August 8, 2024

Nunavut Impact Review Board
Cambridge Bay, Nunavut
[transmitted by email]

To whom it may concern,

Reference: Comments on Revised Draft Standard Impact Statement Guidelines

Stantec is pleased to provide comment, in response to the Nunavut Impact Review Board's (NIRB) call for public review, on NIRB's Revised Draft Standard Impact Statement Guidelines (the "Guidelines").

Stantec is a 30,000 employee global engineering, architecture, and environmental consultancy based in Edmonton. Stantec Canada Environmental Services, with offices in all territories and provinces, has decades of experience in Canada's North, including many regulatory project applications. We are a national leader in the practice of environmental assessment.

Detailed comments and suggestions are provided in Attachment 1. Note that, for clarity and consistency, page numbers are provided as sequential PDF pages due to page numbering reverting to 1 in Section 4 of the Guidelines document.

Further to those comments, the following summarizes key observations:

- **Overall**: The Guidelines generally provide an appropriate level of information requirement, and generally reflect common expectations from the previous NIRB Guidelines. They also are generally representative of such requirements under other territorial, provincial and federal processes, with exceptions noted in the detailed comments.

- **Definition of terms**: The Guidelines include certain terms reflective of still evolving and aspirational concepts in environmental assessment theory and practice (e.g., holistic, ecosystem approach, Inuit lens, systems, collective impacts). These terms are not yet adequately formulated in definition and pragmatic implementation to secure the needed understanding and confidence in meeting evidentiary information requirement for project applications. Given increasing expectations in environmental assessments, reduced ambiguity is necessary to improve mutual desired outcomes. Suggestions are offered regarding addressing this need.

- **Engagement**: Proponent engagement with communities is recognized as an essential source of insight and information in support of a regulatory assessment. Clarification would be beneficial on two related items: differences and respective use of the three types of knowledge identified (Community Knowledge, Indigenous Knowledge, Inuit Qaujimajatuqangit); and, on the degree of expectation by which such insight influences the Impact Statement. Further clarification (beyond that provided in Appendix D: Checklist to Demonstrate Meaningful Engagement) would also be of benefit regarding the NIRB's responsibility to provide guidance to proponents (and communities) on

the level of engagement expected/required with various communities and the degree to which the NIRB will consider the related information during the approval process.

We wish to thank NIRB for the opportunity to provide comment. Preparation of complete generic Guidelines, forming the basis of customized project-specific guidelines, will assist advancement of project reviews in Nunavut and improved opportunities for sustainable outcomes to the benefit of all Nunavummiut.

Best regards,

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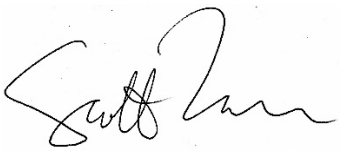

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Attachment: Attachment 1: Review Comments on NIRB Revised Draft Standard Impact Statement Guidelines

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Attachment 1: Review Comments on NIRB Revised Draft Standard Impact Statement Guidelines

Page (PDF)	Section	Topic/Issue	Guideline Text	Comment	Suggested Edit/Change
7	Definitions	Consultation, Engagement	N/A	Definitions for each term should be provided given their frequent use, importance and appear to occasionally be used interchangeably.	Define terms.
7, 8, 9	Definitions	• Community Knowledge • Indigenous Knowledge • Inuit Qaujimajatuqangit	• Reflects the wisdom and experience of Community members, including observations and understandings about the environment and how Knowledge is generated, stored, applied, and shared with others. • the accumulated body of Knowledge, observations, and understandings about the environment and the relationship of living beings with one another and with the environment, that is rooted in the way of life of Indigenous peoples. • that which Inuit have always known to be true. Inuit Qaujimajatuqangit is more than just the information produced and encompasses all aspects of way of life	The importance of each term is recognized. However, they also fundamentally share quite similar meanings. These terms are used extensively in the Guidelines. Given their importance, improved clarity on their differences, and in what contexts each apply, would be of benefit for all instances in which they appear in the Guidelines.	Expand on definitions to clarify differences in meaning in the context as used in the Guidelines; mostly, regarding engagement and information source in support of the assessment.

