However in summary

- Boreal/Woodland Caribou were listed as "threatened" species under the Species at Risk Act.*
- This triggered the development of a National Recovery Strategy for the Species under the Act.*

On August 26th, Environment Canada published for comments its [Recovery Strategy for Woodland Caribou](#) (click for link to the Strategy and appendices).

The Strategy sets the goal of eventually recovering to a sustainable population every caribou herd in Canada, and proposes to do so by returning or maintaining 65% undisturbed habitat in the range of every herd. On the basis of provincial/territorial information, and remote sensing data, the Strategy divides Canada into populations colour coded grey, blue and green as follows:



In green areas (self-sustaining populations), human activity will be allowed as long as the proportion of undisturbed habitat is not brought below 65%.

In grey areas (remaining local populations), human activity may be allowed as long as there is a provincial/territorial action plan that contains a mix of measures to maintain populations.

In blue areas (connectivity local populations), human activity may be allowed as long as there is a provincial/territorial action plan that will achieve 65% undisturbed habitat within 50 years, showing progress every 5 years.

Based on information provided to date by officials, there are several problematic aspects with the recovery strategy, particularly in blue zones. In grey zones, the strategy proposes to accept a mix of measures, including, for example, predator management, and there may therefore be more flexibility. In blue zones, habitat restoration appears to be the only acceptable option. The challenge is that in most of the blue zones, the major cause of habitat disturbance is natural forest fires, which are not under human control, are unpredictable, and take a long time to recover. In many of the blue zones, preventing natural forest fires is not feasible and may be undesirable for ecosystem health. The unpredictability of forest fires makes planning difficult. A bad season could make some of the green areas blue in Manitoba, Ontario, and Quebec.

What does this mean for Saskatchewan?

Because northern Saskatchewan is predominantly "blue" with some "grey" the proposed National Recovery Strategy is calling for there to be no more development activities in northern SK or the western part of NWT (mining, forestry, infrastructure) until local woodland population herds are sustainable. This will be achieved by returning or maintain 65% undisturbed (35% disturbed) habitat in every range of the herd. Unfortunately, the natural fire cycle and processes in northern Saskatchewan results in over 60% disturbance. Man made/anthropogenic activities such as mines, roads, power infrastructure, forestry account for <4% of disturbance. Because the fire disturbance is so high, Environment Canada has determined that there can be no more "disturbances" in these areas. Their action plans would call for the Ministry of Environment to action all fires in northern SK. Notwithstanding the cost-prohibitive nature of this strategy, it is also not a scientifically sound way to manage/provide for a healthy forest ecosystem. Ironically, other provinces that have a higher man-made disturbance, or that have not provided caribou herd population information, or have population counts that are lower than Saskatchewan, have fared better in this plan than Saskatchewan -notably ON and QB - AB and BC to some extent although some of their activities will be restricted. For the most part though, they will be able to undertake activities (such as predator control) to sustain populations as an option - in SK the only option is habitat restoration or large, burned over forests - this will take many decades and there is no guarantee that additional fires will not wipe out recovering habitat.

*While the provincial government is preparing a provincial recovery strategy for boreal caribou, it is unclear whether it will meet the requirements set out by EC and SARA. Certainly it can't do anything with the current state of forest fires. The regeneration rate for northern forests is at least 50 years. There is no methodology identified by EC to put disturbed areas back in to undisturbed category. **Sadly, given the disproportionate effect that fire has on the EC model of determining availability of critical habitat and thus healthy caribou populations, this Recovery Strategy has the potential to decimate industrial development in northern Saskatchewan while not having any effect on boreal caribou populations.***

Prime Minister Harper has been very clear that the government's decisions will incorporate economic considerations, particularly as we come out of the global economic recession. We need to ensure he, and other Government Cabinet colleagues are aware of the serious detrimental effect the Proposed Recovery Plan will have on Saskatchewan, as well as global security of clean energy options.

As you are well aware, the mining industry in Saskatchewan is one of the main drivers to Saskatchewan's recent rise in prosperity, and to the success of many of our members. Consequently, we are asking for the support of our membership to identify to the Government of Canada the serious repercussions this draft Recovery Strategy has for Saskatchewan.

Attached please find a template letter that can be utilized to indicate your concern with Environment Canada's Proposed Draft Recovery Strategy. The public comment period ends October 25, 2011. As with the letter itself, the list of cc'd recipients is a suggested list, and can be modified to suit your needs.

Thank you for your consideration of this request.

Below please find some email addresses that you may wish to forward your letter to:

Andrew Scheer ScheerA@parl.gc.ca
Brad Trost TrostB@parl.gc.ca
Brad Trost trostb0@parl.gc.ca
David Anderson david.anderson1@sasktel.net
David Anderson, MP AnderDa@parl.gc.ca
David Tkachuk tkachd@sen.parl.gc.ca
Ed Komarnicki KomarE@parl.gc.ca
Gerry Ritz RitzG@parl.gc.ca
Kelly Block block.k@parl.gc.ca
Kelly Block C saskatoon@kellyblock.ca
Lynne Yelich yelicL@parl.gc.ca
Lynne Yelich C lynne.yelich.c1@parl.gc.ca
Maurice Vellacott vellam@parl.gc.ca
Pamela Wallin wallinp@sen.parl.gc.ca
Randy Hoback hobacr1a@parl.gc.ca
Randy Hoback hobac.r@parl.gc.ca
Ray Boughen boughen.r@parl.gc.ca
Raynell Andreychuk andre@sen.parl.gc.ca
Rob Clarke clarr@parl.gc.ca
Tom Lukiwski lukiwt@parl.gc.ca
Tom Lukiwski C lukiwski.mp@accesscomm.ca

These are available from the website www.gc.ca and look under MP's last name.

Prime Ministers email is
pm@pm.gc.ca
stephen.harper@parl.gc.ca
peter.kent@parl.gc.ca Minister@ec.gc.ca
Joe.Oliver@parl.gc.ca ministers_office@nrcan.gc.ca
jim.flaherty@parl.gc.ca – searched website to get this email as Finance Minister
john.duncan@parl.gc.ca – searched website to get his email as Aboriginal and Northern Affairs Minister
(not quite the right title)
john.baird@parl.gc.ca - searched website to get his email as Foreign Affairs
diane.finley@parl.gc.ca – searched website to get her email address as Human Resource Development

I see that I missed Ed Fast (Asia Pacific Gateway – International Affairs Minister) on the email – his address should also be available on the website.

Province
premier@gov.sk.ca
minister.ei@gov.sk.ca
minister.env@gov.sk.ca
minister.er@gov.sk.ca

Minister June Draude
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