



## Comments on the *Draft Scope* and *Draft Impact Statement Guidelines*

### *Draft Scope*

Section	Organization	Comment	Action	Justification
Section 1	QIA	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	Edit made	
Section 6	QIA	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.	No edits made	The Details related to this request are within section 6.1 Project Design.3.1 Detailed Project Description, section 6.3.2 Project Phases, and section 11 Environmental Management System of the <i>Revised Draft Impact Statement Guidelines</i> .

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n/a	QIA	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	No Edits Made	The NIRB was in Iqaluit, Kimmirut, and Pangnirtung June 3 to 8, 2023, and feedback received through that process is presented in Public Scoping and IS Guideline Meetings Summary Report released July 25, 2023. The NIRB also received comments from the QIA, Pangnirtung Hunters and Trappers Organization, and the Hamlet of Clyde River.  Expectations on how Inuit Qaujimagatuqangit and Public Engagement are included in the <i>Revised Draft Impact Statement Guidelines</i>
Project Summary	De Beers	The Chidliak Project (the Project) is 120 northeast of Iqaluit. The scope document incorrectly states that it is northwest of Iqaluit.	Edits made	Noted the clarification between the documents the NIRB has received.
Project Components	De Beers	Fuel storage, water use, and waste volumes are not yet finalized, and will not be finalized until later stages of the process.	No Edits Made	The NIRB is using the information supplied by De Beers in its Project Proposal as maximums (scoped as up to XX) that would be required for the proposed project. this maximum number in Impact Assessment allows flexibility for the Proponent in its assessment.
		The Project will also include Processed Kimberlite storage facilities which may include co-disposal with mine rock.	No Edits Made	The NIRB is using the information supplied by De Beers in its Project Proposal as the scope of the proposed project and does not prescribe or limit how the proponent plans and develops a project.
		In addition to the rotary and fixed wing aircraft, airships remain a potential option for transport of materials to the site.	Edits Made	

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		Quarries and borrow pits will be developed as needed close to the locations where the material is required for placement and not necessarily very close to the ore bodies as stated in the scope document. Quarry and borrow pit locations have not yet been determined.	No Edit Made	When the NIRB is scoping, it is creating a list of activities that make up a project or the physical works and/or the undertaking or carrying out of a physical activity that involves the use of the land, waters, or other resources. The list of activities is how the NIRB creates the guidelines or the instructions on what the proponent use as a basis to draft their Impact Statement.
		Please strike the word 'all' from the phrase 'removal of all buildings, equipment, and infrastructure'. Some components will remain on the site in the post-closure environment including the landfill, and the mine rock and processed kimberlite storage facilities. There is also potential for other infrastructure such as the transmission line or buildings to remain, depending on community needs, business opportunities and interests at the time of closure.	Edits made	The NIRB has made several edits to the <i>draft</i> Scope in order to clarify where items may be left in place and/or relocated through the reclamation phase at the end of the project.
		The site power options also include wind resources, solar, hydrogen fuel cells, biofuels, and gas and are not limited to a transmission line, small modular nuclear reactor, or diesel generators as currently listed within the scope document.	Edits made	Edits were made in the Revised <i>Draft</i> Scope and will be carried into the Revised <i>Draft</i> Impact Statement Guidelines as appropriate.
k.i.) Terrestrial wildlife and wildlife habitat	De Beers	NIRB lists species that NIRB indicates are representative terrestrial mammals including caribou, muskoxen, wolverine, grizzly bears, polar bears, wolves, and other species. Muskoxen, wolverine, and grizzly bears either do not occur or are rare and not considered representative of terrestrial mammals on Baffin	No Edit Made	Discuss at Guidelines Workshop

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		Island at this time. De Beers does not believe that they should be identified as valued ecosystem components for this Project and therefore we request more flexible language to enable selection of representative terrestrial mammals based on scientific knowledge and Inuit Qaujimaningit.		
iii seabirds	De Beers	The Project is in the interior of the Hall Peninsula and is not overlapping with any marine or coastal area. It is therefore not appropriate to specifically require assessment of seabirds in the guidelines. We suggest that reference to seabirds are removed from the Scope of the Assessment.	No Edits Made	As the Proponent has indicated that an option for the project proposal is to bring materials in by barge, therefore, seabird and other sea mammals would be required as part of the Scope.
m. marine environment	De Beers	The Project is located in the interior and is not overlapping with any marine or coastal area. Diamonds are very small, and will be removed via air transport from site. There is no ice-breaking or heavy shipping required. Supplies required for construction of mine infrastructure can be transported through regular sea lift to Iqaluit's port similarly to any other construction project within Iqaluit. It is therefore not appropriate to specifically require assessment of marine ecology, marine water and sediment quality, marine biota including fish, and benthic flora and fauna, or marine habitat in the guidelines. We request that reference to these marine components are removed from the Scope of the Assessment due to lack of clear linkage to the Project.	No Edits Made	As in the previous response, as De Beers is retaining an option of bringing materials to site via barge to a site near the proposal and transported in via air or road this is something that would be retained in the scope.

<b>Section</b>	<b>Organization</b>	<b>Comment</b>	<b>Action</b>	<b>Justification</b>
n. marine wildlife	De Beers	As described above, there is no marine component to the Project. It is therefore not appropriate to specifically require assessment of marine wildlife in the guidelines. Species that occur both on land and on the ocean d	No Edits Made	See Previous Responses
o. Terrestrial and marine Species at Risk	De Beers	As described above, there is no marine component to the Project. We therefore suggest that the reference to ‘Terrestrial and marine species at risk’ is changed to ‘Terrestrial species at risk’. Species that use terrestrial habitats during part of their lifecycle and marine habitats at other times will be addressed.	No Edits Made	See Previous Responses
r. Non-traditional land use and resource use	De Beers	To assist De Beers is fully addressing the guidelines, could NIRB explain what types of activities are included in the category of ‘non-traditional land use and resource use’?	No Edits Made	Non-traditional land use and resource use are activities on the land that happen for reasons other than traditional uses. This can include non-traditional hunting, fishing, outfitting, and guiding.
t. Health and well being	De Beers	To assist De Beers is fully addressing the guidelines, could NIRB explain how ‘family and community cohesion’ be considered separately from ‘individual and community wellness’? Are both of these terms required in the guideline or could family and community cohesion perhaps be considered as part of individual and community wellness?	No Edits Made	This information is further described in the Impact Statement Guidelines
4 Steps which the Proponent proposes to take to optimize benefits of the Project, with specific consideration being given to expressed community and	De Beers	benefits of the Project, NIRB lists both ‘health benefits’ and ‘human health and well-being’ as items to be described by the Proponent. Could the NIRB describe how these two items differ from each other? If there is no substantial difference, we suggest that for the purpose of clarity, brevity, and interpretability of the Impact Statement, only one of these items should be listed in the Guidelines.	No Edits Made	This information is further described in the Impact Statement Guidelines

