

QIA Review Comments on draft guidelines for preparation of an impact statement for Chidliak Mine

Comment #	QIA 2023 Chidliak ISG #1
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: Definitions and Terms</p> <p>Page: v</p>
QIA Comment	<p>Current text for “Local Study Area” states: That area where there exists the reasonable potential for immediate impacts due to project activities, ongoing normal activities, or to possible abnormal operating conditions.</p> <p>Immediate is not a defined term like direct and indirect effects, and can apply to spatial or temporal concepts which could be confusing. QIA suggests the broader definition of impact be used instead of immediate in this definition.</p>
QIA Request	<p>QIA recommends this definition be changed to “That area where there exists the reasonable potential for immediate impacts due to project activities, ongoing normal activities, or to possible abnormal operating conditions.”</p> <p>In addition, NIRB should consider removing all references to “immediate impacts”, including but not limited to at p.29 of the ISG, for the same reason.</p>

Comment #	QIA 2023 Chidliak ISG #2
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: Definitions and Terms</p> <p>Page: vi</p>
QIA Comment	<p>For now and into the future, NIRB should consider adding to its definition of “reasonably foreseeable future development” any reasonably foreseeable ancillary development associated with the main proposed project that will be necessary for the main project to function (e.g., a port, a road, a rail line, an airstrip, etc. not included in the immediate Project Description). Attention and change is required to ensure that project splitting and phased development is adequately and appropriately managed from an impact assessment perspective.</p>
QIA Request	QIA recommends this definition be updated as per above.

Comment #	QIA 2023 Chidliak ISG #3
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: Definitions and Terms</p> <p>Page: vi</p>

QIA Comment	QIA recommends removal of reference to "significant" as a criterion during scoping, in the definition of "scoping". Significance of effects is something that occurs only during later portions of the impact assessment process and its use during scoping could see important impacts and benefits artificially removed from the scope of assessment.
QIA Request	QIA recommends the removal of the word "significant" from the "scoping definition.

Comment #	QIA 2023 Chidliak ISG #4
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Definitions and Terms Page: vi
QIA Comment	Inuit food harvesting and food security/sovereignty are critical elements of Inuit well-being.
QIA Request	QIA recommends adding "Inuit food harvesting" and "Inuit food security/food sovereignty" to the list of bullets for well-being.

Comment #	QIA 2023 Chidliak ISG #5
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 1.3 – Precautionary Principle; also Section 10.0 Pages: 7, 44
QIA Comment	<p>In Section 1.3, NIRB states that to demonstrate application of the precautionary principle, the Proponent must include information to "demonstrate that Inuit Qaujimajatuqangit and Community Knowledge is considered in a fulsome way that is consistent with the precautionary principle of not requiring "certainty" to establish the potential for harm to ecosystemic components [...]".</p> <p>In Section 10.0, NIRB also requires the Proponent to "explain how it treated and used Inuit Qaujimajatuqangit [...] noting how variations in knowledge [IQ and western science] were considered and how discrepancies between two views was reconciled". (44 p.)</p> <p>On past projects, QIA has identified concerns associated with Proponents disregarding or downgrading the importance of IQ and/or observations shared by Inuit where they differ from, and are more conservative or protective than, the conclusions of western scientific inquiry. From QIA's perspective, there is a risk that the Proponent will prioritize the western scientific information over IQ. In the text from Section 1.3 and 10.0, the Draft IS Guidelines contain elements of guidance to prevent similar issues from occurring in relation to the Chidliak Diamond Mine Proposal, but more explicit instruction on how to manage and report on this should be provided. This risk</p>

	<p>could be alleviated by explicitly stating the need to consider the most conservative perspective where IQ and science differ, particularly in situations of high uncertainty with respect to the western science.</p> <p>Reference: QIA. 2022. <i>Re: QIA Comments on the Baffinland Iron Mines Corp.'s Mary River Project 2021 Annual Monitoring Report sent June 30, 2022.</i></p>
QIA Request	<p>The QIA recommends that NIRB add the following text to the end of Section 10.0.</p> <p>“For instances where there are variations in knowledge between IQ and western scientific conclusions, the Proponent must consider its obligation to apply the precautionary principle (as described further in Section 1.3) when reconciling discrepancies. Specifically, in situations where there is a high degree of uncertainty, the Proponent shall defer to the more conservative source of knowledge. A detailed record of decision-making rationale and efforts to collaboratively reconcile different findings between western science and IQ should be outlined by the Proponent.”</p>

Comment #	QIA 2023 Chidliak ISG #6
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i></p> <p>Section: 2.0 Preparation and Review of the Impact Statement</p> <p>Page: 9</p>
QIA Comment	Here and elsewhere in the document, the terminology of proponent "use of" Inuit Qaujimagituqangit is used. This term is not generally appropriate as IQ cannot be taken out of its cultural context without meaning being lost; in other words it is essential that Inuit "use" IQ in this process, not the Proponent.
QIA Request	QIA recommends all references to "use" of IQ be changed to "incorporation" or similar language.

Comment #	QIA 2023 Chidliak ISG #7
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i></p> <p>Section: 2.1 The Study Strategy and Methodology</p> <p>Page: 9</p>
QIA Comment	QIA recommends that while it is important for translations of summaries into Inuktitut to be concise, the remainder of the IS and appendices should be as long as necessary to provide a fulsome characterization of existing conditions, changes over time, and effects in the project and cumulative effects cases.
QIA Request	QIA recommends that NIRB revise its guidance to reflect a priority for conciseness in summary documents and comprehensiveness/adequate detail in the IS and its appendices.

Comment #	QIA 2023 Chidliak ISG #8
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 2.1 The Study Strategy and Methodology Page: 10
QIA Comment	Current text states "The Impact Statement shall identify any valued components requested by parties that the Proponent chooses not to adopt as well as any differences in conclusions of potential impacts (including significance determination)."
QIA Request	QIA suggests revision to "The Impact Statement shall identify any valued components requested by parties that the Proponent chooses not to adopt, ...and provide a supporting rationale for not including said valued components , as well as any differences in conclusions of potential impacts (including significance determination). NIRB shall review the rationale and make a determination as to appropriateness of inclusion of the valued component(s) not accepted by the proponent... "

Comment #	QIA 2023 Chidliak ISG #9
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 2.1.1 Acquisition Methodology and Data Analysis Page: 11
QIA Comment	Current text states "Except where specified by the NIRB, the Proponent has the discretion to select the most appropriate methods to collect, compile, and present data, information, and analysis in the Impact Statement." QIA is concerned that this does not put emphasis on the proponent's responsibility to engage with Inuit parties on this most crucial of topics.
QIA Request	QIA recommends adding an additional sentence after the above to the effect of: "The Proponent is expected to do so in consultation with impacted Inuit parties and show evidence of these efforts."

Comment #	QIA 2023 Chidliak ISG #10
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 2.1.2 Documentation Page: 12
QIA Comment	The paragraph on qualitative and quantitative data should be updated for greater clarity and emphasis on the role that Inuit observational parameters should have in the process.
QIA Request	Recommended additional sentence: "Given that Inuit observations are quite often qualitative and culturally-defined through the lens of IQ, it is critical that the Proponent work with Inuit parties to define

	appropriate Inuit criteria to include in the Impact Statement and overall assessment process".
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Comment #	QIA 2023 Chidliak ISG #11
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 2.1.3 Use of Existing Information Page: 12
QIA Comment	Quite often, older IQ-related information needs to be updated given changes over time, alterations in the environmental conditions, and the particularities of the proposed project in question.
QIA Request	An additional sentence is recommended at the end of the only paragraph in section 2.1.3: "Where that information is deemed inadequate or inapplicable by Inuit, the Proponent will work with Inuit parties to develop additional data collection programs related to IQ and Inuit observations."