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Page (PDF)	Section	Topic/Issue	Guideline Text	Comment	Suggested Edit/Change
8	Definitions	Holistic	That something (e.g. the environment) is made up of interconnecting parts that can only be explained by looking at the whole and not the individual parts	This term should not be used unless adequate pragmatic/implementable meaning is provided in the context of regulatory project assessment; no such guidance exists we are aware of.	Do not use this term, or, adequately define it.
13	Part 1 - Introduction	Goals and Benefits of the Guidelines	The NIRB can also issue project-specific Guidelines that would be appended to the Standard Impact Statement Guidelines during a Review Process …	This section should be revised to reflect that the Standard IS Guidelines provide an overview of the general information that may be required in a project-specific review; however, each project will have EIS Guidelines that are specific to the scope of the project and scope of the assessment, including the topics of concern identified during the NIRB's scoping phase. Not all of the Standard EIS content may be applicable to a project, and likewise, a project may have additional requirements that are not reflected in the Standard IS Guidelines. This should not be additional to IS guidelines (as implied). The purpose and goals statements should reflect that the Standard IS Guidelines do not replace the need for project-specific EIS Guidelines to be developed in accordance with NUPPAA s.101(1), and the opportunity to provide comment on such guidelines per s.101(4) and reflected in a later statement in Section 3.1: "The Proponent shall engage potentially impacted communities, the public, and interested parties in the development of the Impact Statement, including but not limited to .."	Edit "Purpose and Target Audience" to better reflect how this Guideline may be further customized to more specifically reflect information requirements relevant to the specific project under review.

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Page (PDF)	Section	Topic/Issue	Guideline Text	Comment	Suggested Edit/Change
20	Figure 1	Environmental Impact Statement	Text in figure	The figure uses the term "Environmental Impact Statement" (EIS), versus "Impact Statement" (IS) as used elsewhere in the Guidelines.	Replace with "Impact Statement" in the figure.
22	Figure 2	Missing text	Proponent submits an Impact Statement for a project proposal during step 1 of a NIRB Screening. It must be clearly stated by the Proponent that the proposal is intended to serve as an Impact Statement as well as the	Sentence is incomplete.	Complete the sentence.
28, 57	2.2 Public Engagement 4.4.1.1 Meaningful Public Engagement	Relationships	Building relationships that start early in project development and prior to the NIRB's impact assessment processes	Building relationships is an appropriate goal and starting engagement early in the process is an appropriate requirement. Prescribing the building of relationships, however, may go beyond what a proponent can deliver. A relationship requires two willing parties, and a project should not be disqualified because one party is unwilling to enter a positive relationship. Engagement can still occur without it.	Clarify that engagement should start early and remove the requirement to build relationships or, at minimum, qualify it as an aspirational goal. Also, specify the evidence required to demonstrate that best (i.e., acceptable) efforts have been made to engage with a specific community or stakeholder group to develop positive working relationships.
33	3.1 Study Strategy and Methodology	Systems	Identification of systems (a bullet in list)	See comment for p. 73.	
35	3.1.1.1 Scientific and Engineering Information	Sampling	For all data obtained from Valued Component sampling the Proponent shall provide: dispersion or variability coefficient (variance, standard deviation, confidence interval, etc.); justification for sample size; and sensitivity and assumptions of experimental design and	Notwithstanding the importance of statistical rigour and validation of data, achieving this is not always relevant, available, useful or meaningful.	Condition the requirements reflecting the comment; e.g., "...as appropriate to the extent possible".

