

ATTACHMENT 1: RESPONSES TO SCREENING COMMENTS ON THE INP

NIRB File No. 26UN010

Questions from Qikiqtani Inuit Association, Government of Nunavut & Government of Canada

1. QIA-01 Project Definition / Design Maturity

Comment Summary: Project remains at planning/preliminary design; component locations/footprints, construction methods, reservoir operating rules, access arrangements, mitigation and monitoring remain under development. QIA considers the Project insufficiently defined to fully identify effect pathways.

NNC Response: NNC acknowledges that the Project is at the preliminary design stage. The screening configuration reflects the Project information currently available and provides the basis for assessment while the design envelope continues to be defined and refined through engineering, engagement and environmental assessment. NNC will maintain a controlled design basis and design-envelope register as engineering advances so that changes to component locations, footprints, construction methods, reservoir operations, access arrangements, mitigation and monitoring can be tracked and reflected in the assessment. The preliminary Project Design Basis will continue to be updated through design development.

2. QIA-02 Public Concern / Engagement / Alternatives

Comment Summary: QIA considers significant public concern likely and states that more community engagement is needed before a preferred alternative can be identified and assessed. QIA requests documentation of issues raised, how they were considered, and outstanding concerns.

NNC Response: NNC acknowledges QIA's position that further engagement is needed as the design and effects information develop. Engagement will continue with potentially affected Inuit, the Iqaluit and Pangnirtung Hunters and Trappers Organizations and other interested parties. NNC will maintain traceable records of issues raised, how they were considered in design and assessment, and matters that remain outstanding. The preferred configuration will be presented with the alternatives considered and the reasons for selection as the assessment advances.

3. QIA-03 Ecosystemic / Socio-Economic Effects

Comment Summary: QIA considers likely adverse and significant ecosystemic and socio-economic effects warrant further consideration. Hydrology, aquatics, wildlife, permafrost, archaeology, socio-economics and cumulative effects remain under study.

NNC Response: Baseline programs are underway for hydrology, aquatics, permafrost, air quality and noise, wildlife and terrestrial ecology, vegetation, archaeology and cultural resources, and socio-economic conditions. Work will continue through 2026, with identified seasonal or information gaps addressed in 2027. Environmental, socio-economic and cumulative effects assessment will advance through winter 2026-2027 using the developing baseline and design information. The assessment will characterize magnitude, duration, geographic extent, reversibility and significance and will identify mitigation, monitoring and follow-up requirements.

4. QIA-04 Wildlife / Fish / Harvesting / Travel

Comment Summary: QIA identifies potential effects on wildlife habitat and movement, fish and fish habitat, Inuit harvesting, travel and access. Key design dependencies include access routing, watercourse crossings, reservoir operation and environmental-flow requirements.

NNC Response: The aquatic, terrestrial and socio-economic work programs will evaluate effects on wildlife habitat and movement, fish and fish habitat, Inuit harvesting, travel and access. These assessments will be coordinated with decisions on access routing, watercourse crossings, reservoir operation and environmental flow requirements and will incorporate available Inuit knowledge and land-use information. The hydrometric program includes five water-level logger stations, four snow and ice sampling locations and two saline-dilution flow-measurement systems. Bathymetric surveys have also been completed to support rating curves at monitoring locations. Results will be updated following each hydrological season.

5. QIA-05 Mitigation Efficacy / Climate Uncertainty

Comment Summary: QIA notes uncertainty regarding reservoir filling/operation, downstream flows, water quality, fish, wildlife movement, permafrost/terrain and Inuit harvesting in a >100-year Arctic project, including the influence of climate change on mitigation effectiveness.

NNC Response: NNC agrees that the long Project life and changing climate create uncertainty that must be addressed through site-specific assessment, monitoring and adaptive management. Reservoir filling is currently anticipated to occur between May and October in a single year, subject to actual inflows. Downstream releases during filling will be based on the environmental-flow requirement established through the coordinated hydrology, aquatic and regulatory processes. The filling assumption will be tested through hydrologic and water-quality modelling. The next-phase assessment will evaluate climate scenarios and mitigation effectiveness and will develop monitoring indicators, thresholds and corrective actions for material uncertainties.