Comment #	QIA 2023 Chidliak ISG #12
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 4.1 Executive Summary Page: 16
QIA Comment	Current final bullet states "The Proponent's conclusions on the residual effects of the proposed project after taking mitigation measures into account and the significance of those impacts." There is no requirement for the Executive Summary to speak to total cumulative effects affecting the same valued components as the proposed project.
QIA Request	QIA recommends adding an additional bullet on cumulative effects requirements for the Executive Summary, stating: "The Proponent's conclusions on the total cumulative effects of the proposed project in combination with other past, present and reasonably foreseeable future developments and activities, for all VSECs/VECs where the Project is predicted to have measurable adverse residual effects, and the significance of those total cumulative effects and any mitigation or other measures committed to in order to reduce those impacts".

Comment #	QIA 2023 Chidliak ISG #13
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 4.1 Executive Summary Page: 16

QIA Comment	The current text requires maps of ground and marine transportation routes. Given impacts from low-level flights on terrestrial mammals and Inuit, this topic should be subject of mapping exercises as well to inform the assessment.
QIA Request	QIA recommends NIRB consider adding "proposed aircraft flight routes where Project-related low-level flying is a possibility" to the list of mapping requirements.

Comment #	QIA 2023 Chidliak ISG #14
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 5.5 Regional Context Page: 20
QIA Comment	Greater clarity is recommended on what NIRB considers to be a "future land use plan". From QIA's perspective, any formal written submission by Inuit parties to a land use planning body should be considered a statement of expectation re: future land use designation desired by that Inuit party, and noted as such, regardless of the status of the LUP process.
QIA Request	NIRB is requested to clarify what it considers to be a "future land use plan". QIA's recommendation for this is identified above.

Comment #	QIA 2023 Chidliak ISG #15
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). 63 pp. Section: 6.1 Project Design Page: 20-21
QIA Comment	<p>In section 6.1 the NIRB notes that the general project impact statement shall include " A discussion of how potential effects to humans and communities have influenced the project design" with a list of criteria (NIRB 2023; 20-21 pg).</p> <p>The QIA is concerned the NIRB has not clearly stated the requirement for details on the consideration of the following factors related to project design:</p> <ul style="list-style-type: none"> • Cumulative impacts • Information gaps • Protection of valued social-economic, cultural, and ecological values (e.g. aquatic, marine, and terrestrial wildlife; archaeological sites; traditional subsistence hunting and travelling between both communities and cabins/camp sites) • How the project design maximizes Inuit benefits for the local Inuit communities. <p>As stated previously (QIA 2022), QIA has raised concerns about the potential impacts of the project, especially in consideration that:</p> <ul style="list-style-type: none"> • The region faces immense pressure from climate change and other historic, ongoing, and proposed developments and activities.

	<ul style="list-style-type: none"> • Significant information gaps required to adequately assess impacts of the proposed project. • The need for <i>protection</i> of Inuit values, not just minimizing impacts, given the two above factors. <p>Reference: QIA. 2022. <i>Re: QIA Screening Comments on Proposed Chidliak Diamond Mine Project (NIRB #22MN025)</i>. [NIRB Registry: 221006-22MN025-QIA Comments-IA2E.pdf].</p>
QIA Request	<p>The QIA requests that the NIRB update the wording within section 6.1 to include the following additions in bold:</p> <ul style="list-style-type: none"> • “A discussion of how design, engineering, and management plans will maintain/enhance the existing ecosystemic integrity, focusing on wildlife habitats, including freshwater habitat, marine habitat, and terrestrial habitat; with specific reference to the context of cumulative impacts in the Qikiqtaaluk region.” (p. 21) • “A discussion of how potential effects to humans (e.g., social, economic, and well-being) and communities have influenced the proposed project design to protect and minimize adverse effects, especially in the context of the project location...” • “A discussion of how potential impacts to aquatic, marine, and terrestrial wildlife (e.g., caribou, Polar bears, Peregrine falcons, belugas, etc.) have influenced the design of the proposed project especially indicating methods to avoid and minimize impacts to aquatic, marine, and terrestrial wildlife, including the geographical location of project components...” • “A discussion of how project design, particularly project infrastructure and site preparation, has been influenced by the distribution of archaeological resources and sites used for harvesting of fish and wildlife and quarrying of soapstone.”

Comment #	QIA 2023 Chidliak ISG #16
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i>.</p> <p>Section: 6.2 Project Purpose, Need, and Alternatives</p> <p>Page: 22</p>
QIA Comment	<p>The final paragraph here asks the Proponent to weigh in on the project’s distributional equity of benefits. This has been an issue of concern to Inuit given the relatively high degree of employment, procurement and other benefits that have been lost from the Inuit and Nunavut economies at other major projects.</p> <p>One primary cause of these losses is the lack of preparation completed by the Proponent before the project starts. For example, contracts are signed prior to properly investigating Inuit Firms’ capacity or Inuit training is only delivered after construction starts, therefore exacerbating an inequity in the skill levels between local Inuit and a southern, Non-Inuit workforce.</p>

QIA Request	At the end of the final paragraph of this section, NIRB should consider providing an additional sentence indicating that "NIRB strongly recommends the Proponent engage deeply with Inuit parties on this topic, given its high priority for those parties and their prior experience with distributional equity issues."
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Comment #	QIA 2023 Chidliak ISG #17
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 6.2 Project Purpose, Need, and Alternatives Page: 22 (General Comment)
QIA Comment	This is a general recommendation that applies to all references to "alternatives" and "alternatives to the project" in the ISG. NIRB should be careful to separate "alternatives to" the Project from "alternative means to undertake" the project, very clearly and decisively in Section 6.2 and 6.2.1. The former, dealing with completely different ways to accomplish the purpose of the project, is only occasionally a serious issue in impact assessment. The latter, focused on how to accomplish the mine through many different available technically and economically feasible construction and operational means, is very often a priority issue that merits very high attention through the impact assessment process.
QIA Request	QIA recommends that NIRB clearly distinguish between the two items above, limiting discussion on "alternatives to" the project to section 6.2, and using language of "alternative means to undertake the project" in section 6.2.1 and all other places in the ISG where "alternatives" are mentioned.