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			statistical methods and models used that affect conclusions.		
39	4.1 Submission Requirements	Inuktut or Inuktitut	Inuktut" or "Inuktitut" means the forms of Inuit language in current usage in Nunavut, including Inuinnaqtun within the Kitikmeot Region of Nunavut	The text (Footnote 10) provides a definition that does not align with that in the Definitions section. The meaning in the definitions section is based on a peoples, while the meaning in the footnote is based on language.	Reconcile the two meanings and also reflect this in a revised definition in the Definitions sub-section (p. 9).
46	4.2.2 Project Overview	Capacity	For example, the capacity of the non-renewable resources being exploited (e.g. iron in the local mountain)…	The meaning of "capacity of the non-renewable resources being exploited" is unclear, especially given that, also used (and aligned with convention elsewhere), capacity is in regards to the capacity of natural systems to receive and sustain impacts.	Clarify the meaning of capacity for non-renewable resources.
52	4.3.1 Project Design	Doses	A description of the estimated contaminant and other material (physical and chemical) levels in the environment as well as estimated doses to members of the public after closure and remediation	Information on such doses is not relevant to a project description nor would normally be provided in such a description. Such information is relevant, as appropriate, later in the assessment; e.g., of human health.	Delete mention of doses.
52	4.3.2.1 Alternatives	Alternatives	The Impact Statement shall include an explicit analysis of all alternative means of carrying out the proposed project components or activities, including a "no-go" alternative. This analysis must include the identification and application of criteria used to determine the technical feasibility and economic viability of the alternatives to the proposed project.	The text implies that an assessment of "alternatives to" are subsumed with an assessment of "alternative means". This is incorrect. The two are fundamentally different and, if both are required, each require a separate assessment. Aligned with precedence elsewhere, alternative means in the Guidelines is typically at least required. Mention of "alternatives to" is later stated in section 4.4 "The NIRB will consider the need for alternatives to, and alternative means of carrying out,	Provide improved clarity on requirements for "alternatives to" and its difference to "alternative means".

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				the proposed project...", the second of only two mentions in the Guidelines.	
54	4.3.3 Economic and Employment Information	Future Development	This includes providing sufficient information regarding foreseeable future development.	The term "foreseeable future development" is used here to refer to potential future development associated with the same project under current review, and, assumedly, also by the same proponent. However, Footnote 15 (bottom of same page), associated with this text, defines "Reasonably foreseeable future development" for which the common definition is provided in the context of a cumulative effects assessment. As such, "foreseeable future" is used in two different but still closely related contexts, intermingling commonly understood meanings.	Expand on the interpretation of these two terms to improve clarity.
54	4.3.3 Economic and Employment Information	Project Splitting	Refers to the practice of Proponents separating a project into smaller parts for the Impact Assessment process, often to prevent a higher-level assessment or to reduce the potential for predictions of significance of impacts from the Project on the environment.	This definition (Footnote 16) is inaccurate; the majority of instances in which claims of project splitting are made are not for the reasons mentioned, implying purposeful deceptive and illegitimate intent, but instead on the basis that ancillary physical activities subject to their own separate regulatory review are not included in the assessed scope of project. This is a reasonable, precedence based (in other jurisdictions) and procedurally legitimate approach.	Delete the rationale in the definition and replace with the rationale provided in this comment.
61	4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and	Knowledge Sources	Rationale for any differences in conclusions between knowledge sources and plans to address.	This requirement implies that a proponent must explain the basis pf reasoning from other parties. This is not always if ever reasonable or	Clarify the limits of meeting this requirement.