6. QIA-06 IQ / HTO Participation / Review Recommendation

Comment Summary: QIA requests continued incorporation of IQ and independent HTO/HTA participation in planning, alternatives, effects assessment, mitigation and monitoring, and recommends that NIRB undertake a Review.

NNC Response: NNC acknowledges QIA's recommendation that the Project undergo a Review. NNC will continue to incorporate Inuit Qaujimajatuqangit and facilitate meaningful participation by the Iqaluit and Pangnirtung Hunters and Trappers Organizations in Project planning, alternatives evaluation, effects assessment, mitigation, monitoring and follow-up. NNC is planning its next-phase work on the basis that the information may be required to support a Part 5 Review, while recognizing that the screening determination rests with NIRB.

7. GN-01 Need for Part 5 Review / Project Scale

Comment Summary: GN states that the Project's scope and extent warrant further review and that the scale, footprint and duration have potential for significant adverse ecosystemic and socio-economic effects.

NNC Response: NNC acknowledges the GN's position regarding the Project's scale, footprint, duration and potential for significant adverse ecosystemic and socio-economic effects. The next phase of assessment will evaluate effects through construction, operation, decommissioning and closure, including cumulative and time-dependent changes. Long-term hydrologic, climate and permafrost conditions will be incorporated where relevant, and the assessment will identify mitigation, monitoring, follow-up and adaptive-management measures.

8. GN-02 Wildlife / Harvesting / Food Security

Comment Summary: GN identifies potential effects on Arctic char, Baffin Island caribou, harvesting activities, access and food security, including potential increased access and harvesting pressure.

NNC Response: The aquatic, terrestrial and socio-economic assessments will evaluate potential effects on Arctic char and fish habitat, Baffin Island caribou, harvesting, access and food security. The assessment will consider changes in flow, water level and water quality, disturbance and movement effects, and the potential for increased access and harvesting pressure. Input from the relevant Hunters and Trappers Organizations and Inuit land users will inform pathway identification, mitigation and monitoring.

9. GN-03 Project Scope Clarity

Comment Summary: GN notes that final alignments, reservoir operations, downstream flow requirements, construction logistics, fuel storage, mitigation and monitoring remain under development and says project scope is unclear regarding supplemental wind turbines and a secondary reservoir.

NNC Response: NNC confirms that supplemental wind turbines and a secondary reservoir are excluded from the Project scope being advanced. The Project description and design basis will be updated as final alignments, reservoir operations, downstream flow requirements, construction logistics, fuel storage, mitigation and monitoring are refined. Material changes will be tracked against the assessed design envelope and communicated through the NIRB process.

10. GN-04 Inuit Employment / Training / Procurement / Wellbeing

Comment Summary: GN states that plans for Inuit employment, career development, training, capacity-building and community-led priorities have yet to be developed and that Review should assess community wellbeing and service effects.

NNC Response: The socio-economic assessment will address Inuit employment, career development, training, procurement and contracting, community wellbeing and potential demands on community services across Project phases. NNC will develop measurable assumptions and objectives for workforce, training and procurement so that potential benefits, constraints and distributional effects can be assessed. These measures will be informed by engagement with Inuit organizations, communities and local businesses.

11. GN-05 Part 5 Review Recommendation

Comment Summary: GN concludes that screening cannot determine significance or adequacy of mitigation/monitoring/adaptive management and recommends a Part 5 Review.

NNC Response: NNC acknowledges the GN's recommendation for a Part 5 Review and the uncertainties identified regarding effects, mitigation, monitoring and adaptive management. NNC is developing the baseline, design and assessment information needed to address these matters through an EIS should NIRB determine that a Review is required.

12. GOC-CIRNAC-01 Project Scope / Public Engagement

Comment Summary: CIRNAC expects public concern and identifies IQ integration, mitigation of residual/cumulative effects, community experience, Inuit employment/training/procurement, and regular accessible project updates as matters to address.

NNC Response: NNC acknowledges the potential for public concern given the Project's scale, location and status as Nunavut's first proposed hydroelectric development of this type. Continued engagement and the next-phase assessment program will address lifecycle integration of Inuit Qaujimajatuqangit, residual and cumulative effects, community experience and land use, Inuit employment and procurement, and accessible updates on milestones, water management and construction scheduling. Engagement outcomes will be documented and linked to design and assessment decisions.