Comment #	QIA 2023 Chidliak ISG #18
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . 63 pp. Section: 6.2.1 Alternatives Page: 22-23
QIA Comment	In section 6.2.1, the NIRB describes five criteria that the assessment of alternatives needs to demonstrate in the application. The QIA is concerned that the NIRB has not included the following criteria: <ul style="list-style-type: none"> • Precautionary approaches and how the limitations such as information gaps are considered. • Specific consideration for cumulative impacts on <i>terrestrial and aquatic ecosystems</i>. • The socio-economic impacts for each alternative.
QIA Request	The QIA requests that the NIRB update the wording within section 6.1 to include the following additions in bold : <ul style="list-style-type: none"> • "The requirements of Section 7.4.3 of this document, specifically the consideration for cumulative impacts on the terrestrial, aquatic, and marine ecosystem and on traditional harvesting activities and whether

	<p>each alternative has considered the vulnerability of the Arctic ecosystem” (23 p.)</p> <ul style="list-style-type: none"> • “The application of the precautionary principle, as outlined in section 1.3, including consideration of uncertainty and potential for adverse impacts”. <p>The QIA requests that the NIRB add a sub-bullet under the first bullet “The socio-economic impacts for each alternative”</p>
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Comment #	QIA 2023 Chidliak ISG #19
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: 6.2.1 - Alternatives</p> <p>Page: 22-23</p>
QIA Comment	<p>Section 6.2.1 of the Draft IS Guidelines specifies that the Impact Statement shall include an explicit analysis of all alternative means of carrying out the proposed project components or activities and provides further guidance on how the assessment should be carried out. The QIA notes that the Proponent has so far proposed multiple alternatives for each of its individual project components and activities. For example, this includes considering multiple mining methods, kimberlite disposal, mine processing, energy generation, transmission, storage, transportation, and telecommunications options among others. Each alternative option for each individual project component may have differing types or degrees of impact on Inuit values (e.g., wildlife, wildlife habitat, Inuit harvesting, etc.) and may vary in terms of their likelihood of effectiveness in the context of Nunavut. In order to effectively evaluate the Proponent’s preferred alternative, a detailed analysis of alternative means at the level of project components or activities will be required, including consideration for routing of components such as roads and transmission corridors.</p>
QIA Request	<p>The QIA recommends that NIRB make the following addition (bolded) to Section 6.2.1:</p> <p>“This analysis must be done to a level of detail which is sufficient to allow the NIRB and public to compare the proposed project with the alternatives and validate that the preferred plan for the proposed project is the most reasonable in terms of the economic costs and the biophysical, social, cultural, well-being, health and economic impacts and benefits. Given the number of options being considered by the Proponent, the level of detail required must include alternatives analysis at the level of individual project components or activities, outlining multiple project permutations. Where different routes are being considered for components such as roads and transmission line corridors, the Proponent must demonstrate strong consideration of IQ and avoidance of impacts on key Inuit values. This will by necessity require serious consideration with Inuit of all technically and economically feasible alternative means prior to the conduct of the main impact assessment on the preferred alternative means. The proponent must include....”</p>

	QIA also notes that when there are this many alternative means being considered, it is necessary for the Proponent to engage with QIA and other Inuit parties long in advance of finalizing their preferred alternatives that make their way into the Impact Statement. It is not generally appropriate or preferable to be re-assessing alternative means after the IS has been drafted based on a single preferred set of alternative means.
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Comment #	QIA 2023 Chidliak ISG #20
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). 63 pp. Section: 6.2.1 Alternatives Pages: 22-23
QIA Comment	<p>Within section 6.1, the NIRB states that “The preferred alternative means should be based on the consideration of biological, ecological, physical, health, social, economic, well-being, and cultural impacts, the technical feasibility and economic viability and the best available technology.” (NIRB 2023; 28-29 pp.)</p> <p>The QIA is concerned as the NIRB has not clearly stated that the preferred alternative means will also include consideration of the atmospheric environment, which means that dust generation may not be adequately incorporated in determining the preferred alternative means to undertake the Project. The QIA has previously noted concerns related to dustfall generation from potential all-season road and mining activities and the specific need for dust to be part of the alternatives analysis due to the potential significant adverse impacts.</p> <p>Reference: QIA. 2022. <i>Re: QIA Screening Comments on Proposed Chidliak Diamond Mine Project</i> (NIRB #22MN025). [NIRB Registry: 221006-22MN025-QIA Comments-IA2E.pdf].</p>
QIA Request	<p>The QIA requests the NIRB update the language provided in section 6.1 to state:</p> <p>“The preferred alternative means should be based on the consideration of biological, ecological, atmospheric environment, physical, health, social, economic, well-being, and cultural impacts, the technical feasibility and economic viability and the best available technology.”</p>

Comment #	QIA 2023 Chidliak ISG #21
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 6.2 Project Purpose, Need, and Alternatives Page: 23

QIA Comment	NIRB identifies a series of bullets of what the assessment of alternatives (which we take to primarily be assessment of alternative means to undertake the project, rather than alternatives to the project) needs to involve. QIA requests additional transparency be required and that a robust assessment be required with detailed rationale.
QIA Request	As the final bullet of this list at pg. 23, QIA recommends NIRB add “[bullet] The proponent is expected to provide evidence that it engaged Inuit parties as early as possible in the identification of alternative means to undertake the project, and where Inuit showed interest, how it involved those parties in developing criteria, weighting, and assessment structures for – and the conduct of the - alternative means assessment. ”

Comment #	QIA 2023 Chidliak ISG #22
References	Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i> . Section: 6.3 Scope of the Project; 7.2.2.1 Spatial Boundaries Pages: 23, 29
QIA Comment	The Site Study Area should include all relevant project components – e.g. flight paths, transmission lines, shipping lanes, or roads (whether all-season or temporary winter roads, construction, post-closure). The Project (and its Study Area) cannot be subdivided in its impact according to Project component, and QIA requests that while separation of components may occur in the evaluation of their impacts, the Site Study Area shall include all Project components and activities. QIA feels strongly that ALL Project components and activities must be assessed for their Project-specific and cumulative impacts. Project splitting should not be allowed.
QIA Request	QIA requests that NIRB revise sections 6.3 and 7.2.2.1 to clarify that the Proponent <i>shall</i> include ALL Project components and activities in the Project and include as part of the Site Study Area to more accurately inform the impact analysis.

Comment #	QIA 2023 Chidliak ISG #23
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 6.5 Economic and Employment Information Page: 25
QIA Comment	NIRB's bullets do not explicitly state the Proponent should provide data on the number of contracts available for the life of the project, nor is a requirement to assess to impacts to Inuit owned business. Currently, NIRB's bullets related to contracts focus on the jobs created by contracts.
QIA Request	Include a bullet “ The proponent is expected to provide a list of contracts for each phase of the project and assess the opportunities these contracts create for Inuit-owned and locally-owned business. If ”

	applicable, this should include any assistance the Proponent will complete with Inuit and local entrepreneurs.”
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Comment #	QIA 2023 Chidliak ISG #24
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i>. 63 pp.</p> <p>Section: 7.1 Factors to be considered in the Impact Assessment</p> <p>Page: 26</p>
QIA Comment	Section 7.1 identifies the factors that should be considered in the impact assessment. Item (k) identifies the need to identify “any monitoring program of the project’s ecosystemic and socio-economics that should be established, including one proposed by the Proponent”. This statement does not explicitly include monitoring based on IQ, nor does it identify the need for the Proponent to adaptively manage based on the findings of these monitoring programs.
QIA Request	The QIA requests that the NIRB update the wording within section 7.1 to explicitly include the requirement for the Proponent to monitor project impacts through both IQ (in collaboration with Inuit) and western science and use the results of monitoring to adapt their practices, impacts and mitigation measures.

