



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

Comment #	QIA 2023 Chidliak ISG #1
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Definitions and Terms Page: v
QIA Comment	<p>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."</p> <p>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.</p> <p>NIRB did not make edits to the Revised Draft IS Guidelines but is considering this comment for the NIRB's Standardized Guidelines Development.</p>
QIA Request	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.

Comment #	QIA 2023 Chidliak ISG #2
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Definitions and Terms Page: vi
QIA Comment	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.
QIA Request	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.

Comment #	QIA 2023 Chidliak ISG #3
References	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: Definitions and Terms Page: vii
QIA Comment	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.
QIA Request	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.”

Comment #	QIA 2023 Chidliak ISG #6
References	Document Name: NIRB. 2023. <i>Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal (NIRB file no. 22MN025).</i> Section: 2.0 Preparation and Review of the Impact Statement Page: various



Comment #	QIA 2023 Chidliak ISG #7
References	<p>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></p> <p>Section: 2.1 The Study Strategy and Methodology</p> <p>Page: 9</p>
QIA Comment	<p>QIA's Comment #7 recommended that NIRB revise its guidance to reflect a priority for conciseness in summary documents and comprehensiveness/adequate detail in the IS and its appendices.</p> <p>NIRB has acknowledged the comment and indicates that it will address the comment in NIRB's Standardized Guidelines process. NIRB has not indicated that they have addressed the comment in the Revised Draft Guidelines.</p>
QIA Request	<p>QIA's comment has not been addressed and remains outstanding.</p> <p>QIA requests that NIRB indicate how the recommendations of Comment #7 regarding NIRB revisions of its guidance to reflect a priority for conciseness in summary documents and comprehensiveness/adequate detail in the IS and its appendices are reflected in the Revised Draft Guidelines.</p>

Comment #	QIA 2023 Chidliak ISG #8
References	<p>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></p> <p>Section: 2.1 The Study Strategy and Methodology</p> <p>Page: 11</p>



QIA Comment	<p>QIA Comment #8 suggested the following revision (suggested changes in bold): “The Impact Statement shall identify any valued components requested by parties that the Proponent chooses not to adopt and provide a supporting rationale for not including said valued components as well as any differences in conclusions of potential impacts (including significance determination). NIRB shall review the rationale and make a determination as to appropriateness of inclusion of the valued component(s) not accepted by the proponent...”</p> <p>NIRB has partially addressed this comment by adding part of the requested text. They have indicated that suggested edits were incorporated into the text as NIRB was able.</p>
QIA Request	<p>QIA’s comment has not been fully addressed.</p> <p>QIA recommends the following revision (suggested changes in bold): “The Impact Statement shall identify any valued components requested by parties that the Proponent chooses not to adopt and provide a supporting rationale for not including said valued components and/or interrelated parts of a system as well as any differences in conclusions of potential impacts (including significance determination). NIRB shall review the rationale and make a determination as to appropriateness of inclusion of the valued component(s) not accepted by the proponent...”</p>
Comment #	QIA 2023 Chidliak ISG #9
References	<p>Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025).</p> <p>Section: 2.1.1 Acquisition Methodology and Data Analysis</p> <p>Page: 11</p>
QIA Comment	<p>QIA Comment #9 recommended that the following addition be made (suggested changes in bold): Except where specified by the NIRB, the Proponent has the discretion to select the most appropriate methods to collect, compile, and present data, information, and analysis in the Impact Statement. The Proponent is expected to do so in consultation with impacted Inuit Organizations and show evidence of these efforts.”</p> <p>NIRB indicated that they have made the suggested addition to the text, but the suggested text does not appear in the Revised Draft Guidelines.</p>
QIA Request	<p>QIA’s comment has not been addressed.</p> <p>QIA recommends that the following addition be made (suggested changes in bold): Except where specified by the NIRB, the Proponent has the discretion to select the most appropriate methods to collect, compile, and present data, information, and analysis in the Impact Statement. The</p>



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Comment #	QIA 2023 Chidliak ISG #14
References	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
QIA Comment	Greater clarity is recommended on what NIRB considers to be a "future land use plan". From QIA's perspective, any formal written submission by Inuit 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".



	NIRB states that clarifications have been made in the document; however, no clarifications are evident in the noted section (5.5).
QIA Request	QIA comment has not been addressed. 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".

Comment #	QIA 2023 Chidliak ISG #16
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 6.2 Project Purpose, Need, and Alternatives Page: 23
QIA Comment	At the end of the final paragraph of this section, NIRB should consider providing an additional sentence indicating that "NIRB strongly recommends the Proponent engage deeply with Inuit Organizations on this topic, given its high priority for those parties and their prior experience with distributional equity issues." NIRB indicates that this suggestion was incorporated throughout the document based on other comments and/or suggestions made by QIA. However, it is not clear where or how this suggestion has been incorporated; it has not been incorporated into the noted section (6.2).
QIA Request	QIA requests that NIRB clarify how and where this suggestion has been incorporated into the Revised Draft Guidelines.

