



NIRB File No.: 08MN053

October 9, 2020

Louis M. Primeau  
Chief Administrative Officer and Director of Finance  
Hamlet of Sanirajak  
P.O. Box 198  
Sanirajak, NU X0A 0K0

Sent via email: [sao\\_hbhamlet@qiniq.com](mailto:sao_hbhamlet@qiniq.com)

**Re: Response of the Nunavut Impact Review Board to the Intervenor, Hamlet of Sanirajak's question following the Board's Technical Meeting associated with the Phase 2 Development Project Proposal, a proposed modification of the Mary River Iron Mine Project**

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Dear Louis Primeau:

This correspondence provides the reply of the Nunavut Impact Review Board (NIRB or Board) to your letter dated September 18, 2020<sup>1</sup> in which the Hamlet of Sanirajak sought the following:

*..clarification on what it [the Nunavut Impact Review Board] considers to be an appropriate weighting of western science and Inuit TK [Traditional Knowledge] in its evaluation of the merits of the proponents [sic proponent's] position.*

Please note that as many participants in the NIRB's on-going assessment of the Phase 2 Development Project Proposal have posed similar questions, the Board provides this correspondence in response to both your specific question and also the broader question of how the NIRB considers Inuit Qaujimajatuqangit<sup>2</sup> and Inuit Qaujimaningit<sup>3</sup> in our assessments generally.

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<sup>1</sup> NIRB Public Registry ID: 331536.

<sup>2</sup> This term was defined by the Board in the NIRB's Strategic Environmental Assessment in Baffin Bay and Davis Strait: NIRB File No. 17SN034, Volume 1, at p. x, as "morality that is the base for Inuit existence. It is the belief system at the core of Inuit identity and governs Inuit society."

<sup>3</sup> This term was defined by the Board in the NIRB's Strategic Environmental Assessment in Baffin Bay and Davis Strait: NIRB File "No. 17SN034, Volume 1, at p. x, "as what Inuit know and a collective knowledge that is more recent in nature. It can be related to Inuit Qaujimajatuqangit that has evolved or changed in recent times.

In response to the specific clarification sought, the Board notes the concept of “weighting” western science and Inuit knowledge does not really reflect the Board’s approach to how Inuit knowledge, both traditional and current, is shared and considered in a manner that informs the Board’s decision-making. The Board views western science and Inuit knowledge as contributing different ways of knowing about the environment and the interrelationships within it. The Board’s approach is not hierarchical, with one type of knowledge being valued above another. Consequently, conflicts between the information provided to the Board is not resolved in favour of one type of knowledge or another. Rather, the Board’s approach is to consider all knowledge shared with the Board by a variety of knowledge sources and knowledge holders holistically in order to inform the Board’s assessment of a given project proposal, including assessing impacts and determining the adequacy of management, mitigation and monitoring measures. As emphasized by the Board in 2019 during the completion of the *NIRB’s Strategic Environmental Assessment in Baffin Bay and Davis Strait: NIRB File No. 17SN034*, Inuit knowledge is not static and unchanging, and cannot be understood in isolation from the knowledge holders who share it:

*...the Board recognizes that this knowledge cannot be understood when separated from its context, and without the ongoing contributions of the knowledge holders who shared their experiences to inform the reports and the SEA. In addition, the Board heard from community members that Inuit Qaujimajatuqangit and Inuit Qaujimaningit is changing very fast due to effects of climate change, cumulative effects, and changes to the way people are interacting with the marine environment and lands surrounding their communities.<sup>4</sup>*

In addition, the application of Inuit knowledge during each assessment is unique to that assessment and reflects the highly contextual, place-based nature of Inuit knowledge. As such, the Board typically provides specific comment about how Inuit Qaujimajatuqangit and Inuit Qaujimaningit have been considered in the Board’s decision report associated with the assessment and also in the recommendations and project certificate terms and conditions developed by the Board to apply specifically to the project.

To ensure that Inuit knowledge is shared with the NIRB in the context of this assessment on an on-going basis, the Board relies on the contributions of all participants. To date, Inuit knowledge has been shared with the Board by the Proponent in the FEIS Addendum, in the comment submissions and questions filed by the Qikiqtani Inuit Association and the community-based Intervenors, and in the form of written and spoken questions and comments shared by Community Representatives and interested members of the public during the November 2019 Public Hearing, and the recent Community Roundtable Sessions in Pond Inlet and Iqaluit. The Board is grateful for the Inuit knowledge shared with the NIRB by all parties to date, but recognizes that Inuit have stated that there is much more to share before the Board makes a decision.

Reflecting the information shared with the Board to this point, in determining the Board’s next steps in the assessment, the Board will continue to ensure that Inuit knowledge holders are able to

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<sup>4</sup> NIRB’s Strategic Environmental Assessment in Baffin Bay and Davis Strait: NIRB File "No. 17SN034, Volume 1, at p. 21.

share their knowledge with the Board, as they consider appropriate. The Board's procedural guidance with respect to the next steps in this assessment will be issued in the upcoming Pre-Hearing Conference Decision at the end of October.

In the interim, if you have further questions regarding the NIRB's on-going assessment of the "Phase 2 Development" Project Proposal, please contact myself, Karen Costello at [kcostello@nirb.ca](mailto:kcostello@nirb.ca) or (867) 983-4608 or the Board's Director of Technical Services, Tara Arko at [tarko@nirb.ca](mailto:tarko@nirb.ca) or (867) 983-4611.

Sincerely,



Karen D. Costello, P. Geo, FGC  
Executive Director  
Nunavut Impact Review Board

cc: Mary River Distribution List