



December 9, 2022

Nunavut-wide Distribution

*Sent via email*

**Re: NIRB Discussion Document for Consultation on Finalizing Standard IS Guidelines**

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Dear Sirs and Madams:

On October 7, 2022, the Nunavut Impact Review Board (NIRB or Board) distributed correspondence inviting parties to attend in-person consultation sessions to support the finalization of the Board's Standard Impact Statement (IS) Guidelines. The Board will be conducting consultation sessions to inform further revisions to the Standard IS Guidelines in Vancouver during the AME Roundup 2023 (January 23-26, 2023).<sup>1</sup>

The *Draft* Standard Impact Statement (IS) Guidelines have been developed as authorized under Article 12, Section 12.2.23(h) of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and s. 26(1)(e) of the *Nunavut Planning and Project Assessment Act, S.C. 2013, c. 14, s. 2 (NuPPAA)*. The Standard IS Guidelines will provide information to guide proponents in the preparation of their IS documentation as required during the NIRB's assessment of project proposals under Article 12 of the *Nunavut Agreement* and Part 3 of the *NuPPAA*. Once finalized, the Standard IS Guidelines will provide greater certainty for proponents wishing to develop project descriptions with sufficient information to support an assessment by the NIRB. The Standard IS Guidelines will provide the general requirements applicable to the assessment of all projects, which will be

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<sup>1</sup>Those attending do not need to be registered at the AME Roundup.

supplemented by any focused, project-specific guidelines the Board considers necessary to guide the assessment of a given project.

On December 6, 2018, the NIRB released an initial version of the *Draft* Standard IS Guidelines for comment. The NIRB sincerely appreciates the substantial time and effort that parties invested in developing their comment submissions. In reviewing the comment submissions received, input during recent NIRB processes, and similar work being done in other regions, several themes emerged that warrant follow up and revisions to the December 2018 *Draft* Standard IS Guidelines. To support these revisions, the NIRB has determined that consultations and further discussions about some emerging central themes (outlined in the attachment to this document) is required.

The NIRB will be holding in-person consultation at the Vancouver Marriott Downtown Hotel (Ambelside II room) as follows:

In-Person Consultation Sessions for the Standard IS Guidelines in Vancouver			
Tuesday, January 24, 2023		Wednesday, January 25, 2023	
9:00 am – 12:00 pm MT	Proponents and Consultants	9:00 am – 12:00 pm MT	Government and other Intervenors
1:30 pm – 4:30 pm MT	Designated Inuit Organizations	1:30 pm – 4:30 pm MT	All parties

In addition to these consultation sessions, the NIRB will be undertaking targeted consultation in each of the three (3) regions to support the finalization of the Standard IS Guidelines. The next steps for the development and finalization of the Standard IS Guidelines are:

Activity	Anticipated Date <sup>1</sup>
In-person consultation on the IS Guidelines	January 24-25, 2023
Regional community consultation	Tentatively February 2023-April 2023
NIRB distributes updated <i>Revised Draft</i> Standard IS Guidelines for comment	Tentatively June 2023
NIRB distributes Finalized Standard IS Guidelines	Tentatively October 2023
<sup>1</sup> Note: all dates are tentative and may be changed by the Board to reflect circumstances	

To assist in planning, the NIRB would appreciate participants planning to attend the consultation sessions in Vancouver to inform Heather Rasmussen, Senior Policy Advisor, by January 13, 2023. If you have any questions or require additional clarification, please contact Heather Rasmussen at 867-983-4606 or [hrasmussen@nirb.ca](mailto:h_rasmussen@nirb.ca).

Sincerely,



Karen Costello  
Executive Director  
Nunavut Impact Review Board

Attachments: Key Topics for Discussion and Input to Inform revisions to the Standard IS  
Guidelines



## ***Non-technical Summary***

The Standard Impact Statement Guidelines will provide information to proponents for the preparation of their Impact Statement, a series of documents describing the planning, implementation, and eventual decommissioning of a project required for a NIRB Review. Project-specific guidelines will be provided as necessary.