Comment #	QIA 2023 Chidliak ISG #17
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: 6.2 Project Purpose, Need, and Alternatives Page: 22 (General Comment)
QIA Comment	QIA comment #17 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. NIRB indicates that edits have been made; however, a review of the Revised Draft Guidelines shows that this suggestion has not been applied throughout the document.



QIA Request	QIA's comment has not been addressed. 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.
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Comment #	QIA 2023 Chidliak ISG #18
References	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> . 63 pp. Section: 6.2.1 Alternatives Page: 24-25
QIA Comment	QIA Comment #18 requested that the NIRB update the wording within section 6.1 to include the following additions in bold : <ul style="list-style-type: none"> • "The requirements of Section 7.4.3 of this document, specifically the consideration for cumulative impacts on the terrestrial, aquatic, and marine ecosystem and on traditional harvesting activities and whether each alternative has considered the vulnerability of the Arctic ecosystem" (23 p.) • "The application of the precautionary principle, as outlined in section 1.3, including consideration of uncertainty and potential for adverse impacts". <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>
QIA Request	QIA's comment has not been fully addressed. QIA recommends that NIRB update the wording within section 6.1 to include the following additions in bold : <ul style="list-style-type: none"> • "The application of the precautionary principle, as outlined in section 1.3, including consideration of uncertainty and potential for adverse impacts".

Comment #	QIA 2023 Chidliak ISG #21
References	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: 6.2 Project Purpose, Need, and Alternatives Page: 23
QIA Comment	QIA Comment #21 recommended that the NIRB add an additional bullet point to the bulleted list on page 23.



Comment #	QIA 2023 Chidliak ISG #23
References	<p>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>. 63 pp.</p> <p>Section: 6.5 Economic and Employment Information</p> <p>Page: 26-27</p>
QIA Comment	<p>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."</p> <p>NIRB has not addressed this comment and has only indicated in the comment table that information for this section has been requested.</p>
QIA Request	<p>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 for each phase of the project 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, 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."</p>

Comment #	QIA 2023 Chidliak ISG #24
References	<p>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>. 63 pp.</p> <p>Section: 7.1 Factors to be considered in the Impact Assessment</p> <p>Page: 27</p>
QIA Comment	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



	<p>science and use the results of monitoring to adapt their practices, impacts and mitigation measures.</p> <p>NIRB has partially addressed this comment by indicating that “<i>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.</i>” NIRB has not indicated in what other sections of the document these comments will be considered.</p>
QIA Request	QIA requests that NIRB indicate where in the Revised Draft Guidelines this comment will be applied.

Comment #	QIA 2023 Chidliak ISG #25
References	<p>Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc’s Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). 63 pp.</p> <p>Section: 7.1 Factors to be considered in the Impact Assessment</p> <p>Page: 27-28</p>
QIA Comment	<p>In Comment #25, QIA remained 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:</p> <p>“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)”</p> <p>NIRB has not addressed this comment. A minor revision has been made to the Revised Draft Scope, section 10 but refers only to ‘new mining technologies’ and does not address the use of mining technologies in the Arctic and/or Baffin Island. NIRB indicates that the requested edit will be considered in the revision of ‘the document’; it is unclear to which document NIRB is referring and why the requested edits were not considered in the current revision.</p>
QIA Request	<p>QIA requests that NIRB add an additional factor to be considered in the Impact Assessment:</p> <p>“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)”</p>



Comment #	QIA 2023 Chidliak ISG #34
References	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: 7.4.1 Impact Prediction Page: 34-5
QIA Comment	QIA recommends revising this first bullet to state “[bullet] Explain how scientific, engineering, and Inuit Qaujimajatuqangit data and analysis were integrated was used to inform the identification of impacts and determination of mitigation;” NIRB indicates that this comment has been addressed but the requested changes have not been made in the Revised Draft Guidelines.
QIA Request	QIA recommends revising this first bullet to state “[bullet] Explain how scientific, engineering, and Inuit Qaujimajatuqangit data and analysis were integrated was used to inform the identification of impacts and determination of mitigation;”

Comment #	QIA 2023 Chidliak ISG #40
References	Document Name: <i>Revised Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i> Issued May 2023 Section: 7.4.5 Indicators and Criteria Page: 39
QIA Comment	QIA Comment #40 requested 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 <i>require</i> that the Proponent “ adopt IQ, including observational/sensory indicators, into the assessment, and/or where these are not included for individual VEC/VSECs, provide a supporting rationale ” (p.37). NIRB has partially addressed this comment by incorporating part of the suggested text.
QIA Request	QIA requests that NIRB also 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.