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<p>regional preferences as to benefits. The scope of the assessment will include steps that the Proponent proposes to take to optimize benefits of the project, and should include, but not be limited to:</p> <p>b. Health benefits</p>				
<p>10. Any other relevant information or matters</p> <p>a. Technical innovations previously untested in the Arctic including new technology for port and road design and operations</p>	De Beers	<p>The NIRB has indicated that the scope of the assessment will include matters NIRB considers relevant such as “new technology for port and road design and operations”. De Beers is not planning to construct a port and will be minimizing the use of roads. De Beers suggests that point 10a. may be more relevant if it was re-stated as “technical innovations previously untested in the Arctic” without specific reference to ports and roads.</p>	Edits Made	<p>As De Beers is proposing a landing area for sea vessels for shipment of materials to site, the item would still be retained. The NIRB has updated the section to include other technologies that De Beers is proposing for the project.</p>
<p>d. Significant effects analysis</p>	De Beers	<p>The NIRB has indicated that the scope of the assessment will include matters NIRB considers relevant such as “significant effects analysis”. De Beers believes that the NIRB is referring to the process of conducting an effects analysis to determine significance, not that the effects analysis itself would be ‘significant’. De Beers suggests that the wording should change to ‘Effects analysis to</p>	No Edit Made	<p>This topic is further discussed in the Impact Statement.</p>

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		determine significance’ or ‘Determination of significance’.		
Quantity of Fuel Storage, Water Use and Grey Water Generated	CIRNAC	CIRNAC recommends that the Board rephrase the wording in the Draft Scope List to reflect that the quantities for fuel storage, water use and grey water generated could increase or decrease when the Proponent submits their Impact Statement.	No Edit Made	As noted to De Beers, the NIRB is using the information supplied by De Beers in its Project Proposal as maximums that would be required by the proposed project and this allows flexibility for the Proponent in its assessment
Hazardous Materials and Progressive Reclamation	CIRNAC	CIRNAC recommends that the Proponent: a) Provide further information on how long and where hazardous material will be stored prior to removal from site or whether a landfarm would be constructed for onsite remediation. b) Clarify if the site would be progressively reclaimed as kimberlites are mined and modular facilities move from one location to another.	No Edit Made	The Details related to this request are within section 6.1 Project Design.3.1 Detailed Project Description, section 6.3.2 Project Phases, and section 11 Environmental Management System of the <i>Revised Draft</i> Impact Statement Guidelines.
Project Components	CIRNAC	CIRNAC recommends that additional detail regarding project components, as indicated in the project proposal, be added to the Draft Scope List.	Edits made	The NIRB has made several edits to the draft scope in order to clarify where items may be left in place and/or relocated.
Project Location	ECCC	ECCC requests that the location of the proposed Project be updated to state “120 km <b>northeast</b> of Iqaluit”.	Edit made	
Project Components – Transmission Line	ECCC	ECCC recommends that the scope of the Project include details of the transmission line, including where the transmission line will be connecting to and where the power will be coming from.	Edit made	

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Characterization of Waste Rock/Borrow Materials	ECCC	ECCC recommends Part e of Anticipated ecosystemic and socio-economic impacts of the Project be revised to “Geological features including discussion of geology, geochemistry and characterization of waste rock and borrow materials”.	Edit Made	
Groundwater Quality and Quantity	ECCC	ECCC recommends item (g) of Part 1 of Scope of the Assessment be revised to include groundwater quantity and quality as follows: “g. Hydrogeology and groundwater, <b>including groundwater quantity and quality</b> ”.	Edit made	
Species at Risk	ECCC	ECCC recommends item (o) of the Scope of the Assessment include avian Species at Risk.	Edit made	
Naturally Occurring Radioactive Materials (NORMs)	ECCC	ECCC recommends the effects of NORMs generated/released by the Project on the environment be included in the Scope of Assessment	Edit made	Edits made to clarify geology; however, the information requested will be included in the Impact Statement Guidelines and/or the geochemical analysis the proponent would undertake as part of the development of the project proposal.
Western scientific sources	ECCC	ECCC recommends the term “scientific sources” in the Scope of the Assessment be updated to “Western scientific sources	No Edit Made	The NIRB uses the term scientific sources as scientific information and defines Inuit Qaujimaningit as well as Traditional Knowledge and Community Knowledge.
Water Quality and Quantity	ECCC-08	ECCC recommends that the Impact Statement Guidelines incorporate specific requirements in relation to water quality and quantity for the following topics and any other relevant topics: <ul style="list-style-type: none"> <li>• effects on surface and groundwater quality and quantity</li> <li>• groundwater-surface water interactions and effects</li> <li>• contaminant sources and pathways</li> <li>• acid rock drainage and metal leaching</li> </ul>	Edits Made	Edits were made to the <i>draft</i> scope and <i>draft</i> IS Guidelines where appropriate.

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		<ul style="list-style-type: none"> <li>• water quality and quantity modeling and estimates (water and mass balances)</li> <li>• water and waste management and treatment</li> <li>• project discharges (including seepage, overflow and runoff)</li> <li>• mitigation measures</li> <li>• monitoring programs</li> <li>• contingency plans</li> </ul>		
Draft Scope – General Comment	DFO	This comment is intended as guidance for the proponent and not as a direct comment on the Draft Scope.	No Edit Made	The NIRB acknowledges the information.
Draft Scope – Decommissioning of winter and all-season roads	DFO	DFO recommends bullet point be modified as follows: “Access to site by fixed wing aircraft, as well as potentially by All-Weather Access Road or Winter Road and associated construction, use, and decommissioning, including the construction, maintenance and decommissioning of bridges and culverts, as well as the rehabilitation of streams”.	Edits made	
Draft Scope List – Water Use and withdrawal	DFO	<p>DFO recommends clarity be provided in the Draft Scope regarding water use (i.e., if water use is proposed only for drinking in the accommodations or also for operational needs) and water withdrawal rates (i.e., if it is 10,000 m<sup>3</sup>/day for each waterbody or combined).</p> <p>DFO recommends bullet point be modified as follows “Up to 10,000 m<sup>3</sup>/day withdrawn <b>each/combined</b> from Qamaniruluk Y Lake, Qamanialuk Lake, Sunrise Lake, Glacier Lake, McKeand River and other waterbodies, <b>not</b></p>	Edit made where applicable	Edit made for the first comment, but the second comment no edits were made as this was not part of the proponent’s application.