Comment #	QIA 2023 Chidliak ISG #25
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i>. 63 pp.</p> <p>Section: 7.1 Factors to be considered in the Impact Assessment</p> <p>Page: 26</p>
QIA Comment	<p>Within section 7.1, the NIRB outlines the factors that will be considered within the Impact Assessment, which includes “(m) the options for carrying out the project that are technically and economically feasible and the anticipated ecosystemic and socio-economic impacts of such options;” (NIRB 2023; p. 32).</p> <p>The QIA has previously noted concerns related to the mining technologies proposed by De Beers that are untested in the Arctic environment and/or new to Baffin Island (QIA 2022). The ISGs do not currently require De Beers to provide an assessment of the feasibility of the proposed options for carrying out the project as it relates to the uncertainty posed by the biophysical constraints presented by the Arctic environment generally or the unique biophysical environment found on Baffin Island.</p> <p>Reference: QIA. 2022. <i>Re: QIA Screening Comments on Proposed Chidliak Diamond Mine Project (NIRB #22MN025)</i>. [NIRB Registry: 221006-22MN025-QIA Comments-IA2E.pdf].</p>
QIA Request	QIA remains concerned about the possibility of the mining technologies being proposed and requests that the NIRB add an additional factor to be considered in the Impact Assessment:

	“Whether the options for carrying out the project have been used in Arctic environments and/or Baffin Island, and where and how the Proponent has assessed the uncertainty associated with impacts referred to in paragraphs (e) and (f), and the uncertainty associated with measures referred to in paragraph (h)”
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Comment #	QIA 2023 Chidliak ISG #26
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 7.2.1 Valued Ecosystemic and Socio-Economic Components Page: 27
QIA Comment	There seems to be some words missing from the second sentence of the first paragraph that make the meaning difficult to parse.
QIA Request	QIA recommends NIRB revise the second sentence in the first paragraph to state "If relevant, the location of these valued components should be indicated on maps or charts, indicating to whom these valued components are important and the reasons why, in terms of biophysical, social, economic, health, cultural, archaeological, recreational, tourism, aesthetic or other considerations."

Comment #	QIA 2023 Chidliak ISG #27
References	Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i> . Section: 7.2.1 – Valued Ecosystemic and Socio-Economic Components, and 7.4.3 Cumulative Effects Assessment Pages: 27, 35-36
QIA Comment	<p>The ISGs currently requires that IQ be used throughout the assessment, including “identifying cumulative effects and the views of the acceptability of the impacts to valued components”. One critical gap is that the ISGs does not provide a list of required valued components. QIA suggests that the ISGs provide a preliminary list that can be refined (with justification). In this list, it will be important to include both IQ and CRLU as valued components.</p> <p>The ISGs should explicitly require the Proponent to seriously address the following questions in its impact statement:</p> <p>What will the Project-specific and cumulative impacts be:</p> <ol style="list-style-type: none">1. On Inuit culture?2. On the transmission of Inuit culture and knowledge?3. On the conduct of traditional Inuit activities (these activities to be considered and addressed not just for their economic value (ie. country food harvesting), but their cultural values as expressions/exercises of tradition, culture, and identity)?
QIA Request	QIA requests that the ISGs be revised to include a list of primary valued components that the Proponent must use in the assessment. This list must include IQ (including transmission of IQ) and CRLU (including economic

	values like country food harvesting but also cultural values like expression of tradition, culture, and identity). See list of questions above for specific consideration and integration into the ISG.
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Comment #	QIA 2023 Chidliak ISG #28
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i>. 63 pp.</p> <p>Section: 7.2.2.1 Spatial Boundaries</p> <p>Page: 28</p>
QIA Comment	<p>In Section 7.2.2.1, the NIRB states that one of the criteria that should be used to determine the spatial boundaries of assessments of each valued component includes “taking into account factors such as watersheds”. (NIRB 2023, 28 p.)</p> <p>The QIA welcomes the consideration of watershed-scale boundaries as part of spatial boundaries determination for assessing valued components. The QIA urges the NIRB to use stronger language to define watersheds as the minimum spatial unit particularly for valued components in the aquatic environment (for example, fish, water quality and quantity, among other components) at the local and regional study area scale. Migratory routes of fish species throughout their life cycle should also be considered when determining the spatial boundaries for aquatic species of interest.</p> <p>The QIA has previously raised concerns about impacts on aquatic-based valued components such as the potential impact on aquatic species (including arctic char) and Inuit fishing practices.</p> <p>Reference: QIA. 2022. <i>Re: QIA Screening Comments on Proposed Chidliak Diamond Mine Project (NIRB #22MN025)</i>. [NIRB Registry: 221006-22MN025-QIA Comments-IA2E.pdf].</p>
QIA Request	The QIA requests revising section 7.2.2.1 to include specific language around consideration of impacts on valued components related to the aquatic environment to use at watershed-scale spatial boundaries and migratory routes during the life cycle of aquatic species to define local and regional study areas.

Comment #	QIA 2023 Chidliak ISG #29
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i>.</p> <p>Section: 7.2.2.1 Spatial Boundaries</p> <p>Page: 29</p>
QIA Comment	The ISGs state “the local study area is that area inclusive of, and beyond the site study area, where there exists the reasonable potential for immediate impacts due to project activities from any phase of the proposed project, ongoing normal activities, or to possible abnormal operating conditions”.

	Elsewhere in the ISGs (such as in describing impact prediction on page 33), assessment of impacts includes “short and long-term direct, indirect, and induced”.
QIA Request	QIA requests that page 29 of the ISGs are revised from “immediate impacts” to “ direct, indirect, and induced impacts ”.

Comment #	QIA 2023 Chidliak ISG #30
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 7.2.2.1 Spatial Boundaries Page: 29
QIA Comment	Current first sentence of this paragraph states “The Impact Statement must contain a justification and rationale for all spatial boundaries and scales chosen.” QIA has seen instances in past NIRB assessments where there has been extensive issues with proponents making LSAs, in particular, artificially small, and as a result, underestimating potential effect distribution across the landscape.
QIA Request	QIA recommends NIRB change the above-noted sentence to ““The Impact Statement must contain a justification and rationale for all spatial boundaries and scales chosen, and provide evidence that they have consulted Inuit about these spatial boundaries and their appropriateness, and where Inuit have identified alternative spatial boundaries, provide a rationale for why they were not adopted. ”

Comment #	QIA 2023 Chidliak ISG #31
References	Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.’s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i> . Section: 7.3 Description of... Baseline Information and throughout Page: 31
QIA Comment	When referencing IQ in the ISGs, there is little guidance to the Proponent on the standard to use, or the approach. NIRB should offer assistance, particularly in the portions of the Review where IQ will play a significant role, like in describing long-term trends in baseline and trend-over-time (pre-Project condition setting) analysis.
QIA Request	QIA requests that the ISGs be revised throughout with more detail provided on portions of the Review where IQ will play a significant role, including Section 7.3.

Comment #	QIA 2023 Chidliak ISG #32
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References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i></p> <p>Section: 7.3 – Description of the Ecosystemic and Socio-Economic Environments and Baseline Information</p> <p>Page: 31</p>
QIA Comment	<p>In Section 7.3, NIRB identifies the need for baseline data to reflect sufficient time, depth, and geographic broadness of both temporal and spatial scale to adequately identify natural fluctuations and trends including cyclical and other recurrent phenomena. The QIA notes that this is a particularly important consideration when it comes to the baseline temporal scale for Baffin Island caribou, which exhibit an approximately 60-90 year population cycle. Currently, caribou are at the low point in this cycle, but Inuit note that their populations are beginning to increase again.</p> <p>There is historic western scientific data relevant to the proposed project area (e.g., aerial surveys, telemetry studies over a 48-year period from 1974-2022) and DeBeers has noted that they have collected 13 year of baseline data (though it is not known how much of this is specific to caribou). By comparison, Inuit Qaujimagatuqangit (IQ) is centered around Inuit oral history that has been passed down over centuries, and as such can provide a much more comprehensive time scale from which to draw baseline information on caribou. The preceding paragraph notes the importance of characterizing the baseline from an Inuit lens, not just a western scientific view, and the QIA believes that this must be explicitly reiterated in the context of considering long-term natural cyclical trends in caribou populations, habitat use, and behaviour.</p>
QIA Request	<p>The QIA requests that the NIRB revise the final paragraph in Section 7.3 to emphasize the importance of relying on IQ (not just western scientific data) to characterize long-term natural fluctuations and trends such as caribou population cycles. This can be done by adding the following statement between the first and second sentences: “Where well-supported long term western scientific data is lacking or there exists a reasonable degree of uncertainty, baseline data must be based primarily on Inuit Qaujimagatuqangit (IQ), particularly with reference to long-term natural fluctuations and trends that may not be sufficiently characterized by historic western scientific data and relatively short-term project-specific studies.”</p>

Comment #	QIA 2023 Chidliak ISG #33
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i></p> <p>Section: 7.4.1 Impact Prediction</p> <p>Page: 33</p>
QIA Comment	There is a simple typo with a missing word in the first sentence of 7.4.1.