The next steps for the development and finalization of the Standard Impact Statement Guidelines are:

Activity	Anticipated Date
In-person consultation on the Impact Statement Guidelines	January 24-25, 2023
Regional community consultation	February 2023-April 2023 <i>Tentative</i>
NIRB distributes updated <i>Revised Draft</i> Standard IS Guidelines for comment	June 2023 <i>Tentative</i>
NIRB distributes Finalized Standard IS Guidelines	October 2023 <i>Tentative</i>

Note: All dates may be changed by the Board reflecting circumstances

### ***Key Topics for Discussion and Input***

Several themes were identified during the review of the December 6, 2018 comment submissions on the *Draft* Standard Impact Statement Guidelines, recent NIRB processes, and through similar work in other regions. The NIRB is requesting input on the following topics, as well as any additional feedback from parties:

Topic	Details
Inuit Qaujimajatuqangit and Public Engagement	<ul style="list-style-type: none"> <li>▪ Inuit and community members need to be involved throughout all stages of project development.</li> <li>▪ Inuit Qaujimajatuqangit needs to inform all stages of the impact assessment.</li> <li>▪ The Proponent shall share how it has followed all applicable Inuit protocols for the collection, protection, and use of Inuit Qaujimajatuqangit.</li> <li>▪ Inuit need to be involved in both the collection and interpretation of Inuit Qaujimajatuqangit and other Knowledge shared.</li> <li>▪ The Proponent must provide reasons for conclusions differing from community views.</li> </ul>
Methods	<ul style="list-style-type: none"> <li>▪ Sufficient information and analysis must be included (for example scientific information, consideration information, Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge).</li> <li>▪ The Proponent shall identify and/or clarify any uncertainties in methods and conclusions.</li> <li>▪ Proponents are encouraged to use plain language as much as possible and consider plain language summaries for each chapter.</li> <li>▪ The Proponent shall engage with potentially impacted communities on what visuals would be most helpful (for example 3-D models, maps with pictures on them, or photos of the area).</li> </ul>
Socio-Economic Impact Assessment	<ul style="list-style-type: none"> <li>▪ An assessment of the socio-economic environment shall be done with the same level of effort and expertise as the biophysical environment.</li> <li>▪ The Proponent shall engage with Inuit and community members from potentially affected communities so that the factors that are most important to Inuit well-being are chosen as indicators.</li> <li>▪ A holistic understanding of health must be taken.</li> </ul>
Baseline (Biophysical and Socio-Economic)	<ul style="list-style-type: none"> <li>▪ Baseline includes historical background and current baseline conditions.</li> </ul>

Topic	Details
	<ul style="list-style-type: none"> <li>▪ A description of how the existing environment is expected to change over the life of the project in response to climate change.</li> <li>▪ Any time limits associated with the validity of data used must be clarified (for example, baseline data may not be valid after a certain time due to changes in sampling techniques).</li> </ul>
Impact Assessment (including Significance Analysis)	<ul style="list-style-type: none"> <li>▪ The impact assessment must describe: <ul style="list-style-type: none"> <li>○ Potential impacts and effects on individual valued components considered;</li> <li>○ Potential impacts and changes to the valued components as they relate to or form systems (also referred to as collective impacts);</li> <li>○ Significance of the predicted impact and reasoning for that determination;</li> <li>○ Potential cumulative effects of the proposed project on the valued components and the systems identified;</li> <li>○ Potential for transboundary effects;</li> <li>○ Proposed mitigation measures to avoid, reduce, or offset predicted impacts; and</li> <li>○ Predicted residual impacts after mitigation measures are applied.</li> </ul> </li> <li>▪ Proponents are expected to focus on assessing the impacts identified by communities as issues of concern, in addition to those with greater potential to cause residual impacts.</li> </ul>
Cumulative Effects	<ul style="list-style-type: none"> <li>▪ A cumulative effect refers to the accumulation or addition of changes to the socio-economic or biophysical environment caused by past, existing, and proposed human activities and/or natural processes.</li> <li>▪ Cumulative effects on valued biophysical and socio-economic components must include culture, health, and food security.</li> <li>▪ Input should be requested from all relevant parties (including governments, Designated Inuit</li> </ul>

