



Sanirajak

The Project now before the NIRB includes a hydroelectric facility with a dam and reservoir, all-season access infrastructure, a transmission line and associated construction and water-management activities. The Kuugaaluk River system also supports Inuit travel and harvesting, as well as fish and wildlife habitat.

Given the scale, location, and character of the Project, public concern is likely to arise once more project design and potential environmental and socio-economic effects information becomes available. The information currently provided does not allow QIA to characterize the extent of public concern or determine whether concerns raised through engagement remain outstanding. Furthermore, QIA considers that more community engagement is needed before a preferred alternative can be identified and, in turn, assessed.

QIA recommends that continued engagement with potentially affected Inuit on more detailed project design and effects identification information is required to ensure likely public concerns are identified and addressed. Such engagement requires documentation of the issues raised, how those issues have been considered, and any concerns that remain outstanding. Such a process is available through the NIRB review.

II. Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why.

QIA considers that the Project is likely to cause significant adverse ecosystemic or socio-economic effects. However, the available information is not sufficient to fully characterize or conclusively determine the significance of those effects with the available information.

The Project has several potential ecosystemic and socio-economic effect pathways. NNC identifies potential interactions involving hydrology and water quality, fish and fish habitat, wildlife and wildlife movement, permafrost and terrain, Inuit land use and harvesting, travel, country foods, and socio-economic conditions.

Several of these effects remain under study or depend on Project design that is still being refined. Hydrologic and aquatic studies are continuing to inform reservoir operation, downstream flows, fish habitat and water quality. Wildlife studies are continuing to improve information on seasonal habitat use and movement. Permafrost, geotechnical, archaeological and socio-economic studies are also ongoing. NNC states that this additional information will continue to refine Project design, effects assessment, mitigation and monitoring.

The socio-economic assessment is also preliminary, including further work related to harvesting and land use, accommodation, community well-being, employment and training, local business capacity, and the distribution of Project benefits and effects.

Cumulative effects have similarly been considered at a screening level. NNC indicates that, if an EIS is required, a fuller cumulative effects assessment would be undertaken, including further consideration of pathways, indicators and significance.

QIA therefore considers that there are likely adverse and significant ecosystemic and socio-economic effects that warrant further consideration. The ongoing baseline studies, Project design and effects assessment will be important for determining the magnitude, duration, geographic extent and significance of these effects and for conclusively assessing for significance to inform decision-making and identify appropriate mitigation measures and evaluate their likely efficacy.

III. Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; if so, why.

QIA considers that the Project is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities. However, the available information is not sufficient to determine the significance of those effects at this stage.

The Project Area includes wildlife and fish habitat and areas used for Inuit travel and harvesting. NNC identifies potential effects associated with habitat disturbance, human presence, noise, vehicle and aircraft activity, and potential interference with wildlife movement. Wildlife studies remain ongoing, including work to improve information on seasonal habitat use, species movement and sensitive areas.

NNC also identifies potential effects on fish and fish habitat associated with changes in water flows and levels, sediment and substrate conditions, habitat connectivity and fish movement, water quality and ice conditions. Aquatic studies remain ongoing and are expected to further inform Project design and effects assessment.

The Project Proposal also identifies harvesting, land use, country foods and travel safety as matters requiring further consideration. NNC states that Inuit Qaujimajatuqangit (IQ) has informed Project siting, routing, seasonal timing, fish and wildlife considerations and cultural protection, and that IQ and Inuit engagement will continue to inform design, mitigation, monitoring and effects assessment.

Important aspects of the Project that may influence these effects are also still being refined, including access routing, watercourse crossings, reservoir operation and environmental flow requirements.

QIA therefore considers that potential effects on wildlife, fish and fish habitat, harvesting, travel and access require continued studies as the Project design and baseline information advance. Further information will be needed to characterize and conclusively determine the significance of these effects and to inform decision-making and identify appropriate mitigation measures and evaluate their likely efficacy.

IV. Whether the Project is of a type where potential adverse effects are highly predictable and mitigable with known technology.

QIA considers that the Project is not of a type where potential adverse effects of the Project are highly predictable and mitigable with known technology.

NNC identifies established mitigation measures for several conventional construction-related effects, including erosion and sediment control, in-water work, dust and noise, wildlife avoidance and timing measures, spill prevention, waste management, and protection of archaeological and cultural resources.

NNC also identifies several environmental and social management plans that would be developed as the Project advances.

Greater uncertainty remains for potential effects associated with reservoir filling and operation, downstream flows and water quality, fish and aquatic habitat, wildlife movement, permafrost and terrain conditions, and Inuit harvesting and socio-economic conditions. These effects depend in part on baseline studies and Project design information that remains under development. This uncertainty is particularly important given the scale and type of the Project, which includes a large reservoir, long-term regulation of the Kuugaaluk River system, and dam and related infrastructure expected to operate over a period of more than 100 years in an Arctic environment. Climate change may further influence hydrological conditions, flood and extreme precipitation events, ice conditions, permafrost stability, erosion and terrain response over the life of the Project. These changing conditions may affect dam and reservoir performance, downstream flow management, and the effectiveness of erosion and sediment controls and other standard mitigation measures. There is also uncertainty as to whether standard mitigation will be effective in avoiding or sufficiently reducing longer-term effects on fish and fish habitat, wildlife movement and habitat use, and associated Inuit harvesting activities.

While NNC proposes follow-up and adaptive management, including indicators, thresholds, corrective actions and adjustments to mitigation, there is high degree of uncertainty associated with potential effects, so it is not clear if these established / standard mitigation measures will be addressed or addressed adequately.

QIA considers that while established mitigation may be available for some expected Project effects, additional information is required before the potential adverse effects of the Project can be identified and determining whether effective mitigation measures are available and feasible to address these effects.

V. Any matter of importance to QIA related to the Project proposal, or additional factors that should be considered if a Review is required.

A key matter of importance for QIA is that much of the information needed to identify public concerns, preferred alternatives, and to understand the character and significance of Project effects is outstanding.

NNC has provided a screening-level Project configuration, but environmental and socio-economic baseline studies, aspects of Project design, effects assessment, mitigation and monitoring remain ongoing or subject to refinement. NNC itself states that Project information will continue to be updated as design, baseline studies, engagement and regulatory review advance.

QIA also notes that the incorporation of IQ remains ongoing. Continued engagement with potentially affected Inuit, together with the independent participation of relevant Hunters and Trappers Organizations/Associations, should inform subsequent Project planning, alternatives analysis, effects assessment, mitigation and monitoring. Furthermore, QIA considers that more community engagement is needed before a preferred alternative can be identified and, in turn, assessed.

Of particular importance are reservoir operation and downstream flows; fish and aquatic habitat; wildlife habitat and movement; Inuit harvesting, travel and land use; road and transmission routing; permafrost

and geotechnical conditions; socio-economic effects; cumulative effects; and the effectiveness of proposed mitigation, monitoring and adaptive management.

The comments above should not be interpreted as QIA supporting or opposing the Project or identifying a preferred Project alternative. Currently, however, QIA does recommend that the NIRB undertake a review of the Iqaluit Nukkiksautiit Project proposal.

Nakurmiik,

A handwritten signature in black ink, appearing to read 'Assol', followed by a horizontal line.

Assol Kubeisinova

Senior Manager, Lands and Regulatory Affairs

Qikiqtani Inuit Association