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Qikiqtani Inuit Association

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Serving the communities of

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March 4, 2026

Ryan Barry
Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik)
Cambridge Bay, NU X0B 0C0
Email: rbarry@nirb.ca

Subject: QIA Review of Draft CEAF Discussion Paper

Dear Ryan Barry,

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 draft Discussion paper for the Cumulative Effects Assessment Framework (CEAF) for the Mary River Project as the member of the CEAF Steering Committee. The results of our review are provided in Appendix A.

Nakurmiik,

Assol Kubeisinova
Senior Manager, Lands and Regulatory Affairs
Qikiqtani Inuit Association

Attachment: Appendix A

Appendix A—QIA Review of Discussion Paper

Comment #1	CEAF Discussion Paper
Issue	Overall intent and scope of the Discussion Paper
Reference	Introduction (pg. # 3)
Discussion	<p>Para. 2: "...it may also lead to improvements for the conduct of monitoring programs across Nunavut"</p> <p>It would be valuable here, or elsewhere in the report, to be more intentional as to the types of improvements hoped to be achieved.</p>
Recommendation	A point raised during previous discussions was the opportunity (or need) to ensure better coordination of monitoring programs - e.g. improved alignment of key indicators, assessed using common design, to contribute to more coordinated and improved CE understanding across programs and scales. This could be more explicit. See Comment # 9 , below

Comment #2	CEAF Discussion Paper
Issue	Overall intent and scope of the Discussion Paper
Reference	Introduction (pg # 3)
Discussion	"The objectives of this discussion paper are to engage with..."
Recommendation	Perhaps a more accurate statement is that: "The discussion paper, as a public document, sets out foundational knowledge to help advance the development of a CEAF. The intent is to facilitate common understanding and engagement with communities, interested parties and the public..."

Comment # 3	CEAF Discussion Paper
Issue	Overall intent and scope of the Discussion Paper
Reference	Introduction (pg. # 3)
Discussion	<p>The discussion paper is dense with background information (esp. pg. #s 11 – 13), and likely the largest section(s) (i.e. reporting on CEA for the MRP) are yet to be added.</p> <p>As such, a concern is how useful this Discussion Paper will be as a platform to initiate discussion and engagement, and thus the overall intent of the Discussion Paper.</p> <p>This might be a point for further discussion amongst SC members: i.e. the extent to which this Discussion Paper is intended to summarize information for the SC vs. the extent to which it is intended to move discussions forward and facilitate community, interest based, and public understanding of advancing a CEAF.</p>

Comment # 3	CEAF Discussion Paper
Issue	Overall intent and scope of the Discussion Paper
Recommendation	<p>A revised structure (without sacrificing agreed-upon elements), that is more succinctly focused on establishing the foundation(s) for advancing a CEAF and promoting understanding, would be:</p> <ul style="list-style-type: none"> i) What is a CEAF (including defining CE, at least conceptually) ii) How CEs are currently assessed and monitored (brief overview of CE processes in Nunavut [non-technical], followed by the monitoring programs in place in Nunavut and a chart of who does/monitors what components) iii) What makes a good CEAF [at least the minimum, well established features] (for example, strong coordination across monitoring programs, different types of monitoring that occur and feed into a CEAF, aligning project CEs with regional CEs and vice versa, informing future project CEs – e.g. MRP; importance of alignment/coordination of monitoring programs and, perhaps, where things currently stand in this regard). Some basic, general features. iv) The CEAF development process v) CEAF information needs and requirements (required MRP CE inputs, identifying current and future developments, etc. – i.e. a listing of the types of information needs, more so than a detailed presentation of the results of these, complemented by an explanation as to ‘why’ this information is important to a CEAF). <p>The above might serve to provide a more succinct document and basis for engagement, discussion, and understanding. It does not sacrifice agreed-upon core content, based on the SC approved outline.</p> <p>The more detailed (background, technical) material might then be included in a few key <i>Appendices</i> (extracting some of the existing text). For example:</p> <ul style="list-style-type: none"> a. Terminology b. Synthesis of CEA results for MRP (as noted in the draft and based on BIM reports provided) c. Synthesis of key issues and concerns (as per the section noted in the draft report)

Comment #4	CEAF Discussion Paper
Issue	Terminology Section
Reference	Terminology (pg. # 4)
Discussion	The terminology is important, but the section on terminology seems disruptive to the core of the Discussion Paper.