Topic	Details
	<p>Organizations, and potentially affected communities) and be informed by community-based monitoring programs.</p> <ul style="list-style-type: none"> <li>▪ Cumulative effects must consider that cumulative biophysical and socio-economic effects can also result from individually minor, but collectively significant, effects occurring over a period of time.</li> <li>▪ Proponents shall address how the assessment of alternatives considered cumulative effects.</li> </ul>
Significance Determination	<ul style="list-style-type: none"> <li>▪ Assessing the significance of potential impacts is the most important aspect of an Impact Statement and must involve potentially affected communities.</li> <li>▪ The Proponent shall include how it considered different parties' views in determining the significance of potential impacts.</li> <li>▪ The Proponent shall describe how Inuit Qaujimagatuqangit, well-being, and the values of potentially impacted communities are reflected in the determination of significance.</li> </ul>
Sustainable Development	<ul style="list-style-type: none"> <li>▪ Adding social acceptability and food security as a factor in sustainability.</li> <li>▪ Considering potential alternative economic activities that may be lost or reduced because of the Project.</li> </ul>
Climate Change	<ul style="list-style-type: none"> <li>▪ The Impact Statement shall include a discussion on global climate change.</li> <li>▪ The Proponent must assess how potential climate change could affect valued components.</li> <li>▪ Proponents shall demonstrate how climate change has been considered in the design and planning of the Project including the post-closure period.</li> <li>▪ Assessments shall address uncertainty and indicate how areas impacted by development are expected to change over time and under different climate change conditions/models.</li> </ul>
Phased Development and Amendments	<ul style="list-style-type: none"> <li>▪ The Proponent shall provide sufficient information regarding their plans for foreseeable future development related to the Project.</li> </ul>

## ***Key Topics for Discussion and Input to Inform revisions to the Draft Standard IS Guidelines (2018)***

In reviewing the comment submissions received on December 6, 2018 on the *Draft Standard IS Guidelines*, input received during recent NIRB processes, and similar work being done in other regions, several themes emerged that warranted follow up and revisions to the Guidelines. Key themes the NIRB has identified for further consultation and discussion include:

- Treatment of Inuit Qaujimajatuqangit and involvement of potentially affected communities throughout all phases of project development, assessment of a proposed project, and development of an Impact Statement
- Use of plain language and accessible documents
- Appropriate methodology
- Socio-economic impact assessment
- Baseline development
- Impact assessment of individual valued components as well as collective impacts
- Cumulative effects
- Significance determination
- Sustainable development
- Climate change
- Phased development and amendments

### **Framing the Impact Assessment**

As established under the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and expanded upon in the *Nunavut Planning and Project Assessment Act (NuPPAA)*, the NIRB's role is to assess the potential impacts of proposed development in the Nunavut Settlement Area (NSA) and the Outer Land Fast Ice zone (together called the designated area<sup>2</sup>) prior to approval of any required project authorizations. The NIRB is responsible for conducting impact assessments with screening, review, and monitoring functions within the NSA in accordance with Article 12 of the *Nunavut Agreement* and sections 86 to 114 of the *NuPPAA*. The NIRB utilizes both Inuit Qaujimajatuqangit and recognized scientific methods to gauge and assess the biophysical<sup>3</sup> and socio-economic impacts of project proposals and makes recommendations to the Government of Canada about which projects should be allowed to proceed and under what terms and conditions to mitigate,

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<sup>2</sup> While the *NuPPAA* references the designated area, for ease of reference and translation purposes the NIRB generally refers to the NSA when referencing its jurisdiction.

<sup>3</sup> While the terminology used in the *Nunavut Agreement* and *NuPPAA* is "ecosystemic impacts," for ease of reference and translation purposes the NIRB generally uses the term "biophysical" when referencing effects on the biological and physical components of the environment.

manage, or monitor the anticipated impacts.

Pursuant to Section 12.8.2 of the *Nunavut Agreement*, the NIRB may also, on its own account, or upon application by a Designated Inuit Organization, or the proponent, reconsider the existing terms and conditions contained in a NIRB Project Certificate issued for a previously approved project. The process of assessment under a reconsideration varies considerably and is scalable to reflect the scale and scope of the changes to the original project. If the changes proposed, and potential for impacts that were not previously assessed, are significant, the NIRB may require the proponent to submit an Addenda to their original Impact Statement to reflect the changes.

Following the completion of the Board's assessments, the Board maintains an on-going monitoring role for projects that have previously been assessed by the Board and approved to proceed.

