



June 1, 2026

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Subject: QIA Review of CEAF Discussion Paper

Dear Calvin Ehaloak,

The Qikiqtani Inuit Association (QIA) respectfully submits this correspondence in response to the Nunavut Impact Review Board’s (the NIRB) request for review of the “Discussion Paper in support of the development of the Cumulative Effects Assessment Framework for Baffinland Iron Mines Corp.’s Mary River Project” (Discussion Paper).

The Discussion Paper poses a series of questions for a reviewer’s consideration.

I. Is the proposed definition of cumulative effects sufficiently clear?

QIA notes that the definition suggested in the Discussion Paper reflects the typical elements of cumulative effects (CE) definition, including the consideration of past, present, and reasonably foreseeable future development, other human activities, and natural processes.

What constitutes *past* is the focus of temporal bounding and is a question posed for consideration in the Discussion Paper. What constitutes *reasonably foreseeable development* is restrictive, reflecting a typical project-centred approach, whereby it is constrained to projects or activities currently under regulatory review or those, which will be submitted for regulatory review in the near future, as determined by the existence of a project description, letter of intent, or other regulatory application.

QIA previously recommended¹ that cumulative effects be considered even after closure and decommissioning, as any future developments that may interact with the Project’s effects after closure and decommissioning are not likely reasonably foreseeable. The reviewer notes that the qualifier “reasonably foreseeable” applies to “development”; it does not appear to apply to “other human

¹ Jared Ottenhof (QIA) to Ryan Barry (NIRB), RE: QIA Submission for Cumulative Effects Assessment Framework Workshop | NIRB File 08MN053, dated January 18, 2024.



activities.” What constitutes “other human activities” is not explicit. Therefore, QIA recommends that the definition of ‘reasonably foreseeable’ be broadened, so as to include projects which are contemplated, but not yet proceeding through a regulatory process.

II. Is further guidance needed to help differentiate between project-specific effects and cumulative effects?

QIA would like to reference its earlier submission², also appended to this document, on *Backgrounder No.1: Materials to Support Cumulative Effects EA Guidelines Update for the Mary River Project* (Backgrounder 1) where a point was flagged about a distinction made between inter-project and intra-project effects. The Discussion Paper does not use the same inter- versus intra- terminology. This may introduce some confusion.

As previously noted, the distinction between inter- and intra-project effects is accurate, in the context of a project-centered and regulatory cumulative effects assessment (CEA). Adopting a valued-component-centred approach, in contrast, would mean no distinction between whether the totality of effects is from multiple actions by the same project or actions from separate projects. For example, sensory disturbance and habitat loss from the same project do not have different outcomes vs. sensory disturbance from one project and habitat loss caused by another project.

This is not a point of contention per se, but it warrants clarification. QIA recommends that the NIRB provide further guidance to clarify that intra-project (combined) effects must be considered when conducting a cumulative effects assessment under the Cumulative Effects Assessment Framework (CEAF).

III. What other sources of research and monitoring information are available to support project-specific cumulative effects assessment and management?

The current approach appears to be focused on developing an inventory of research and monitoring programs, reports, or data sets that are *available* versus determining what information is *valuable* to support project-specific cumulative effects assessment and to help situate this within a regional context. At this stage of the CEAF process, the utility of this information (e.g. Summary of GoC-led or funded regional research and monitoring programs) is unclear.

As the CEAF progresses (i.e. once valued components (VCs) are selected), it will be essential to turn greater attention to the specific nature of these programs or data sets to determine their utility. Based on a

² Assol Kubeisinovala (QIA) to Ryan Barry (NIRB), Subject: QIA Review of Baffinland Backgrounder Documents, dated March 19, 2026.



previous analysis of Northwest Territories' Cumulative Impact Monitoring Program (NWT CIMP)³, it is important to ensure that the information (data) across multiple sources to support the CEAF are:

- *Compatible*: It must be possible to integrate or compare monitoring data; that is, there must be consistency in the approach to data collection and analysis.
- *Observable*: Data must be of sufficient scale and resolution to allow tracking of baseline change over time and/or across space – project to regional.
- *Detectable*: Data or parameters must allow for the detection of change in baseline conditions or potential threats to the VC concern.
- *Adaptable*: Data must be useful for understanding or detecting change at multiple spatial scales and the indicators applicable to multiple projects or disturbance types.
- *Accessible*: Data must be accessible, retrievable, and available with clear metadata standards.
- *Usable*: Data must meet multiple end-user needs, including project proponents and others with responsibilities for managing cumulative effects.

IV. How could the monitoring report templates for the Mary River Project be improved to address potential project contributions to regional cumulative effects and enhance readability?

The monitoring reports submitted by the Proponent to the NIRB in their annual report come from various consultants and are present in different formats. Formatting is not much of an issue, though time is.

QIA's largest challenge in completing comprehensive annual report reviews is a lack of consistency in the review period. Though NIRB has often provided 30-day review periods, Baffinland's release date has been inconsistent. This inconsistency is problematic from a resourcing perspective.