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		<b>exceeding 10% of the available water volume, or 10% of the watercourse instantaneous flow</b>		
Draft Scope – Sea Lift	DFO	DFO recommends the construction of a staging area and the use of a sea lift for material transport be included in the Draft Scope.	Edit made	
Draft Scope – Wording under <i>Fisheries Act</i>	DFO	DFO recommends Items 1) i-iv and m-v be updated to “All fisheries as defined in the <i>Fisheries Act</i> ”.	Edits made	
Draft Scope – Representative fish	DFO	DFO recommends item 1) i-ii be updated to “Aquatic biota including fish as defined by the <i>Fisheries Act</i> , [...]”	Edits made	
Draft Scope – Mitigation Measures	DFO	DFO recommends item h. be removed.	Edit made	
Draft Scope – <i>Fisheries Act</i> Authorization Requirements	DFO	DFO recommends wording in the table be updated to “Authorization pursuant to paragraphs 34.4(2)(b) and 35(2)(b) of the <i>Fisheries Act</i> ” If Species at Risk may be present, then the following should be added: “Permit pursuant to sections 32, 33 and subsection 58(1) of the <i>Species at Risk Act</i> ”.	Edit made	
Legislation in Draft Scope List	TC	Current text: Navigable Waters Approval(s) and/or Exemption(s) and Oil Pollution Prevention/Emergency Plan as per the <i>Canada Shipping Act</i> , Approval under the <i>Navigation Protection Act</i> Replace with: Approval under the <i>Canadian Navigable Waters Act</i> . Consultation in accordance with Canadian Aviation Regulation 307.	Edit made	

*Draft Impact Statement Guidelines*

<b>Section</b>	<b>Organization</b>	<b>Comment</b>	<b>Action</b>	<b>Justification</b>
Definitions and Terms Local Study Area	QIA 2023 Chidliak ISG #1	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.” In addition, NIRB should consider removing all references to “immediate impacts”, including but not limited to p.29 of the ISG [Impact Statement Guidelines], for the same reason.	No Edits Made	No Edits were made in the Revised Draft IS Guidelines; however, the comment is being considered in the NIRB’s Standardized Guidelines Development
Definitions and Terms Reasonably Foreseeable Future Development	QIA 2023 Chidliak ISG #2	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.	No edit	Edits made to Phased Development section of the IS Guidelines and the Scope as appropriate
Definitions and Terms Scoping	QIA 2023 Chidliak ISG #3	QIA recommends the removal of the word “significant” from the “scoping” definition.	No Edit Made	The NIRB acknowledges the comment and will address it in the Standardized Guidelines process
Definitions and Terms Well-being	QIA 2023 Chidliak ISG #4	QIA recommends adding “Inuit food harvesting” and “Inuit food security/food sovereignty” to the list of bullets for well-being.	Edit made	
1.3 – Precautionary Principle; also Section 10.0	QIA 2023 Chidliak ISG #5	The QIA recommends that NIRB add the following text to the end of Section 10.0. <b>“For instances where there are variations in knowledge between IQ and western scientific</b>	Edit made	Edits made where appropriate and as required.

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		<b>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.”</b>		
2.0 Preparation and Review of the Impact Statement	QIA 2023 Chidliak ISG #6	QIA recommends all references to "use" of IQ be changed to "incorporation" or similar language.	Edits made	Edits were made where appropriate and to improve readability of the document.
2.1 The Study Strategy and Methodology	QIA 2023 Chidliak ISG #7	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	No Edit Made	The NIRB acknowledges the comment and will address the comment in the NIRB’s Standardized Guidelines process
2.1 The Study Strategy and Methodology	QIA 2023 Chidliak ISG #8	QIA suggests revision to “The Impact Statement shall identify any valued components requested by parties that the Proponent chooses not to adopt, <b>...and provide a supporting rationale for not including said valued components</b> , as well as any differences in conclusions of potential impacts (including significance determination). <b>NIRB shall review the rationale and make a determination as to appropriateness of inclusion of the valued component(s) not accepted by the proponent...</b> ”	Edits made	Suggested edits were incorporated into the text as the NIRB was able.
2.1.1 Acquisition Methodology and Data Analysis	QIA 2023 Chidliak ISG #9	QIA recommends adding an additional sentence after the above to the effect of:	Edits made	Emphasis in text was incorporated into the text

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		<b>“The Proponent is expected to do so in consultation with impacted Inuit parties and show evidence of these efforts.”</b>		
2.1.2 Documentation	QIA 2023 Chidliak ISG #10	Recommended additional sentence: <b>“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”.</b>	Edits made	
2.1.3 Use of Existing Information	QIA 2023 Chidliak ISG #11	An additional sentence is recommended at the end of the only paragraph in section 2.1.3: <b>“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.”</b>	No Edit Made	As this comment is outside of the NIRB’s jurisdiction, the comment was not incorporated. However, QIA has made other editorial suggestions that were incorporated into the document.
4.1 Executive Summary	QIA 2023 Chidliak ISG #12	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”.	Edits made	Clarification was made within the section indicated
4.1 Executive Summary	QIA 2023 Chidliak ISG #13	QIA recommends NIRB consider adding <b>“proposed aircraft flight routes where Project-related low-level flying is a possibility”</b> to the list of mapping requirements.	Edit made	

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5.5 Regional Context	QIA 2023 Chidliak ISG #14	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. NIRB is requested to clarify what it considers to be a "future land use plan". QIA's recommendation for this is identified above	Edits made	Clarification made in the document.
6.1 Project Design	QIA 2023 Chidliak ISG #15	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"> <li>• “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; <b>with specific reference to the context of cumulative impacts in the Qikiqtaaluk region.</b>” (p. 21)</li> <li>• “A discussion of how potential effects to humans (e.g., social, economic, and well-being) and communities have influenced the proposed project design to <b>protect and minimize adverse effects, especially in the context of the project location...</b>”</li> <li>• “A discussion of how potential impacts to <b>aquatic, marine, and terrestrial</b> wildlife (e.g., caribou, Polar bears, Peregrine falcons, belugas, etc.) have influenced the design of the proposed project especially indicating methods to <b>avoid and</b> minimize impacts to <b>aquatic, marine, and terrestrial</b> wildlife, including the geographical location of project components...”</li> </ul>	Edits made	Edits were made as appropriate

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		<ul style="list-style-type: none"> <li>• “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 <b>fish and wildlife</b> and quarrying of soapstone.”</li> </ul>		
6.2 Project Purpose, Need, and Alternatives	QIA 2023 Chidliak ISG #16	At the end of the final paragraph of this section, NIRB should consider providing an additional sentence indicating that " <b>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.</b> "	Edit made	The suggestion was incorporated throughout the document based on other comments and/or suggestions made by QIA.
6.2 Project Purpose, Need, and Alternatives	QIA 2023 Chidliak ISG #17	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	Edits made	
6.2.1 Alternatives	QIA 2023 Chidliak ISG #18	<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"> <li>• “The requirements of Section 7.4.3 of this document, specifically the consideration for cumulative impacts on the <b>terrestrial, aquatic, and</b> marine ecosystem and on traditional harvesting activities and whether each alternative has considered the vulnerability of the Arctic ecosystem” (23 p.)</li> <li>• “<b>The application of the precautionary principle, as outlined in section 1.3, including consideration of uncertainty and potential for adverse impacts</b>”.</li> </ul>	Edits made	

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		The QIA requests that the NIRB add a sub-bullet under the first bullet “The socio-economic impacts for each alternative”		
6.2.1 - Alternatives	QIA 2023 Chidliak ISG #19	<p>The QIA recommends that NIRB make the following addition (bolded) to Section 6.2.1:  “<b>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 if 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.</b> The proponent must include....</p> <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</p>	Edits made	Edits have been made in the document where appropriate and the NIRB includes information in the section on the process when a change to preferred alternatives occur.

