

GNWT Comments on the NIRB 2024 Revised Draft Standard Impact Statement Guidelines

Comment Number	Subject	Reference	Priority	Background/Rationale	Recommendation to Address Issues
1	Page numbering	Entire document	low	The page numbers restart for each section. This makes the document challenging to use, particularly when providing references within the document.	Make the page numbers continuous for the whole document.
2	Definitions	p.6 – suggested addition	low	“Designated area” is a term used throughout the Guidelines, but it is not defined.	Provide a definition of designated area in the Definitions section.
3	Definitions	p.6	low	Indicators, criteria and parameters are terms used throughout the Guidelines and the definitions do not speak to socio-economic components.	Provide a definition of indicator, criteria and parameter that includes examples of socio-economic components.
4	Definition of “Indigenous groups asserting s. 35 rights”	p.7	high	The defined term is not appropriate to use in all cases as some Indigenous groups, such as the Tłı̨chǫ, have <i>established</i> Treaty harvesting rights in part of Nunavut. Changing the term to “Indigenous s. 35 rights group” will include Indigenous groups that hold rights in Nunavut and Indigenous groups that assert rights in Nunavut. The definition also includes superfluous wording. Please note that the GNWT does not use the term “Indigenous group;” “Indigenous government or Indigenous organization” is the GNWT’s preferred term. Similarly, the GNWT does not use the term “s. 35 rights;” the GNWT’s preferred term is	Change the defined term, and all uses of the term throughout the document, to “Indigenous s. 35 rights group.” Delete “of the Aboriginal Peoples of Canada” in the definition.

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				“asserted or established Aboriginal and/or Treaty rights.” In these comments, the GNWT is using the terms used by NIRB in the revised draft Guidelines.	
5	Definition of “Inuktut or Inuktitut”	p.8	medium	The definition refers to a people instead of to a language.	Change the definition to refer to a language.
6	Definition of “Intervenor”	p.8 – suggested addition	low	A definition is not provided for “Intervenor.”	Consider adding a definition of “Intervenor.”
7	Definition of “Party”	p.8	medium	The definition does not explicitly mention non-Inuit Indigenous groups. It is understood that “intervenor” could include these groups.	Consider adding “other Indigenous s. 35 rights groups” to the definition.
8	Definitions of “Party” and “Public”	p.8 and 9	medium	These definitions aren’t reconcilable. “The public” is mentioned in the definition of “Party.” However, the definition of “Public” then uses the term “interested party,” which, though undefined, appears to mean any “party.” The definition of “Public” also includes terms that appear to overlap with terms used in the definition of “Party.”	Change the definitions of both terms to use consistent terminology, so that “public” is a subset of “party.”
9	Definition of “Well-being”	p.10	low	The definition needs different wording in the first sentence to be non-circular. Well-being itself is not defined.	Change the first sentence to read as follows: “The specific indicators of being well for a particular impact assessment that are identified by the potentially impacted communities,

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					in collaboration with the Regional Inuit Association.”
10	Add reference(s) to “Indigenous groups” - 1. Introduction; 1.1 - Document Key; 1.3 - Overview of an Impact Statement; 2.2 - Public Engagement; 2.2 - Public Engagement; 2.4 - Sustainability and Sustainable Development; 3.1 - Study Strategy and Methodology; 3.1.1 - Acquisition Methodology and Data Analysis; 3.1.1.2 -Inuit Qaujimaqatuqangit, Indigenous Knowledge, and Community Knowledge; 4.1.3 Main Document; 4.1.6.1 Executive Summary; 4.2.6	Part 1 - p.12 - 2 nd bullet among those at end of page; Section 1.1 - p.14 - Appendix C in blue text box ; Section 1.3 - p.16 - 2 nd last full sentence on page. P. 17 first paragraph; Section 2.2 - p.26 - Blue text box and second sentence on page.; Section 2.2 - p.28 - Blue text box - second sentence; Section 2.4 - p.30 - Last partial sentence on page; Section 3.1 - p.32 - First and second sentences of last paragraph.; Section 3.1.1 -p.33 - Second sentence of last paragraph; Section 3.1.1.2 - p.34 - First	medium	The references to “potentially impacted communities”/”communities”/ “local communities” are insufficient given that for Indigenous groups in the Northwest Territories, communities aren’t s. 35 rights bearing entities.	Add a reference to “Indigenous groups” in each noted instance.