Comment #4	CEAF Discussion Paper
Issue	Terminology Section
Recommendation	<p>i) Move the list of terminology to an Appendix, where it can then be easily extracted and used in (i.e. appended to) any/all future CEAF documents. This would also allow for a longer list, if applicable, and evolution over time.</p> <p>ii) The 'Terminology' section might be relabelled as 'What is a CEAF' (see Comment # 3), whereby the focus is on communicating what a CEAF (in general) is about and what it is intended to do – including defining and unpacking the definition of 'cumulative effects'</p> <p>iii) Explanation of the concept of cumulative effects would be strengthened by including a diagram/visual or two, to help communicate to communities/public. There are some simple diagrams that differentiate between 'Valued component focused' versus 'Project focused' to help explain the CE concept.</p>

Comment #5	CEAF Discussion Paper
Issue	CE terminology regarding "individually minor" effects
Reference	Last para pg. #5/ top of pg. # 6
Discussion	<p>Referring to definitions of cumulative effects, a reference is made to Government of Canada and a statement that: "Generally, they all refer to effects that are individually minor, but collectively significant"</p> <p>Although this is what is stated in the source, it is somewhat misleading. Cumulative effects can also result from multiple (interacting or compounding) MAJOR effects, or from individual MAJOR effects + other effects that are minor in nature. That cumulative effects result from (only) individually minor effects is a common statement, but not accurate. This point should be clarified, as not <i>all</i> cumulative effects are comprised of <i>only</i> individually minor effects.</p>
Recommendation	Simply remove this statement.

Comment #6	CEAF Discussion Paper
Issue	SC's definition of 'Reasonably Foreseeable Future Development'
Reference	Pg. # 7
Discussion	The present definition of a 'Reasonably Foreseeable Future Development' is limited to "projects or activities" within the current regulatory locus. This excludes other planned developments, which the SC and the public know will take place, such as the development of additional Deposits at the Mary River Project.
Recommendation	<p>QIA recommends revising the current definition of a 'Reasonably Foreseeable Future Development' to include all planned and potential developments. QIA suggests the following wording:</p> <p style="text-align: center;">Reasonably Foreseeable Future Development: Those future projects or activities:</p>

Comment #6	CEAF Discussion Paper
Issue	SC's definition of 'Reasonably Foreseeable Future Development'
	<ol style="list-style-type: none"> 1. which are currently under regulatory review or 2. for which a staked claim exists or 3. for which a Class 2 or 3 Land Access Authorization was issued or an application for such was filed.

Comment #7	CEAF Discussion Paper
Issue	SC's definition of 'Cumulative Effects'
Reference	Pg. # 7
Discussion	<p>An operational definition of CE is important to include. Some issues that require further discussion or consideration regarding the definition are as follows:</p> <ol style="list-style-type: none"> i) For clarity, does future “development” in the definition refer exclusively to “projects” (i.e. developments that undergo regulatory review, or does it also mean “activities” (as per NIRB’s definition), which may capture human disturbances that are not “projects”? ii) It is implied by the definition that a cumulative effect to, for example, traditional land use or culture, would be viewed <i>indirectly</i> via a change to the biophysical environment. Will this understanding be clear to all interests or parties? This point may need to be more explicit given that the Nunavut Agreement addresses ecosystemic and socio-economic environments. iii) Not all changes to the environment are “effects”. Change could be will within the range of what is normal variation or tolerance or acceptability.
Recommendation	<ol style="list-style-type: none"> i) CEs should be defined as: “effects... that result from changes in the environment caused by...” ii) The SC’s definition may need to clarify whether these effects may be to either or both ecosystemic and socio-economic components/systems.