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		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.		
6.2.1 Alternatives	QIA 2023 Chidliak ISG #20	The QIA requests the NIRB update the language provided in section 6.1 to state: “The preferred alternative means should be based on the consideration of biological, ecological, <b>atmospheric environment</b> , physical, health, social, economic, well-being, and cultural impacts, the technical feasibility and economic viability and the best available technology.”	No Edit Made	Atmospheric environment has been included in the Scope for the assessment and is considered a part of the biophysical, ecological environments.
6.2 Project Purpose, Need, and Alternatives	QIA 2023 Chidliak ISG #21	As the final bullet of this list at pg. 23, QIA recommends NIRB add “[bullet] <b>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.”</b>	Edit made	The NIRB incorporated the suggestion in the section and in previous sections as requested.
6.3 Scope of the Project; 7.2.2.1 Spatial Boundaries	QIA 2023 Chidliak ISG #22	QIA requests that NIRB revise sections 6.3 and 7.2.2.1 to clarify that the Proponent shall 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.	Edits made	
6.5 Economic and Employment Information	IA 2023 Chidliak ISG #23	Include a bullet “ <b>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.</b> ”	No Edit Made	Information is currently requested in the section

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7.1 Factors to be considered in the Impact Assessment	QIA 2023 Chidliak ISG #24	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.	No Edit Made	The list included here is from NuPPAA s. 103 and the NIRB is unable to consider text for this section. Suggested edits will be considered in other sections of the document and in the NIRB's process to finalize its Standard Guidelines.
7.1 Factors to be considered in the Impact Assessment	QIA 2023 Chidliak ISG #25	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: <b>“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)”</b>	No Edit Made	Edits were not made to the suggested section but to the Revised Draft Scope list section 10 and will be considered in the revision of the document.
7.2.1 Valued Ecosystemic and Socio-Economic Components	QIA 2023 Chidliak ISG #26	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 <b>are important</b> and the reasons why, in terms of biophysical, social, economic, health, cultural, archaeological, recreational, tourism, aesthetic or other considerations."	Edit made	
7.2.1 – Valued Ecosystemic and Socio-Economic Components, and 7.4.3 Cumulative	QIA 2023 Chidliak ISG #27	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,	No Edit Made	It is unclear from the question what QIA is requesting as the NIRB has been developing a Scope with this Document. The NIRB will seek clarification at the Guidelines workshop if this remains an outstanding issue.

Section	Organization	Comment	Action	Justification
Effects Assessment		culture, and identity). See list of questions above for specific consideration and integration into the ISG.		
7.2.2.1 Spatial Boundaries	QIA 2023 Chidliak ISG #28	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.	No Edit Made	This request is prescriptive and the IS Guidelines are not meant to prescribe to the proponent how to do their assessment but provide information on how to select the appropriate areas for an assessment through engagement and consultation of the public and users of the resource.
7.2.2.1 Spatial Boundaries	QIA 2023 Chidliak ISG #29	QIA requests that page 29 of the ISGs are revised from “immediate impacts” to “ <b>direct, indirect, and induced</b> impact	No edit made. Discussion at guidelines workshop will determine change	This edit is similar to the request in QIA 1 with a definition. The NIRB will not be including the edit at this time and will include this with the consideration of the development of NIRB’s Standardized Guidelines.
7.2.2.1 Spatial Boundaries	QIA 2023 Chidliak ISG #30	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, <b>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.</b>	Edit made	
7.3 Description of... Baseline Information and throughout	QIA 2023 Chidliak ISG #31	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 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.	No Edit Made	As previous comments from the QIA have been incorporated into the revised Draft the NIRB and it is not clear on what is be requested here. Specific items can be discussed at the Guidelines workshop before the finalization of the document. Further, QIA made suggestions later in their comments which have been incorporated into the document where applicable and further discussion can occur at the IS Guidelines Workshop.

Section	Organization	Comment	Action	Justification
7.3 – Description of the Ecosystemic and Socio-Economic Environments and Baseline Information	QIA 2023 Chidliak ISG #32	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: <b>“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.”</b>	Edits made	Edits made as appropriate
7.4.1 Impact Prediction	QIA 2023 Chidliak ISG #33	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.”	Edit made	
7.4.1 Impact Prediction	QIA 2023 Chidliak ISG #34	QIA recommends revising this first bullet to state “[bullet] Explain how scientific, engineering, and Inuit Qaujimagatuqangit <b>data and analysis were integrated was used</b> to inform the identification of impacts and determination of mitigation;”	Edit made	
7.4.1 Impact Prediction	QIA 2023 Chidliak ISG #35	QIA requests that the ISGs revise this sentence from “differences and similarities in results from scientific, engineering, and Inuit Qaujimagatuqangit” on page 33 to <b>“how IQ was used to inform, interpret, or guide the scientific and engineering results and where IQ was</b>	Edit made	

Section	Organization	Comment	Action	Justification
		<b>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”.</b>		
Page 34	QIA 2023 Chidliak ISG #36	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.	Edit made	ECCC-10 is a similar comment to QIA’s and the NIRB encourages QIA to review the edits made.
7.4.3 Cumulative Effects Assessment	QIA 2023 Chidliak ISG #37	QIA suggest a change of language to " The Proponent shall identify and assess the project’s <del>potential cumulative effects</del> <b>total cumulative effects on valued components subject to residual impacts from the Project</b> based on the components listed below ".	Edit made	
7.4.3 Cumulative Effects Assessment	QIA 2023 Chidliak ISG #38	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 <b>or synergistic effects</b> from the addition <b>or interaction of</b> changes to the environment...”. QIA requests that the ISGs take the following phrase out of parentheses and ensure the Proponent is required to consider “... <b>all human activities, including past, existing, and proposed activities</b> ” (p.35).	Edits made	Edits made as appropriate
7.4.3 Cumulative Effects Assessment	QIA 2023 Chidliak ISG #39	QIA requests that the ISGs be revised to explicitly state that a separate significance determination should be made for every biophysical and socioeconomic components	Edits made	

Section	Organization	Comment	Action	Justification
7.4.5 Indicators and Criteria	QIA 2023 Chidliak ISG #40	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. The ISGs should also be revised to require that the Proponent “ <b>adopt IQ, including observational/sensory indicators, into the assessment, and/or where these are not included for individual VEC/VSECs, provide a supporting rationale</b> ” (p.37).	Edits Made	
7.4.6 Significance Determination	QIA 2023 Chidliak ISG #41	The QIA requests that the NIRB update the wording within section 7.4.6 (k) to add the following bullet point: “ <b>Have a measurable/observable negative effect on Inuit use of a culturally significant area or value.</b> ”	Edits made	Edits were made where appropriate to improve readability
7.4.6 Significance Determination	QIA 2023 Chidliak ISG #42	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.	Edits made	Edits were made where appropriate to improve readability
7.4.7 Certainty	QIA 2023 Chidliak ISG #43	The QIA requests that the NIRB update the wording within section 7.4.7 to state: “The level of certainty with predictions is related to limitations in the overall understanding of the ecosystem, <b>limitations in the overall understanding of the use of the technology within the Arctic and/or Baffin Island</b> , and limitations in accurately foreseeing future events or conditions.”	Edit made	