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	Project Location; 4.3.2.1 Alternatives; 4.4.1 Public Engagement; 4.4.1.1 Meaningful Public Engagement; 4.4.5 Impact Assessment Approach; 4.4.5.1 Impact Prediction ; 4.1.1 Translation; 4.2.6 Project Location; 4.4.1 Public Engagement; 4.4.,3.3 Spatial Boundaries; 4.4.5.7 Significance determination; 4.5 Project Environment and Impact Assessment; 4.5.2.1 Identification of Valued Components, Systems, and Potentially	sentence under this heading.; Section 4.1.3 -p.3 - 2 nd sentence under this heading; Section 4.1.6.1 -p.5 - last full sentence on page; Section 4.1.6.1 - p.6 - 3 rd and 5 th bullets on page; Section 4.2.6 - p.11 - Final full sentence before bullets; Section 4.2.6 - p.12 - Last sentence of section; Section 4.3.2.1- p.16 - First sentence of final bullet; Section 4.4.1- p.19 - Third row of green text box (Table 5) and first sentence after green text box; Section 4.4.1.1- p. 20 – Second sentence under heading; final sentence of first			

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	Impacted Communities; 4.6.4 Closure and Reclamation Plan	paragraph under heading; first and second sentences of second paragraph under heading; and fourth bullet and first bullet on p. 21; Section 4.4.5 - p. 35 – First sentence following bullets; Section 4.4.5 - p.36 - Second last sentence before bullets, second row of Table 10 on p. 37; Section 4.4.5.1 - p.38 - Fourth bullet at top of page; Section 4.1.1 -p.3 - 2 nd sentence under this heading; Section 4.2.6 - p.12 - Second sentence after bullets; Section 4.4.1- p.19 - Second last row of green text box (Table 5); Section			

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		4.4.3.3 - p.31 - second bullet; Section 4.4.5.7 - p.50 - first row of green text box and fifth bullet, p. 51 - second and last bullets; Section 4.5 - p.54 - Potentially impacted communities bullet; Section 4.5.2.1 - p.56-57 – Title, first sentence following bullets and last sentence of section; Section 4.6.4 - p.69 - third bullet and last bullet; p.70 - last sentence of section			
11	Avoid misinterpretation of the words “consults” , “consultation” , “consulting” etc. - 1.3 - last sentence of 2 nd last paragraph -	Section 1.3 - p.17 ; Section 2.2 - p.26 - Second sentence on page and p.27 - Text above the bullets; Section 2.2 - p.26 - Second sentence of second paragraph; p. 27 –	medium	There is potential for any reference to “consultation,” even if not specifically relating to Indigenous peoples, to be confused with s. 35 consultation. Therefore, the references/phrases “consults with them”, “consults”, “consultation”, should be changed to a different term/phrase wherever applicable, to avoid being	Change references/phrases consults with them”, “consults” , “consultation” etc. to a different term/phrase in each noted instance. Examples: Replace “consulting” with “replying.”; Change “consult” to “engage.”; Replace “public consultation” with “public engagement.”; Change

