



Sanirajak

## Appendix A

<b>Comment #</b>	QIA 2024 NIRB DISG #1
<b>Subject</b>	Local Study Area Definition
<b>Reference</b>	Definitions and Terms; Page 8
<b>Priority</b>	High
<b>Background</b>	A Local Study Area (LSA) typically includes the area where both direct and indirect project-caused impacts are likely to occur. For example, BC's <i>EAO Effects Assessment Policy</i> (v1: 2020) states "LAA [BC EAO uses the term "Local Assessment Area" in lieu of LSA] encompasses the project footprint and the zone of influence of the project, including areas that may be affected by direct and indirect project effects", and distinguishes this from a Regional Assessment Area.
<b>QIA Recommendation</b>	Revise the definition of an LSA, removing the word "direct" to read "...for impacts due to project activities..."

<b>Comment #</b>	QIA 2024 NIRB DISG #2
<b>Subject</b>	Threshold for Mitigation Definition
<b>Reference</b>	Definitions and Terms; Page 10
<b>Priority</b>	Low
<b>Background</b>	Consistency between terms is recommended to match the other "threshold" definition above ("threshold of impact").
<b>QIA Recommendation</b>	Consider starting this definition with "The point when a change reaches an established point..."

<b>Comment #</b>	QIA 2024 NIRB DISG #3
<b>Subject</b>	Consultation Record Verification
<b>Reference</b>	2.2 Public Engagement, 4.2.6.1 Land Tenure , 4.3.2.1 Alternatives, 4.4.1 Public Engagement, 4.7 List of Consultants and Organizations
<b>Priority</b>	High
<b>Background</b>	<p>The DISG discuss consultation with the public generally, and with Inuit specifically, in a number of places, as an essential aspect of the various phases of development of an impact statement. While the DISG now require the submitting party to provide evidence of consultation, it does not require evidence that Inuit organizations or impacted Inuit communities have verified the consultation record.</p> <p>This can result in situations where concerns are reinterpreted through a different lens before they are put in writing by the proponent, leading to potential to mis-identify the nature and depth of those community concerns.</p> <p>We note that requirements for verification of Indigenous consultation records, with the impacted Indigenous community, is now a standard requirement for regulatory processes across Canada, as it is relevant to the determination of whether obligations have been met to address impacts on s. 35 constitutionally protected Indigenous rights.</p>
<b>QIA Recommendation</b>	QIA recommends that section 4.4.1.4 <i>Engagement Details and Outcomes</i> include the following requirement:

	<i>Evidence should be provided that, where there is engagement with an affected Inuit community or with an Inuit organization, the affected Inuit community or organization party has verified the engagement record being provided in the impact statement.</i>
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<b>Comment #</b>	QIA 2024 NIRB DISG #4
<b>Subject</b>	Sustainability Factors
<b>Reference</b>	Section 2.4 Sustainability and Sustainable Development, Page 31
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state, “6) The extent the proposed project reflects the priorities and values of the residents of the designated area...”</p> <p>QIA notes this is a positive factor to flag, but it is important to further emphasize that the needs and well-being of Nunavummiut, especially Inuit rights holders, should be at the core of the concept of sustainability.</p>
<b>QIA Recommendation</b>	Please add text in this section to reflect that a proponent must show that it has integrated Inuit perspectives on the concept of sustainability into its consideration of the project's contribution to sustainability.

<b>Comment #</b>	QIA 2024 NIRB DISG #5
<b>Subject</b>	Interpretation of Inuit Qaujimajatuqangit
<b>Reference</b>	Section 3.1.1.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 34
<b>Priority</b>	High
<b>Background</b>	The DISG state, “(t)he Proponent shall show evidence that: ... Knowledge holders were involved in both the collection and interpretation of Inuit Qaujimajatuqangit and other knowledge shared...”
<b>QIA Recommendation</b>	<p>QIA recommends clarifying the quoted statement by including the following wording: "Where the proponent's interpretation of effects differs from that of Inuit Qaujimajatuqangit holders, the proponent will show evidence of how it has attempted to reconcile these differences with Inuit parties".</p> <p>In addition, QIA recommends that the quoted bullet text be followed with:  <i>...and other knowledge shared, including provision of opportunity to the knowledge holders of advance review for any sections of the impact statement where Inuit Qaujimajatuqangit was subject to proponent interpretation and summation...</i></p>

<b>Comment #</b>	QIA 2024 NIRB DISG #6
<b>Subject</b>	Recommendation to consult with Knowledge holders on Inuit Qaujimajatuqangit
<b>Reference</b>	Section 3.1.3 Use of Existing Information, Page 36
<b>Priority</b>	High
<b>Background</b>	<p>The DISG state:</p> <p><i>The NIRB further recommends that the Proponent consult with Knowledge holders on the applicability of using Inuit Qaujimajatuqangit, Indigenous</i></p>

	<p><i>Knowledge, or Community Knowledge previously shared and not specific to the proposed Project.</i></p> <p>The proper applicability of Inuit Qaujimajatuqangit is critical, and its importance ought to be emphasized to the Proponent.</p>
<b>QIA Recommendation</b>	QIA recommends revising the quoted text in the following manner: "The NIRB further requires the Proponent to show evidence it made best efforts to consult with...."

<b>Comment #</b>	QIA 2024 NIRB DISG #7
<b>Subject</b>	Proponent record of compliance
<b>Reference</b>	Section 4.2.1 Proponent Information, Page 8 <i>*Note: Page numbers restart in Part 4.*</i>
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state:</p> <p><i>The Proponent shall reference its:</i></p> <ul style="list-style-type: none"> <li><i>record of compliance with governmental policies and regulations pertaining to ecosystemic and socio-economic issues in past operations...</i></li> </ul> <p>QIA is concerned there may not be enough specificity here for the Proponent to state issues of past non-conformity. A likely response from a Proponent would be to issue a general statement that it has a strong record of compliance in x, y and z jurisdictions over x number years. Parties to the assessment would learn little from that information if given.</p>
<b>QIA Recommendation</b>	Request that NIRB ask for identification of any instances of non-compliance with regulatory or project certificate conditions from Proponent's other projects to be included in an annex to the impact statement, with all relevant projects, certificates and permits/licences flagged in case any party wants to expand their due diligence check.

<b>Comment #</b>	QIA 2024 NIRB DISG #8
<b>Subject</b>	Proponent reference to relations with Indigenous peoples
<b>Reference</b>	Section 4.2.1 Proponent Information, Page 8
<b>Priority</b>	Low
<b>Background</b>	<p>The DISG state:</p> <p><i>The Proponent shall reference its...</i></p> <ul style="list-style-type: none"> <li><i>relations with Indigenous peoples, including prior experience with any Impact and Benefits Agreements if appropriate...</i></li> </ul> <p>The Proponent should also note any Indigenous engagement policies they currently follow.</p>
<b>QIA Recommendation</b>	At the end of the bullet, please add "'....and Indigenous engagement policies".