Section	Organization	Comment	Action	Justification
8.2. Socio-Economic Environment and Impact Assessment	QIA 2023 Chidliak ISG #44	Revised sentence should add the following “...employment <del>and</del> training <b>and contracting</b> opportunities shall be undertaken with a level of effort and expertise at least equivalent to that applied to the assessment of the ecosystemic values.”	Edit made	
10.0 Inuit Quajimajatuqangit and all references to IQ in the ISGs	QIA 2023 Chidliak ISG #45	QIA requests that the bullet “Associated issues related to the storage and ownership of the Knowledge” be revised to <b>“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”</b> . 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, and 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.). 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. When the ISGs use a stand-in word or phrase for IQ, please replace with IQ throughout for greater clarity.	Edit made	-Edits made as appropriate and incorporation of other comments by the QIA will assist with the clarification of Inuit Quajimajatuqangit in the document. Any further concerns can be discussed at the Guidelines workshop. -Comments are also being considered in the NIRB’s Standardized Guidelines process.

Section	Organization	Comment	Action	Justification
10.0 – Inuit Qaujimajatuqangit	QIA 2023 Chidliak ISG #46	The QIA requests that the NIRB revise the statement referenced above to read: “The Proponent shall explain how it treated and <b>incorporated</b> Inuit Qaujimajatuqangit, <b>including as both a primary source of knowledge and to help</b> address gaps in currently available scientific data....”	No Edit Made	QIA Comment 5 included suggested edits to this section where information was incorporated. Please review edit and confirm if this addressed the comment.
11.1 Environmental Management Plan	QIA 2023 Chidliak ISG #47	QIA recommends NIRB add the following sentence to the end of the second paragraph of this section: <b>"The Proponent shall discuss how it engaged and will continue to engage Inuit in the development and implementation of its Environmental Management Plan."</b>	Edits made	
11.2 Environmental Protection Plan	QIA 2023 Chidliak ISG #48	QIA recommends NIRB add the following sentence after the first sentence of the only paragraph in this section: <b>"The Proponent shall discuss how it engaged and will continue to engage Inuit in the development and implementation of its Environmental Protection Plan."</b>	Edit made	
11.3 Monitoring and Mitigation Plans	QIA 2023 Chidliak ISG #49	QIA requests that the ISGs be revised as follows: - Page 46 “The Proponent shall provide a risk assessment... <b>possible changes to the technology or engineering design as proposed in the project description (e.g. size and capability of aircraft, terrestrial vehicles, marine vessels, etc.)...</b> ” - Page 46 “... the Proponent is required to outline how results from monitoring, from continued engagement... , <b>and lessons from other projects operating in similar environments</b> will be used to refine or modify...”	Edits Made	Edits were made as appropriate

Section	Organization	Comment	Action	Justification
		<p>- Page 47 “evaluation of the <b>effectiveness</b> of mitigation measures <b>including the degree of certainty of this evaluation...</b>”</p> <p>- 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. <b>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.</b>”</p> <p>- Page 48 “... all monitoring plans... coordinated with <b>and contribute to ongoing...</b>”</p>		
11.3 Monitoring and Mitigation Plans	QIA 2023 Chidliak ISG #50	QIA recommends NIRB add the following bullet: <b>"The Proponent shall discuss how its monitoring plans relate to and enhance its closure goals, objectives, criteria and final state."</b>	Edits made	
11.3.1 Follow-up and Adaptive Management Plans	QIA 2023 Chidliak ISG #51	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: <b>“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”</b> .	Edits made	
11.3.1 Follow-Up and Adaptive Management Plans	QIA 2023 Chidliak ISG #52	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	Edits made	

Section	Organization	Comment	Action	Justification
		adaptive management strategies, <b>including the need for operational reductions or shutdowns during sensitive timing windows.</b> ”		
11.3.1 Follow-Up and Adaptive Management Plans	QIA 2023 Chidliak ISG #53	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.	No Edit Made	Comments are being considered as part of the NIRB’s Standardized Guideline process; edits may be considered if more direct suggestions provided around the Guidelines Workshop.
11.3.3 Socio-Economic Environmental Plans	QIA 2023 Chidliak ISG #54	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 preconstruction preparation.	Edits made	
11.4 Closure and Reclamation Plan	QIA 2023 Chidliak ISG #55	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.	Edits made	
Chidliak NIRB Screening - QIA Comments	QIA 2023 Chidliak ISG #56	<b>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.</b> <b>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.</b>	Edits made	
Appendix A	QIA 2023 Chidliak ISG #57	The revised Impact Statement Guidelines should include updated references.		The NIRB appreciates the comment and will ensure that the references are updated in the final IS Guidelines for this project.

Section	Organization	Comment	Action	Justification
General Comments	De Beers	<p>We have observed in the Draft EIS Guidelines what appear to be new and/or expanded considerations to be addressed, particularly in comparison to other recently assessed mining projects in Nunavut. This includes for items such as food security, gender based analysis, perceived environmental effects, and use of IQ and community feedback. As some of these items are relatively new to Nunavut impact assessments, we are hopeful NIRB would be able to provide additional justification and guidance on their assessment (and effective inclusion into an EIS). We are also of the opinion these items must properly reflect the scope of the project being assessed and be applied only where necessary.</p> <p>We feel that the ever-expanding list of items to be assessed is likely to generate substantially more text and costs without necessarily generating information that will be useful in the final approval decision. Adding bulk and complexity to the Impact Statement will make the document less comprehensible and less useful to reviewers and decision makers. Instead, we suggest paring down the guidelines where possible to eliminate redundancy and encouraging proponents to focus their assessments on what matters most.</p>	No Edit Made	<p>The NIRB appreciates the comments and will consider them in its standardized Guideline assessment.</p> <p>In general Impact Assessment are always evolving and the IS Guidelines are a living document incorporating Industry Best Practices. The Guidelines are a guidance document for proponents to use for the development of an Impact Statement and are more broadly discussed to allow flexibility to the Proponent to discuss topics with communities, regulators, Inuit Organizations, and other agencies that participate in the NIRB process. The Proponent can discuss with the NIRB and other participating parties how it will present the data in the document and what information/topics are or are not discussed.</p> <p>The NIRB's IS Guidelines workshop is also hosted by the NIRB to allow discussions about topics such as these to allow all sides to discuss expectations in the IS Document and understand the topics the public and other parties have commented on in the past and present.</p>
Section 7.4.6 Significance Determination	De Beers	<p>The NIRB has indicated which attributes should be taken into consideration by the NIRB in determining significance of each impact. These are provided in items a through k.</p> <p>k.) Item k is not like the items listed in item a through j. Item k. provides a bulleted list of effects that will be considered significant, without any consideration of the other aspects of those effects.</p>	No Edit Made	<p>As the NIRB has made edits to this section based on others comments, the proponent is encouraged to review the edits and ask questions at the IS Guidelines Workshop before finalization of these Guidelines.</p>

