

September 18, 2020

Karen Costello Executive Director Nunavut Impact Review Board Cambridge Bay, NU

VIA EMAIL (info@nirb.ca)

Question to Technical Meeting

As discussed during closing comments at the Technical Meeting, there was a question that the Hamlet of Sanirajak attempted to ask but we were unable to for which we were advised to submit the question in writing. Below is that question:

In reviewing the IQ in the EIS Guidelines for Phase 2 document, it indicates under Section 7.5 Traditional Knowledge that, "The Proponent shall discuss how it weighed and incorporated TK in baseline data collection, impact prediction, and significance assessment and the development and monitoring programs.". It is assumed that the Nunavut Impact Review Board must evaluate the extent to which the proponent has fulfilled this requirement in its submissions for Phase 2. Comments made at the technical meeting from Oceans North and the Department of Fisheries and Oceans were interpreted by those organizations much differently than the interpretation put forward by the proponent when it comes to interpreting the knowledge of western science relative to marine mammal behavior. This seemed to be the case even though the same knowledge from western science was being used to support opposing arguments.

As an intervenor, it would be useful to know whether the Nunavut Impact Review Board considers TK provided by Inuit knowledgeable in marine mammal behavior to be of equal, lessor or greater weight than knowledge provided that relies on western science. The reasons that this question is of great importance is that western science knowledge with respect to the behavior of marine mammals in the project area is mostly relatively new, perhaps from the last decade or two, whereas Inuit TK goes back hundreds or even thousands of years. Further, the same western science data seems to be able to be used to support directly opposing views whereas ambiguity is not present in Inuit TK.

We look forward to receiving a response from NIRB that provides clarification on what it considers to be an appropriate weighting of western science and Inuit TK in its evaluation of the merits of the proponents position.

Yours truly,

Louis M. Primeau, B. Comm., CPA-CMA, CPA-CMA

Chief Administrative Officer and Director of Finance