13. GOC-CIRNAC-02 Ecosystemic / Socio-Economic Effects

Comment Summary: CIRNAC states that the scale of landscape transformation would benefit from technical evaluation and defers to NIRB on whether Review or regulatory processes are appropriate.

NNC Response: NNC acknowledges that the extent of landscape transformation warrants detailed technical evaluation. If NIRB determines that a Review is required, the EIS will assess the potential ecosystemic and socio-economic effects of reservoir inundation, altered hydrology and the linear infrastructure corridor, together with mitigation, residual effects and cumulative effects.

14. GOC-CIRNAC-03 Predictability / Mitigation In Arctic Conditions

Comment Summary: CIRNAC says adverse effects are not necessarily highly predictable because there is no comparable Nunavut hydro development with long-term monitoring under changing climate and continuous permafrost conditions; site-specific evaluation is required.

NNC Response: NNC agrees that mitigation cannot be assumed effective solely because it has been used for other northern civil works. The assessment and engineering programs will use site-specific hydrology, permafrost, terrain, water-quality and ecological information to evaluate effects and mitigation performance. Monitoring and adaptive-management measures will address material uncertainty under changing climate conditions.

15. GOC-CIRNAC-04 Inuit Employment / Capacity / Procurement

Comment Summary: CIRNAC recommends formal plans to prioritize local Inuit employment, apprenticeships, skills development and local business contracting, including long-term operations, remote monitoring and environmental stewardship.

NNC Response: NNC will develop formal objectives and commitments for local Inuit employment, apprenticeships, skills development and contracting opportunities across construction and long-term operations. Opportunities associated with remote monitoring and environmental stewardship will also be considered. Defined workforce and procurement assumptions will support the socio-economic effects assessment and future reporting.

16. GOC-CIRNAC-05 Dam Safety / Emergency Preparedness

Comment Summary: CIRNAC calls for dam breach modelling, inundation mapping, Dam Safety Management Plans, Emergency Preparedness and Emergency Response Plans, downstream notification procedures and community safety measures, with reference to CDA guidance.

NNC Response: Dam-breach modelling, inundation mapping, dam-safety management planning, emergency preparedness and emergency response planning will be completed in accordance with applicable Canadian Dam Association guidance. Initial versions are planned for development between December 2026 and March 2027 and will be updated as the design reaches issued-for-construction status and following construction, as appropriate. The work will address downstream notification and community safety measures.

17. GOC-CIRNAC-06 Devolution / Regulatory Responsibility

Comment Summary: CIRNAC notes current responsibilities for water licence approval and Crown land administration may transition to the GN on April 1, 2027, under devolution.

NNC Response: NNC acknowledges the planned transition of responsibility for water-licence approvals and Crown land administration to the GN on April 1, 2027. The Project team will track the transition, confirm responsible authorities and application interfaces before each regulatory milestone, and prepare submissions in accordance with the legislative and administrative framework in force at the time.

18. GOC-DFO-01 Fish / Fish Habitat / Downstream Effects

Comment Summary: DFO expects significant public concern and identifies potential effects from altered Kuugaaluk River flows on spawning, rearing, migration, overwintering habitat, Arctic char and downstream ecological linkages to Irvine Inlet/Cumberland Sound.

NNC Response: The aquatic assessment and hydrology program will evaluate effects of altered Kuugaaluk River flows on spawning, rearing, migration, connectivity and overwintering habitat, Arctic char populations, and downstream ecological linkages to Irvine Inlet and Cumberland Sound. The study area includes the proposed reservoir, associated tributaries and the downstream system. Baseline conditions will be assessed against construction, reservoir filling and operational scenarios, including relevant climate conditions, to identify mitigation and monitoring requirements.

19. GOC-DFO-02 Fisheries Act / Baseline / Offsetting

Comment Summary: DFO states current baseline information is insufficient to evaluate scale and duration of fish/fish-habitat effects and anticipates a later Request for Review; appropriate baseline will be critical to advice, mitigation and any offsetting plan.

NNC Response: NNC acknowledges that additional baseline and design information is required to support Fisheries Act review. Aquatic baseline work began in 2025 with reconnaissance and fish sampling in the Kuugaaluk River downstream of Unnamed Lake. Habitat surveys, fisheries assessments and water-quality sampling continued in 2026, and a further season is planned for 2027 to replicate key parameters and address natural variability and identified gaps. A Request for Review will be submitted during detailed design with the available baseline, design and mitigation information. The results will inform any determination of harmful alteration, disruption or destruction of fish habitat and, if required, offsetting and monitoring plans.