<b>Comment #</b>	QIA 2024 NIRB DISG #9
<b>Subject</b>	Regional context

<b>Reference</b>	Section 4.2.5 Regional Context, Page 11
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state:</p> <p><i>This discussion should also include regional current and future land and/or aquatic use activities, including hunting, harvesting, gathering, occupancy, and land uses such as for cultural practices, travel and camps, and cultural connection (past, present, and future) in proposed project impacted area.</i></p> <p>QIA believes the inclusion of engagement with affected Inuit communities is necessary as an explicit requirement in developing a description of the regional environment.</p>
<b>QIA Recommendation</b>	After the paragraph included above, please add "(t)he NIRB expects strong effort to be placed on and shown in the impact statement on engagement with affected Inuit communities in establishing this regional context".

<b>Comment #</b>	QIA 2024 NIRB DISG #10
<b>Subject</b>	Description of the Project Location
<b>Reference</b>	Section 4.2.6 Project Location, Page 11
<b>Priority</b>	Low
<b>Background</b>	<p>The DISG state: "(t)he Impact Statement shall contain a concise description of the geographical setting and the socio-ecological context in which the proposed project would take place.</p> <p>QIA notes that the word "concise" may be interpreted to mean "as short as possible". Concise descriptions may result in the proponent being asked to do more later when it could have been done in the beginning.</p>
<b>QIA Recommendation</b>	Please consider replacing "concise" with "appropriately detailed" or "adequately detailed" and, to ensure that this context is "appropriate" or "adequate", require that it be "vetted with potentially impacted parties" or similar.

<b>Comment #</b>	QIA 2024 NIRB DISG #11
<b>Subject</b>	Alternative means
<b>Reference</b>	Section 4.3.2.1 Alternatives, Pages 15-16
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state:</p> <p><i>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 (e.g., transportation as well as ecosystemic and socio-economic environments).</i></p> <p>QIA requests more clarification on what is considered an "alternative means".</p>
<b>QIA Recommendation</b>	<p>QIA suggests adding the following text or similar:</p> <p><i>Non-exclusively, alternative means can include facility siting, transportation routing and nature, speed and volume of activity including extraction/deposition and associated longevity of operation, areas used to extract necessary materials to run the project including water sources,</i></p>

	<i>workforce size, housing, transport, and work rotations, energy sources, waste management plans and locations, among others.</i>
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<b>Comment #</b>	QIA 2024 NIRB DISG #12
<b>Subject</b>	Inuit-owned businesses
<b>Reference</b>	Section 4.3.4 Economic and Employment Information, Page 17
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state:</p> <p><i>This information is expected to inform the impact assessment for the socio-economic environment and socio-economic components (Section 4.5.2.3), and shall include...</i></p> <ul style="list-style-type: none"> <li><i>Estimation of the number of full and part-time jobs to be created directly and indirectly by the proposed project, with consideration of local business and supply contracting...</i></li> </ul> <p>QIA requests clarification on what “consideration of local business and supply contracting” entails.</p>
<b>QIA Recommendation</b>	QIA recommends the proponent be required to include a credible estimate of what proportion of procurement is likely to accrue to local and regional Inuit-owned businesses and a discussion of any limits to their ability to take advantage of the procurement opportunities on offer from the Project.

<b>Comment #</b>	QIA 2024 NIRB DISG #13
<b>Subject</b>	Employment information
<b>Reference</b>	Section 4.3.4 Economic and Employment Information, Page 17
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state:</p> <p><i>This information is expected to inform the impact assessment for the socio-economic environment and socio-economic components (Section 4.5.2.3), and shall include...</i></p> <ul style="list-style-type: none"> <li><i>Opportunities for employment...</i></li> </ul> <p>QIA would like to see reference to the local and regional labour pools.</p>
<b>QIA Recommendation</b>	Please add the following text to the bullet, or similar: "with consideration of local and regional labour pools' suitability to access those opportunities and a discussion of any limits to their ability to take advantage of the employment opportunities on offer from the Project."

<b>Comment #</b>	QIA 2024 NIRB DISG #14
<b>Subject</b>	Inuit-owned businesses
<b>Reference</b>	Section 4.3.4 Economic and Employment Information, Page 17-18
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state:</p> <p><i>This information is expected to inform the impact assessment for the socio-economic environment and socio-economic components (Section 4.5.2.3), and shall include...</i></p>

	<ul style="list-style-type: none"> <li>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 and what the contractor obligations to employees will be. This includes opportunities for these contracts to create Inuit owned and locally owned business. If applicable, this should include any assistance the Proponent will provide Inuit and local entrepreneurs...</li> </ul> <p>QIA notes it is unlikely that understanding how many Inuit owned businesses may be <b>created</b> will be adequate; the information required should be expanded to include how many existing Inuit owned businesses have the capacity to be awarded contracts.</p>
<b>QIA Recommendation</b>	QIA recommends revising the last sentence to the following text, or similar: "This includes opportunities for these contracts to be awarded to and create Inuit owned and locally owned businesses".

<b>Comment #</b>	QIA 2024 NIRB DISG #15
<b>Subject</b>	Baseline
<b>Reference</b>	General throughout the document, including but not limited to: <ul style="list-style-type: none"> <li>Section 4.4.1 Public Engagement;</li> <li>Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge (Page 24)</li> <li>Section 4.4.4.1 Establishing Baselines</li> <li>Section 4.4.5.4 Cumulative Impacts Assessment</li> <li>Section 4.5.2.2 Baseline Information</li> </ul>
<b>Priority</b>	High
<b>Background</b>	The term "baseline" is often used in impact assessment processes, including in impact statements, to represent current conditions as a default. However, current conditions can mask changes over time to date, and, thus, the vulnerability of people and the environment to further change. Good practice within an impact assessment looks at a baseline as far back in time as reasonably practicable given available information from science and Inuit Qaujimajatuqangit and does not default to current conditions.
<b>QIA Recommendation</b>	QIA recommends that the NIRB use the terminology of "baseline, trend over time, and current conditions" throughout the DISG to distinguish that current conditions and baseline are not synonymous and should be treated as such.

<b>Comment #</b>	QIA 2024 NIRB DISG #16
<b>Subject</b>	Meaningful Public Engagement
<b>Reference</b>	Section 4.4.1 Public Engagement, Table 5, Page 19
<b>Priority</b>	Moderate
<b>Background</b>	As one of the requirements for meaningful public engagement, the DISG list the provision of "(d)etails on how the Proponent intends to address the concerns identified through public engagement throughout the life of the project."
<b>QIA Recommendation</b>	QIA recommends adding, "...life of the project, including detailing all relevant commitments made to deal with concerns raised".

