Robbin Sinclaire
Nunavut Impact Review Board
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March 22, 2024

RE: QIA Follow-up to CEA Workshop

Dear Robbin Sinclaire,

The Qikiqtani Inuit Association (QIA) is pleased to provide the Nunavut Impact Review Board (NIRB or the Board) with this written submission summarizing QIA's recommendations on the approach to the cumulative effects assessment of the Mary River Project (the Project). These recommendations are a result of the discussions leading up to and during the Cumulative Effects Assessment Framework Workshop that took place in Iqaluit on February 19 and 20, 2024 (the Workshop).

QIA would like to assure NIRB that QIA stands firm in its position on the scope of the cumulative effects assessment (CEA) that includes the following consideration of temporal and geographical boundaries, as well as valued components.

The temporal scope of the CEA is framed by the past and future boundaries. The first boundary is in the past, prior to the start of the Project, while the boundary of the future is set at the point when the impacts of the Project are no longer measurable.

The geographical boundaries of the CEA include the impacted communities (Mittimatalik (Pond Inlet), Ikpiarjuk (Arctic Bay), Kangitugaapik (Clyde River), Sanirajak, Igloolik, Kimmirut, and Kinngait) inclusive of their travel routes, the range of mobile aquatic and terrestrial wildlife, watersheds where Project effects may be expected, and the Tallurutiup Imanga National Marine Conservation Area.

In addition, QIA believes that the CEA must focus on the following valued ecosystem components and valued socio-economic components:

- Narwhal;
- Caribou;
- Ringed seal;
- Inuit Culture, Resources, and Land Use;
- Snow and vegetation quality;
- Water and sediment quality;

- Walrus;
- Anadromous arctic char
- Sea ice;
- Public transportation safety;
- Other terrestrial wildlife, and
- Ground / permafrost stability.

QIA understands that Baffinland intends to submit the Sustaining Operations Proposal 2 (SOP2) amendment application to the NIRB in the near future. This amendment application will require a CEA to ensure intervenors and regulators are able to make informed decisions throughout the review process. QIA does not believe that it is feasible to complete a comprehensive CEA ahead of the SOP2 amendment application, and instead supports a tailored CEA for SOP2. The scope of this tailored CEA will require insight from all parties to ensure its sufficiency.

QIA firmly believes that NIRB should not accept any new amendment applications, other than SOP2, before a comprehensive and thorough CEA is completed. Further, any potential development of new mineral deposits (e.g., Deposits 2 and 3) must not occur without the comprehensive CEA in place.

As discussed during the Workshop, QIA envisions the comprehensive CEA as a multi-party process coordinated and led by NIRB. Solid process elements should be set, including:

1. Thematic technical meetings aimed at in-depth discussions of specific issues;
2. Mechanisms to provide feedback by the parties and NIRB;
3. Mechanisms to ensure that the assessment is accountable to the parties;
4. Thorough community consultations;
5. Periodic check-ins to ensure a smooth flow of the process and accord between the parties, and
6. Production of the Board's interim report for commenting. The intent for the interim report is to summarize the results achieved so far and to outline remaining process components.

The Qikiqtani Inuit Association looks forward to closely working with all parties, including the Nunavut Impact Review Board, on this important endeavour.

Nakurmiik,

Chris Spencer
A/Director, Lands & Resource Management
Qikiqtani Inuit Association