20. GOC-HC-01 Methylmercury / Country Foods / Human Health

Comment Summary: Health Canada highlights potential methylmercury exposure through country foods associated with reservoir inundation and offers expertise on country-food contamination, HHRA, air, noise, drinking water and recreational water quality.

NNC Response: NNC acknowledges the potential for reservoir inundation to affect methylmercury exposure through country foods. Baseline tissue, soil and water sampling is underway. The assessment will evaluate methylmercury and country-food pathways and define the scope of any human health risk assessment required, in consultation with Health Canada. Community-led sampling of key consumed country foods will be considered, and related food, social and cultural effects will be addressed in the socio-economic assessment.

21. GOC-TC-01 CNWA - Dam as Major Work

Comment Summary: Transport Canada confirms the dam is a Major Work under the Canadian *Navigable Waters Act* and that a formal review will start when an application is submitted; NPP file 2025-615109 is assigned.

NNC Response: NNC acknowledges that the proposed dam is a Major Work under the Canadian *Navigable Waters Act* and notes NPP file 2025-615109. The CNWA application has been included in the regulatory roadmap. Navigation information, engineering design and downstream floodplain modelling based on LiDAR and bathymetric information will be developed to support Transport Canada's review when the application is submitted.

22. GOC-TC-02 CNWA – Road / Transmission Crossings

Comment Summary: Transport Canada says watercourse crossings may require individual CNWA submissions depending on navigability and crossing design; physical characteristics, navigation use and design details are required.

NNC Response: Each proposed road or transmission-corridor watercourse crossing will be screened for navigability and applicable CNWA requirements as design advances. The crossing inventory will document physical characteristics, seasonal conditions, current and historical navigation or traditional travel use, and the proposed crossing design. Crossings requiring review will be advanced through individual submissions or other applicable CNWA processes.

23. GOC-NRCAN-01 ML/ARD Characterization - Hard Rock

Comment Summary: NRCAN requests a clear geochemical characterization approach for the very large volumes of rock from hard-rock source areas to evaluate metal leaching / acid rock drainage potential.

NNC Response: The geochemical characterization program is under development. Four proposed rock-quarry areas have received surface lithological characterization, and representative samples were collected from exposed or shattered rock. If blasting is proposed, additional samples will be selected from available bedrock core

and other representative source material. The program will be refined to characterize the rock units and source areas at a sampling density suitable to evaluate metal-leaching and acid-rock-drainage potential and to inform quarry selection and material use.

24. GOC-NRCAN-02 ML/ARD - Road Corridor Material

Comment Summary: NRCan asks whether road-corridor borrow/granular material will also be included in the ML/ARD characterization program.

NNC Response: Yes. The geochemical program will include proposed quarry and road-corridor borrow sources and areas where excavation or scarification could expose fresh mineral surfaces. Potential sources will be assessed for material homogeneity and sampled as appropriate. Surficial soil from one identified borrow source has been collected for initial metal-leaching evaluation, and additional sources and excavation areas will be evaluated as the alignment and material plan are refined.

25. GOC-NRCAN-03 ML/ARD - Material Management

Comment Summary: NRCan asks how excavated material would be managed if characterization identifies parameters of concern for metal leaching or acid rock drainage.

NNC Response: Material-management procedures will be informed by the geochemical results. A decision framework will address testing, acceptance criteria, segregation, placement, containment and monitoring. Material that does not meet the applicable criteria will be isolated and managed to prevent contact-water and contaminant-release risks. Quarry development and placement plans will retain flexibility to respond to analytical results.

26. GOC-NRCAN-04 Natural Hazards / Seismic / Landslide / Faults

Comment Summary: NRCan recommends adding natural hazards, discussion of faults, seismic and landslide effects, dam design codes/standards, and associated mitigation (e.g., CDA Guidelines and applicable building codes).

NNC Response: A geohazard assessment is included in the current work program. It will address relevant faults, seismic hazards, slope instability and landslide potential and will identify implications for dam and infrastructure design. Applicable Canadian Dam Association guidance, building codes and other design standards will be documented together with the resulting mitigation and design criteria.