<b>Comment #</b>	QIA 2024 NIRB DISG #17
<b>Subject</b>	Engagement results and verification
<b>Reference</b>	Section 4.4.1.4 Engagement Details and Outcomes, Pages 22-23
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: “(t)he <i>Impact Statement shall describe the information shared during each engagement, including at a minimum...</i>”</p> <p>Further information is needed on sharing information back to the party/parties involved in engagement and how this information was verified.</p>
<b>QIA Recommendation</b>	QIA suggests adding another bullet to identify: “How the proponent shared the results of the engagement setting with the party/parties involved, and evidence of verification by those parties...”

<b>Comment #</b>	QIA 2024 NIRB DISG #18
<b>Subject</b>	Commitments made by Proponent
<b>Reference</b>	Section 4.4.1.4 Engagement Details and Outcomes, Page 23
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state:</p> <p><i>The Impact Statement shall describe the information shared during each engagement, including at a minimum...</i></p> <ul style="list-style-type: none"> <li><i>How the Proponent intends to address the concerns identified through the life of the project, extending to monitoring and post-closure...</i></li> </ul> <p>Tying the proponent’s intentions to concrete commitments is important for the ability to gauge the adequacy, strength and likelihood that the proponent’s intentions will be realized.</p>
<b>QIA Recommendation</b>	Please add to the bullet: "...and post-closure, including identification of all commitments made or referred to at the engagement setting (and which concern they are related to), and any commitments made subsequently by the proponent to deal with the issue or concern".

<b>Comment #</b>	QIA 2024 NIRB DISG #19
<b>Subject</b>	Inuit Qaujimajatuqangit Plan
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Table 6, Page 23
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG list the submission of an Inuit Qaujimajatuqangit Plan as a requirement for treatment of Inuit Qaujimajatuqangit.</p> <p>The Proponent should provide evidence that this Inuit Qaujimajatuqangit Plan was subject to consultation with Inuit parties prior to submission.</p>
<b>QIA Recommendation</b>	Please include in the bullet: “Inuit Qaujimajatuqangit Plan submitted and evidence that it was subject to consultation with Inuit parties prior to submission”.



<b>Comment #</b>	QIA 2024 NIRB DISG #20
<b>Subject</b>	Inuit Qaujimajatuqangit Validation
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Table 6, Page 23
<b>Priority</b>	Low
<b>Background</b>	<p>The DISG list the following as a requirement for treatment of Inuit Qaujimajatuqangit: <i>“(a)pplicable Inuit protocols were followed for the collection, protection, and use of Inuit Qaujimajatuqangit and this is demonstrated in the Proponent’s submissions. The information shared has been validated.”</i></p> <p>There is a need to include for clarity who is validating the information.</p>
<b>QIA Recommendation</b>	Please include in the text: “...validated by specified Inuit party/parties”.

<b>Comment #</b>	QIA 2024 NIRB DISG #21
<b>Subject</b>	Existing studies
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Table 6, Page 23
<b>Priority</b>	Moderate
<b>Background</b>	Table 6 item <i>“Methods for Gathering Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge”</i> would benefit from a description of how to appropriately treat existing studies completed by Inuit parties.
<b>QIA Recommendation</b>	Suggest the addition of a bullet for how the Proponent accessed and appropriately used existing studies completed by Inuit parties.

<b>Comment #</b>	QIA 2024 NIRB DISG #22
<b>Subject</b>	Consideration of Inuit Qaujimajatuqangit in proponent conclusions
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Table 6, Page 23
<b>Priority</b>	High
<b>Background</b>	<p>The DISG list the following as a requirement for treatment of Inuit Qaujimajatuqangit: <i>“Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge has been gathered, evaluated, and considered in the conclusions presented in the Impact Statement.”</i></p> <p>The Proponent should be required to demonstrate with details how it considered Inuit Qaujimajatuqangit and weighed it against other factors in the conclusions presented.</p>
<b>QIA Recommendation</b>	QIA recommends adding the following text, or similar: “...considered and shown how it was considered equitably with Western scientific information...”.

<b>Comment #</b>	QIA 2024 NIRB DISG #23
<b>Subject</b>	Tracking and validating addressing of concerns
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Table 6, Page 24
<b>Priority</b>	Moderate

<b>Background</b>	<p>The DISG list the following as a requirement for treatment of Inuit Qaujimajatuqangit: <i>“(p)lans to address concerns identified through Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge”</i></p> <p>This item would benefit from the addition of a critical step of ensuring that the concerns identified have been addressed, as determined by those who identified the concern.</p>
<b>QIA Recommendation</b>	QIA recommends adding to the end of the bullet: “... including tracking and validating with the Inuit party that raised it that the concern has been adequately addressed.”

<b>Comment #</b>	QIA 2024 NIRB DISG #24
<b>Subject</b>	Differences in conclusion of knowledge sources
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Table 6, Page 24
<b>Priority</b>	High
<b>Background</b>	<p>The DISG list the following as a requirement for treatment of Inuit Qaujimajatuqangit: <i>“(r)ationale for any differences in conclusions between knowledge sources and plans to address.”</i></p> <p>This item would benefit from clarifying what the information the proponent must include, and the description of the ways the proponent attempted to reconcile the differences and how it will not only address but monitor the changes.</p>
<b>QIA Recommendation</b>	QIA recommends the inclusion of the following text: “identify any situations where the proponent and Inuit parties disagree on impacts, how these differences were subject to further engagement with the Inuit party/parties, and all measures committed to by the proponent to reconcile the difference and, where appropriate, monitor the change”.

<b>Comment #</b>	QIA 2024 NIRB DISG #25
<b>Subject</b>	Threshold of acceptable change
<b>Reference</b>	<p>Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 24</p> <p>Section 4.4.5.6 Indicators, Criteria, and Parameters, Page 48</p>
<b>Priority</b>	Low
<b>Background</b>	QIA notes the term “threshold of acceptable change” is not currently defined in the <i>Definitions</i> sections of the document.
<b>QIA Recommendation</b>	QIA suggests defaulting to the “threshold of significance” term here, which is in the <i>Definitions</i> section, or alternatively adding a definition for “threshold of acceptable change” to the <i>Definitions</i> section.

<b>Comment #</b>	QIA 2024 NIRB DISG #26
<b>Subject</b>	Inuit Qaujimajatuqangit topic examples
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 25
<b>Priority</b>	Low

<b>Background</b>	<p><i>The DISG state:</i></p> <p><i>The Proponent shall describe how Inuit Qaujimajatuqangit, Indigenous Knowledge, and/or Community Knowledge has been gathered, evaluated, and considered in the conclusions presented in the impact statement. This includes the information shared (e.g. land use, wildlife patterns), questions and concerns raised, interactions between people, and how knowledge is produced and shared.</i></p> <p>QIA feels that by using two examples of Inuit-Qaujimajatuqangit-related topics only, this may suggest to proponents that land use and wildlife patterns are the main topics of information.</p>
<b>QIA Recommendation</b>	QIA suggests considering the removal of examples or increasing examples to more fully encompass potential Inuit Qaujimajatuqangit topics.