QIA Request	QIA recommends NIRB revise this sentence to state “The Proponent shall assess the potential for short and long-term direct, indirect, induced, cumulative, and transboundary impacts of the proposed project on the biophysical and socio-economic environments, and the interactions between valued ecosystemic components and valued socio-economic components and the greater systems they are a part of.”
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Comment #	QIA 2023 Chidliak ISG #34
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i> . Section: 7.4.1 Impact Prediction Page: 33
QIA Comment	The first bullet under “Assessment of Impacts on Individual Valued Components” is an example where the term “used” in reference to the proponent’s “use” of IQ is not advisable, as noted in a previous comment. In addition, it is advisable to refer not only to IQ data but IQ analysis as well; the two are effectively inseparable from another and from Inuit IQ holders.
QIA Request	QIA recommends revising this first bullet to state “[bullet] Explain how scientific, engineering, and Inuit Qaujimajatuqangit data and analysis were integrated was used to inform the identification of impacts and determination of mitigation;”

Comment #	QIA 2023 Chidliak ISG #35
References	Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i> . Section: 7.4.1 Impact Prediction Page: 33
QIA Comment	The ISGs require the Proponent to include “differences and similarities in results from scientific, engineering, and Inuit Qaujimajatuqangit” in its assessment of impacts on individual VCs. IQ is a framework for interpretation that can be used by Inuit to analyze and frame western science and other approaches (e.g. impact assessment, social science). Requiring just a comparison between IQ and scientific/engineering findings is problematic and may exacerbate the ongoing tension and conflict between approaches as seen in other NIRB assessment processes. Rather, it is critical that the Proponent is required to identify how it reconciled any differences between western science and IQ or how they may support one another. See comment above on the precautionary principle as well.
QIA Request	QIA requests that the ISGs revise this sentence from “differences and similarities in results from scientific, engineering, and Inuit Qaujimajatuqangit” on page 33 to “ how IQ was used to inform, interpret, or guide the scientific and engineering results and where IQ was able to offer new or additional insights or results may not align in full, and where scientific and IQ findings differ, the Proponent will identify efforts it has made and

	mitigation, monitoring and accommodation measures it has adopted to reconcile these differences”.
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Comment #	QIA 2023 Chidliak ISG #36
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal</i> (NIRB File No. 22MN025).</p> <p>Page: 34</p> <p>Reference: Government of Canada (2023, January 27). <i>Net-Zero Emissions by 2050. Government of Canada.</i> https://www.canada.ca/en/services/environment/weather/climatechange/climate-plan/net-zero-emissions-2050.html.</p>
Comment	<p>The Draft IS Guideline states that the “Impact Statement shall include a discussion on global climate change and the Proponent must describe and assess, based on current knowledge, how potential climate change could affect Valued Components.” Additionally, it is stated that for each monitoring and mitigation plan, a description of measures taken to protect infrastructure from the effects of climate change is included. However, the majority of this document focuses on mitigating the effects of climate change and monitoring the impacts from climate change rather than describing how they will reduce their contribution to climate change.</p> <p>Since the Government of Canada has created a 2030 Emissions Reduction Plan which lays out a sector-by-sector plan for Canada to attain its emissions reduction target of 40% below 2005 levels by 2030 and net-zero emissions by 2050, there should be an emissions section added to the IS Guidelines that describes what the Proponent will do to reduce their emissions, to be in accordance with the Emissions Reduction Plan.</p>
Request	QIA requests that a bullet be added to 7.4.2.1 Climate Change to include an assessment of the Project’s emissions, including a discussion on how its contribution to the 203 Emissions Reduction Plan.

Comment #	QIA 2023 Chidliak ISG #37
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: 7.4.3 Cumulative Effects Assessment</p> <p>Page: 35</p>
QIA Comment	<p>Current text: “The Proponent shall identify and assess the project’s potential cumulative effects based on the components listed below.”</p> <p>QIA suggest that terminology focusing on the "project's potential cumulative effects" is not helpful to a full and proper cumulative effects assessment. The focus of any proper cumulative effects assessment should not be on the project’s cumulative effects alone, but on the total cumulative effects on each</p>

	valued component where the project will have an additive or synergistic contribution to those total effects.
QIA Request	QIA suggest a change of language to " The Proponent shall identify and assess the project's potential cumulative effects total cumulative effects on valued components subject to residual impacts from the Project based on the components listed below ".

Comment #	QIA 2023 Chidliak ISG #38
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal</i> (NIRB File No. 22MN025).</p> <p>Section: 7.4.3 Cumulative Effects Assessment</p> <p>Page: 35</p>
QIA Comment	<p>The ISGs state that a “cumulative effect (or impact) refers to the accumulation or addition of changes to the environment by...”. Synergistic effects are those that when they overlap, cause a greater impact than simple additive effects.</p> <p>The ISGs requires the Proponent consider human activities in a cumulative effects assessment but only provide example parameters of “past, existing, and proposed activities”. These examples should be requirements rather than examples that may be used. Elsewhere in the ISGs (e.g. page 39, bullet (i)), there is only reference to projects being considered as cumulative effects. Activities are critical, as projects may not include existing air travel, shipping, ground transportation, or other social, economic, or cultural activities that are not the direct result of a project.</p>
QIA Request	<p>QIA requests that the ISGs be revised to include the following revised definition at the top of Section 7.4.3: “A cumulative effect (or impact) refers to the accumulation or synergistic effects from the addition or interaction of changes to the environment...”.</p> <p>QIA requests that the ISGs take the following phrase out of parentheses and ensure the Proponent is required to consider “...all human activities, including past, existing, and proposed activities” (p.35).</p>

Comment #	QIA 2023 Chidliak ISG #39
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal</i> (NIRB File No. 22MN025).</p> <p>Section: 7.4.3 Cumulative Effects Assessment</p> <p>Page: 36</p>
QIA Comment	Under the heading Evaluation of significance, the ISGs states “: The Cumulative Effects Assessment shall identify and predict the likelihood and significance of potential cumulative effects, including direct, indirect, and residual impacts.” And “The Proponent shall consider and determine the significance of the cumulative effects using the criteria described in Section 7.4.6”

	However, it is unclear whether or not a standalone significance determination is needed when considering cumulative effects. QIA believes such a stand alone statement regarding impact significance should be completed
QIA Request	QIA requests that the ISGs be revised to explicitly state that a separate significance determination should be made for every biophysical and socio-economic components.