The NIRB views the environment holistically, comprised of individual interconnected parts that are only fully understood by considering those individual components as parts of a whole. For example, assessing potential impacts of project activities on valued components (VC) individually may not be considered significant, but when considered collectively and "particularly ... as interrelated parts of a system" they may be considered significant.<sup>4</sup> The Board considers the environment to include biological, physical, human, health, and cultural components. Taking a holistic view of the components of the Earth, this includes the complex web of inter-relationships between the living and non-living components which sustain all life on earth, including the social, cultural, and health aspects of human group existence. Components of the Earth include:

- (a) land, water and air, including all layers of the atmosphere;
- (b) all living and non-living matter and living organisms, including plant, animal, and human life;
- (c) the social, economic and cultural conditions that influence the life of people or a community insofar as they are related to the matters described in (a) and (b);
- (d) the interacting natural systems that include components referred to in (a), (b) and (c).

### Topic Specific Discussion

While the NIRB is highlighting key topics for the purpose of focusing the discussions during the upcoming consultations, particularly where new information is being included and/or where parties may have differing views, this is not meant to limit discussions. When the NIRB issues a *Revised Draft* of the IS Guidelines for comment in 2023, the NIRB will also provide the NIRB's response to comments received on the 2018 *Draft* Standard IS Guidelines consultation draft.

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<sup>4</sup> Ehrlich, A. (2021). Collective Impacts: Using Systems Thinking in Project-level Assessment. *Impact Assessment and Project Appraisal*. 1-17.

Sections are organized by general topics and do not reflect the full extent of content required in the IS Guidelines. The NIRB is further working to develop additional guidance documents for proponents and parties with regards to Inuit Qaujimajatuqangit and socio-economic impact assessment.

### Treatment of Inuit Qaujimajatuqangit and Public Engagement

The NIRB appreciates that the availability of Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge may be limited by obligations of confidentiality and other ethical obligations that may be attached to such information, but expects the Proponent to take reasonable measures to access and apply this type of knowledge throughout their impact assessment, and to reflect the knowledge shared throughout the development of the project and the IS. The NIRB is providing the following for consideration:

- Inuit Qaujimajatuqangit is that which Inuit have always known to be true.<sup>5,6</sup> Inuit Qaujimajatuqangit is more than just the information produced and encompasses all aspects of way of life.
- The NIRB also considers Indigenous Knowledge and Community Knowledge shared by potentially impacted Indigenous groups and communities outside the NSA.
- Inuit need to be engaged throughout all stages of project development (including project planning and design, construction, operations, and monitoring and post-closure) and Inuit Qaujimajatuqangit needs to inform and be applied in development of all stages of the impact assessment. This includes: identification and assessment of alternatives; selection of valued components and systems they comprise; baseline; potential impacts and significance; and mitigation and environmental management measures.
- The Proponent shall share within the IS how it has followed all applicable Inuit protocols for collection, protection, and use of Inuit Qaujimajatuqangit; that the Proponent has the permission of the Knowledge holders to use the Inuit Qaujimajatuqangit as presented in the IS; and that Knowledge holders have verified the way in which the Inuit

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<sup>5</sup> Karetak, J., Tester, F., & Tagalik, S. (Eds.). (2017). Inuit Qaujimajatuqangit: What Inuit Have Always Known To Be True.

<sup>6</sup> Although there are many descriptions of Inuit Qaujimajatuqangit, the Board recently cited, with approval the following passage expressing several central concepts fundamental to the understanding of Inuit Qaujimajatuqangit: *Inuit Qaujimajatuqangit contains Inuit oral history, what has been passed down verbally over centuries of Inuit Knowledge. Inuit Qaujimajatuqangit encompasses both the past and the present. It cannot be separated from within Inuit society. It is part of our Inuit identity. Inuit Qaujimajatuqangit is Inuit knowledge that is both living and adapting and very much part of our present day and present-day life. It is how Inuit live and see the world. It is distinct and specific to the Arctic environment. It cannot be duplicated anywhere else, nor can it be interpreted or represented by non-Inuit without consent from those Inuit to whom that knowledge is gained. Inuit Qaujimajatuqangit is verified by Inuit for Inuit* (R. Paton, Qikiqtani Inuit Association, as cited by the NIRB in the NIRB's Reconsideration Report and Recommendations for Baffinland's Phase 2 Development Proposal, Baffinland Iron Mines Corporation Project Certificat No. 005, NIRB File No. 08MN053, May 13, 2022, at p. 35, footnote 35).