<b>Comment #</b>	QIA 2024 NIRB DISG #27
<b>Subject</b>	Treatment of differing conclusions
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 25
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG instructs the proponent to provide “(o)n any points of disagreement/differing conclusions, tracking or retracing of how these conclusions were drawn and clear identification of whether and how different conclusions were reconciled through further engagement.”</p> <p>This point should also include how it was verified by the Inuit party.</p>
<b>QIA Recommendation</b>	QIA recommends revising this requirement to include: “...reconciled with verification by the Inuit party through further engagement”

<b>Comment #</b>	QIA 2024 NIRB DISG #28
<b>Subject</b>	Use of Inuit Qaujimajatuqangit to inform mitigation measures
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 25
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG instructs the proponent to use Inuit Qaujimajatuqangit to:</p> <ul style="list-style-type: none"> <li>○ <i>Identify Valued Components</i></li> <li>○ <i>Determine the level of significance of identified impacts</i></li> <li>○ <i>Inform project monitoring methods</i></li> </ul> <p>Although the text above the bullets indicates this is non-exhaustive, it would benefit from the inclusion of informing the mitigation measures.</p>
<b>QIA Recommendation</b>	QIA recommends adding “Inform mitigation measures” as a bullet.

<b>Comment #</b>	QIA 2024 NIRB DISG #29
<b>Subject</b>	Analyzing and interpreting Inuit Qaujimajatuqangit
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 26

<b>Priority</b>	High
<b>Background</b>	The DISG instructs the proponent that an expected practice includes “(a)nalyzing and interpreting Inuit Qaujimajatuqangit”; however, it is necessary to clarify the statement identifying who should be analyzing and interpreting Inuit Qaujimajatuqangit and how.
<b>QIA Recommendation</b>	QIA suggests adding the following text, or similar: "ensure that best efforts are made such that Inuit Qaujimajatuqangit holders involved in the generation and sharing of Inuit Qaujimajatuqangit are meaningfully involved in the analysis, interpretation, and verification of the findings associated with the Inuit Qaujimajatuqangit shared".

<b>Comment #</b>	QIA 2024 NIRB DISG #30
<b>Subject</b>	Transmitting Inuit Qaujimajatuqangit
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 26
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG instructs the proponent that an expected practice includes “(t)ransmitting Inuit Qaujimajatuqangit and Communicating it in Public Forums”</p> <p>Further clarity is required on the transmission of Inuit Qaujimajatuqangit. The Proponent should not transmit Inuit Qaujimajatuqangit until it is verified.</p>
<b>QIA Recommendation</b>	QIA suggests revising text for clarity: “The proponent shall not transmit Inuit Qaujimajatuqangit in a public forum until it, and the specific way in which it will be shared, has been verified by the relevant Inuit party or parties”.

<b>Comment #</b>	QIA 2024 NIRB DISG #31
<b>Subject</b>	Timelines and temporal scale of Inuit Qaujimajatuqangit
<b>Reference</b>	Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 26
<b>Priority</b>	Moderate
<b>Background</b>	The DISG instructs the proponent that an expected practice includes “(t)imelines and temporal scale”, which requires further clarification.
<b>QIA Recommendation</b>	QIA suggests revising text for clarity: "Inuit were given adequate time to review any materials associated with Inuit Qaujimajatuqangit in draft form and comment on it, prior to it being shared in the impact statement or other submission." In addition, if the NIRB has other timeline and temporal scale issues, QIA recommends including them here.

<b>Comment #</b>	QIA 2024 NIRB DISG #32
<b>Subject</b>	Use of previously collected Inuit Qaujimajatuqangit
<b>Reference</b>	Section 4.4.2.1 Methods for Gathering Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 26
<b>Priority</b>	High
<b>Background</b>	<p>The DISG states:</p> <p><i>The Proponent shall provide background on the methodology used to collect, interpret, analyze, and synthesize Inuit Qaujimajatuqangit,</i></p>

	<p><i>Indigenous Knowledge, and Community Knowledge, including at a minimum, but not limited to:</i></p> <ul style="list-style-type: none"> <li><i>Use of previously collected Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge from literature, databases, or other sources, including for original Project assessments for amendments...</i></li> </ul> <p>QIA notes the issue of proponents often relying on older and sometimes spatially divergent Inuit Qaujimajatuqangit, especially considering Inuit Qaujimajatuqangit is not static and evolves over time and applies differently across different areas.</p>
<b>QIA Recommendation</b>	<p>QIA requests the following additional text:</p> <ul style="list-style-type: none"> <li><i>... for amendments. Where the proponent seeks to rely on previously gathered Inuit Qaujimajatuqangit, it must show evidence that it engaged with affected Inuit groups to determine the relevance and limitations of that information in relation to the assessment of current conditions, changes over time, and potential project effects. Potential issues may include the amount of time since the data was collected, changes that have occurred since the data was collected, and the proximity (or lack thereof) to the project-affected location.</i></li> </ul>

<b>Comment #</b>	QIA 2024 NIRB DISG #33
<b>Subject</b>	Verification of Inuit Qaujimajatuqangit
<b>Reference</b>	Section 4.4.2.2 Details and Outcomes, Pages 26-27
<b>Priority</b>	High
<b>Background</b>	<p>The DISG state:</p> <p><i>The Impact Statement shall describe the information shared during each engagement specific to Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge as described in Section 4.4.2. Additional detail that must be included are, at a minimum...</i></p> <p>This section would benefit from the inclusion of a bullet on details of the verification of Inuit Qaujimajatuqangit.</p>
<b>QIA Recommendation</b>	QIA recommends the addition of a bullet: "evidence of how Inuit-Qaujimajatuqangit-related materials were verified prior to their inclusion in the impact statement".

<b>Comment #</b>	QIA 2024 NIRB DISG #34
<b>Subject</b>	Protection and appropriate use of confidential Inuit Qaujimajatuqangit
<b>Reference</b>	Section 4.4.2.3 Managing Confidential Information, Page 28
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: "(p)er the NIRB's Rules of Procedure, Proponents may file a motion with the NIRB requesting that a file be made confidential and not be posted publicly."</p> <p>A NIRB procedure to strengthen protection and appropriate use of confidential Inuit Qaujimajatuqangit is of benefit here.</p>

<b>QIA Recommendation</b>	<p>QIA requests the NIRB have a procedure in place—or confirm an existing procedure with a reference to it in the Standard IS Guidelines—to ensure that when a proponent submits confidential Inuit Qaujimajatuqangit information, or any confidential information that includes Inuit Qaujimajatuqangit, that:</p> <ol style="list-style-type: none"> <li>1. The proponent provides explicit evidence of consent for provision of that material from the relevant Inuit Qaujimajatuqangit holding person/organization, and/or</li> <li>2. The NIRB have a verification process where it vets information purported to represent the Inuit Qaujimajatuqangit of an individual/organization, with that individual/organization, prior to accepting the material for the NIRB's confidential consideration.</li> </ol>
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<b>Comment #</b>	QIA 2024 NIRB DISG #35
<b>Subject</b>	Temporal scope
<b>Reference</b>	Section 4.4.3.4 Temporal Boundaries, Page 32
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“(t)emporal boundaries of the post-closure period may span many years, depending on the site, the type of project, and the methods of closure.”</i></p> <p>QIA notes that a temporal scope should apply up until a time where no adverse effects from a project are measurable (which may be long after closure), rather than to the completion of the project life cycle.</p>
<b>QIA Recommendation</b>	QIA recommends adding the following text for greater clarity and considering whether similar text is required in the earlier section on “Temporal Scope”: “the temporal scope of effects should be tied to a defensible timeframe, after which no adverse effects on the environment or people from the project will likely be measurable”.