Comment #8	CEAF Discussion Paper
Issue	Linking the legislative framework (components, features) to the development of a CEAF
Reference	Overview of legislative framework in Nunavut (pg. # 8)
Discussion	<p>Two questions are posed in the margins of the text: Are there specific parts of the legislative framework which aren’t spoken to in sufficient detail or which should be clarified further? Should we include a chart of who is responsible for what in terms of monitoring for each VC?</p> <p>This is an important section. The information establishes a basic understanding of how CEs are assessed and monitored in Nunavut and sets out the environment in which a CEAF will function.</p>

Comment #8	CEAF Discussion Paper
Issue	Linking the legislative framework (components, features) to the development of a CEAF
Recommendation	<p>i) See Comment # 3 above. This section might be strengthened by focusing on how CEs are currently assessed and monitored by first offering a brief overview of the legislative framework from the project and upward (i.e. project CE, certificate, project CE monitoring; government monitoring, regional committees, NGMP – non-technical description).</p> <p>ii) This might be followed a summary chart of who does/monitors what components (see Comment # 8).</p> <p>iii) Overall, there is need to be more explicit in this section as to why and how this information (i.e. the components of the legislative framework that are described) is foundational to the development and function/operations of the CEAF. This might be addressed briefly in an opening paragraph to the section, to provide clearer context.</p>

Comment #9	CEAF Discussion Paper
Issue	Scope of section on “Roles, responsibilities and related data/research”
Reference	Roles, responsibilities and related data/research (pg. # 11)
Discussion	<p>The scope of this section remains unclear. Is the purpose: (i) simply to list all data sets and monitoring programs (unsure how useful it would be); or (ii) to identify and gather/consolidate these in some way, such that they may be used or drawn upon (a significant undertaking).</p> <p>There is likely rich data out there from research programs over the years (based on those listed on the NRI website, but inventorying this would be a large undertaking, and it isn't clear just yet whether or how they might feed into the CEAF.</p> <p>It might be, instead, that the CEAF can help set future research project priorities based on any identified gaps in existing monitoring programs.</p>
Recommendation	<p>i) Section revised to focus on identifying (table/chart) only existing government and Inuit and regional monitoring programs (i.e. who is monitoring what VCs and responsible for what).</p> <p>This information is likely to be more directly relevant to advancing the CEAF (and understanding CE governance) than identifying academic research - and the data sets produced.</p> <p>ii) It might be worth commenting in this section of the report on the importance of supporting coordination across these different monitoring programs, in instances where the same VCs or indicators are being monitored, to provide a basis for CE understanding. This is, based on the purposes stated for the CEAF, part of the intended outcome/benefits.</p>

Comment #9	CEAF Discussion Paper
Issue	Scope of section on “Roles, responsibilities and related data/research”
	iii) It might be stated that the CEAF will help set future research priorities based on any identified gaps in existing monitoring programs.

Comment #10	CEAF Discussion Paper
Issue	Clarity of the added role of the CEAF
Reference	Overview of legislative framework in Nunavut: last paragraph (“In conclusion...), pg. # 10
Discussion	It is stated that the legislative framework for CE and management “has created a comprehensive system of assessment and monitoring...” For communities, other interests, and members of the public this might raise the question of what is it then, exactly, that the CEAF will add or improve.
Recommendation	The need for advancing the CEAF may need to be reiterated here and clarified in relation to the current comprehensive systems. See Comment # 1 , above.

Comment #11	CEAF Discussion Paper
Issue	Concerns with assessment and monitoring of CE for the approved Project
Reference	Pg. # 20
Discussion	Section “Overview of concerns raised regarding the assessment and monitoring of cumulative effects associated with development of the approved Project” remains to be expanded. Over the years, QIA provided its submissions to the NIRB for the reconsideration of the Project Certificate and as part of the annual report review. Those submissions can provide a wealth of information for this section of the Discussion Paper. In addition, in December 2025, QIA submitted a number of studies completed as part of the Inuit Stewardship Plan for the Project.
Recommendation	QIA recommends populating this section with the information extracted from QIA’s submissions to the Board over the years.