



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

<b>Comment #</b>	QIA 2023 Chidliak ISG #1
<b>References</b>	<b>Document Name:</b> NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i> <b>Section:</b> Definitions and Terms <b>Page:</b> v
<b>QIA Comment</b>	QIA Comment #1 requested that the definition for “Local Study Area” 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.”  QIA also requested that NIRB consider removing all references to “immediate impacts”, including but not limited to p.29 of the ISG [Impact Statement Guidelines], for the same reason.  NIRB did not make edits to the Revised Draft IS Guidelines but is considering this comment for the NIRB’s Standardized Guidelines Development.
<b>QIA Request</b>	QIA appreciates that NIRB is considering this for standard ISG development. However, QIA’s comment has not been addressed in the Chidliak ISG or Scope and continues to be outstanding.

<b>Comment #</b>	QIA 2023 Chidliak ISG #2
<b>References</b>	<b>Document Name:</b> NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i> <b>Section:</b> Definitions and Terms <b>Page:</b> vi
<b>QIA Comment</b>	QIA Comment #2 recommended that the definition of “reasonably foreseeable future development” be expanded and updated to be more comprehensive to include 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.



	NIRB did not make edits to the definition of “reasonably foreseeable future development” in the Definition and Terms section but indicates that appropriate edits have been made to the Phased Development section of the IS Guidelines and the Scope. There is no ‘Phased Development’ section evident in the current Revised Draft of the IS Guidelines and no changes have been made to the Scope addressing QIA’s concerns.
<b>QIA Request</b>	QIA’s comment does not appear to be addressed and is outstanding. QIA requests clarity on what edits were made to the IS Guidelines and Scope to address this comment.

<b>Comment #</b>	QIA 2023 Chidliak ISG #3
<b>References</b>	<b>Document Name:</b> NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i> <b>Section:</b> Definitions and Terms <b>Page:</b> vii
<b>QIA Comment</b>	QIA Comment #3 recommended removal of reference to "significant" as a criterion during scoping, in the definition of “scoping”.  NIRB did not make edits to the Definitions and Terms section as recommended but acknowledged the comment and indicated that it will be addressed in the Standardized Guidelines process.
<b>QIA Request</b>	QIA appreciates that NIRB is considering this for standard ISG development. However, QIA’s comment has not been addressed in the Chidliak ISG or Scope and remains outstanding.  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. This being the case, QIA recommends that the term “significant” be removed from the definition of “scoping.”

<b>Comment #</b>	QIA 2023 Chidliak ISG #6
<b>References</b>	<b>Document Name:</b> 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> <b>Section:</b> 2.0 Preparation and Review of the Impact Statement <b>Page:</b> various







**Proponent is expected to do so in consultation with impacted Inuit Organizations and show evidence of these efforts.”**

<b>Comment #</b>	QIA 2023 Chidliak ISG #12
<b>References</b>	Document Name: NIRB. 2023. <i>Revised 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: 17
<b>QIA Comment</b>	QIA Comment #12 recommended 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”.  NIRB indicated that they have made the suggested addition to the text, but the suggested text does not appear in the Revised Draft Guidelines.
<b>QIA Request</b>	QIA’s comment has not been addressed.  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”.

<b>Comment #</b>	QIA 2023 Chidliak ISG #14
<b>References</b>	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i> Section: 5.5 Regional Context Page: 21
<b>QIA Comment</b>	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 Organizations to a land use planning body should be considered a statement of expectation re: future land use designation desired by that Inuit Organization, 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”.





<b>QIA Request</b>	<p>QIA’s comment has not been addressed.</p> <p>QIA recommends that NIRB clearly distinguish between references to “alternatives” and “alternatives to the Project,” 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.</p>
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<b>Comment #</b>	QIA 2023 Chidliak ISG #18
<b>References</b>	<p><b>Document Name:</b> NIRB. 2023. <i>Revised 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><b>Section:</b> 6.2.1 Alternatives</p> <p><b>Page:</b> 24-25</p>
<b>QIA Comment</b>	<p>QIA Comment #18 requested that the NIRB update the wording within section 6.1 to include the following additions <b>in bold</b>:</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> <p>NIRB has partially addressed this comment. The suggested text of the first bullet point above has been incorporated; however, the second point has not.</p>
<b>QIA Request</b>	<p>QIA’s comment has not been fully addressed.</p> <p>QIA recommends that NIRB update the wording within section 6.1 to include the following additions <b>in bold</b>:</p> <ul style="list-style-type: none"> <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>

<b>Comment #</b>	QIA 2023 Chidliak ISG #21
<b>References</b>	<p><b>Document Name:</b> NIRB. 2023. <i>Revised 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><b>Section:</b> 6.2 Project Purpose, Need, and Alternatives</p> <p><b>Page:</b> 23</p>
<b>QIA Comment</b>	QIA Comment #21 recommended that the NIRB add an additional bullet point to the bulleted list on page 23.