Section	Organization	Comment	Action	Justification
		<p>For example, Item k indicates that the NIRB will consider impacts to be significant if they are likely to be adverse (first bullet). Does this mean that all adverse impacts will be considered significant or only that adversity is essential for a determination of significance? What happens if the effect is adverse, but none of the other factors in the bulleted list are met? There will be adverse impacts associated with development projects that are not great enough in magnitude, large enough extent, long enough in duration etc. to be significant. The factors in the bulleted list should be considered in relation to each other. It should be up to the Proponent to propose a framework for consideration of significance as it relates to these and other factors.</p> <p>The preamble to the bulleted list in item k. should be adjusted to indicate that these are factors which the Proponent should consider when proposing a framework for significance determination.</p>		
11.3 Monitoring and Mitigation Plans	CIRNAC-03	CIRNAC recommends that Section 11.3 of the Draft Impact Statement Guidelines also include a discussion on how future changes will be influenced by Inuit Qaujimajatuqangit and Indigenous Knowledge	No Edit Made	As QIA submitted extensive comments on the incorporation of Inuit Qaujimajatuqangit for the document, the NIRB would encourage CIRNAC to review the document and bring further suggestions to the IS Guidelines Workshop.
Reference to Transboundary Groups	CIRNAC-04	CIRNAC recommends nuancing the phrasing used in Section 7.4.4 to indicate that Indigenous groups for whom Canada recognizes asserted and established Section 35 rights within the designated area should not be characterized as transboundary groups when impacts may occur to those rights, and such impacts should be addressed in the non-transboundary sections of the Impact Statement.	No Edit Made	Suggested edits made to update definition. It is not NIRB's responsibility to satisfy requirements of GOC international agreements, so if references should be included here, please provide suggested text directly. This can be discussed at the Guidelines workshop.

Section	Organization	Comment	Action	Justification
		In addition, the Board may wish to consider noting in this section that Canada is a party to the United Nations Economic Commission for Europe's Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention). Further, the Board may also wish to consider reviewing/elaborating on the definition of 'transboundary impacts' in the Definitions and Terms section. The use of the term 'Party' in the definition is potentially confusing in relation to the other provided definitions for 'Parties' and 'Public'.		
Climate Change and Water Quality	ECCC-09	ECCC recommends that the following be added to Section 7.4.2.1 (Climate Change) of the Draft Impact Statement Guidelines: <ul style="list-style-type: none"> <li>- Impacts from climate change on sensitive ecosystem features within the terrestrial, <b>freshwater</b>, and marine ecosystems;</li> <li>- Uncertainties related to climate change predictions, and the related effect on other predictions in the Impact Statement, including water quantity <b>and quality</b> and permafrost thawing.</li> </ul>	Edits made	
Strategic Assessment of Climate Change (SACC)	ECCC-10	ECCC recommends the <a href="#">Draft Technical Guide Related to the Strategic Assessment of Climate Change: Assessing Climate Change Resilience</a> be considered when assessing impacts of the Project. ECCC recommends the following information be requested as part of the Impact Statement, in consultation with the <a href="#">Draft Technical Guide Related to the Strategic Assessment of Climate Change: Guidance on quantification of net GHG emissions, impact on carbon sinks, mitigation measures, net-zero plan and</a>	Edits made	Edits made where appropriate and comment is similar to QIA 2023 Chidliak ISG #36

Section	Organization	Comment	Action	Justification
		<p>upstream GHG assessment (“the draft Technical Guide”):</p> <p><b>GHG emission estimate:</b></p> <ul style="list-style-type: none"> <li>• • ECCC suggests that the proponent should provide the GHG information outlined in Section 5.1.1 of the SACC, including: <ul style="list-style-type: none"> <li>• o a description of each of the project’s main sources of GHG emission and their estimated annual GHG emissions over the lifetime of the project;</li> <li>• o net GHG emissions by year for each phase of the project based on the project’s maximum capacity</li> </ul> </li> <li>• (additional guidance at Section 2.1 of the Technical Guide); <ul style="list-style-type: none"> <li>• o each term of Equation 1 (Net GHG emissions = Direct GHG emissions + Acquired energy GHG emissions - Avoided domestic GHG emissions - Offset measures), per year for each phase of the project (additional guidance at Section 2.1 of the Technical Guide);</li> <li>• o emissions intensity (Equation 4 of the Technical Guide) for each year of the operation phase of the project (additional guidance at Section 2.1.5 of the Technical Guide);</li> <li>• o the quantity and a description of the “units produced” (tonnes of ore or other as appropriate) used in Equation 4 of the Technical Guide for each year of the operation phase of the project (additional guidance at Section 2.1.5 of the Technical Guide);</li> <li>• o methodology, data, emission factors and assumptions used to quantify each element of the net</li> </ul> </li> </ul>		

Section	Organization	Comment	Action	Justification
		<p>GHG emissions (refer to Section 3.1.1 of the SACC and Section 2 of the Technical Guide);</p> <ul style="list-style-type: none"> <li>• o a discussion on the development of emissions estimates and uncertainty assessment (refer to Section 3.3 of the SACC); and</li> <li>• o when applicable, a description of large sources of GHG emissions that may be the consequence of accidents or malfunctions.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>• • ECCC suggests that a Best Available Technologies / Best Environmental Practices (BAT/BEP) Determination, as described in Section 3.2 of the Technical Guide. This BAT/BEP Determination process will assess potential mitigation measures throughout all phases of the project and put the emphasis on minimizing net GHG emissions as early as possible and throughout the project lifetime, as described in Section 5.1.4 of the SACC. Additional guidance is provided in Sections 3.4.1 and 3.4.2 of the Technical Guide.</li> <li>• • If it is anticipated that the project will produce GHG emissions in 2050 and beyond (including from post-closure monitoring and activities), ECCC suggested that the proponent also provide a credible net-zero plan that would use and build off the BAT/BEP Determination to describe the mitigation measures that will be taken to minimize GHG emissions throughout all phases of the project and achieve net-zero emission by 2050, as described in Section 5.3 of the SACC. The net-zero plan must follow the principles and include the information</li> </ul>		

Section	Organization	Comment	Action	Justification
		<ul style="list-style-type: none"> <li>outlined in Sections 3.5.1 and 3.5.2 of the Technical Guide, respectively.</li> </ul> <p><b>Carbon sinks:</b></p> <ul style="list-style-type: none"> <li>If the proposed project is anticipated to impact carbon sinks, ECCC suggests the proponent provide a quantitative and qualitative description of the project's positive or negative impact on carbon sinks, as indicated in Section 5.1.2 of the SACC. Additional guidance on the methodology to estimate losses or gains to carbon sinks is provided in Section 4 of the Technical Guide. The Impact Statement must also provide any mitigation measures planned to restore disturbed carbon sinks as described under Section 3.4.3 of the Technical Guide.</li> </ul> <p><b>Impact of the Project on federal emissions reduction efforts and on global GHG emissions:</b></p> <ul style="list-style-type: none"> <li>ECCC suggests that the Impact Statement should provide an explanation of how the project may impact Canada's efforts to reduce GHG emissions but also a discussion on how a project could impact global GHG emissions, if applicable. Additional guidance is provided in Section 5.1.3 of the SACC.</li> </ul>		
Assessment of potential impacts to human health	HC-01	HC recommends that the NIRB consider adopting the following change to the Draft IS guidelines: Revise the draft guidelines to include use of HC Guidance Documents for Evaluating Human Health Impacts in Environmental Assessment for the assessment of potential Project-related health impacts as part of the IS (or IS Addendum) submission.	Edits made	Edits were made as applicable