Qaujimajatuqangit is presented and has informed and been applied to their impact assessment.

- Inuit need to be involved in both the collection and interpretation of Inuit Qaujimajatuqangit and other Knowledge shared. The Proponent must include how Inuit Qaujimajatuqangit, Community Knowledge, and Indigenous Knowledge has been shared, evaluated, and considered.
- The IS shall describe efforts made to distribute project information and discuss information and materials provided during public engagement. The IS shall include how participating groups and individuals were selected, the methods used (time, place, and purpose), reference materials provided, evidence of community confirmation of the Proponent's characterization of their concerns, the results, and the ways in which the Proponent intends to address the concerns identified. Rationale for conclusions differing from community views must be provided. The Proponent shall ensure they are developing materials with the input from potentially affected communities (e.g., videos, posters) and that the material is relatable, accessible, and includes indicators identified as important by potentially affected communities.

## Methodology

The NIRB is providing the following for consideration regarding methodologies of different knowledge sources as well as IS sections, different audiences, and the need for Proponents to engage with Knowledge holders and potentially affected communities.

- It is the sole responsibility of the Proponent to prepare an IS that includes sufficient information and analysis (e.g., scientific information, engineering information, Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge).
- The IS shall be concise and focus on the assessment of potential impacts to biophysical and socio-economic components individually as well as collectively.
- The IS shall contain the information as outlined in Article 12, Section 12.5.2 of the *Nunavut Agreement* and s. 101(3) of the *NuPPAA* and must clearly present the information requested in that section in a clear and easy to follow format and presented for all audiences expected to read the materials.
- Where the conclusions drawn from scientific, engineering, and technical knowledge are inconsistent with the conclusions drawn from Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, the IS shall contain a balanced presentation of the issues and a statement of the Proponent's conclusions and rationale, as well as plans to address the differences or concerns identified.
- The Proponent shall clarify any uncertainties in methods and conclusions (e.g., baseline collection, impact assessment, mitigation, etc.).

- The Proponent shall ensure that the Popular Summary in the IS represents an accessible and plain language summary of the entire project assessment, including potential impacts, significance determination, and proposed mitigation and monitoring measures. In addition, the Proponent shall use visual aids to support the reader’s understanding of what the project entails. The Proponent shall engage with potentially impacted communities on what visuals would be most helpful. Furthermore, potential impacts and indicators shall reflect the concerns and priorities of potentially affected communities. For example, whether water in a lake is drinkable or safe for fish may be more important indicators for potentially affected communities rather than measured salinity levels.
- While some sections of the IS will necessarily need to include technical and detailed information, Proponents are encouraged to use plain language as much as possible and to consider including plain language summaries for each chapter.

### Socio-Economic Impact Assessment

The NIRB received comments on the need for more rigorous socio-economic impact assessment and has heard increasing feedback on the need for more in-depth work on valued components, including well-being, cultural impact assessments, and food security. The NIRB is providing the following for consideration:

- The assessment of potential adverse and beneficial impacts on the socio-economic environment such as well-being, health, culture, and traditional land and/or aquatic uses (such as hunting, harvesting, gathering, and cultural expression and connection), archaeology, food security, economic, employment and training opportunities shall be undertaken with a level of effort and expertise at least equivalent to that applied to the assessment of the biophysical values.
- Potential socio-economic impacts should be predicted for different demographics.
- Additional project assessment is required to ensure that all applicable employment plans, policies, and programs provide more details on Inuit recruitment, retention, and advancement, including cross-cultural training and conflict resolution mechanisms, provisions for cultural time off work, on-site supports for Inuit workers and community supports for workers’ families, country food programs, etc.
- The Proponent shall engage with Inuit from potentially affected communities so that the factors that are most important to Inuit well-being are chosen as indicators.
- The Proponent will provide evidence that it provided adequate opportunities for affected communities to identify “what matters most” for their well-being and quality of life “on the land”, “in the community”, and “in the workplace” during scoping, and these Inuit values, Valued Components and indicators are fully integrated into the assessment, with a detailed explanation if this has not been undertaken.
- A holistic understanding of health must be taken.

