



June 24, 2024

Marjorie Kaviq Kaluraq, Chairperson
Nunavut Impact Review Board
Cambridge Bay, NU
XOB 0C0
email: info@nirb.ca

RE: Revised Draft Impact Statement Guidelines

Dear Ms. Kaluraq,

On May 15, 2024, the Nunavut Impact Review Board (NIRB) extended the comment period related to the Revised Draft Impact Statement Guidelines (Guidelines) to July 10, 2024. The purpose of writing to you today is in response to this request for comment.

Initially we would like to commend the NIRB for its ongoing leadership at the forefront of progressive impact assessment processes. The latest version of the draft Guidelines continues that leadership as the NIRB works to enhance assessment processes in Nunavut.

For the consideration of the NIRB, we offer the following observations on the content of the draft Guidelines in the hopes that NIRB staff will consider and incorporate these recommendations in future revisions to the draft Guidelines:

- **Lack of definitions:** Throughout the draft Guidelines many terms are used but definitions of those terms are not clear, or not as clear as they could be. For example, terms such as “engagement” and “consultation”, among others, require clear definitions to add all parties to a review process.
- **New burden placed on proponents:** Some requirements, such as identifying thresholds for acceptable change, go beyond what proponents can or should do and stray into the responsibility and authority of NIRB.
- **Unclear expectations:** Some of the NIRB expectations of proponents in the updated draft Guidelines are unclear. Work to enhance language in the updated draft Guidelines to clearly outline NIRB expectations of proponents in terms of amounts of information, number of engagements, etc.... will help all parties through the NIRB led assessment process.

We believe that the NIRB is on the right track to updating the draft Guidelines, but further enhancements and refinements need to be made to ensure that Nunavut remains a jurisdiction that is attractive for investment, and that the NIRB assessment process continues to be looked up to as a leading example. We further request future opportunities to review and comment on future revisions to draft Guidelines.

If there are any questions, please do not hesitate to reach out to us.

Yours truly,

Karen D. Costello

Karen Costello
Executive Director, NWT & Nunavut Chamber of Mines