27. GOC-NRCAN-05 Permafrost

Comment Summary: NRCan reiterates permafrost considerations for dam stability, foundation conditions, materials and geotechnical investigations discussed at the April 2026 workshop.

NNC Response: Permafrost conditions are being incorporated into the geotechnical and design program, including foundation conditions, material behaviour and dam stability. Site investigations and thermal modelling will inform design criteria and mitigation, and the assessment will consider how permafrost conditions may change over the Project life.

28. GOC-NRCAN-06 Explosives Licensing

Comment Summary: NRCan notes that explosives manufacture requires a licence and storage may be included; NRCan may become a responsible Minister if an explosives storage/manufacturing licence is required.

NNC Response: Explosives will be transported, stored and handled in accordance with applicable legislation and licence requirements. NNC does not currently propose to manufacture explosives on site; the present assumption is that packaged emulsions or nitroglycerine-based products would be used. The supply, storage and handling approach will be refined as construction planning advances, and NRCan licensing requirements and responsible-minister implications will be confirmed before commitments are made.

29. GOC-ECCC-01 Surface Water Quality

Comment Summary: ECCC identifies reservoir/flooding water-quality changes (including mercury methylation, nutrients, DO and pH), explosives residues, sediment/erosion, ML/ARD, spills, wastewater and sewage as pathways requiring technical assessment and mitigation.

NNC Response: The next-phase assessment will evaluate reservoir and flooding-related water-quality changes, including methylmercury, nutrients, dissolved oxygen and pH, as well as explosives residues, erosion and sedimentation, metal leaching and acid rock drainage, spills, wastewater and sewage. The assessment will consider construction, reservoir filling, early operation and routine operation. Results will inform the evaluation of design and operating parameters such as discharge depth, flow scheduling, erosion controls, material management and waste infrastructure, together with monitoring and adaptive-management measures.

30. GOC-ECCC-02 Hydrology / IFR / Reservoir Filling

Comment Summary: ECCC identifies uncertainty and inconsistency in hydrology and environmental-flow assumptions, including observed vs synthetic flow validation, 10% seasonal IFR vs 1-4 m³/s planning range, reservoir-filling inflows/duration, downstream effects, monitoring/adaptive management and climate effects.

NNC Response: The flows presented at screening are preliminary and will be refined using the ongoing hydrometric program and model validation. The assessment will reconcile observed and synthetic flows, the seasonal percentage-based environmental-flow assumption and the 1 to 4 cubic metre per second planning range. It will also evaluate reservoir-filling inflows and duration, year-round turbine discharge, maintenance shutdown conditions, winter icing and ecological effects, downstream flow and water-quality effects, climate sensitivity, and monitoring and adaptive management. Final environmental-flow requirements will be developed through the coordinated hydrology, aquatic and engineering assessments rather than relying on the screening assumptions alone.

31. GOC-ECCC-03 Migratory Birds / SAR Baseline

Comment Summary: ECCC says baseline information is insufficient regarding migratory bird species composition, seasonal occurrence, habitat use, abundance and federally listed SAR; it requests defined LSA/RSA, species inventories, methods/timing/coverage and breeding/nesting/staging/moulting/migration habitat characterization.

NNC Response: The adequacy of the 2026 bird program will be reviewed at the end of the survey season. The baseline report will define local and regional study areas and describe species composition, seasonal occurrence, habitat use, abundance, survey methods, timing and coverage, including breeding, nesting, staging, moulting and migration functions. Federally listed species at risk will be addressed. Identified seasonal, geographic or methodological gaps will inform the 2027 program.

32. GOC-ECCC-04 Migratory Bird Effects - Reservoir / Transmission

Comment Summary: ECCC requests explicit effects pathways for habitat lost/altered by reservoir filling and for transmission-line collision, movement/migration effects, sensitive areas, mitigation and monitoring.

NNC Response: The next-phase assessment will explicitly evaluate loss or alteration of bird habitat from reservoir inundation and potential transmission-line collision, displacement and movement or migration effects. Sensitive habitats and periods will be identified using baseline information, and the assessment will describe avoidance, design, mitigation, monitoring and follow-up measures.

33. GOC-ECCC-05 Migratory Bird Species at Risk

Comment Summary: ECCC identifies Buff-breasted Sandpiper, Harlequin Duck, Ivory Gull, Red Knot (rufa) and Red-necked Phalarope for effects and mitigation consideration.