Comment #	QIA 2023 Chidliak ISG #50
References	Document Name: <i>Revised Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i> Issued May 2023 Section: 11.3.1 Follow-up and Adaptive Management Plans



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	Page: 78
QIA Comment	<p>QIA Comment #50 recommended NIRB add the following bullet: "The Proponent shall discuss how its monitoring plans relate to and enhance its closure goals, objectives, criteria and final state."</p> <p>NIRB indicates that the requested addition has been made but it does not appear in the Revised Draft Guidelines.</p>
QIA Request	QIA recommends NIRB add the following bullet: "The Proponent shall discuss how its monitoring plans relate to and enhance its closure goals, objectives, criteria and final state."

Comment #	QIA 2023 Chidliak ISG #55
References	<p>Document Name: <i>Revised Draft Guidelines for Preparation of an Impact Statement for DeBeers Canada Inc.'s Chidliak Diamond Mine Proposal (NIRB File No. 22MN025)</i> Issued May 2023</p> <p>Section: 11.4 Closure and Reclamation Plan</p> <p>Page: 80-1</p>
QIA Comment	<p>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.</p> <p>NIRB indicates that comments are being considered as part of the Standardized Guideline process and that further edits may be considered following the Guidelines Workshop.</p>
QIA Request	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.



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

Comment #	QIA 2023 Chidliak ISG #58
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Section 11.3.3 Page: 88
QIA Comment	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.
QIA Request	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."

Comment #	QIA 2023 Chidliak ISG #59
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Section 7.3 Page: 40
QIA Comment	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



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Comment #	QIA 2023 Chidliak ISG #60
References	<p>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></p> <p>Section: Section 8.1.7.1</p> <p>Page: 57</p>
QIA Comment	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.
QIA Request	Section 8.1.7.1 (iv) be updated to the following: "Discussion of waters in the RSA of importance to local harvesting activities by surrounding communities."



Comment #	QIA 2023 Chidliak ISG #61
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Section 8.2.9.2 Page: 76
QIA Comment	While an assessment of cumulative effects is required throughout the impact assessment, it should be explicitly stated that cumulative effects on Inuit well-being should be considered.
QIA Request	QIA recommends the following be added to 8.2.9.2: "Assessment of any other potential cumulative effects on individual and community well-being in the RSA."

Comment #	QIA 2023 Chidliak ISG #62 Comment
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Section 8.2.9.1 Page: 76
QIA Comment	Inuit income and wealth is not included in baseline information or in the impact assessment predictions. Income and wealth are an important dimension of material well-being and one that can be impacted by the Project.
QIA Request	QIA recommends the following be added to baseline data requirements in Section 8.2.9.1: "Description of Inuit income and wealth and ability to meet and exceed basic material needs (food, housing, clothing, etc.) where food security and housing availability, affordability and adequacy are key considerations." Correspondingly, QIA recommends the following be added to the Impact Assessment requirements in Section 8.2.9.2: "Potential effects on Inuit income and wealth and ability to meet and exceed basic material needs (food, housing, clothing, etc.) where food security and housing availability, affordability and adequacy are considered."

Comment #	QIA 2023 Chidliak ISG #63 Comment
References	Document Name: NIRB. 2023. <i>Revised Draft Guidelines for the preparation of an impact statement for DeBeers Canada Inc's Chidliak Diamond Mine Proposal</i> (NIRB file no. 22MN025). Section: Section 8.2.9.2 Page: 76
QIA Comment	The balance between work and personal life has an impact on Inuit well-being and culture. Understanding an Inuk's time to devote to traditional



Comment #	QIA 2023 Chidliak Revised Draft ISG # 64
References	<p>Document Name: 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)</p> <p>Section: Section 11.3.3</p> <p>Page: 88</p>
QIA Comment	<p>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."</p> <p>Language should reflect that any socio-economic monitoring and management plan should monitor and mitigate impacts associated with the decided-upon VSECs.</p>
QIA Request	<p>The statement be updated to include more inclusive language on what the Proponent should monitor and manage:</p> <p>"...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</p> <p>"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."</p>

Comment #	QIA 2023 Chidliak Revised Draft ISG #65
References	<p>Document Name: 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)</p> <p>Section: 7.4.2.1 Climate Change</p> <p>Page: 44</p>
QIA Comment	The NIRB states, “Uncertainties related to climate change predictions, and the related effect on other predictions in the Impact Statement, including water quantity, water quantity , 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”.
QIA Request	The red text should be updated to reflect the correct wording.

Comment #	QIA 2023 Chidliak Revised Draft ISG # 66
References	Document Name: 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) Section: 8.1.3.2 Impact Assessment Page: 53
QIA Comment	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.
QIA Request	Please add benthic invertebrates to the discussion of potential impacts of noise and vibration.