

June 1, 2026

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Via email: [info@nirb.com](mailto:info@nirb.com)

Dear Tara Arko,

Thank you for the Nunavut Impact Review Board's (the Board) correspondence of April 30, 2026, requesting initial feedback on the Discussion Paper and supporting documentation shared in advance of the upcoming Cumulative Effects Assessment Framework (CEAF) Workshop in Iqaluit on June 9-10, 2026.

The Board has identified key issues that it would appreciate receiving feedback on from interested parties. The following responses are being provided on behalf of federal departments and agencies that will participate in the CEAF Workshop, including: the Canadian Northern Economic Development Agency; Crown-Indigenous Relations and Northern Affairs Canada; Environment and Climate Change Canada; Fisheries and Ocean Canada; Health Canada; Natural Resources Canada; Parks Canada; and, Transport Canada.

- *Definition of cumulative effects utilized*
  - *Is the proposed definition of cumulative effects sufficiently clear?*
  - *Is further guidance needed to help differentiate between project-specific effects and cumulative effects?*

The Government of Canada is supportive of the definition for cumulative effects proposed in the Discussion Paper. That said, Natural Resources Canada notes that, given the definition provided in the Discussion Paper for "effects versus impacts", the Board may wish to confirm that, for the purposes of the CEAF, "cumulative effects" are understood to also include consideration of cumulative impacts. Environment and Climate Change Canada also highlights for parties' clarity that synergistic cumulative effects are typically associated with two or more effects arising from separate mechanisms.

The Government of Canada is of the opinion that additional guidance may be needed regarding "combined" project effects. It is important to take into consideration the unique assessment and development history of the Mary River Project. An updated, comprehensive cumulative effects assessment may require a degree of refreshed

consideration of the contribution of “combined” projects effects to cumulative effects, particularly as certain project components are not yet constructed.

- *Potential gaps in monitoring of cumulative effects*
- *Additional research and monitoring relevant to development of a CEAF*
  - *What other sources of research and monitoring information are available to support project-specific cumulative effects assessment and management?*
  - *How can we improve coordination across governments, proponents, academia and other stakeholders for research and monitoring to inform regional cumulative effects management?*

The Government of Canada is eager to hear parties’ views regarding potential, additional research and monitoring priorities as well as opportunities for further coordination and collaboration.

Environment and Climate Change Canada highlights the existence of national and international efforts to coordinate monitoring approaches to support regional cumulative effects assessments, including the Arctic Council’s Conservation of Arctic Flora and Fauna (CAFF) Circumpolar Biodiversity Monitoring Program (CBMP) and the CircumArctic Rangifer Monitoring and Assessment (CARMA) Network. Consideration could be given to how such work can inform improved coordination across governments, proponents, academia and other stakeholders.

- *Geographic and temporal scale*
  - *What geographic scale and temporal boundaries are appropriate for the development of the CEAF?*

The Government of Canada is supportive of parties’ previous comments regarding expanding the temporal and spatial scope of assessment, as relevant and on a Valued Component-specific basis. This is particularly important with respect to the ranges of mobile aquatic and terrestrial wildlife. The Government of Canada appreciates that quantitative data may not always be readily available with respect to expanded temporal and spatial scopes. The Government of Canada can provide additional input as the CEAF initiative develops.

Regarding Aquatic Invasive Species, Parks Canada notes that spatial and temporal boundaries may benefit from reflecting pathways and biological risk, including a broader geographic scope encompassing settlement habits, dispersal zones, and key anchorages. It is also important to recognize potential lag times in effects; monitoring approaches extending through operations and into periods of reduced or ceased shipping activity may help capture important dynamics. Parks Canada is available to speak to monitoring considerations for this topic.

Natural Resources Canada also recommends whole watershed and associated drainage area assessment of impacts to water quality. Natural Resources Canada is available to speak further on topic, including considerations regarding snowmelt.

- *Identification of projects, activities and processes to be considered*
  - *What projects, activities and processes should be considered for development of the CEAF?*
  - *How should induced development/future phases for the Mary River Project be considered?*

The Government of Canada highlights that there have been several recent regulatory submissions and/or investment announcements relating to projects that should be considered in an updated cumulative effects assessment of the Mary River Project (e.g., the Iqaluit Nukkiqsautiit Hydro Project, the newest iteration of the Grays Bay Road and Port Project, the Port of Churchill Plus, etc.). Specific projects, activities and processes to consider would depend on the timing of the updated assessment, and agreement on Valued Components and geographic and temporal boundaries. The Government of Canada can provide additional input as the CEAF initiative develops.