NNC Response: The baseline and effects assessment will consider Buff-breasted Sandpiper, Harlequin Duck, Ivory Gull, Red Knot (rufa), Red-necked Phalarope and other migratory bird species at risk with a reasonable likelihood of occurrence. Current survey protocols can identify the listed species, while desktop information and habitat suitability will also be used to evaluate potential presence and effects.

34. GOC-ECCC-06 Migratory Bird Nesting / Migration Timing

Comment Summary: ECCC identifies a general nesting period of late May to mid-August and migration from late May to October, recommends avoidance/adaptation/rescheduling/relocation, and cautions that active nest searches are often inappropriate except under specific conditions.

NNC Response: NNC recognizes the general nesting and migration periods identified by ECCC. Project activities will first consider avoidance, rescheduling, relocation and other measures to reduce risk to migratory birds. Complete seasonal avoidance may not be practicable for certain time-sensitive investigations. Where work must occur during sensitive periods, activity-specific procedures will be developed with qualified biologist input and in accordance with applicable guidance. Nest searches will only be used where appropriate to the species, habitat and activity and where they can effectively reduce risk.

35. GOC-ECCC-07 Hazardous Substances Near Bird-Used Waters

Comment Summary: ECCC advises that petroleum/hazardous-material use, storage, handling and transport near waters frequented by migratory birds require plans and precautions to prevent accidental releases.

NNC Response: The Project will incorporate precautions for the use, storage, handling and transport of petroleum products and hazardous materials near waters used by migratory birds. Preventive controls and response procedures will be documented in project-phase environmental protection, fuel-management and spill-prevention plans.

36. GOC-ECCC-08 Major Maintenance Waste

Comment Summary: ECCC requests details on the hazardous/non-hazardous nature, generation frequency and storage of 'major maintenance waste' and how it differs from other waste streams.

NNC Response: The term major maintenance waste will be clarified in the next technical submission. The waste assessment will identify anticipated maintenance activities, expected hazardous and non-hazardous waste streams, likely generation frequency and volumes, temporary storage and secondary-containment requirements, transportation and approved off-site disposal or recycling routes, and how these streams differ from routine operational wastes.

37. GOC-ECCC-09 Fuel Setback / Refuelling Practices

Comment Summary: ECCC recommends fuel storage/dispensing >31 m from waterbodies and lists transfer/equipment best practices including shutoffs, drip controls, secondary containment, parking setbacks and inspections.

NNC Response: A minimum 31-metre setback from waterbodies will be applied to fuel storage and dispensing where practicable. Fuel-transfer controls will include appropriate shutoffs, drip containment, secondary containment, equipment parking setbacks and inspections. These requirements will be formalized in the Spill Prevention Plan. Where site constraints prevent the setback, the location-specific risk and additional engineering, containment and response controls will be documented.

38. GOC-ECCC-10 Accidents / Malfunctions Risk Assessment

Comment Summary: ECCC requests a thorough accident/malfunction risk assessment covering plausible worst cases and more likely lower-consequence scenarios, probability/severity, mitigation and residual risk.

NNC Response: The next-phase assessment will include an accidents and malfunctions assessment covering credible lower-consequence events and plausible worst-case scenarios, with probability, consequence, mitigation and residual-risk evaluation. Dam failure modes and consequences will be assessed through dam-breach analysis in accordance with Canadian Dam Association guidance. Operational risks and controls will also be addressed through the project risk register, engineering design, dam-safety management and emergency planning.

39. GOC-ECCC-11 Effects of The Environment on The Project

Comment Summary: ECCC requests analysis of how future climate/permafrost conditions may affect construction and operation, create pathways to VEC effects, change risk over project life and require mitigation.

NNC Response: Future climate and permafrost conditions will be assessed as potential effects of the environment on the Project. Permafrost thermal modelling is planned using Canadian downscaled CMIP6 climate scenarios. Findings will inform engineering design, mitigation and risk management and will be linked to potential pathways affecting valued ecosystemic and socio-economic components over the Project life.

40. GOC-ECCC-12 Climate Change Resilience

Comment Summary: ECCC recommends use of the Strategic Assessment of Climate Change resilience guidance when assessing Project resilience over its lifetime.