	NIRB has partially addressed this comment by adding some of the requested language to the introductory paragraph to the list on page 23. However, by excluding the specific language requested, the NIRB has not addressed the source of QIA's concerns.
<b>QIA Request</b>	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 Organizations 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> ”

<b>Comment #</b>	QIA 2023 Chidliak ISG #23
<b>References</b>	<b>Document Name:</b> NIRB. 2023. <i>Revised 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. <b>Section:</b> 6.5 Economic and Employment Information <b>Page:</b> 26-27
<b>QIA Comment</b>	QIA Comment #23 requested that the NIRB 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.”  NIRB has not addressed this comment and has only indicated in the comment table that information for this section has been requested.
<b>QIA Request</b>	QIA is not clear on what information is being requested here and from whom. This commitment is not clear in the revised draft ISG. Suggest making specific edit to bullet six on page 26: “Contracting and procurement information <b>for each phase of the project</b> including, if known, a breakdown of the number and types of jobs that will be done by contractors, what the contractor obligations to employees will be, <b>and opportunities for 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> ”

<b>Comment #</b>	QIA 2023 Chidliak ISG #24
<b>References</b>	<b>Document Name:</b> NIRB. 2023. <i>Revised 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. <b>Section:</b> 7.1 Factors to be considered in the Impact Assessment <b>Page:</b> 27
<b>QIA Comment</b>	QIA Comment #24 requested 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









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

<b>Comment #</b>	QIA 2023 Chidliak ISG #58
<b>References</b>	<b>Document Name:</b> NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i> <b>Section:</b> Section 11.3.3 <b>Page: 88</b>
<b>QIA Comment</b>	In QIA's experience, Proponents have placed a heavy reliance on secondary data collection for socio-economic indicators. While convenient, secondary data often has many limitations, including how it can be disaggregated and whether the sample is representative of the target population. VSEC indicators should be selected based upon the need to measure them to understand project impacts from baseline, and not availability of secondary data. It should be made clear the Proponent may have to collect primary data to effectively monitor Project socio-economic impacts. Further, this may necessitate data collection beyond the project footprint, especially to capture impacts on community well-being.
<b>QIA Request</b>	At the end of the second paragraph in Section 11.3.3, QIA recommends the following text be added: "Where secondary data does not exist for VSEC indicators, primary data collection will be required. This may include data collection beyond the project footprint in impacted communities, especially when considering community well-being."

<b>Comment #</b>	QIA 2023 Chidliak ISG #59
<b>References</b>	<b>Document Name:</b> NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i> <b>Section:</b> Section 7.3 <b>Page: 40</b>
<b>QIA Comment</b>	Inadequate baseline data can challenge the effectiveness of impact predictions and make subsequent assessments of the project's benefits and impacts less reliable. A strong foundation of baseline data is essential for measuring and understanding the changes associated with the Project in both the socioeconomic and biophysical environments. Without appropriate, valid, and reliable baseline data, there's a risk that mitigation measures might be misdirected or not fully address the actual impacts. The Impact Guidelines should not only emphasize the importance of collecting thorough baseline data, but firmly mandate the inclusion of data that allows for detailed analyses and future comparisons. It's beneficial to include a wide range of relevant, reliable indicators that can provide a clearer picture