Therefore, QIA recommends that:

1. The NIRB impose a strict annual report release date on the Proponent, and
2. The NIRB provide an annual review period of 30 days from said release date, with extensions on the review period (e.g., 45 days) granted to intervenors should a delayed release be received.

V. How can we improve coordination across governments, proponents, academia and other stakeholders for research and monitoring to inform regional cumulative effects management?

³ <https://doi.org/10.1002/ieam.4179>



This question is closely related to the issue identified above and, arguably, the largest challenge to advancing and sustaining the CEAF. The Discussion Paper notes, “(t)he information and data collected by the proponent and governments for each Valued Component to track project interactions and effects may also be chosen to align with regional monitoring programs and initiatives designed to manage cumulative effects by using comparable collection methods, indicators, etc.”

If the project CEAF is to be meaningful at broader regional/geographic scales, then there *must* be alignment between monitoring programs by way of common (or multi-scaled) indicators and appropriate meta-data. This must be a priority of developing the CEAF initiative.

As noted in Baffinland’s Backgrounder No. 2, “Baffinland needs information from multiple external partners to strengthen cumulative effects reporting because many of the drivers of regional change are outside Baffinland’s control or data collection capacity.”

A project-centred CEAF *can* effectively situate project cumulative effects within a regional context, but it necessitates alignment between, or coordination of, monitoring programs (indicators, baselines, trends analyses) across scales. This is the role of institutions (not project proponents), to ensure that regional contexts are available to meaningfully support the interpretation and understanding of project cumulative effects. Who is responsible for such coordination, and supporting governance framework, is not yet clear.

Addressing this issue is foundational, especially when monitoring responsibilities are currently distributed across many actors. If there is no regional coordinating mechanism (e.g. cumulative effects secretariat) with clear governance responsibilities, there is risk of the CEAF not meeting expectations beyond assessing the project’s effects. The importance of a data governance or coordinating structure warrants much greater attention.

VI. What geographic scale and temporal boundaries are appropriate for the development of the CEAF?

The larger the geographic boundaries, the more comprehensive is the CEAF to ensuring an appropriate understanding of VC conditions, trends, vulnerability, and susceptibility to multiple stressors, including project stress. However, an important consideration is that the larger the spatial scale/scope, the greater the importance of institutions in coordinating regional baseline information (i.e., indicator trends, conditions, spatial variability), and ensuring the compatibility of data across monitoring programs (proponent, government, other), such that the cumulative contributions of project effects can be meaningfully assessed and their significance to VC sustainability understood.



If the CEAF for the Project is to be meaningful at such broad regional/geographic scales, then there *must* be alignment between monitoring programs by way of common (or multi-scaled) indicators and appropriate meta-data. This may require a much stronger responsibility for NIRB (or cooperating institutions) in CEA governance to support the CEAF than is what is currently reflected in the Discussion paper. As such, QIA maintains its March 2024 recommendation as quoted in Discussion Paper s. 4.3 *Scope of Initiative*.

Pre-project baseline (i.e. trends and conditions prior to the project’s development) is a valuable reference point for understanding the nature and magnitude of change over time. However, it is important to also recognize that today’s VC conditions *in absence* of the project would not necessarily reflect past, pre-project conditions owing to the effects of other activities and natural or climate-induced change. Thus, temporal trends are likely more valuable for benchmarking the Project's contributions to cumulative effects, and the magnitude of change, provided that such data exists to establish trends and to distinguish project contributions.

For future bounding, climate scenarios are valuable considerations in any CEAF. A caveat to defining defensible future climate change scenarios is the possibility that significant (detrimental) changes in future VC condition or sustainability are identified/modeled even in absence of any further project effects. Of course, this is not a sound argument for poor project mitigation to reduce cumulative contributions; however, it is possible that such mitigations may have minimal influence on outcomes under certain plausible climate scenarios.

To adopt a future scope of consideration after closure and decommissioning is also a valuable approach to capture the full life cycle cumulative impacts of the project. The caveat is the high level of uncertainty involved in long-term projections, and how interactions will occur with future undertakings that are currently *hypothetical* or not even known.

The consideration of any future developments potentially interacting with Project effects post closure and decommissioning may not align with what is defined in the Discussion Paper as constituting “reasonably foreseeable” future development.

VII. What Valued Components (VCs) should be the focus for development of the CEAF?

The Discussion Paper includes QIA’s previous recommendation on the VCs to be considered in the CEAF:

- Narwhal;
- Caribou;
- Ringed seal;



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Inuit avatimut kamatiarnimut katimajiit (IAKK) committee conducts valuable community-based monitoring, and QIA provided the resulting studies to the NIRB.

C. *Baffinland Backgrounders Nos. 1 and 2*

QIA reiterates its comments on Baffinland Backgrounder documents as previously submitted⁴ to the NIRB.

Nakurmiik,

Assol Kubeisinova

Senior Manager, Lands and Regulatory Affairs

Qikiqtani Inuit Association

⁴ Assol Kubeisinova (QIA) to Ryan Barry (NIRB), Subject: QIA Review of Baffinland Backgrounder Documents, dated March 19, 2026.