<b>Comment #</b>	QIA 2024 NIRB DISG #36
<b>Subject</b>	Baseline information
<b>Reference</b>	Section 4.4.4.1 Establishing Baselines, Page 34
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“At a minimum, baseline information should be... Suitable for estimating pre-project (historical) baseline conditions...”</i> The text seems to suggest that pre-project is synonymous with historical baseline conditions.</p>
<b>QIA Recommendation</b>	QIA suggests revising to: "Suitable for estimating historic baseline conditions, current conditions, and trends over time between them".

<b>Comment #</b>	QIA 2024 NIRB DISG #37
<b>Subject</b>	Confidence levels
<b>Reference</b>	Section 4.4.4.2 Gaps and Uncertainties, Page 34
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“(f)or scientific data collection, information should be included on the... confidence levels associated with baseline data...”</i></p>

	In order to avoid proponents attributing high confidence levels without adequate evidence, QIA recommends including further text to clarify the point.
<b>QIA Recommendation</b>	QIA suggests the inclusion of the following text: <i>"(f)or scientific data collection, information should be included on the... confidence levels associated with baseline, trend over time and current conditions data, including detail on how they were determined and who determined them".</i>

<b>Comment #</b>	QIA 2024 NIRB DISG #38
<b>Subject</b>	Valued components and impact pathways
<b>Reference</b>	Section 4.4.5 Impact Assessment Approach, Page 35
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>"(t)he required impact assessment, [sic] shall describe... (p)otential impacts on individual valued components..."</i></p> <p>It is important to include impact pathways and project interactions with the receiving environment for better understanding of the impact.</p>
<b>QIA Recommendation</b>	QIA suggests adding: <i>"...valued components, including discussion of the pathways by which those impacts are estimated to be caused"</i> .

<b>Comment #</b>	QIA 2024 NIRB DISG #39
<b>Subject</b>	Cumulative effects
<b>Reference</b>	Section 4.4.5 Impact Assessment Approach, Page 35
<b>Priority</b>	High
<b>Background</b>	<p>The DISG state: <i>"(t)he required impact assessment, [sic] shall describe... Potential cumulative impacts of the proposed project on the valued components as well as the systems identified..."</i></p> <p>Projects have project-specific impacts, which contribute to total cumulative effects from all sources. Individual projects do have an accumulation of impacts from various project interactions with the receiving environment that can make the total impacts from the project greater than the sum of individual effects, but that remains a project-specific accumulation of effects.</p> <p>Additionally, the description of cumulative effects would fall into the category following the second last bullet in the subject list (<i>"(p)redicted residual impacts after mitigation measures"</i>) where cumulative effects would be assessed on any valued component where the project had a measurable adverse project-specific effect.</p>
<b>QIA Recommendation</b>	QIA recommends revising the terminology in the quoted statement.

<b>Comment #</b>	QIA 2024 NIRB DISG #40
<b>Subject</b>	Cumulative effects
<b>Reference</b>	Section 4.4.5 Impact Assessment Approach, Page 35
<b>Priority</b>	Moderate
<b>Background</b>	The DISG state: <i>"(t)he required impact assessment, [sic] shall describe... Predicted significance of identified impacts."</i>

	QIA suggests specifying project and total cumulative impacts here.
<b>QIA Recommendation</b>	Please add: "...impacts, including both project-specific and total cumulative impacts."

<b>Comment #</b>	QIA 2024 NIRB DISG #41
<b>Subject</b>	Systems analysis
<b>Reference</b>	Section 4.4.5 Impact Assessment Approach, Page 36
<b>Priority</b>	Low
<b>Background</b>	<p>The DISG state: "(a) <i>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.</i>"</p> <p>Similarly, there is a capability of an ecosystem to support the conditions necessary for Inuit to exercise their rights.</p>
<b>QIA Recommendation</b>	QIA requests a similar systems analysis to evaluate the ecosystem and the resources required to support the exercise of Indigenous rights as protected under s. 35.

<b>Comment #</b>	QIA 2024 NIRB DISG #42
<b>Subject</b>	Input of Inuit Qaujimagatuqangit
<b>Reference</b>	Section 4.4.5 Impact Assessment Approach, Page 37
<b>Priority</b>	Moderate
<b>Background</b>	QIA notes Inuit Qaujimagatuqangit is missing from the list of key inputs into the impact assessment.
<b>QIA Recommendation</b>	Please add a bullet: "Inuit Qaujimagatuqangit"

<b>Comment #</b>	QIA 2024 NIRB DISG #43
<b>Subject</b>	Impact prediction and verification
<b>Reference</b>	Section 4.4.5.1 Impact Prediction, Table 10, Page 37
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG list the following as a requirement for impact prediction: "(g) <i>aps or uncertainty in the impact assessment (including the methods used, information available, and results) identified.</i>"</p> <p>QIA suggests that, for any impact predictions with moderate or higher uncertainty, the proponent should identify its follow up monitoring plan to verify predictions.</p>
<b>QIA Recommendation</b>	QIA recommends updating the wording in Table 10 to reflect our suggestion.

<b>Comment #</b>	QIA 2024 NIRB DISG #44
<b>Subject</b>	Knowledge sources
<b>Reference</b>	Section 4.4.5.1 Impact Prediction, Table 10, Page 37
<b>Priority</b>	Low



<b>Background</b>	The DISG list the following as a requirement for impact prediction: <i>“(k)ey differences in conclusions drawn from knowledge sources and justification for the Proponent’s preference, if any, identified and described.”</i>  There is a need to add some clarity here when discussing knowledge sources.
<b>QIA Recommendation</b>	QIA recommends adding the following text: “...from different knowledge sources and parties to the assessment and justification...”

<b>Comment #</b>	QIA 2024 NIRB DISG #45
<b>Subject</b>	Baseline conditions
<b>Reference</b>	Section 4.4.5.1 Impact Prediction, Page 37
<b>Priority</b>	Moderate
<b>Background</b>	The DISG state: <i>“(t)he Proponent shall provide a discussion on how the predicted changes or impacts compare to baseline conditions (see Section 4.4.4).”</i>  QIA has flagged consistent concerns about both the use of the terminology of baseline and the importance of inputs from Inuit parties.
<b>QIA Recommendation</b>	QIA recommends revising the text in the following way: “.... baseline and current conditions, respectively, and to any thresholds or preferences for the state of each Valued Component expressed by Inuit”.