Section	Organization	Comment	Action	Justification
		<p><i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Air Quality</i>  <a href="https://www.publications.gc.ca/site/eng/9.802343/publication.html">https://www.publications.gc.ca/site/eng/9.802343/publication.html</a></p> <p><i>Guidance for Evaluating Human Health Impacts in Environmental Assessments: Country Foods</i>  <a href="https://www.publications.gc.ca/site/eng/9.855584/publication.html">https://www.publications.gc.ca/site/eng/9.855584/publication.html</a></p> <p><i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Drinking and Recreational Water Quality</i>  <a href="https://www.publications.gc.ca/site/eng/9.832511/publication.html">https://www.publications.gc.ca/site/eng/9.832511/publication.html</a></p> <p><i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Human Health Risk Assessment</i>  <a href="https://www.publications.gc.ca/site/eng/9.870475/publication.html">https://www.publications.gc.ca/site/eng/9.870475/publication.html</a></p> <p><i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise</i>  <a href="https://www.publications.gc.ca/site/eng/9.832514/publication.html">https://www.publications.gc.ca/site/eng/9.832514/publication.html</a></p> <p><i>Guidance for Evaluating Human Health Impacts in Environmental Assessment: Radiological Impacts</i>  <a href="https://www.publications.gc.ca/site/eng/9.803614/publication.html">https://www.publications.gc.ca/site/eng/9.803614/publication.html</a></p> <p><i>Guidance for the Environmental Public Health Management of Crude Oil Incidents</i>  <a href="https://publications.gc.ca/collections/collection_2018/sc-hc/H129-82-2018-eng.pdf">https://publications.gc.ca/collections/collection_2018/sc-hc/H129-82-2018-eng.pdf</a></p>		

<b>Section</b>	<b>Organization</b>	<b>Comment</b>	<b>Action</b>	<b>Justification</b>
7.4.1 Hydrogeology	NRCan-01	NRCan recommends that information on hydrogeology, including a hydrogeological model, be presented in a comparable fashion to previous assessments. Examples of previous guidelines that could be presented as well delineating hydrogeological information requirements include the 2012 guidelines for Agnico-Eagle Mines Ltd.'s Meliadine Project (NIRB File 11MN034) and the 2013 guidelines for Sabina Gold & Silver Corp.'s Back River Project (NIRB File No. 12MN036).	Previous wording carried forward into this draft for parties' further review	Due to this and several other comments from several parties and the Proponent seeking more detail and clarity on topics, NIRB has brought forward the previous sections specifying VEC and VSEC information. Parties are requested to discuss at the Guidelines Workshop or submit additional feedback around the Guidelines Workshop if further updates to the wording of these sections are appropriate.
NRCan-02 7.4.1 Impact Prediction	NRCan-02	NRCan recommends that information on geology be presented in a comparable fashion to previous assessments. Examples of previous guidelines that could be presented as well delineating geological information requirements include the 2012 guidelines for Agnico-Eagle Mines Ltd.'s Meliadine Project (NIRB File 11MN034) and the 2013 guidelines for Sabina Gold & Silver Corp.'s Back River Project (NIRB File No. 12MN036)	Previous wording carried forward into this draft for parties' further review	Due to this and several other comments from several parties and the Proponent seeking more detail and clarity on topics, NIRB has brought forward the previous sections specifying VEC and VSEC information. Parties are requested to discuss at the guidelines workshop or submit additional feedback around the guidelines workshop if further updates to the wording of these sections are appropriate.

Section	Organization	Comment	Action	Justification
Acid Rock Drainage and Metal Leaching/Geochemistry 7.4.1 Impact Prediction	NRCan-03	NRCan recommends that information on the characterization of excavated and processed mine materials and their ARD/ML potential follow the guidelines presented in the Mine Environment Neutral Drainage (MEND) report 1.20.1, and that it be presented in a comparable fashion to previous assessments for consistency. Previous tailored impact statement guidelines (TISG) that could be presented as example recommendations for site characterization, mineralogy and geochemistry testing, including recommendations for the presentation of analytical methods and results include the <a href="#">Terms of Reference for the Environmental Assessment of Snap Lake Diamond Project</a> and the <a href="#">Tailored Impact Statement Guidelines for the Wasamac Gold Mine Project</a> .	Previous wording carried forward into this draft for parties' further review	Due to this and several other comments from several parties and the Proponent seeking more detail and clarity on topics, NIRB has brought forward the previous sections specifying VEC and VSEC information. Parties are requested to discuss at the guidelines workshop or submit additional feedback around the guidelines workshop if further updates to the wording of these sections are appropriate.
Permafrost, Terrain Stability, Hazards 7.4.2 Impacts of the Environment on the Proj	NRCan-04	NRCan recommends that information on permafrost, terrain stability and seismic hazards be presented in a comparable fashion to previous assessments. Examples of previous guidelines that could be presented as well delineating permafrost information requirements include the 2012 guidelines for Agnico-Eagle Mines Ltd.'s Meliadine Project (NIRB File 11MN034) and the 2013 guidelines for Sabina Gold & Silver Corp.'s Back River Project (NIRB File No. 12MN036)	Previous wording carried forward into this draft for parties' further review	Due to this and several other comments from several parties and the Proponent seeking more detail and clarity on topics, NIRB has brought forward the previous sections specifying VEC and VSEC information. Parties are requested to discuss at the guidelines workshop or submit additional feedback around the guidelines workshop if further updates to the wording of these sections are appropriate.
Navigation	TC-02	Add a request for the Proponent to include detailed information from the Inuit communities on their possible use of this river system.	No Edit Made	NIRB made edits in sections based on QIA's comments, please review the revised draft to see if the requirement is met and bring further questions to the IS Guidelines Workshop