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	Community Knowledge			possible, especially for sources of traditional knowledge, for which only the individual(s) from other parties are in a position to themselves explain.	
70	4.4.4.1 Establishing Baselines	Inuit lens	Recognizing the relationships between valued components and Inuit Qaujimajatuqangit and/or cultural practices, it is important that the Impact Statement reflects a holistic view of what the current state of the environment is, not just for a scientific view, but from an Inuit lens.	The term "Inuit lens" is not defined in the Guidelines. Notwithstanding that the term has notably gained usage in various literature the last years (also as "Indigenous lens") and that its wording comes with an implied common understanding, we are unaware of a working definition adequate to provide the necessary guidance and assistance to proponents and practitioners completing and defending an IS in the context of regulatory assessments.	Do not use the term unless it is adequately defined and its pragmatic implementation in an IS is explained.
70	4.4.4.1 Establishing Baselines	Baseline data collection	To identify natural fluctuations and trends, including cyclical and other recurrent phenomena, the Proponent shall collect baseline data to reflect sufficient time, depth, and geographic broadness of both temporal and spatial scale. For example, populations and distributions of wildlife are known to fluctuate in cyclic trends over extensive time periods and geographic ranges and it could take several years to conduct the field research necessary to collect adequate baseline information across all seasons.	The requirement for multiple years of baseline studies is questionable regarding need except possibly in the most extenuating circumstances (e.g., no data available and no surrogate information available elsewhere), and, represents a substantial risk to project advancement and investment given the substantial delay incurred relative to what is commonly understood as the accepted minimum of at least one year covering relevant seasonal field periods. Also, information to support a confident understanding of "natural fluctuations" is often limited or not available given the complex factors and extended periods of observation time (even with IQ) required.	Modify mention of multiple years to ensure not a mandatory expectation, and that such time durations are not always needed. It is also helpful to note that each assessment context (e.g., VSECs, geography, data sources) is different and, as such, flexibility is appropriate in addressing the customized needs of each assessment.

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Page (PDF)	Section	Topic/Issue	Guideline Text	Comment	Suggested Edit/Change
70-71	4.4.4.1 Establishing Baselines	Natural Fluctuations and Baseline	• To identify natural fluctuations and trends, including cyclical and other recurrent phenomena, the Proponent shall collect baseline data to reflect sufficient time, depth, and geographic broadness of both temporal and spatial scale. • At a minimum, baseline information should be: collected in a manner conducive to detailed analyses, extrapolations and reliable predictions"	Requirements appear to be applicable more to biophysical data. These requirements are not likely to be able to be met for socio-economic data.	Revise wording throughout to include "as appropriate" or "as applicable" and remove "at minimum".
71	4.4.4.1 Establishing Baselines	Baseline/historical baseline	Suitable for estimating pre-project (historical) baseline conditions (*bullet in list*)	Baseline is not the same as historical baseline, but the two are used interchangeably, which is confusing, unclear and not aligned with practice and precedence elsewhere. Baseline are current conditions, at the time of assessment, and against which incremental project effects are assessed. Historical baseline however is a far past point in time typically prior to any anthropogenic disturbance in the region that is desired by some to provide an alternative basis of comparison. Current national practice does not require a historical baseline; however, acknowledgment of past natural and human conditions and history is beneficial to provide further context for the assessment.	Ensure clarity between baseline and historical baseline.

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72	4.4.5 Impact Assessment Approach	Historic conditions	Baseline information (including current and historic conditions) and trends for change (*bullet in list*)	See comment for p. 71. Note that any conventional baseline, by definition, includes a representation of past conditions to the extent that they remain observable and/or measurable.	
73	4.4.5 Impact Assessment Approach	Systems	A systems analysis is a more high-level and holistic evaluation of collective impacts to the environment and should focus on the capability of natural systems (local and regional) to maintain their structure and functions and to support biological and ecological diversity.	Notwithstanding that the fundamental concept (of large complex natural systems) reflects the reality of the environment, there is no ready means, precedence or guidance regarding how to pragmatically assess a "system" in the context of a regulatory project application, nor an adequate definition of what a system is that is not based only on scholarly theory. The cited reference, while of value in explaining the concept in general use in resource management and decision making, does not constitute guidance readily translated to project assessment. Further, other equally undefined and unexplained terms are combined, notably holistic. Concepts such as "holistic" and "collective impacts" do not offer needed edification. We are aware of interest in the MVEIRB (as per Footnote 18) on these subjects; however, current implementation examples are limited to decisions by that regulatory body, versus as exercised within the assessment on which the decision refers. Utilization by a review and/or decision-making authority of expansive such terms and concepts is an approach they can make given the larger opportunity they have for exercising basis of their	"Systems", "holistic" and "collective" should be removed unless clear, meaningful and pragmatic guidance is provided on implementation. The MVERIB's concept of "Key Lines of Inquiry" (KLOI) is recommended for adoption by NIRB, that is reflective of a systems approach but reasonably pragmatically implementable.