- The Proponent should use a determinants of health approach when predicting potential effects of proposed projects on health.
- The Proponent should undertake both a Health Impact Assessment and Human Health Risk Assessment.
- Health impact assessments related to Inuit shall include the following considerations: food security; perceived and real risk of contamination and effects of both on country food harvesting and alienation; a Population Health approach; Inuit determinants of health that go beyond the biophysical, and consider the mental, physical, and spiritual aspects of health.

## Baseline

The NIRB received many comments on defining temporal expectations and what should constitute the baseline, including ‘reasonably foreseeable project’ and ‘existing conditions’. The NIRB is providing the following for consideration:

- Updating the term “baseline” to refer to trends over time to include historical background and current baseline conditions.
- Requiring the IS to include a description of how the existing environment is expected to change over the life of the project (construction, operation, and closure phases) in response to climate change, so that all effect analyses can be undertaken and mitigation can be proposed in respect to this changing baseline.
- Requiring the IS to clarify whether there are any time limits associated with the validity of data used (i.e., baseline data may not be valid after a certain time period due to change in sampling techniques, etc.).

## Impact Assessment

Throughout its recent assessments, the NIRB has received significant feedback on the need for impact assessments to reflect the values, thoughts, concerns, and Inuit Qaujimajatuqangit of potentially affected communities. This includes how all components of the environment are interconnected. The NIRB is providing the following for consideration:

- Requiring the impact assessment, including significance analysis, to describe:
  - Potential impacts and effects on individual valued components (VC) considered;
  - Potential impacts and changes to the VCs as they interrelate to form systems (or to collective impacts);
  - Significance of the predicted impact and reasoning for that determination;
  - Potential cumulative effects of the proposed project on the VCs as well as the systems identified;
  - Potential for transboundary effects;
  - Proposed mitigation measures to avoid, reduce, or offset predicted impacts; and

- Predicted residual impacts after mitigation measures have been applied.
- Proponents are expected to increase their focus and efforts on assessing the impacts that have been identified by communities as issues of concerns, as well as those with greater potential to cause residual impacts. This is true regardless of the Proponent's conclusions on the significance of those impacts.
- A matrix or a comparable tool should be employed to identify all linkages between environmental elements and project components and activities, highlighting significant interactions between both. The Proponent is further encouraged to reach out to the potentially affected communities to identify appropriate tools to clearly identify and show the potential for impacts.

### Cumulative Effects

The NIRB is providing the following topics and comments for consideration regarding Cumulative Effects Assessment:

- A cumulative effect refers to the accumulation or addition of changes to the environment caused by past, existing, and proposed human activities and/or natural processes. These changes occur over space and time and can be brought about by effects that are additive or interactive. The combination and interaction between these types of effects can increase or decrease the impact of a single effect. For example, hunting, oil spills, loss of habitat, and commercial fishing pressure on prey species, can all combine to affect the health and abundance of marine mammals in a given area and potentially change the existing landscape.
- A Cumulative Effects Assessment (CEA) shall include an assessment of trends over time and alterations in the pace of change for each value, in order to establish the degree of vulnerability to future change, of the value in question.
- The scope of CEA on valued biophysical and socio-economic components must include culture, health, and food security. Collaboration and input should be sought from all relevant parties (including governments, Designated Inuit Organizations, and potentially affected communities) and be informed by community-based monitoring programs.
- The Proponents shall be required to conduct a CEA on any VC if a potential residual effect has been identified. However, the CEA shall not be limited to those effects predicted as 'residual' or 'significant' during the impact assessment and must consider that cumulative biophysical and socio-economic effects can also result from individually minor, but collectively significant, effects occurring over a period of time.
- The Proponent shall describe and demonstrate how Inuit Qaujimagatugangit, Indigenous Knowledge, and Community Knowledge were used in identifying potential cumulative effects and the views of the acceptability of the impacts to valued components and the

systems they are comprised of. This analysis must include the measures the Proponent proposes to reduce and compensate for potential cumulative effects.