Comment #	QIA 2023 Chidliak ISG #40
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal</i> (NIRB File No. 22MN025).</p> <p>Section: 7.4.5 Indicators and Criteria</p> <p>Page: 37</p>
QIA Comment	<p>Consideration must be made for concerns around contamination that will likely drive avoidance by Inuit resource users from specific areas <i>and</i> resources. This must be weighted equally to the analysis that considers “sensitivity to contaminants and environmental pathways of exposure and bioaccumulation”.</p> <p>The ISGs does require information on “whether and how the Proponent adopted Inuit observational/sensory indicators into its assessment” of indicators and VCs, but more explicit requirements are needed to consider Inuit indicators of environmental impact and health. This is one way NIRB may better enhance consideration of IQ in this Review, by requiring the Proponent to work with Inuit to describe how Inuit are likely to measure or gauge their own level of trust in the environment in order to account for possible avoidance of Project impacted areas in assessing potential contaminants.</p> <p>The ISGs should offer more guidance on how to collect and use IQ to ensure good practice and the expectations of impacted Inuit communities are met.</p>
QIA Request	<p>QIA requests that the ISGs be revised to require the proponent to include “likelihood of Inuit to use or trust the area or resource” when developing indicators for valued components relevant to contaminant pathways and sensitivity analysis.</p> <p>The ISGs should also be revised to <i>require</i> that the Proponent “adopt IQ, including observational/sensory indicators, into the assessment, and/or where these are not included for individual VEC/VSECs, provide a supporting rationale” (p.37).</p>

Comment #	QIA 2023 Chidliak ISG #41
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). 63 pp.</p> <p>Section: 7.4.6 Significance Determination</p> <p>Page: 38</p>
QIA Comment	Section 7.4.6 lists the factors that, at a minimum, should be taken into consideration by the NIRB in determining the significance of each impact, and

	lists 11 elements, including a set of considerations under (k) describing the conditions that would lead to a finding of significant impacts. QIA requests that this list include any impacts that will reduce cultural use of a culturally significant area or value.
QIA Request	The QIA requests that the NIRB update the wording within section 7.4.6 (k) to add the following bullet point: “Have a measurable/observable negative effect on Inuit use of a culturally significant area or value.”

Comment #	QIA 2023 Chidliak ISG #42
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 7.4.6 Significance Determination Page: 39
QIA Comment	There is a bulleted sub-list of factors (K) where NIRB identifies “Impacts are to be considered significant if they are likely to/likely to be:” QIA understands the desire of NIRB to provide additional clarity on what makes effects significant. That said, the language of this list is in places problematic. Primarily, it suggests (with the second to last bullet's "and") that all of these criteria must be met for an impact to be considered significant. That is an extremely high bar for significance and we suspect was not NIRB’s intention for this to be an “all of the below must be in place for an impact to be consider significant” list. Significance typically is personified by a couple of factors (e.g., high magnitude, adverse, irreversible effects) but to require all of the listed criteria to be met is unrealistic. For example, damage to an important cultural site may be significant but would not occur at a broad spatial scale, one of the required bullets.
QIA Request	QIA recommends that NIRB identify that bullet "k" includes some characteristics that may suggest significance, but not this is neither a comprehensive nor mandatory list, and that the Proponent must establish a defensible set of significance criteria for consideration by the parties, and strongly suggest they include Inuit in both the criteria setting process and the conduct of significance determination for valued components where IQ is a critical input.

Comment #	QIA 2023 Chidliak ISG #43
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). 63 pp. Section: 7.4.7 Certainty Page: 39
QIA Comment	In section 7.4.7, the NIRB notes that the Proponent would be required to assess the amount of uncertainty related to the different effects of the project

	<p>and their significance. Specifically, the NIRB noted that “The level of certainty with predictions is related to limitations in the overall understanding of the ecosystem and limitations in accurately foreseeing future events or conditions.” (NIRB 2023; p. 45)</p> <p>The QIA has previously noted concerns related to the mining technologies proposed by De Beers that are untested in the Arctic environment and/or new to Baffin Island (QIA 2022). The NIRB did not specifically mention the uncertainty related to technologies that may be utilized during the lifetime of the project and their possible effects on valued components, which the QIA views as a crucial component in the impact assessment approach to evaluating certainty.</p> <p>Reference: QIA. 2022. <i>Re: QIA Screening Comments on Proposed Chidliak Diamond Mine Project (NIRB #22MN025)</i>. [NIRB Registry: 221006-22MN025-QIA Comments-IA2E.pdf]</p>
QIA Request	<p>The QIA requests that the NIRB update the wording within section 7.4.7 to state:</p> <p>“The level of certainty with predictions is related to limitations in the overall understanding of the ecosystem, limitations in the overall understanding of the use of the technology within the Arctic and/or Baffin Island, and limitations in accurately foreseeing future events or conditions.”</p>

Comment #	QIA 2023 Chidliak ISG #44
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i>.</p> <p>Section: 8.2. Socio-Economic Environment and Impact Assessment</p> <p>Page: 40</p>
QIA Comment	NIRB's current description does not explicitly state the Proponent should assess the impacts of the project's contracting opportunities.
QIA Request	Revised sentence should add the following “...employment and training and contracting opportunities shall be undertaken with a level of effort and expertise at least equivalent to that applied to the assessment of the ecosystemic values.”

Comment #	QIA 2023 Chidliak ISG #45
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025)</i>.</p> <p>Section: 10.0 Inuit Quajimajatuqangit and all references to IQ in the ISGs</p> <p>Page: 44</p> <p>Reference: ITK. (2018.) <i>National Inuit strategy on research: implementation plan</i>. ITK, Ottawa, Ont., Canada.</p>

QIA Comment	<p>NIRB should clarify that “issues related to the storage and ownership of Knowledge” (p.44) include Inuit ownership and storage. It is important that information is not publicized without agreement being obtained from Inuit to ensure IQ is being used respectfully. Ensuring Inuit access, ownership, and control over data and information gathered on population, wildlife, and environment is key to achieving Inuit self-determination in research (ITK, 2018).</p> <p>As per good practice, QIA notes that Inuit own their own data and, as such, any data must be repatriated (in other words returned) to Inuit for long-term storage. In this case, QIA is the RIA and DIO and will support Inuit communities in protecting this information.</p> <p>The NIRB ISGs also do not consistently use the term IQ throughout. References to “Inuit perspectives or observations” (p.34) or “types of knowledge collected and/or shared” (p.44) should be clarified if meaning is distinct from IQ. If NIRB is using these phrases and words as stand-ins for IQ, the term IQ is recommended to be used for greater clarity.</p> <p>QIA requests that IQ be better defined and applied throughout the ISGs to ensure it is clear to the Proponent and all parties that IQ is more than knowledge, but also a way of thinking (this is identified in NIRB’s definition of IQ) <i>AND</i> an interpretive framework. IQ can therefore be used both to inform (i.e., as a data source and source of comparative data alongside science) and to analyze (i.e., it can also be an interpretive frame for western science and impact analysis). QIA feels that there should be inclusion of how the science collected by the Proponent relating to project effects has been informed or influenced by IQ (by experts in IQ – i.e., knowledgeable Inuit recognized by their communities as such).</p>
QIA Request	<p>QIA requests that the bullet “Associated issues related to the storage and ownership of the Knowledge” be revised to “appropriate protocols acceptable to impacted Inuit communities for repatriation and long-term storage of IQ data, acknowledging that Inuit are the owners of this data”.</p> <p>The ISGs should also be revised to clarify use of IQ to require the Proponent to use the data as knowledge, a way of thinking, <i>and</i> an interpretive framework. This includes a framework to guide or enhance the scientific analysis and impact analyses. The meaningful consideration and application of IQ should also be emphasized, such that the Proponent will consider weighting the IQ equally to other knowledges (e.g. scientific, social scientific) and frameworks (e.g. legal, scientific, economic, etc.).</p> <p>While the ISGs do refer to the requirement of IQ verification with Inuit (both verification of the IQ itself and its application or interpretation in the assessment), this requirement needs to be added to this section as well.</p> <p>When the ISGs use a stand-in word or phrase for IQ, please replace with IQ throughout for greater clarity.</p>