Section	Organization	Comment	Action	Justification
Watercourse crossings	TC-03	<p>TC requests that the Proponent:</p> <ol style="list-style-type: none"> <li>1. Self-assess the navigability of each waterway that will be crossed by the access road using Transport Canada’s Navigation Protection Program Project Review Tool (<a href="https://npp-submissions-demandes-ppn.tc.canada.ca/projectreview-outildexamenduprojet">https://npp-submissions-demandes-ppn.tc.canada.ca/projectreview-outildexamenduprojet</a>). Note that the Project Review Tool also includes a decision tree that can help the Proponent determine whether a waterway is considered navigable (<a href="#">EN_Decision_Tree.PNG (1451×795) (canada.ca)</a>).</li> <li>2. Provide details on the outcome of the self-assessment.</li> </ol> <p>For all watercourse crossings over a navigable waterway, TC requests that the Proponent:</p> <ol style="list-style-type: none"> <li>3. Identify whether each watercourse crossing will meet all the applicable requirements to be a CNWA “minor work”. The Minor Works Order can be found at: <a href="https://laws-lois.justice.gc.ca/eng/regulations/SOR-2021-170/FullText.html">https://laws-lois.justice.gc.ca/eng/regulations/SOR-2021-170/FullText.html</a> (see in particular: sections 3-8 (General) and section 34 (Watercourse Crossings)).</li> </ol> <p>For all watercourse crossings over a navigable waterway that are not Minor Works, TC requests that the Proponent:</p> <ol style="list-style-type: none"> <li>4. Provide details regarding: <ul style="list-style-type: none"> <li>• Plan and profile drawings and construction methodology for the watercourse crossing(s)</li> <li>• Normal high water level measurements at the site of the watercourse crossing(s).</li> <li>• How the waterway(s) is used for navigation.</li> <li>• The Proponent’s findings on how navigation may be impacted by the watercourse crossing(s).</li> </ul> </li> </ol>	Edit made	Edit made in section 6.3.1, please review and see if further edits are required

Section	Organization	Comment	Action	Justification
		<ul style="list-style-type: none"> <li>Proposed mitigation measures to address impacts to navigation.</li> </ul>		
Civil aviation	TC-04	Add that the proponent must provide for consultation in accordance with Canadian Aviation Regulation 307.	Edit made	Edit made in section 6.3.1, please review and see if further edits are required
Traditional Areas for Land Use	Pangnirtung Hunters & Trappers Organization	Submitted maps from studies undertaken by Inuit Heritage Trust and Harvest Study (2004)	No Edit Made	No edits were made for specific comments, however, QIA made a number of edits to various sections regarding the incorporation of Inuit Qaujimaqatuqangit and community knowledge throughout the IS Statement Guidelines.
Nuclear Energy	Municipality of Clyde River	<p>The EIS Guidelines are cast in general terms, and do not refer to specific project components. Depending on how the guidelines are interpreted, they may not fully capture Clyde River's concerns with nuclear power. Given the long history of public concern with nuclear technology in the Arctic, the Municipality believes the proponent's EIS should:</p> <p>Provide additional information about the specific type of reactor being contemplated (manufacturer, model, size, etc.)</p> <p>Provide additional information about the projected electricity needs of the mining operation {including seasonal variations in energy needs)</p> <p>Describe potential emissions (both routine and accidental).</p> <p>Analyze the potential effects of emissions on all ecosystemic and socioeconomic factors listed in the scope document (pp. 2-4).2 Explain how these potential effects will be monitored, managed, and/or mitigated.</p> <p>Describe how fuel will be transported and how the reactor will be refueled. Outline the steps that will be taken to avoid accidental emissions into the</p>	Previous wording carried forward into this draft for parties further review	Due to this and several other comments from several parties and the Proponent seeking more detail and clarity on topics, NIRB has brought forward the previous sections specifying VEC and VSEC information. Parties are requested to discuss at the guidelines workshop or submit additional feedback around the guidelines workshop if further updates to the wording of these sections is appropriate.

Section	Organization	Comment	Action	Justification
		<p>environment and exposure to workers and communities when transporting/handling nuclear fuel.</p> <p>Describe how nuclear waste (spent fuel, irradiated materials/equipment) will be stored, transported, and/or disposed of. Outline the steps that will be taken to avoid accidental emissions into the environment and exposure to workers and communities when storing, transporting, and disposing of nuclear waste.</p> <p>Describe how the proponent consulted with Inuit communities and organizations on the question of nuclear power.</p>		
Licensing Process for Nuclear Energy		<p>Nunavut's Co-management Boards, not just the CNSC need to consider our concerns</p> <p>The Municipality of Clyde River is aware that some of these issues might be discussed during a Canadian Nuclear Safety Commission (CNSC) licensing process for the proposed reactor. However, the Municipality believes it would be inappropriate to leave these questions to the CNSC.</p> <p>When Inuit signed the Nunavut Agreement, we agreed to surrender our Aboriginal title in exchange for specified rights, benefits, and political development. The agreement created co-management boards like the Nunavut Impact Review Board (NIRB), Nunavut Planning Commission (NPC), and Nunavut Water Board (NWB) to provide Inuit with better opportunities to participate in decisions about development in our territory.</p> <p>Allowing the use of nuclear reactors at mining projects, without a thorough assessment by Nunavut's Inuit organizations and co-management institutions -with</p>	No Edits Made	<p>The NIRB acknowledges the comment by the municipality of Clyde River. Should the proponent determine that it would be using a small modular nuclear reactor, the NIRB would require the Proponent to provide information to the NIRB about the nuclear reactor and its processes. The NIRB would also have to approve the use of the small nuclear reactor before the Canadian Nuclear Safety Commission commenced its licencing process.</p>

Section	Organization	Comment	Action	Justification
		<p>opportunities for all Nunavummiut to meaningfully participate -would run contrary to the spirit of the Nunavut Agreement.</p> <p>The Municipality does not believe that a CNSC licensing process is adequate to address our concerns or to facilitate Inuit participation. Compared to a NIRB review, a CNSC licensing process is narrow in scope. The focus is on safety, with significantly less attention on broader environmental, social, and economic impacts. NIRB reviews have significantly more provisions for the application of Inuit Qaujimajatuqaingit (Inuit knowledge), and NIRB board and staff have significantly more experience working with Inuit Elders and knowledge-holders. CNSC licensing processes also have fewer opportunities for public engagement and Indigenous participation. Clyde River's experiences with the National Energy Board's permitting of seismic surveys shows that Canada's energy regulators are not well-suited to facilitate meaningful Inuit participation.</p>		
Regional Assessment should be conducted before any nuclear reactors are permitted		<p>A project-specific assessment will not fully address our concerns with the use of nuclear reactors at mines in Nunavut. All Nunavummiut should have the opportunity to participate in the decision regarding whether nuclear reactors should be permitted in our territory. These opportunities will not be possible in a project-specific review, which necessarily focuses on the perspectives of adjacent communities. In making these important decisions, we should also consider political and moral issues about uranium mining, nuclear weapons, and</p>	No Edits Made	<p>The NIRB acknowledges the comment and should a small nuclear reactor become a preferred alternative for the project, the NIRB will discuss with appropriate parties. The NIRB also appreciates receiving a copy of the letter for the file.</p>

Section	Organization	Comment	Action	Justification
		<p>nuclear waste, which will not be captured in a project specific NIRB review of a diamond mine.</p> <p>The Municipality of Clyde River has written a letter to Nunavut's Inuit organizations and co-management boards, as well as the governments of Canada and Nunavut, requesting they collaborate on a regional assessment of the use of nuclear reactors at mining projects in Nunavut. This letter, which provides more details about the potential benefits of a regional assessment, is attached for your information.</p>		