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				rationale. Such opportunity however is far more limited in the preparation of an environmental assessment given the need for, on every detail, clear, rationalized defensibility with full revelation of chain of information/data sources, gaps, uncertainties and level of confidence for what is filed on the public record.	
74	4.4.5.1 Impact Prediction	Induced Impacts	The Proponent shall assess the potential for short and long-term direct, indirect, induced, and cumulative impacts – including transboundary impacts and impacts to Indigenous Groups asserting s. 35 rights – of the proposed project on the ecosystemic and socio-economic environments, and the interactions between valued components and the greater systems they are a part of.	Given the importance of "induced" projects in the assessment of cumulative effects and the need to clearly differentiate it from others, a definition is required (available in federal assessment guidance), including the timeframe over which induced effects need to be considered and the level of detail which is appropriate for assessment of induced effects.	Provide a definition.
81	4.4.5.4 Cumulative Impacts Assessment	Reasonably Foreseeable - Definitions	A cumulative impact refers to the accumulation or addition of impacts to the environment and society caused by past, existing, proposed, and reasonably foreseeable projects impacts that could result from the impact of the proposed Project combined with those of any other project that has been carried out, is being carried out, or is likely to be carried out.	Reasonably foreseeable projects, by current convention, may include proposed (publicly announced) projects, which may also be under regulatory review. Also, the text concludes, starting with "...combined with those...", with overlapping and repeating reference to temporal state of projects that, given what was just previously stated, causes confusion.	Simplify and restate the text adopting current convention as available in other guidance (e.g., federally).

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81	4.4.5.4 Cumulative Impacts Assessment	Errata	The discussion shall include...Evidence of engagement with potentially impacted parties the NIRB and reflecting…	NIRB is not an affected party in the context here.	Delete "The NIRB".
82	4.4.5.4 Cumulative Impacts Assessment	Scenarios	Documentation of the methodology used to predict cumulative impacts, including multiple realistic scenarios of conceptualized phased developments.	Clarification is required as to what exactly the "scenarios" are based on; that basis is implied as only potential future phases of the same Project under review, which is an acceptable and useful means to assess possible such phases, versus, scenarios of potential hypothetical "futures" composed of physical activities proposed by other proponents and/or induced by the Project. If the latter, that level of assessment does not align with information requirements for the assessment of cumulative effects under other jurisdictions, including federal (from which CEA method has been largely if not fully adopted in other regulatory regimes).	Clarify meaning and use of scenarios.
86	4.4.5.6 Indicators, Criteria, and Parameters	Criteria, Indicator, Metric, Variables, Parameters, Threshold of Impact, Threshold for mitigation	For the Standard Impact Statement Guidelines, the NIRB uses the following definitions…(*list follows)*	The five terms (criteria, indicator, metric, variables, parameters) largely overlap in meaning and intent and as such introduce redundancy and confusion on what specifically each mean and in difference to the others; this is notably so for "variables" and "metric". A consolidation would bring these into alignment with current common practice elsewhere.	Condense these five terms into just two (indicator and criteria), or, merge terms of very similar meaning, or, expand on meaning and differences of all terms.