	of potential impacts. With comprehensive baseline data, stakeholders are better positioned to evaluate the project's effects throughout its lifecycle.
<b>QIA Request</b>	<p>QIA recommends the following be included in Section 7.3:</p> <p>“The following are requirements for using baseline data:</p> <ul style="list-style-type: none"> <li>• Is collected in a manner conducive to detailed analyses, extrapolations, and reliable predictions.</li> <li>• Is suitable for estimating pre-project baseline conditions.</li> <li>• Can be used to predict potential effects from the project.</li> <li>• Is collected with consideration to seasonal or temporal variations, ensuring a comprehensive representation.</li> <li>• Supports evaluations of post-project changes in conditions.</li> <li>• Adheres to recognized data standards or methodologies to ensure consistency.</li> <li>• Is gathered in collaboration or consultation with relevant stakeholders, ensuring diverse insights.</li> <li>• Is transparent and made accessible to all relevant stakeholders.”</li> </ul>
<b>Comment #</b>	QIA 2023 Chidliak ISG #60
<b>References</b>	<p><b>Document Name:</b> NIRB. 2023. <i>Revised 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><b>Section:</b> Section 8.1.7.1</p> <p><b>Page:</b> 57</p>
<b>QIA Comment</b>	Waterbodies that are at risk of experiencing direct impacts from the Project and that are important to Inuit for local harvesting activities need to be monitored. Given the definitions of Regional vs. Local Study Area, Section 8.1.7.1 (iv) should be modified to ensure monitoring is inclusive of any waterbodies that may experience direct impacts from the Project, whether the effects are “immediate” or not.
<b>QIA Request</b>	<p>Section 8.1.7.1 (iv) be updated to the following:</p> <p>“Discussion of waters in the RSA of importance to local harvesting activities by surrounding communities.”</p>





	activities and time on the land versus work is therefore an important consideration for baseline data and impact predictions.
<b>QIA Request</b>	QIA recommends the following be added to baseline data requirements in Section 8.2.9.1: “Description of Inuit work-life balance and ability to devote time to traditional activities and time on the land versus work.” QIA recommends the following be added to Impact Assessment requirements in Section 8.2.9.2: “Potential effects on Inuit work-life balance as a result of increased opportunity to work at the Project.”

<b>Comment #</b>	QIA 2023 Chidliak Revised Draft ISG # 64
<b>References</b>	<b>Document Name:</b> NIRB. July 2023. Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc.’s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) <b>Section:</b> Section 11.3.3 <b>Page: 88</b>
<b>QIA Comment</b>	The ISG states that “...it is expected that the Proponent’s socio-economic monitoring plans and programs will include human resources, occupational health and safety, community and public involvement, implementation of Inuit Impact and Benefit Agreements, and if applicable, development partnership agreements with government departments, designated Inuit organizations and provincial, territorial, and non-Inuit Indigenous governments for transboundary impacts.” Language should reflect that any socio-economic monitoring and management plan should monitor and mitigate impacts associated with the decided-upon VSECs.
<b>QIA Request</b>	The statement be updated to include more inclusive language on what the Proponent should monitor and manage: “...it is expected that the Proponent’s socio-economic monitoring plans and programs will align with VSECs, and include implementation of Inuit Impact and Benefit Agreements...” and “The focus of the socio-economic monitoring plans and program should be on the VSEC indicators, which may include topics such as health, culture, wellbeing, and food security of the communities potentially to be affected by the proposed project.”

<b>Comment #</b>	QIA 2023 Chidliak Revised Draft ISG #65
<b>References</b>	<b>Document Name:</b> NIRB. July 2023. Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc.’s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) <b>Section:</b> 7.4.2.1 Climate Change <b>Page: 44</b>
<b>QIA Comment</b>	The NIRB states, “Uncertainties related to climate change predictions, and the related effect on other predictions in the Impact Statement, including water quantity, <b>water quantity</b> , and permafrost thawing.” The red text is a



	duplication of statements and is assumed to be a mistake, we believe the text should be changed to “water quality”.
<b>QIA Request</b>	The red text should be updated to reflect the correct wording.

<b>Comment #</b>	QIA 2023 Chidliak Revised Draft ISG # 66
<b>References</b>	<b>Document Name:</b> NIRB. July 2023. Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc.’s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025) <b>Section:</b> 8.1.3.2 Impact Assessment <b>Page:</b> 53
<b>QIA Comment</b>	When the NIRB requests the proponent to discuss the potential impacts of noise and vibration on fish in fresh water and marine environments they should also include benthic invertebrates as vibrations are known to negatively impact benthic invertebrate behaviours such as foraging, predator avoidance, and burrowing activities.
<b>QIA Request</b>	Please add benthic invertebrates to the discussion of potential impacts of noise and vibration.