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Qikiqtani Inuit Association

ᑭᑭᑭᑭᑭᑭᑭᑭ P.O. Box 1340
ᑭᑭᑭᑭᑭᑭᑭᑭ Iqaluit, Nunavut
X0A 0H0

July 17, 2023

Cory Barker
Technical Advisor III
Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik)
Cambridge Bay, Nunavut
Sent via email to: info@nirb.ca

Re: Draft Scope and Draft Impact Statement Guidelines for De Beers Canada Inc's "Chidliak Diamond Mine" Project Proposal (NIRB File No.22MN025)

Cory Barker and the Nunavut Impact Review Board,

The Qikiqtani Inuit Association is providing this letter of comments as part of the Nunavut Impact Review Board (NIRB) screening process for DeBeers Canada Inc.'s Chidliak Diamond Mine (Chidliak or the Project) proposed for the Southern Qikiqtani region. We have reviewed the available materials and have provided several comments for consideration and incorporation into the revised Impact Statement Guidelines.

QIA has provided comments which will aid the NIRB and Proponent in developing guidelines, and impact statement, respectively, to ensure a robust review process and to provide the information and discussion required to ensure fulsome participation in that process. Through the identification of clear gaps or areas for further concept development, the resulting revised documentation should provide for a clear and straightforward review process. Through the draft Impact Statement Guidelines, NIRB has provided a good and updated basis on which to build.

In our review, there emerged several overarching themes requiring attention. There was limited information regarding engagement with communities and the Designated Inuit Organizations (DIOs). QIA has identified several suggested approaches in remedying this issue. There is also a lack of detail and clarity on incorporation and storage of Inuit Qaujimajatuqangit (IQ) and local knowledge. The incorporation of IQ is critical in ensuring Inuit input and knowledge is adequately and properly incorporated into the project at the design level, and not as an afterthought when modifying or amending mitigation, monitoring, and management plans. QIA has provided several comments to aid in addressing these issues in the revised Impact Statement Guidelines.

QIA has identified that there was a lack of information surrounding employment and the remote workforce. While novel approaches to Inuit benefits and employment are generally welcomed for discussion, there is a significant concern surrounding the proponent's MineSmart approach and remote work, and what this means for Inuit employment opportunities at the project.

QIA would like to highlight to NIRB that significant and meaningful work was done between QIA and Baffinland Iron Mines Corp., with our work developing Adaptive Management principles in the Inuit

Certainty Agreement, regarding the Precautionary Principle. Noting that the NIRB is relying on the United Nations definition from 1992, a more appropriate definition was developed between Inuit and industry which should apply to this and future projects in the Nunavut Settlement Area. The definition is as follows:

“When an activity raises threats of harm to environmental, sociocultural, and economic wellbeing and resilience, precautionary measures and preventative action should be taken using a systems approach, even if some cause and effect relationships are not fully established.”

This definition is indicative of a proponent committed to operating in a responsible manner incorporating IQ, western science with recognition that regulatory requirements provide a basis for planning, and can be exceeded.

The above-mentioned concerns, and our more detailed submission can be found in the accompanying document. As a Designated Inuit Organization for the Chidliak Project, QIA looks forward to future opportunities to continue to provide input to the Impact Assessment and Public Review process to ensure that Inuit rights and interests are protected and promoted.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jared Ottenhof', with a stylized, cursive script.

Jared Ottenhof
Director, Lands and Resource Management