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87-88	4.4.5.7 Significance Determination	Levels of Significance	Describe and define the terms used to identify levels of significance. The Proponent is encouraged to develop levels of significance through engagement and consultation with the public and governments and organizations. Common levels of significance include but are not limited to: “negligible” "low", "medium", "high", “adverse”, “additive”, “beneficial”, “positive”, and “negative”.	The introduction of a variety of possible definitions for significance without further explanation around their circumstances of use or how they may differ from one another creates confusion.	Provide a single recommended approach for characterizing significance; e.g. conventional binary (significant, not significant) or ordinal scale (e.g., low, medium, high). Provide further explanation on the use of the definitions.
88	4.4.5.7 Significance Determination	Basis of significance evaluation/ ecosystem approach	Consistent with the ecosystem approach requirements noted above and holistic view of the environment, the Proponent should highlight the interactions within and between valued components to increase understanding of the dynamism of the ecosystems in question and the nature and severity of the predicted impacts as discussed in Section 4.5.	"Ecosystem approach", first and only used here in the Guidelines, is not defined. Notwithstanding its general usage in the relevant literature, no pragmatic means to implement this (assuming what it means is understood) is available. As mentioned previously, "holistic" (also in the text) is not defined in a way that assists implementation, notwithstanding its general common understanding. "Interactions" and "dynamism" is assumedly alluding to a "systems" approach; however, as previously mentioned, this too is inadequately defined. Further, these concepts, while admittedly relevant at a fundamental level, do not lend themselves individually or collectively to actual assessment method with the needed clarity to ensure adequacy of filed evidence in the IS.	Rewrite or delete this requirement in consideration of the comment.

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89	4.4.5.7 Significance Determination	Descriptors for specifying significance	The following are descriptors which may be applicable for specifying significance of identified potential impacts:...	Clarity is required between the usage of such "descriptors" and the preceding list of "attributes". Such attributes serve to, optionally and as appropriate and usefully, supplement the characterization of the attributes, where the attributes are the primary effects basis and mandated (as per the Act). Without such clarification some may interpret the descriptors at an equivalent weight as the attributes, which would represent an unreasonable and onerous requirement given the more complex nature of many of the descriptors.	Clarify usage of descriptors.
91	4.5.1 Ecosystemic Environment Baseline and Impact Assessment	Project applicability	Ecosystemic impact assessment applied to all project phases of development: *(list of bullets)*	Not all such phases are applicable to all projects.	Insert "as applicable".
91, 93	4.5.1.1 Identification of Valued Components, Systems 4.5.2.1 Identification of Valued Components, Systems, and Potentially Impacted Communities	Valued Component (VC) Selection	The valued ecosystemic components could include: Valued Socio-economic Components could include:	While each subsequent bullet list of candidate VCs is implied as suggestions only (versus mandatory, given the use of “could” in the preamble text), by some these are often nonetheless interpreted as mandatory.	Emphasize that these VCs are suggestions or examples only, and that final VC selection will reflect those customized for the project under review in consideration of many influences, such as nature of the project, project effects, nature of environment receiving those effects, and community views.

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92	4.5.1.2 Baseline Information	Conceptual Site Model	Information should be presented in the form of a “Conceptual Site Model”…	"Conceptual site model" is not defined.	Define "conceptual site model".
92	4.5.1.2 Baseline Information	Ecosystemic approach	In describing the ecosystemic environment, the Proponent shall take an ecosystemic approach that is informed by scientific, Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge perspectives regarding ecosystem health and integrity.	An "ecosystemic approach" is undefined (also see response for page 88). What is explained is sources of information and what is to be assessed, but what is not explained is how it is to be assessed.	Explain what an "ecosystem approach" is and how assessed.
92	4.5.2 Socio-Economic Environment Baseline and Impact Assessment	Project applicability	Socio-economic impact assessment applied to all project phases of development: *(list of bullets)*	Not all such phases are applicable to all projects.	Insert "as applicable".
99-107	4.6 Environmental Management System	Definitions	All	Clarification by improved differentiation is required between multiple products due to similarities of content, at least between the following key components: Environmental Management System, Environmental Management Plan, Environmental Protection Plan.	Insert, early in the section, a list of these three items, each briefly explaining its focus so as to make clear the unique nature of each and hence their key differences.