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	<p>“consults with them”; 2.2 - Public Engagement; 2.2 - Public Engagement; 2.2 - Public Engagement; 3.1.3 - Use of Existing Information; 1.4.1 - Draft Impact Statement Submitted During Review (Standard Approach); 4.1.6.2 Non-Technical Summary; 4.2.6.1 Land Tenure; 4.3.2.1 Alternatives; 4.4.1 Public Engagement; 4.4.1.2 Participants in Engagement; 4.4.3.3 Spatial Boundaries; 4.4.3.4 Temporal Boundaries; 4.4.4.1 Establishing Baselines; 4.4.5.4 Cumulative</p>	<p>First Sentence; Section 2.2 - p. 27 – Consulting bullet; Section 3.1.3 - p.36 - Final sentence; Section 1.4.1 - p.17 - 2nd sentence of 1.4.1; Section 4.1.6.2 - p.7 - Final sentence of section; Section 4.2.6.1 - p. 13 – First sentence; Section 4.3.2.1- p.16 - Final sentence of first full paragraph; Section 4.3.2.1- p. 16 – Final sentence of final bullet; Section 4.4.1- p. 19 – First sentence after green text box; Section 4.4.1- p. 19 – Second sentence after green text box; Section 4.4.1.2- p.22 - Red text box at top of page;</p>		<p>misinterpreted as referring to s.35 consultation.</p>	<p>“consultations” to “engagement.”; Delete “and consultations” as the reference to “engagement” suffices to describe all that follows that reference.; Delete “consults with them”, “and particularly consultation”, “and consultation” etc. wherever appropriate, as the remainder of the sentence(s) suffice.</p>

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	Impacts Assessment; 4.4.5.5 Transboundary Impacts and Impacts to Indigenous Groups asserting s. 35 Rights; 4.6.3.2 Socio-Economic Environmental Plans; 4.4.5.7 Significance Determination.	Section 4.4.1.2- Second sentence on p. 22; Section 4.4.3.3 - p.31 - first sentence below bullets; Section 4.4.3.4 - p. 32 – last sentence of second last paragraph of section; Section 4.4.4.1 - p. 34 – Third last bullet of section; Section 4.4.5.4 - p.45 - first partial sub-bullet; Section 4.4.5.5 - p.47 - third sentence of final paragraph; Section 4.6.3.2 - p.68 - final sentence of section; Section 4.4.5.7 - p. 51 – bold text in middle of page.			
12	2.2 - Public Engagement	Section 2.2 Public Engagement	medium	This section states that “The focus of public engagement is to create opportunities to exchange and clarify information, gather input, and	Add text to clarify that gathering Indigenous Knowledge from non-Inuit Indigenous peoples is distinct from public engagement.

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				<p>promote collaboration and understanding amongst the public to inform the project design, as well as the NIRB’s Impact Assessment processes, proceedings, and decision-making. Public engagement and gathering of Inuit Quajimajatuqngit are different exercises (see Section 4.4.2 for requirements related to Inuit Quajimajatuqngit).”</p> <p>There is no parallel text to:</p> <ul style="list-style-type: none"> • distinguish Indigenous Knowledge collection and engagement with Indigenous Knowledge holders other than Inuit as from public engagement; or • indicate that there may be specific considerations associated with Indigenous Knowledge collection and engagement with Indigenous Knowledge holders. <p>It is important that proponents be aware of these distinctions.</p>	
13	3.1.3 – Existing information - validity of existing data	Section 3.1.3 – Use of Existing Information	low	Section 3.1.3 refers to the use of existing information in preparing the impact statement. It is unclear whether there are any timelines associated with the validity of the data or whether it is up to the proponent to	The Guidelines should clarify if certain data (i.e., baseline data) may be invalid after a certain point or whether this is included in the statement that it is the responsibility of the proponent to provide

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				include that within their discussion on limitations of existing data. For example, baseline data may not be valid after a certain point dependent on updated detection limits, sampling techniques, natural trends in the medium, etc.	rationale on the validity of any existing data.
14	Instructions for the structure of the Impact Statement (IS) document	Sections 4.2 to 4.6 – Sections of the Impact Statement Guidelines document	medium	Section 4.1.3 of the draft Guidelines provides direction on how the IS document should be structured, providing eight broad categories to include in the IS. It is difficult to follow how the headings in Section 4.2 to 4.6 relate to the eight broad categories outlined in Section 4.1.3. For example, Section 4.1.3 requires the IS to have an introduction and environmental assessment context section, but Section 4.2 to 4.6 of the Guidelines does not use the same broad category and instead outlines the requirement for a description of the project overview, location, land tenure, proponent information, etc. without clarifying which of the eight broad categories from Section 4.1.3 this information belongs in.	Revise sections 4.1.3 and 4.2 to 4.6 to provide clear direction on where certain information should be presented within the IS. It may be worth considering a numbering system within the IS Guidelines so that these numbers are consistent between the guidelines and the IS structure. This recommendation is applicable to other sections as well.

