

August 23, 2023

Tara Arko
Director, Technical Services
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

**RE: Revised Draft Impact Statement Guidelines for De Beers Canada Inc's
"Chidliak Diamond Mine" Project Proposal**

Dear Tara Arko,

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to submit comments on the Board's *Revised Draft* Impact Statement Guidelines for De Beers Canada Inc.'s "Chidliak Diamond Mine" Project Proposal.

The GN has reviewed the Board's *Revised Draft* Guidelines and has included the comment below to describe the GN's suggested revisions. The GN appreciates the opportunity to review these materials as part of its participation in the NIRB review process. Should there be any concerns or need for follow-up, please do not hesitate to contact me at jfbuller@dryasconsulting.ca.

Qujannamiik,


Justin Buller

Justin Buller
Interim Avatiliriniq Coordinator

GN - IS Guideline Comment 01	
Department	Environment
Organization	GN
Subject/Topic	Effects Assessment – Editorial Comments
References	<ul style="list-style-type: none"> • Section 7.4.6 Significance Determination • Section 8.0 Project Environment and Impact Assessment
IDENTIFICATION OF ISSUE	
<p>Section 8.0 of the Impact Statement Guidelines covers requirements for the Proponent's detailing of the Project Environment and Impact Assessment. This includes the requirement to identify indicators and significance thresholds (Section 8.1 pg. 42). For significance thresholds to be meaningful and support properly protective mitigation measures, it is recommended that thresholds take into consideration cases where baseline conditions exhibit a degree of impact/negative effect already (i.e., thresholds should be defined that consider the residual or actual ability of the ecosystem component to withstand/recover from project perturbation, rather than a theoretical/unimpaired starting state).</p> <p>This is supported by the baseline conditions assessment, as Section 7.3 Description of the Ecosystemic and Socio-Economic Environments and Baseline Information requires that "...in characterizing the environmental impacts of the proposed project, the Proponent shall consider the historical background conditions..., [and] current baseline environment and the environmental and socio-economic trends within the proposed project area..." (pg.32). Note that in Section 7.4.6 Significance Determination this is essentially required, as noted in describing the requirement for defining impacts as significance if they would "...negatively affect ecological functions or exceed assimilative capacity of the ecosystemic and socio-economic environments", however this wording does not expressly consider cases where assimilative capacity may be less than would be expected in an unimpacted baseline case.</p>	
RECOMMENDED EDITS	
<p>The Guideline in Section 7.4.6 Significance Determination could be strengthened by:</p> <ul style="list-style-type: none"> - stating "...available assimilative capacity..." (emphasis added for clarity) rather than just "...assimilative capacity..." in sub-item 9 of item k, and - in by using an 'or' rather than 'and' for the sub-list items (implying that <u>all</u> listed characteristics would need to be present for it to be classed as significant) – i.e., the list should use an 'or' (end of sub-item 10), as any one of the listed characteristics should result in an impact being classified as significant. 	