<b>Comment #</b>	QIA 2024 NIRB DISG #46
<b>Subject</b>	“When required” definition
<b>Reference</b>	Section 4.4.5.3 Climate Change, Table 12, Page 39
<b>Priority</b>	Low
<b>Background</b>	The DISG list the following points as the means to identify GHG emissions and project impact to climate change commitments: <i>“(w)hen required, an upstream GHG assessment. When required, a net-zero plan.”</i>  For greater clarity, is there any further information the NIRB can provide on when these would be required?
<b>QIA Recommendation</b>	QIA recommends revision or addition of further detail to these topics.

<b>Comment #</b>	QIA 2024 NIRB DISG #47
<b>Subject</b>	Cumulative effects
<b>Reference</b>	4.4.5.4 Cumulative Impacts Assessment, Table 13, Page 43
<b>Priority</b>	High
<b>Background</b>	<i>Table 13 directs the proponent to: Identify the Project’s predicted cumulative impacts on valued components and ecosystemic and socio-economic systems in combination with reasonably foreseeable projects and activities, including proposed future activities associated with the proposed Project under assessment, within determined spatial and temporal assessment boundaries. Assess the significance of residual cumulative impacts after the application of proposed mitigation measures, with a focus on the Project’s relative contribution to cumulative impacts.</i>

	<p>This text only focuses on the “reasonably foreseeable projects” and does not include past and present cumulative effects.</p> <p>The second part of the text suggests there should be a focus on a project's relative contribution, which is an outdated "project contribution" approach to cumulative effects assessments. The focus should be clearly stated to be assessing total cumulative effects on valued components, also likely to be impacted by the project (a “valued component health centred” approach), not the project's contribution to those cumulative effects.</p>
<b>QIA Recommendation</b>	<ol style="list-style-type: none"> <li>1. QIA recommends this text reference past, present and reasonably foreseeable cumulative effects.</li> <li>2. QIA requests the NIRB clarify that the focus should be first and foremost on the total cumulative effects on valued components and systems, not the contribution of a project, which is a secondary consideration.</li> <li>3. QIA recommends it be a requirement that Inuit parties are engaged in any cumulative effects assessment.</li> </ol>

<b>Comment #</b>	QIA 2024 NIRB DISG #48
<b>Subject</b>	Cumulative effects
<b>Reference</b>	Section 4.4.5.4 Cumulative Impacts Assessment, Page 44
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: “(a) <i>cumulative impact assessment seeks to identify adverse cumulative ecosystemic and socioeconomic 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.</i>”</p> <p>QIA is concerned that a cumulative impact assessment would be limited to the effects from <b>projects only</b>. Best practices for cumulative impact assessments include any human caused (anthropogenic) change agents, including but not limited to climate change and more minor activities that may not be considered “projects”.</p>
<b>QIA Recommendation</b>	QIA recommends including the following text: “...carried out, and any other anthropogenically-caused changes.”

<b>Comment #</b>	QIA 2024 NIRB DISG #49
<b>Subject</b>	Scoping the Cumulative Impact Assessment
<b>Reference</b>	Section 4.4.5.4 Cumulative Impacts Assessment, Page 44
<b>Priority</b>	Moderate
<b>Background</b>	<p>The part “a) Scoping the Cumulative Impact Assessment” is unclear to QIA. QIA was under the impression that the NIRB requires a cumulative impact assessment for each valued component that is likely to be subject to any measurable adverse impacts from a project. As a result, the only factor to consider when scoping <u>what</u> VCs are included in the cumulative impact assessment should be that whether the project is likely to cause a measurable adverse effect on that VC. After that, the VC’s inclusion in a cumulative impact assessment is mandatory.</p>

	<p>The question of how much attention and effort should be spent on each VC in a cumulative impact assessment is a separate one that should be the focus of scoping of the cumulative impact assessment.</p> <p>We suggest some language changes to section “a” to better recognize this.</p>
<b>QIA Recommendation</b>	<p>QIA suggests the following changes to the language of this section:</p> <ol style="list-style-type: none"> <li>1. The first sentence of the section should be revised for the purposes of clarity to [added text in square brackets]: “The Proponent shall scope the cumulative impact assessment by describing the baseline conditions for each valued component that is subject to the cumulative impact assessment [, which for greater clarity is all valued components where the project is likely to have measurable adverse impacts]...”</li> <li>2. The first bullet in this section should be revised to reflect that valued components are not subject to exclusion from the cumulative impact assessment for any reason once a project-specific effects has been identified. Text should be revised to [new text in square brackets and proposed deletions in strikethroughs]: <ul style="list-style-type: none"> <li>• “Description of relevant considerations for broader, regional cumulative impact considerations for the selection or exclusion of [each relevant] valued components, as informed and confirmed by:”</li> </ul> </li> <li>3. Sub-bullet 2, which states “Guidance for identifying valued components (see Section 4.4.3.1); and,” should be removed entirely, as the valued components for the project assessment have been previously defined, no new valued components are being introduced, and it should be mandatory that all valued components that are subject to likely measurable adverse project impacts are included in the cumulative impact assessment. As a result, that guidance is moot at this point in the assessment</li> </ol>

<b>Comment #</b>	QIA 2024 NIRB DISG #50
<b>Subject</b>	Baseline and cumulative impact assessment
<b>Reference</b>	Section 4.4.5.4 Cumulative Impacts Assessment, Page 44
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: “(t)he Proponent shall scope the cumulative impact assessment by describing the baseline conditions for each valued component, which considers the impacts of past, existing, proposed and reasonably foreseeable projects and activities within determined spatial and temporal assessment boundaries.”</p> <p>Consideration should be included for the impacts of the past and existing developments on the valued component. Using a current baseline can serve to mask those impacts.</p>
<b>QIA Recommendation</b>	QIA suggest revising the text: "...by describing historic baseline, current conditions and changes over time for each valued component..."

<b>Comment #</b>	QIA 2024 NIRB DISG #51
<b>Subject</b>	Cumulative effects
<b>Reference</b>	Section 4.4.5.4 Cumulative Impacts Assessment, Page 45
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“(t)he Proponent shall identify the Project’s predicted cumulative impacts on valued components and ecosystemic and socio-economic systems in combination with reasonably foreseeable projects and activities.”</i></p> <p>This description neglects cumulative effects from past and present projects and other activities, which may not be properly captured from current conditions. Best practice for a cumulative impact assessment focuses on total change over time from an agreed upon appropriate baseline set in the past, not just change from today into the future. In fact, it is entirely possible that a cumulative impact assessment with a proper baseline set in the past, may find that even in the pre-project circumstance or current conditions, there may be a pre-existing significant adverse cumulative impact condition on a valued component. This would not be captured from the "today forwards" approach implied by the existing language here.</p>
<b>QIA Recommendation</b>	QIA recommends an addition of the following: “...in combination with past, present, and reasonably foreseeable...”