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15	4.3.2 Purpose and Need of Project	Section 4.3.2- p.15 - 2 nd and 3 rd bullets	medium	These two bullets should mention impacts/benefits beyond Nunavut.	State that the proponent should include impacts and benefits beyond Nunavut in the rationale for the proposed project.
16	4.3.3 - First paragraph, first and second sentences	Section 4.3.3- p.17	medium	The use of the term “foreseeable future development related to the proposed project” and the inclusion of the footnote using the term “reasonably foreseeable future development” aren’t appropriate as the focus should be on expansion/change to the project at issue to prevent project splitting. If the infrastructure for the project at issue facilitates another project by another proponent, that future development would be within the quoted term above. However, that clearly wouldn’t constitute project splitting.	Delete footnote 15 and change “foreseeable future development related to the proposed project” to “foreseeable expansion or change to the proposed project.”
17	4.4.1 Public Engagement	Section 4.4.1 – final sentence in paragraph after Table 5	Medium	Gathering Indigenous Knowledge from non-Inuit Indigenous peoples is distinct from public engagement. See comment Number 28 above, under Section 2.2 Public Engagement.	Recommend changing the final sentence to wording such as “Public engagement, gathering of Inuit Qaujimagatuqangit, and gathering Indigenous knowledge from non-Inuit Indigenous peoples are different exercises.
18	4.4.1.2 Participants in Engagement	Section 4.4.1.2 - Final sentence on p. 21	medium	The word “regional” should not be used as some Indigenous groups in the Northwest Territories that the proponent would need to engage with are community-based.	Delete the word “regional.”

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19	4.4.1.2 Participants in Engagement	Section 4.4.1.2- Second sentence on p. 22	medium	The uses of the word “community” in this sentence aren’t ideal in the Northwest Territories context as some Indigenous groups aren’t in a community.	Begin this sentence with “In Nunavut,…” so that it’s clear that it doesn’t apply outside of Nunavut. It will then be clear that only the following sentence deals with the context outside of Nunavut.
20	4.4.1.4 Engagement Details and Outcomes	Section 4.4.1.4- Second last bullet on p.23	medium	In only referring to “community views,” this bullet omits Indigenous groups in the Northwest Territories, where communities aren’t the rights bearing entities for Indigenous groups.	Change the bullet to state: “Rationale for conclusions differing from views expressed by a community or Indigenous group.”
21	4.4.2 Inuit Qaujimagatuqangit, Indigenous Knowledge, and Community Knowledge	Section 4.4.2 - First four rows of Table 6 under “Methods for Gathering…” heading on p. 23	medium	The heading is “Methods for Gathering Inuit Qaujimagatuqangit, Indigenous Knowledge, and Community Knowledge,” but the text does not explicitly include content about Indigenous Knowledge and Community Knowledge.	Expand the content of the table to explicitly mention Indigenous Knowledge and Community Knowledge.
22	4.4.2 Inuit Qaujimagatuqangit, Indigenous Knowledge, and Community Knowledge	Section 4.4.2 - p. 25 – 2 nd last sentence before blue text box	medium	This sentence is missing a reference to, if applicable, Indigenous groups outside of Nunavut.	Change the sentence to state: “Proponents are strongly encouraged to engage with the applicable Regional Inuit Organization, if applicable, Indigenous groups outside of Nunavut and local organizations for their respective processes and best practices developed.”
23	4.4.3- Interested parties and Indigenous organizations asserting s. 35	Section 4.4.3 - “Scope of Impact Assessment” p. 28	medium	Section 4.4.3 refers to “input from the Proponent and interested parties (e.g. Federal and Territorial Government departments, Designated Inuit Organizations, and members of the	Recommend expanding the list of examples of interested parties to include non-Inuit Indigenous groups.