Environment and Climate Change Canada also recommends consideration of relevant external drivers of wildlife population trends, including those unrelated to projects and activities (e.g., migratory influences and natural population cycles), in order to support more accurate interpretation of cumulative effects.

With respect to the consideration of induced development/future phases for the Mary River Project, the Government of Canada is supportive of the approach taken by Baffinland Iron Mines Corporation (Baffinland) for the Sustaining Operations Proposal 2 assessment (i.e., consideration of Deposits 2-3 as reasonably foreseeable development and Deposits 4-9 as potentially induced future development). Natural Resources Canada recommends additional scenarios for the project be considered, as appropriate, to capture reasonably foreseeable and potentially induced future developments.

- *Selection of Valued Components*
  - *What Valued Components should be the focus for development of the CEAF?*

The Government of Canada is supportive of the Valued Components previously identified by the Qikiqtani Inuit Association (as set out in the Discussion Paper) being the focus for development of the CEAF initiative. The Government of Canada remains open to discussion regarding additional Valued Components to consider, should they be suggested by other parties. In particular, Environment and Climate Change Canada encourages further discussion on the inclusion of additional marine taxa such as seabirds and bowhead whales.

Environment and Climate Change Canada also notes that holistic approaches to considering cumulative effects (beyond Valued Components) should be considered in developing the CEAF. Environment and Climate Change Canada is available to speak to this topic.

- *Other identified areas of interest*
  - *What updates to guidance should be adopted to improve the assessment of cumulative effects in future amendment applications?*
  - *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?*

Crown-Indigenous Relations and Northern Affairs Canada notes that additional clarity may be required concerning significance determinations for cumulative effects assessment and how climate change is considered (e.g., the significance of cumulative effects on Valued Components versus the significance of the Mary River Project's contribution to cumulative effects on Valued Components.)

Environment and Climate Change Canada also recommends that potential impacts associated with pollution and contaminants be considered, for freshwater, terrestrial and marine ecosystems, independent of air pollution pathways.

To improve monitoring report templates, Crown-Indigenous Relations and Northern Affairs Canada recommends inclusion of a standalone summary which provides not only conclusions comparing monitored impacts with assessment conclusions, but also quantitative summary data (where available) for both. Natural Resources Canada also recommends inclusion of a section describing how any gaps or inconsistencies in monitoring methodologies were (or could be) addressed, as well as how engagement has informed any changes in monitoring.

The Discussion Paper notes that the legislative framework specific to cumulative effects assessment and management in Nunavut empowers the Nunavut Planning Commission to refer project proposals to the Board that would normally be exempt from assessment, where there are concerns for potential cumulative impacts in relation to other projects and activities in a region. Crown-Indigenous Relations and Northern Affairs Canada suggests that the CEAF initiative could be an opportunity for parties to discuss recommendations regarding this mechanism, should there be identified regional contributors to cumulative effects that may otherwise not typically be assessed.

As a general comment, Fisheries and Oceans Canada recommends that guidance for future assessments direct that additional rationale be provided regarding significance considerations, including, for example, the reversibility of impacts.

Finally, Natural Resources Canada would like to bring to the Board's attention the following additional resources that may be of some use in the development of the CEAF initiative. Natural Resources Canada is available to speak more about these resources.

- [Risk Assessment Framework for Cumulative Effects \(RAFCE\)](#) – a risk and impacts-based cumulative effects assessment framework for scoping regional cumulative effects issues.
- [Risk Assessment Software for Cumulative Effects \(RASCE\)](#) – a Web-based collaborative tool for Regional Risk Assessment and Prioritization. The software performs analysis and modeling using artificial intelligence and large language models to produce assessment reports and a prioritization diagram.
- [Cumulative Effects of Natural and Anthropogenic Disturbances under Climate Change in Western Canada: Assessing the Trade-Offs Among Long-Term Conservation of Priority Species and Places, Carbon Sequestration and Land Management. Note 7](#) – through the development of an integrated open-platform system for management, this work evaluates cumulative effects on indicators and examines trade-offs. This system can be applied to other regions and objectives.

The Government of Canada looks forward to participating in the upcoming CEAF Workshop and continuing to work with interested parties to develop this important initiative.

Thank you,

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