- The Proponent shall identify and provide a rationale for the valued components that were selected and excluded, and the discussion should be based on those that are most likely to be affected by the proposed project in combination with other projects and activities in the appropriate spatial boundary.
- The CEA shall identify and predict the likelihood and significance of potential cumulative effects, including direct, indirect, and residual impacts. The significance of potential cumulative effects shall be assessed with and without the application of mitigation measures and include a plan to compare the effects predictions in the assessment with the results of project monitoring, to assess the accuracy of the assessment. Estimations of significance in relation to cumulative effects shall consider the overall capacity of an area or region to sustain impacts from human activities, the full range of human activities (including predicted effects on climate change).
- Proponents shall address how the assessment of alternatives considered cumulative effects.
- The Proponent shall demonstrate a similar rigour and level of effort in conducting the CEA as demonstrated for the project-level effects assessment.
- CEA should integrate a proponent's realistic scenarios of future development plans for the project (e.g., likely subsequent phases of development and/or modifications of the project under assessment).
- CEA should include detailed considerations of the known and predicted future impacts of climate change.

### Significance determination

The NIRB is providing the following for consideration, including the need for Inuit Qaujimajatuqangit to inform and be applied to the Proponent's determination of significance:

- Assessing the significance of potential impacts is the most important aspect of an IS and must involve potentially affected communities. Using both qualitative and quantitative methods, the Proponent shall take the factors listed in s. 90 of the *NuPPAA*, at a minimum, into account when determining the significance of predicted impacts.
- The Proponent shall include in the discussion of significance how it considered different parties' views in determining significance of potential impacts. The Proponent shall further indicate how Inuit Qaujimajatuqangit, well-being, and the values of potentially impacted communities are reflected in the determination of significance. Proponents are required to put greater emphasis and effort on mitigating and monitoring predicted impacts of greater magnitude.

- The Proponent shall include the range of viewpoints expressed on the issue of significance, particularly where varying viewpoints could affect the determination of significance, and shall provide a rationale for the viewpoint applied by the Proponent to draw conclusions with respect to significance. If the Proponent's view of what constitutes a significant impact, or what impact is significant, differs from potentially affected communities, the Proponent shall clearly identify what measures are proposed to demonstrate the accuracy of the Proponent's significance determination if the project were approved to proceed.

### Sustainable Development

Sustainable development is about balancing economic, biophysical, social, cultural, and health needs and well-being, while allowing for the protection of the environment and availability of benefits for present and future generations. The Board must consider whether, and to what extent, the project would protect and enhance the existing and future well-being of the residents and communities of the NSA, taking into account the interests of other Canadians. The NIRB is providing the following for consideration:

- Adding social acceptability as a factor in sustainability, where economic benefits are compared to environmental, economic, social, and cultural adverse effects.
- Considering potential alternative economic activities that may be lost or reduced as a result of the Project.
- Adding food security to the consideration of whether a project constitutes sustainable development.

### Climate Change

The NIRB is providing the following topics and comments for consideration relating to climate change:

- The IS shall include a discussion on global climate change and the Proponent must assess how potential climate change could affect VCs as well as the effects of climate change on proposed activities. Proponents shall further detail how climate change has been considered in the design and planning of the Project and extends beyond the life of the project, rather than ending at closure.
- Proponents are expected to show evidence they have engaged and included Inuit perspectives and observations with respect to climate change, including the impacts of climate change on the environment and changes to the use of areas or traditional activities.
- Assessments shall address uncertainty and indicate how areas impacted by development are expected to change over time and under different climate change conditions/models. The Proponent shall design and apply multiple future climate scenarios for impact

assessment, where these scenarios span the range of possible future climates, rather than designing and applying a single “best guess” scenario. It is recommended that the range of future climates considered by the Proponent should include up to date scenarios, such as those used in the Arctic Climate Impact Assessment Report as well as those in the relevant Intergovernmental Panel on Climate Change Assessments for Polar Regions.

### Phased Development and Amendments

Amendments and any associated addendums to the IS will be dealt with on a project-by-project basis and the NIRB would release information requirements as needed. The NIRB is providing the following topics and comments for consideration:

- The Proponent shall provide sufficient information regarding their plans for foreseeable future development related to the Project, and shall address how the Proponent is avoiding “project splitting”.<sup>7</sup> Providing information at the level of conceptual design is generally sufficient when providing information on the Proponent’s future development plans.

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<sup>7</sup> “Project splitting” is the practice of submitting several parts of a project as independent projects to circumvent comprehensive assessment of all aspects of the project as a whole.