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	rights for projects with transboundary implications			public).” Non-Inuit Indigenous groups are not included in the list of examples of interested parties, which is especially important for projects with transboundary impacts.	
24	4.4.3.3 - Spatial boundaries and transboundary implications	Section 4.4.3.3 – p. 30, Regional Study Area bullet, last sentence	low	This sentence advises proponents to “duly consider the transboundary implications of impacts to identified valued components and impacts to Indigenous Groups asserting s. 35 rights as a result of air and marine transportation (if applicable) for the proposed project.” This may create the erroneous impressions that assessment of transboundary effects should be limited to probable impacts related to air and marine transportation. Transboundary impacts assessment should be much broader, and should consider impacts that that are not related to air or marine transportation.	Recommend one of the following changes: <ul style="list-style-type: none"> change “as a result of as a result of air and marine transportation (if applicable)” to “as a result of <u>activities including but not limited to</u> air and marine transportation (if applicable).” end the sentence after “rights.”
25	4.4.3.3 Spatial Boundaries	Section 4.4.3.3 - p.30 - 2 nd sentence	medium	There are two concerns with this sentence: <ol style="list-style-type: none"> It uses the term “consult”, which could be misinterpreted as referring to s. 35 consultation; It doesn’t include a reference to Indigenous groups, which is important in the context of the Northwest Territories as 	Replace “consult” with “engage” and add a reference to “Indigenous groups.”

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				communities are not rights-bearing entities.	
26	4.4.4.1 Establishing baselines	Section 4.4.4.1 - p. 33 and 34 Establishing baselines	medium	Some of the requirements in the bulleted list of minimum requirements on p. 34 may not be applicable to Inuit Quajimajatuqangit, Indigenous Knowledge, and Community Knowledge.	Add or change text before the list of the minimum baseline requirements to acknowledge that Inuit Quajimajatuqangit, Indigenous Knowledge, and Community Knowledge may not necessarily align with the list of requirements, but are nonetheless valuable and required.
27	4.4.5 Impact Assessment Approach	Section 4.4.5 - p. 35 – sixth bullet	low	This bullet says “Potential impacts to Indigenous Peoples asserting s. 35 rights.” It is unclear why the defined term “Indigenous Peoples asserting s. 35 rights” is not used here. Refer to comment Number 4 above, under definitions.	Consider whether a defined term should be used here.
28	4.4.5 Impact Assessment Approach	Section 4.4.5 - p. 35 – sixth bullet	medium	This bullet says “Potential impacts to Indigenous Peoples asserting s. 35 rights.” It is unclear if this should be about impacts to Indigenous Peoples or impacts to Indigenous Peoples’ ability to exercise s. 35 rights.	Reword to be clear if the requirement is to assess impacts on Indigenous peoples, on the ability to exercise rights, or both.
29	4.4.5	Section 4.4.5 - p.36 Impact analysis on systems	medium	The statement regarding systems analysis speaks to the collective impacts to the environment, noting that the focus should be to support biological and ecological diversity. It does not speak to impacts to people and their health and well-being.	A systems analysis should also include the collective impacts on people, including their culture, health and well-being.

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30	Use of undefined terms like “reasonably foreseeable projects” – 4.3.3 and 4.4.5.4	Section 4.3.3- Use of undefined term “foreseeable future development scenarios”; Section 4.4.5.4 - p.44 - first sentence after table, second last sentence of second paragraph, and first sentence under a); Section 4.4.5.4 - p.45 - second last bullet on page	medium	Some sentences in the referenced sections use undefined terms like “reasonably foreseeable projects” instead of the defined term “reasonably foreseeable future development.”	Change undefined terms, wherever applicable, to the defined term “reasonably foreseeable future development.”
31	4.4.5.4 -Cumulative Impacts Assessment	Section 4.4.5.4 Cumulative Impacts Assessment	High	The Canadian Council of Ministers of the Environment (CCME) defines cumulative impacts as changes in the environment caused by multiple interactions among human activities <i>and natural processes</i> that accumulate across space and time. Consideration of cumulative impacts during a cumulative impacts assessment of a project should not be limited to only the impacts from ‘past, existing, proposed, and reasonably foreseeable projects’ as currently stated in the first paragraph of Section 4.4.5.4. Human disturbance, such as mining development, and natural factors, such	It is recommended that when conducting a cumulative impacts assessment, all potential contributing factors, both from human development and natural processes, are included. As such, the definition of cumulative impacts in the first sentence of Section 4.4.5.4 should be expanded to include natural processes, and the contribution of impacts due to natural process should considered throughout Section 4.4.5.4.