<b>Comment #</b>	QIA 2024 NIRB DISG #52
<b>Subject</b>	Consultation on cumulative effects
<b>Reference</b>	Section 4.4.5.4 Cumulative Impacts Assessment, Page 46
<b>Background</b>	<p>The DISG state: <i>“(t)his discussion shall include... Documentation of the methodology undertaken and criteria used to evaluate interactions between the Project’s valued components with past, existing, proposed, and reasonably foreseeable projects and activities, including proposed future activities associated with the proposed Project under assessment, within the spatial and temporal boundaries (see Section 4.4.5.1)...”</i></p> <p>QIA is concerned that, unlike in the section on project-specific impacts, there is no requirement in this section on cumulative impacts for a proponent to show that it gathered Inuit perspectives on the significance of cumulative impacts.</p>
<b>QIA Recommendation</b>	QIA recommends the inclusion of the above clarification.

<b>Comment #</b>	QIA 2024 NIRB DISG #53
<b>Subject</b>	Mitigation measures
<b>Reference</b>	Section 4.4.5.4 Cumulative Impacts Assessment, Page 46
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“(t)his discussion shall include... A description of the proposed mitigation measures that are technically or economically feasible, including potential regional or collaborative approaches, and their effectiveness to avoid, minimize, restore, or offset potential adverse cumulative biological, ecological, physical, health, social, economic, and cultural impacts...”</i></p>

	QIA notes there is no requirement to include mitigation measures that were recommended by other parties but not committed to.
<b>QIA Recommendation</b>	QIA recommends adding the following clarification to the end of the paragraph: "Include mitigation measures that were recommended by other parties but not committed to, including reasons why they were not committed to (e.g. feasibility, economic reasons, etc.)".

<b>Comment #</b>	QIA 2024 NIRB DISG #54
<b>Subject</b>	Significance determination and Inuit Qaujimajatuqangit
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Table 16, Page 49
<b>Priority</b>	Moderate
<b>Background</b>	As a requirement for significance determination, the DISG list the following: <i>"(h)ow scientific evidence, Inuit Qaujimajatuqangit, Traditional Knowledge, and Community Knowledge was used to inform the methods and conclusions of the significance determination are described."</i>  Knowledge sources should be considered on the same level.
<b>QIA Recommendation</b>	QIA recommends adding the following clarification: "(h)ow...Community Knowledge was considered equitably and was used to inform..."

<b>Comment #</b>	QIA 2024 NIRB DISG #55
<b>Subject</b>	Significance determination and knowledge sources
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Table 16, Page 50
<b>Priority</b>	Low
<b>Background</b>	As a requirement for significance determination, the DISG list the following: <i>"(a)ny key differences in conclusions drawn from knowledge sources and justification for the Proponent's preference, if any, are described."</i>  QIA believes that adding detail to distinguish the different knowledge and input sources would be beneficial for consistency.
<b>QIA Recommendation</b>	QIA recommends updating the text to include: "...drawn from different knowledge sources and parties and justification..."

<b>Comment #</b>	QIA 2024 NIRB DISG #56
<b>Subject</b>	Pre-existing significant impacts
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Page 50
<b>Priority</b>	Moderate
<b>Background</b>	<i>"(a)ssessing the significance of potential impacts is the most important aspect of an Impact Statement and is conducted through comparison of the predicted state of the environment with and without the proposed project and assessing the importance of the changes identified."</i>  There may be a pre-existing significant adverse impact on one or more valued components even in the pre-project circumstance. It is beneficial for it to be explicitly recognized as a possibility.
<b>QIA Recommendation</b>	QIA recommends revising the text to reflect this possibility.

<b>Comment #</b>	QIA 2024 NIRB DISG #57
<b>Subject</b>	Levels of significance
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Page 50
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“(i)n developing its significance determinations of potential residual impacts, Proponents are expected to... Describe and define the terms used to identify levels of significance.”</i></p> <p>QIA looks for more clarity on the term "levels of significance". It currently suggests a possible gradient, that something can be highly significant, moderately significant, etc. Clarity on this point is critical to the NIRB process.</p>
<b>QIA Recommendation</b>	QIA suggests the NIRB clearly state whether it considers significance to be binary (significant or not significant) or subject to degrees of significance.

<b>Comment #</b>	QIA 2024 NIRB DISG #58
<b>Subject</b>	Knowledge sources
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Page 50
<b>Priority</b>	Low
<b>Background</b>	<p>The DISG state: <i>“(i)n developing its significance determinations of potential residual impacts, Proponents are expected to... Describe any key differences in conclusions drawn from knowledge sources and justification for the Proponent’s preference, if any. This will include efforts made, including mitigation, monitoring, and accommodation measures it has adopted to reconcile these differences.”</i></p> <p>A consistency check is required if the NIRB adopts previous language recommended by QIA above.</p>
<b>QIA Recommendation</b>	QIA recommends revising the text to include: "...drawn from different knowledge sources and parties and justification..."

<b>Comment #</b>	QIA 2024 NIRB DISG #59
<b>Subject</b>	Significance determination
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Page 51
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“... to define community values and identify criteria to be used in the significance determination... Considerations could include the:</i></p> <ul style="list-style-type: none"> <li><i>• Proximity of project activities and components to a community</i></li> <li><i>• Areas the community identifies as important</i></li> <li><i>• Intensity and frequency of traditional and cultural uses in the area</i></li> <li><i>• Diversity of traditional and cultural uses and experiences in the area</i></li> <li><i>• Uniqueness of the particular area to the cultural practices</i></li> <li><i>• Role that the location holds in trade and cultural exchange</i></li> <li><i>• Role the place holds in the community’s history and culture”</i></li> </ul> <p>It is critically important to recognize that adverse impacts and pressures in other areas may change traditional use. For example, if fewer areas are left for a cultural practice as other areas are inaccessible, have reduced wildlife, are considered</p>

	<p>contaminated or are subject to sensory alterations, the remaining areas where high traditional and cultural use attributes are in place become even more important and sensitive to change.</p> <p>In addition, QIA finds using the term “uniqueness” of a particular area to suggest that only some areas may be unique, where potentially all areas are unique given the specific areas of the lands and waters are important to knowledge transfer.</p>
<b>QIA Recommendation</b>	<ol style="list-style-type: none"> <li>1. Please add the bullet: “Critical importance of an area where pressures in other areas have increased reliance on this area for traditional use”</li> <li>2. Please add the bullet: “Desired future use of an area”</li> <li>3. Replace “Uniqueness” to “Importance” in the fifth bullet</li> </ol>

<b>Comment #</b>	QIA 2024 NIRB DISG #60
<b>Subject</b>	Levels of significance suggestions
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Page 51
<b>Priority</b>	Moderate
<b>Background</b>	<p>The DISG state: <i>“The terms used to describe the level of significance must be clearly defined, where possible in quantitative terms. 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”.</i>”</p> <p>QIA finds this language to be unusual and the terminology of "levels of significance" is unclear. There are two typical approaches to significance:</p> <ol style="list-style-type: none"> <li>(1) binary (something is significant or not significant as defined by a certain threshold or other method), or</li> <li>(2) significance is measures by degrees - wherein low, medium and high are relevant distinctions that should be tied to more stratified thresholds.</li> </ol> <p>However, rarely are terms like "additive" used, and terms like adverse/negative and beneficial/positive are measures of the directionality of an impact, not their significance.</p>
<b>QIA Recommendation</b>	QIA recommends revisions for clarity in this section.