Comment #	QIA 2023 Chidliak ISG #46
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: 10.0 – Inuit Qaujimajatuqangit</p> <p>Page: 44</p>
QIA Comment	<p>The QIA is concerned by the following direction provided in Section 10.0: “The Proponent shall explain how it treated and used Inuit Qaujimajatuqangit, used to address gaps in currently available scientific data, noting how variations in knowledge were considered and how discrepancies between two views was reconciled” (p. 44, emphasis added). This wording suggests that DeBeers should emphasize western scientific data and methodologies, using Inuit Qaujimajatuqangit to fill gaps where western scientific information is unavailable. The QIA notes that Inuit Qaujimajatuqangit <u>should not be secondary</u> to western science in the Impact Statement and this should be explicitly conveyed to the Proponent through the IS Guidelines.</p> <p>It is also important to note that “use” of IQ is limited to IQ holders themselves (it cannot be separated from the knowledge holders and dissected by holders of a different worldview), and terminology that suggests that Proponents can “use” it should be avoided.</p>
QIA Request	<p>The QIA requests that the NIRB revise the statement referenced above to read:</p> <p>“The Proponent shall explain how it treated and incorporated Inuit Qaujimajatuqangit, including as both a primary source of knowledge and to help address gaps in currently available scientific data....”</p>

Comment #	QIA 2023 Chidliak ISG #47
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: 11.1 Environmental Management Plan</p> <p>Page: 45</p>
QIA Comment	It is critical to show how the proponent has and plans to continue to engage Inuit in the development and implementation of all management and monitoring plans associated with the project.
QIA Request	<p>QIA recommends NIRB add the following sentence to the end of the second paragraph of this section:</p> <p>"The Proponent shall discuss how it engaged and will continue to engage Inuit in the development and implementation of its Environmental Management Plan."</p>

Comment #	QIA 2023 Chidliak ISG #48
References	<p>Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p>

	Section: 11.2 Environmental Protection Plan Page: 46
QIA Comment	It is critical to show how the proponent has and plans to continue to engage Inuit in the development and implementation of all management and monitoring plans associated with the project.
QIA Request	QIA recommends NIRB add the following sentence after the first sentence of the only paragraph in this section: "The Proponent shall discuss how it engaged and will continue to engage Inuit in the development and implementation of its Environmental Protection Plan."

Comment #	QIA 2023 Chidliak ISG #49
References	Document Name: Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) Issued May 2023 Section: 11.3 Monitoring and Mitigation Plans Pages: 46-48
QIA Comment	<p>On page 46 of the ISGs, a risk assessment is required for changes that may impair the implementation or effectiveness of proposed mitigation measures or management. Examples provided include the global economy and international markets, ownership transfer, and global pandemic. Other considerations should include possible changes in technology or engineering choices as proposed in the project description (e.g. size and capability of aircraft or ships, etc.) as these would have the potential to change the efficacy of mitigation measures.</p> <p>On page 46, the ISGs also state that "the Proponent is required to outline how results from monitoring and from continued engagement with communities and residents, Inuit, and other stakeholders will be used to refine or modify the design and implementation of mitigation measures and management plans". Consideration of other Projects operating in similar environments should also be considered in design of monitoring and mitigation plans.</p> <p>The ISGs state that the monitoring and mitigation plans shall include "evaluation of the efficiency of mitigation measures..." (p.47). The term should be effectiveness or efficacy of mitigation measures (i.e. the ability of the measure to produce the desired result). This step is extremely critical and should be emphasized.</p> <p>On the top of page 48 of the ISGs, "... all monitoring plans should be designed so that results from these programs can be coordinated with ongoing regional initiatives or programs with relevant government organizations, local organizations, or regional authorities". Coordination is important, but there also should be effort made to contribute to these programs as well.</p>
QIA Request	QIA requests that the ISGs be revised as follows: <ul style="list-style-type: none"> - Page 46 "The Proponent shall provide a risk assessment... possible changes to the technology or engineering design as proposed in

	<p>the project description (e.g. size and capability of aircraft, terrestrial vehicles, marine vessels, etc.)...</p> <ul style="list-style-type: none"> - Page 46 "... the Proponent is required to outline how results from monitoring, from continued engagement... , and lessons from other projects operating in similar environments will be used to refine or modify..." - Page 47 "evaluation of the effectiveness of mitigation measures including the degree of certainty of this evaluation..." - Last bullet on p. 47 should be revised to state "Discussion of how Inuit Qaujimajatuqangit, Indigenous Knowledge, scientific research, community, and regulator feedback informed the specific monitoring and mitigation plans and proposed actions. The Proponent shall discuss how it engaged and will continue to engage Inuit in the development and implementation of its monitoring and mitigation plans, and what IQ-informed and Inuit-led monitoring it is committed to in relation to the project." - Page 48 "... all monitoring plans... coordinated with and contribute to ongoing..."
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Comment #	QIA 2023 Chidliak ISG #50
References	<p>Document Name: Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) Issued May 2023</p> <p>Section: 11.3 Monitoring and Mitigation Plans</p> <p>Pages: 46-48</p>
QIA Comment	Currently, there is no discussion on the relation between the monitoring and mitigation plans and Closure.
QIA Request	<p>QIA recommends NIRB add the following bullet:</p> <p>"The Proponent shall discuss how its monitoring plans relate to and enhance its closure goals, objectives, criteria and final state."</p>

Comment #	QIA 2023 Chidliak ISG #51
References	<p>Document Name: Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) Issued May 2023</p> <p>Section: 11.3.1 Follow-up and Adaptive Management Plans</p> <p>Page: 48</p>
QIA Comment	<p>The NIRB Guidance addresses the importance of "Plans to involve Inuit and local communities in monitoring".</p> <p>QIA would also like to see more specific requirements for the Proponent's description of the ways local Inuit (and QIA) will be involved in adaptive management – including through the development of management objectives, indicators, thresholds (or triggers) and responses.</p>

QIA Request	The ISGs should be revised to require the Proponent to include Inuit involvement in developing the Proponent's follow-up and adaptive management plan, by adding this bullet to the list on page 48: "The ways QIA and Inuit will be involved in adaptive management planning and implementation, including through the development of management objectives, indicators, thresholds (or triggers) and responses" .
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Comment #	QIA 2023 Chidliak ISG #52
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 11.3.1 Follow-Up and Adaptive Management Plans Page: 48
QIA Comment	The list of information that should be included in the IS regarding the Proponent's follow-up and adaptive management plan should include specific operational mitigation measures, such as the requirement to reduce or stop exploration or production during particular timing windows or migratory periods based on identified thresholds.
QIA Request	QIA requests that the NIRB revise the final bullet point to state: "If applicable, identifications of tiers of triggers or thresholds that would result in increasing or varied adaptive management strategies, including the need for operational reductions or shutdowns during sensitive timing windows. "

Comment #	QIA 2023 Chidliak ISG #53
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 11.3.1 Follow-Up and Adaptive Management Plans Page: 48
QIA Comment	The list of information that should be included in the IS regarding the Proponent's follow-up and adaptive management plan omits terminology such as optimize and augment that are used elsewhere when discussing positive socio-economic benefits.
QIA Request	QIA requests that the NIRB revise the bullets to ensure it is clear, consistent and explicit that adaptive management applies to not only mitigation of adverse impacts but the optimization and augmentation of positive benefits.