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				as forest fires and permafrost thaw can have equally important and compounding impacts on the environment and society.	
32	4.4.5.5 Transboundary Impacts and Impacts to Indigenous Groups asserting s. 35 Rights	Section 4.4.5.5 - p.47 -first paragraph	medium	“Designated area” is an undefined term when it is first used in this section. The last paragraph on the page goes into more detail that helps with understanding what is meant, but it is still somewhat unclear.	It is recommended to add “designated area” as a defined term (see comment above) or explain what “designated area” means at its first use in 4.4.5.5.
33	4.4.5.5 Transboundary Impacts and Impacts to Indigenous Groups asserting s. 35 Rights	Section 4.4.5.5 - p. 47 – final sentence	high	This sentence should refer to specific Indigenous groups instead of areas.	Refer to specific Indigenous groups instead of referring to areas.
34	4.4.5.6	Section 4.4.5.6 - p. 48 use of thresholds	medium	The Guidelines ask that proponents use established and recognized thresholds and justify all thresholds used. However, it is unclear what established and recognized thresholds would exist for socio-economic valued components, nor how a proponent would determine thresholds for socio-economic valued components.	It is suggested that the text of the Guideline reflect that defining thresholds for socio-economic valued components is not required, or that they will only be defined if requested by parties.

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35	4.8 Conclusion	First sentence under hearing, p. 70	Low	This bullet says, “Potential impacts to Indigenous Peoples asserting s. 35 rights.” It is unclear why the defined term “Indigenous Peoples asserting s. 35 rights” is not used here.	Consider whether a defined term should be used here.
36	Appendix C - Nunavut-specific potentially impacted parties ²	Appendix C, heading, p. 74	Medium	The term “Nunavut-specific potentially impacted parties” is unclear, as some of the listed organizations operate within and outside Nunavut. Proponents may need to engage these organizations on impacts within Nunavut and on transboundary impacts.	Consider rewording the description of the list on page 74.
37	Appendix C - Engagement with the GNWT	Appendix C: Engagement Organizations, page 75	High	Appendix C contains a table identifying organizations in neighboring jurisdictions and those with transboundary interests that a proponent should engage with. This table should include the GNWT because the GNWT may participate in NIRB processes for projects that may have impacts on NWT residents and environment.	The GNWT should be listed in Appendix C as an organization that a proponent should engage with if there are potential transboundary impacts from a project.
38	Appendix C – Engagement with Tłıchq Government	Appendix C: Engagement Organizations- Tłıchq Government	High	Appendix C should use the appropriate terminology when referring to the Tłıchq Government and the areas defined in the Tłıchq Agreement. “Mqwhì Gogha Dè Njìtèè” is defined in the Tłıchq Agreement and overlaps with a portion of Nunavut.	Add Tłıchq Government to the furthest right column. In the third column, replace “Tłıchq Settlement Region” with “Mqwhì Gogha Dè Njìtèè.”

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39	Appendix C - Engagement with Transboundary Indigenous Groups	Appendix C: Engagement Organizations, page 75	Medium	Acknowledging that Appendix C is described as “non-exhaustive,” the list of IGIOs that proponents may need to consider engaging should be expanded.	Add the following to the furthest right column: <ul style="list-style-type: none"> • Deline Got’ine Government • Akaitcho Territory Government • Northwest Territory Métis Nation
40	Appendix C - Engagement with Transboundary Indigenous Groups	Appendix C: Engagement Organizations, page 75 – resource management boards	medium	Acknowledging that Appendix C is described as “non-exhaustive,” the list of resource management boards that proponents may wish to engage should be expanded.	Add the following to the furthest right column: <ul style="list-style-type: none"> • Wek’èezhìi Renewable Resources Board • Sahtu Land and Water Board