<b>Comment #</b>	QIA 2024 NIRB DISG #61
<b>Subject</b>	Significant levels of change
<b>Reference</b>	Section 4.4.5.7 Significance Determination, Page 52
<b>Priority</b>	Low
<b>Background</b>	<p>The DISG state: <i>“(t)he following are descriptors which may be applicable for specifying significance of identified potential impacts... Intensive in concentration or associated with significant levels of change”</i></p> <p>To clarify this statement, QIA suggests a different term to be used rather than “significant levels” here under the principle that you cannot define a term by using that term.</p>



<b>QIA Recommendation</b>	<ol style="list-style-type: none"> <li>1. QIA recommends revising to “high magnitude of change”.</li> <li>2. It is recommended to state that these are not the only characteristics, nor are they all required to be in place for an impact to be deemed significant.</li> </ol>
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<b>Comment #</b>	QIA 2024 NIRB DISG #62
<b>Subject</b>	Human Health Risk Assessment
<b>Reference</b>	Section 4.5.3 Human Health and Environmental Risk Assessment, Page 60
<b>Priority</b>	High
<b>Background</b>	<p>The DISG state: “(a)ny decision related to the need for and type of Human Health Risk Assessment (HHRA) shall be described and justified. The results and conclusions reached in the assessment related to human health should be sufficiently detailed and appropriate for the specific project and the type of HHRA undertaken.”</p> <p>The assessment of health needs to consider Inuit determinants of health and use a population health approach relevant to Inuit, which looks at more than what a standard HHRA and Environmental Risk Assessment include. Inuit health has social, cultural, spiritual, mental, and physical components, and standard HHRAs and Environmental Risk Assessment are limited by the last of those components in a meaningful fashion.</p>
<b>QIA Recommendation</b>	QIA recommends revising the text based on this comment, to reflect a broader and more inclusive approach to assessment of impacts on health.

<b>Comment #</b>	QIA 2024 NIRB DISG #63
<b>Subject</b>	Meaningful engagement
<b>Reference</b>	APPENDIX D: CHECKLIST TO DEMONSTRATE MEANINGFUL ENGAGEMENT, Page 77
<b>Priority</b>	Moderate
<b>Background</b>	<p>Meaningful engagement is a process of exchange meaning that the proponent provides information, and the community provides feedback in the form of concerns and recommended measures. Therefore, a cycle of responses by the proponent ("what if we do x to fix y") and feedback from the community ("that is/isn't good enough, you need to do z") takes place. Meaningful engagement should require the proponent to show evidence that it has responded to all recommended measures by communities.</p> <p>In addition, the Board can recommend that this checklist be used by the proponent with the communities, rather than solely the proponent by itself, where a much more nuanced response – and greater engagement - is likely.</p>
<b>QIA Recommendation</b>	<ol style="list-style-type: none"> <li>1. QIA requests the table be revised to ensure the Proponent responds to all recommended measures.</li> <li>2. QIA recommends including a preamble identifying that this checklist should preferably be used in collaboration with communities, rather than solely by the proponent.</li> <li>3. QIA recommends repeating the heading row on subsequent pages for readability.</li> </ol>



<b>Comment #</b>	QIA 2024 NIRB DISG #64
<b>Subject</b>	Spelling and grammar errors
<b>Reference</b>	N/A; General
<b>Priority</b>	Low
<b>Background</b>	<p>There are a number of spelling or grammar errors in the document. For example:</p> <ul style="list-style-type: none"> <li>a) 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 24 – “pos-closure” instead of “post-closure”</li> <li>b) Section 4.4.2 Inuit Qaujimajatuqangit, Indigenous Knowledge, and Community Knowledge, Page 26 – capital C on the word “Communicating”</li> <li>c) 4.4.5.2 Impacts of the Environment on the Project: Table 11: Requirements for Predicting Potential Impacts of the Environment on the Project, Page 38 – this does not appear to be a table</li> <li>d) 4.4.5.3 Climate Change, Table 12: Requirements for Climate Change Assessment, Page 39 – greenhouse has should be changed to gas.</li> </ul>
<b>QIA Recommendation</b>	QIA recommends reviewing the document for spelling, grammar and consistency.

<b>Comment #</b>	QIA 2024 NIRB DISG #65
<b>Subject</b>	Adaptive Management Planning
<b>Reference</b>	4.6 Environmental Management System; 4.6.2 Environmental Protection Plan, among other locations in the DISG referring to adaptive management
<b>Priority</b>	Moderate to High
<b>Background</b>	<p>The DISG states that “<i>The Proponent’s Environmental Management System shall take an adaptive management approach</i>” and goes on to describe what an adaptive management system is (pg. 62). Section 4.6 also indicates that it is important to engage Inuit and incorporate Inuit Qaujimajatuqangit into review of monitoring results and recommendation of additional adaptive management measures.</p> <p>Section 4.6.2 calls for the proponent to describe their “adaptive management approach”.</p> <p>Overall, the DISG does a reasonably good job re: clarifying the importance of adaptive management planning and the critical role that Inuit and Inuit Qaujimajatuqangit need to play in its development and implementation. QIA has a couple of comments on this topic for consideration in finalizing the ISG.</p>
<b>QIA Recommendation</b>	<ol style="list-style-type: none"> <li>1. NIRB should clarify that over-reliance on yet-to-be completed adaptive management plans in impact statements, as this can reduce the confidence the Board has in mitigation adequacy. Wherever possible, reliance first should go to specific mitigation commitments, with adaptive management plans as a fallback position in case actual impact outcomes vary. In addition, the NIRB should note that where possible, for impacts predictions that identify moderate to high uncertainty or where moderate or greater magnitude impacts are predicted, the onus is on the proponent to go beyond the conceptual level and provide detailed thresholds and</li> </ol>

	<p>responses for at risk valued components in its adaptive management plans.</p> <p>2. Section 4.6 of the DISG uses Inuit oversight of monitoring and recommendations re: adaptive management as an example. QIA recommends that the NIRB require that the proponent clarify in its impact statement the nature, level, and mechanisms of Inuit oversight that it is committed to implement in relation to monitoring, adaptive management planning, and adaptive management plan implementation.</p>
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