	QIA 2023 Chidliak ISG #54
References	Document Name: Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) Issued May 2023 Section: 11.3.3 Socio-Economic Environmental Plans

	Page: 49
QIA Comment	QIA is increasingly concerned that major projects are not proactive in delivering training to Inuit or advertising contracting opportunities to Inuit Firms during the assessment phase. This can lead to a relatively high degree of employment, procurement and other benefits being lost from the Inuit and Nunavut economies. One primary cause of these losses is the lack of preparation completed by the Proponent before the project starts. For example, contracts are signed prior to properly investigating Inuit Firms' capacity or Inuit training is only delivered after construction starts, therefore exacerbating an inequity in the skill levels between local Inuit and a southern, Non-Inuit workforce.
QIA Request	QIA requests that the section add a requirement for the Proponent's plans, policies, and programs to discuss how it will mitigate against this issue of pre-construction preparation.

Comment #	QIA 2023 Chidliak ISG #55
References	Document Name: Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) Issued May 2023 Section: 11.4 Closure and Reclamation Plan Page: 49
QIA Comment	The ISGs state that the closure and reclamation plan include a "Discussion regarding re-establishing conditions that will permit the land to return to a similar pre-project land use". It is not clear that this desired condition state – "return to a similar pre-project land use" state, is the preference of Inuit. This section of the document should require the Proponent to show how it has and will engage with Inuit in the establishment of end state land use objectives.
QIA Request	QIA requests that the ISGs be revised to require the Proponent to show evidence that it has worked with Inuit – and will continue to work with Inuit – to establish end land use state preferences and criteria as part of preliminary Closure and Reclamation Planning.

Comment #	QIA 2023 Chidliak ISG #56
References	Document Name: Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) Issued May 2023 221006 - Chidliak NIRB Screening - QIA Comments Page: 65
QIA Comment	A major concern is employment. The proponent has stated the use of novel technology to allow for remote work, and a possible hub in Iqaluit. However, this means Inuit must continue to travel from their home community for work. It is also not clear if remote work means Inuit will be competing globally for jobs rather than competing with individuals within Canada. More detailed information is required on what is intended and what this means for Inuit employment to assess socio-economic impacts appropriately.

	In the correspondence sent by QIA to Cory Baker on October 6, 2022, titled Re: QIA Screening Comments on Proposed Chidliak Diamond Mine Project, it was stated that “The Proponent has identified that there is a low population and low percentage of skilled tradespersons available in the north to draw upon to work in the proposed mine (p.39) and the use of SmartMine technology appears to allow workers to stay home and work in mining activities.” It is known that remote mining technology is employed to lessen the need for migrant workers, but neither the technology nor its application are understood by the members of the affected communities, and "De Beers provides no details on workforce needs compared to the existing population of communities closest to the proposed site."
QIA Request	Due to the lack of information surrounding employment and the remote workforce, the Impact Statement should include this information as a specific bullet in section 6.5. The proponent shall consider the implications and applicability of using remote SmartMine technology in the Qikiqtani Region and discuss its training initiatives to ensure Inuit are employable with this technology.

Comment #	QIA 2023 Chidliak ISG #57
References	Document Name: Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) Issued May 2023 Appendix A
QIA Comment	There are several reference errors throughout the tables in the appendix.
QIA Request	The revised Impact Statement Guidelines should include updated references.

QIA Review Comments on draft Scope of the Project for the Chidliak Mine

Comment #	Draft Scope of the Project #1
References	Document Name: 230512-22MN025-Draft Scope List-FT4E Page: 2
QIA Comment	<p>It is stated as part of section 1 in the draft scope list that “The assessment of the potential for ecosystemic and socio-economic impacts to result from the proposed project components and activities as outlined in the section above will be inclusive of the factors listed below”. The list stated under this statement includes Climate, Noise, Terrestrial Environment etc. However, the impacts of Dust related to the project are not listed.</p> <p>Dust generated from mining operations can have significant impacts on the environment, human health and surrounding communities. Therefore, it is important to be considered as an impact to result from this proposed project.</p> <p>Dust has been a large concern from communities within other projects, including the Mary River Project, and specific adaptive management objectives, indicators, thresholds and responses have had to be created.</p>

	Therefore, even though Air Quality is stated as an impact, the Dust impacts resulting from the proposed may be of concern and should be added to the list of ecosystemic impacts in section 1.
QIA Request	Dust be included in the list present in section 1 that contains the ecosystemic impacts to result from the proposed project components and activities since it has been seen to be a large concern in previous projects.

Comment #	Draft Scope of the Project #2
References	Document Name: 230512-22MN025-Draft Scope List-FT4E Page: 5
QIA Comment	<p>In section six (6), it is stated in the Draft Scope List that “The scope of the assessment will include any closure and reclamation plans to ensure that issues associated with the effective closure and reclamation of all Project components are considered at the earliest possible stage in the development process, thereby influencing design to take into account environmental issues related to closure and reclamation.”. Additionally, it is stated that this must include “Care and Maintenance”, and “Closure and Reclamation”.</p> <p>Restoring ecosystemic integrity after a project closure is important to protect the environment, support sustainable development, mitigate climate change, conserve biodiversity, and enhance human well-being. Therefore, the closure and reclamation plan for the project should be expanded upon to include other important steps, including:</p> <ol style="list-style-type: none"> 1. Restoration plan specifically to restore ecosystem integrity 2. Plan to remove or remediate contaminants 3. Ecosystem rehabilitation plan 4. Monitoring program to track progress 5. Long-term management and maintenance plan 6. Plan for stakeholder engagement
QIA Request	To expand upon section six (6) to include other important steps in the reclamation and closure plans. Including a restoration plan to restore ecosystem integrity, a plan to remove or remediate contaminants, ecosystem rehabilitation, a monitoring program to track the progress, a long-term management and maintenance plan, and stakeholder engagement. The proponent has expressed that the project plan includes strategic mining of kimberlite pipes, with processing plant and other infrastructure which will be moved based on the pipe mined at the time. There is a strong need for a detailed progressive reclamation plan as the project equipment shifts from one site to the next.

Comment #	Draft Scope of the Project #3
References	Document Name: 230512-22MN025-Draft Scope List-FT4E Page: NA

QIA Comment	<p>The Draft Scope List document states that the assessment of impacts to each valued component will “draw upon relevant information from scientific sources, Inuit Qaujimaningit, traditional and community knowledge.”. Additionally, it is stated that the scope of the assessment will include “all nonconfidential details pertaining to any Inuit Impact and Benefit Agreement”. However, there is no mention of incorporating the engagement of stakeholders in any of the sections in the Draft Scope List.</p> <p>Incorporating the engagement of stakeholders is key to the success of this Project. Therefore, the methodology surrounding engagement and the incorporation of the information collected should be included.</p>
QIA Request	To create a section in the Draft Scope List discussing engagement with stakeholders and the incorporation of the data collected or to incorporate this into the other sections more frequently.