



**By Email (info@nirb.ca)**

August 8, 2024

Dionne Filiatrault A/ Executive Director  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, Nunavut X0B 0C0

Dear Ms. Filiatrault:

**Re: Nunavut Impact Review Board Revised *Draft* Standard Impact Statement Guidelines for Comment**

Nunavut Tunngavik Inc. (NTI) appreciates the opportunity to provide comments on the Nunavut Impact Review Board's (NIRB) revised Draft Standard Impact Statement Guidelines.

NTI's comments consider our experiences in participating in NIRB processes, as well as those of other Inuit participants, such as the Regional Inuit Associations (RIAs), Regional Wildlife Organizations and Hunter and Trappers Organizations (HTOs).

In providing these comments, NTI is guided by the direction provided in the *Nunavut Agreement*, particularly with Sections 12.2.5 and 12.2.24 that provide key insights into the intended objectives and outcomes of NIRB processes. Section 12.2.5 emphasizes that NIRB's primary objectives in carrying out its functions must be, at all times, to protect the existing and future well-being of residents and communities, as well as the ecosystemic integrity of the Nunavut Settlement Area. Protecting the well-being of Inuit, who form the majority of Nunavut's resident population and the ecosystems that Inuit rely upon, is a key feature of the *Nunavut Agreement* and should be an overriding consideration guiding NIRB's work in its project assessment processes.

In addition to supporting comments provided by the RIAs, NTI provides the following detailed comments to NIRB's Revised Draft Standard Guidelines for the Preparation of an Impact Statement" dated April 2024.

**NTI's Detailed Comments on NIRB's Revised *Draft* Standard Impact Guidelines**

NTI supports the overarching principles that guide NIRB's impact assessment process including the consideration and inclusion of Inuit Qaujimajatuqangit, public engagement, the precautionary principle, and striving towards sustainability and sustainable development.

*Note: Text in italics below is quoted from the Draft Standard Impact Statement Guidelines.*

**P. 23, para. 3**

*Inuit Qaujimajatuqangit is central to the lives of Inuit across the Nunangat, including in Nunavut.*

NTI Comment 1: Inuit Qaujimajatuqangit is central to the lives of Inuit across Inuit Nunangat. (Delete “the” and add “Inuit” before “Nunangat”. Remove “, including in Nunavut” as Nunavut is widely recognized as part of Inuit Nunangat.)

**Pg. 23, para. 6**

*The Board has adopted the following description of Inuit Qaujimajatuqangit: “what Inuit have always known to be true” (see Karetak, J., Tester, F., & Tagalik, S. (Eds.). (2017). Inuit Qaujimajatuqangit: What Inuit Have Always Known To Be True).*

NTI Comment 2: The reference looks like the start of a reference list citation rather than an in-text citation.

**PP. 24-25, Inuit Qaujimajatuqangit**

NTI Comment 3: The way that Inuit Qaujimajatuqangit is defined and explained in Section 2.1 does not seem congruent with the way it is described as being collected, recorded, protected, analyzed, interpreted, and synthesized by a proponent in other parts of the document (particularly section 4.4.2).

The methods and requirements for including Inuit Qaujimajatuqangit in an Environmental Impact Statement do not seem to focus on the necessity of having Inuit involved in all aspects of describing and sharing Inuit Qaujimajatuqangit in a, preferably, oral context. This should be considered in how Inuit Qaujimajatuqangit is included in Impact Statements.

**P. 25, para. 2,**

*Proponents are strongly encouraged to engage with the applicable Regional Inuit Organization and ...*

NTI Comment 4: “Regional Inuit Organization” be changed to “Regional Inuit Association.” This also applies to another reference at p. 51.

**P. 26, para., 1,**

*Proponents are required to engage potentially impacted communities, the public, and interested parties about proposed projects and activities ...*

NTI Comment 5: add the list of organizations for “public engagement”, “Designated Inuit Organizations including Regional Inuit Associations and Nunavut Tunngavik Inc.” in this and other paragraphs on public engagement. While RIAs are the primary DIOs on surface right management and project review on behalf of Inuit in a specific region, NTI is the DIO for Article 5 and has the overall responsibility in representing Inuit and ensuring the implementation of the Nunavut Agreement including Article 12.