NNC Response: The assessment methodology will consider ECCC's Strategic Assessment of Climate Change guidance when evaluating Project resilience. Climate scenarios, time horizons and their application to design, effects assessment, mitigation and adaptive management will be documented.

41. GOC-ECCC-13 GHG Emissions / Land-Use Change

Comment Summary: ECCC requests annual GHG estimates for construction, operations and decommissioning, land-use change and carbon-sink effects, plus mitigation and consideration of a net-zero-by-2050 plan consistent with SACC guidance.

NNC Response: A quantitative greenhouse-gas assessment will be completed when construction equipment, schedules, fuel use and operating assumptions are sufficiently defined. It will estimate annual emissions for construction, operation and decommissioning; land-use change and reservoir-related emissions; and effects on carbon sinks. The assessment will identify mitigation and consider a net-zero-by-2050 plan consistent with applicable Strategic Assessment of Climate Change guidance. Avoided regional emissions from displaced diesel generation will be presented separately from Project emissions.

42. GOC-ECCC-14 Air Quality / Road Surface / Appendix C

Comment Summary: ECCC notes the road surface is not specified and dust controls would be needed for gravel; ECCC also says the referenced Major Equipment and Mobilization Estimate (Appendix C) appears unavailable.

NNC Response: The proposed access road will have a gravel surface. The air-quality assessment will evaluate fugitive dust from construction and operation and identify controls, which may include water or approved chemical suppressants where appropriate. The Major Equipment and Mobilization Estimate referenced as Appendix C will be included or clearly cross-referenced in the next submission so that equipment assumptions supporting the assessment can be reviewed.

43. GOC-ECCC-A1 Migratory Birds - Desktop Sources

Comment Summary: ECCC recommends considering eBird as an additional desktop source for migratory birds and SAR, including spring/fall migration sightings.

NNC Response: eBird will be included as an additional desktop source for migratory birds and species at risk, including spring and fall migration records. NNC notes that records may be concentrated near Iqaluit because of the remoteness of much of the Project area; eBird information will therefore supplement, rather than replace, field surveys and other regional data sources.

44. GOC-ECCC-A2 Migratory Birds - LSA / RSA Coverage

Comment Summary: ECCC questions whether LSA/RSA are appropriate for all migratory bird groups, notes the RSA extent is unclear, suggests RSA minimum 20 km beyond LSA, and asks whether 2027 RSA field surveys are planned.

NNC Response: The 2026 local study area is considered suitable for characterizing direct Project interactions such as reservoir-related displacement and potential transmission-line collision. Before the 2027 field season, the assessment team will formally evaluate the appropriate regional study area for each bird group, including ECCC's suggested extent of at least 20 kilometres beyond the local study area, and determine whether additional regional field surveys or other data are required.

45. GOC-ECCC-A3 Migratory Birds - Survey Scope / Key Habitat

Comment Summary: ECCC asks whether 'staging areas' include migratory birds, requests key bird habitats such as wetlands/rivers/lakes with a minimum 1 km buffer, and asks for the scale used for migratory corridors/routes.

NNC Response: Future reporting will define staging areas and state whether the term includes migratory birds. Key habitats, including wetlands, rivers and lakes, will be mapped with an appropriate zone of influence, considering ECCC's recommended minimum one-kilometre buffer. The spatial scale and evidence used to identify migratory corridors and routes will also be documented.

46. GOC-ECCC-A4 Migratory Birds - Timing / Methods

Comment Summary: ECCC says 2026 survey timing was too late for breeding waterbirds/shorebirds, recommends breeding surveys mid-June to mid-July and spring arrival surveys late May to mid-June, questions aerial surveys for shorebirds, and recommends considering PRISM/plot methods and ARUs.

NNC Response: NNC acknowledges that the delayed start of the 2026 program created an early-season data gap. The 2027 program will be designed to address breeding waterbird and shorebird surveys during the mid-June to mid-July period and spring-arrival surveys during the late May to mid-June period, subject to safe access and actual seasonal conditions. Survey methods will be selected based on species, habitat, safety and expected data value. Previous regional experience found PRISM plots difficult and unsafe on rocky, uneven terrain and found early ARU deployment vulnerable to freshet and drifting snow. The work plan will document the rationale for linear transects, stationary watches, aerial surveys and any targeted use of plots or acoustic methods.

-End of Document-