**P. 36, para., 1,**

*Further, the Proponent shall ensure that Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge used from databases receives input from the applicable Regional Inuit Association(s) and/or Knowledge holders on applicability.*

NTI Comment 6: add “Nunavut Tunngavik Inc.” after “... Regional Inuit Association(s)”. Please note that in places where the focus was working with communities, the addition of NTI is not proposed, consistent with the practice that RIAs are the primary DIOs and also the lead DIOs in working with the communities.

**Part 4, P. 1:**

NTI Comment 7: The page numbers restart at 1 at the beginning of Part 4.

**Part 4, P. 10, bullet 4; Part 4.3.2.1, P. 16, para. 2; Part 4.4.3.4, P. 31, para. 2**

*changes that would occur in the local or regional study areas because of the proposed project and/or the alternative means to undertake the project. (pg. 10)*

*If the preferred alternative changes throughout the course of its assessment, the Proponent shall consult with the NIRB to determine whether this proposed change would result in a change to the scope of the proposed project under Review. (pg. 16)*

*The Proponent shall also consider where applicable, the temporal bounds of project alternatives under assessment, noting where they differ from those for the preferred option. As is the case for the determination of spatial boundaries, the temporal boundaries must indicate the range of appropriate scales at which baseline descriptions and the assessment of ecosystemic, socio-economic, and cumulative impacts are presented.*

NTI Comment 8: In past reviews, alternative options presented within an Impact Statement ended up being within the scope of the project being assessed and the alternatives were part of NIRB’s approval. Certain sentences about “Alternatives” in the Revised Impact Statement Guidelines suggest that the Alternatives presented in an Impact Statement are not necessarily within the scope of the project being assessed and that those alternatives might have different study areas than the project being proposed. Clarity is needed on whether alternatives presented in an Impact Statement are within the scope of the project being proposed. Clarity is also needed on whether all alternative options presented in an Impact Statement are also under review by NIRB.

**Part 4, P. 23, Part 4.4.2**

NTI Comment 9: The way Inuit Qaujimajatuqangit is mentioned throughout section 4.4.2 suggests it is something that can be extracted, incorporated, and broken down into components by a proponent as part of an Impact Statement. This way of describing Inuit Qaujimajatuqangit seems to contradict the definition and explanations of Inuit Qaujimajatuqangit in Section 2.1 which describes Inuit Qaujimajatuqangit as being only held and generated by Inuit, belonging to Inuit, maintained through oral traditions and best understood in oral contexts, holistic and inseparable, and including aspects of the physical world, identity, culture, and spiritual beliefs.

**Part 4, P. 51, para., 1,**

*The Proponent should work with potentially impacted communities, the public, and interested parties, including the Regional Inuit Organizations, to define community values and identify criteria to be used in the significance determination.*

NTI Comment 10: add “Nunavut Tunngavik Inc.” after “... Regional Inuit Association(s)”.

**Part 4, P. 43, Part 4.4.5.4 Cumulative Impacts Assessment**

NTI Comment 11: The approach to cumulative impacts assessment set out in the Standard Impact Statement Guidelines should be amended to reflect the outcomes of the Cumulative Effects Assessment (CEA) Framework to be developed for the Mary River Project. NIRB held a CEA Framework Workshop on February 19-20, 2024. NIRB’s workshop report included a recommendation to develop a CEA Framework to guide future assessments for the Mary River Project with an acknowledgement that the results of the CEA Framework could be incorporated into the finalized Standard Impact Statement Guidelines.

NTI recommends that NIRB use the development of the CEA Framework that is expected to provide for an enhanced and more holistic approach to cumulative impacts as an opportunity to revamp the requirements for cumulative impact assessment in the Standard Impact Statement Guidelines. The lessons learned from the Mary River Project regarding cumulative impacts should be used to strengthen cumulative impact provisions in the Standard Impact Statement Guidelines.

**Part 4, P. 74, fn. 22,**

*Proponents should further engage with the with application Regional Inuit Association on the respectful protocols, expectations, and potential participant groups and individuals for the collection, protection, and use of Inuit Qaujimajatuqangit.*

NTI Comment 12: add “Nunavut Tunngavik Inc.” after “... Regional Inuit Association”. Also, correction – “application” to “applicable.”

### ***Literature Cited***

NTI Comment 13: There are no page numbers in the Literature Cited section.

### **Concluding Remarks**

Should you have any questions or need any clarifications with regard to the above, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dustin Fredlund', with a stylized flourish at the end.

Dustin Fredlund  
Chief Operating Officer