Section	Source	Comment	Action	Justification
Final Scope Part 2, Section i.iv) and m.v)	KIA	Recommend that the **following modification be made**: "Inuit harvesting rights as defined in the Nunavut Land Claim Agreement (NLCA)" **replace "Aboriginal fisheries as defined in the *Fisheries Act*".** Inuit harvesting rights are clearly defined in the NLCA. They include the right to harvest fish and marine mammals (among others), and it provides much more legal certainty than does the recently amended *Fisheries Act* definition for Aboriginal fisheries. In other words, Inuit rights under the NLCA should supersede "Aboriginal fisheries" as is defined in the *Fisheries Act*.	No change	*Fisheries Act* wording to be used.
Final Scope Part 2, Section q. and r.; Part 5, Section f.	KIA	There is no consideration for the project's impacts on Inuit as landowners or on Inuit ownership rights. The proponent should consider the potential positive and negative effects on Inuit Owned Land (IOL), and how negative effects can be mitigated.	No change	Difficult to include within the scope of environmental assessment.
Final Scope Part 2, Section p. Part 5, Section a., g., h.; Part 6	KIA	Many of these components will be part of the bilateral negotiations for an Inuit Impact and Benefits Agreement (IIBA) between the proponent and the KIA. The NIRB may be placing an unreasonable burden on the proponent to integrate some socio-economic information into the DEIS because timelines for finalizing the IIBA may not coincide with the NIRB's DEIS timelines. This may cause uncertainties for the proponent because, although some IIBA components will be non-confidential, *all matters discussed during IIBA negotiations will be confidential until the IIBA is signed*. Therefore, the proponent's DEIS may have substantial gaps in socio-economic data even though their intent bay be to provide such information.	No change	The NIRB's request would be that only those non-confidential details which could be comfortably shared by both parties would be disclosed.
6.6.1.1, Mine Sites on Goose Property and George Property, pg. 21	KIA	The ground thermal regime and depth to base of permafrost are not included in the required description of the geology/mineralogy of each of the deposits. **Suggested edit: add item** xi. The location of the permafrost boundaries (i.e. base of permafrost and any taliks) shall be delineated with respect to the ore body and proposed mine excavations. The location of the depth of zero annual amplitude and base of the permafrost should be supported by thermistor data.	No change; content already present	Section 8.1.4 Territorial Environment vi., viii, and ix outline these baseline descriptions for entire project area.
	KIA	**Suggested edit: add item** xi.) The location of the permafrost boundaries (i.e. base of permafrost and any taliks) shall be delineated with respect to the ore body and proposed mine excavations. The location of the depth of zero annual amplitude and base of the permafrost should be supported by thermistor data.	No change; content already present	Section 8.1.4 Territorial Environment vi., viii, and ix outline these baseline descriptions for entire project area.
6.6.1.5 Marine Shipping & Associated Facilities, pg. 24	KIA	**Suggested edit: add item** xii.) Groundwater geochemistry and hydrogeology, particularly the baseline water quality parameters, piezometric conditions and flow direction prior to, during and upon completion of mining.	No change; content already present	Sections 8.1.7 Groundwater and Surface Water Quality, 8.1.6 Hydrological Features and Hydrogeology, and Marine Environment sections include these requirements in the Baseline Information Sections.
7.10 Impacts of the Environment on the Project, pg. 44	KIA	**Suggested edit: unless NIRB can provide a rationale for item vii.) as written, the text should be revised as follows:** "Potential effects of climate change on permafrost thawing in the Project area, with discussion of the related implications on the stability of project components and sensitive land features."	No change	No clear requirement to revise.
Water Quality Section	KIA	Nunavut Land Claims Agreement Article 20 Compensation is not identified in the DEIS Guidelines. Suggested edit: the DEIS should acknowledge that the proponent and the KIA will engage in discussions towards a water compensation agreement if water quality, quantity or flow will be affected on Inuit Owned Landed.	No change; content already included	Section 3.1 of the guidelines outlines from the NLCA that the EIS must contain information on "f) Steps which the Proponent proposes to take to compensate interests adversely affected by the Project;
6.4 Alternatives, pg. 18	KIA	Alternatives Assessment does not include requirement for assessment of alternative locations for disposal of treated mine effluent. **Suggested edit:** "Methods for site water treatment (i.e. mill, sewage, tailings, storm water etc.) and disposal, including alternative sites for disposal of treated effluent (i.e. land, water, alternative water bodies)."	Change incorporated	

Section	Source	Comment	Action	Justification
Section 6.6.8, ii Power Generation, pg. 31	KIA	Proposed assessment of emissions only refers to greenhouse gas emissions and does not specify criteria contaminants associated with fuel combustion emissions. **Suggested edit: change wording to read:** "Discussion on how fuel combustion emissions (NOx, SOx, particulate matter, etc.) and greenhouse gas emissions will be reduced.	No change; content already present	Items required in Section 8.1.1.2 Air Quality Impact Assessment, as well as 9.4.14 Air Quality Monitoring and Management Plan bullets ii and iv.
7.2 Traditional Knowledge, pg. 34	NSMA	The NSMA would like to confirm that Métis Traditional Knowledge (MTK) will also be incorporated, particularly with respect to transboundary impacts, the Bathurst caribou herd, current and historical patterns of land and resource use, water quality, and for the mine closure and reclamation plan.	No change	Comments on record; guidelines include broad reference.
7.5.1 Spatial Boundaries, pg. 37	NSMA	"*The Proponent is advised to duly consider the transboundary implications of impacts to identified VECs (Valued Ecosystem Components)/ VSECs (Valued Socioeconomic Components) especially as defined by the Minister to include the Bathurst caribou calving ground and the communities and groups who depend upon this resource."* The NSMA would like to see the above wording be more assertive. Rather than advised, the Proponent should be obliged to duly consider the transboundary implications of the proposed Project.	Change incorporated	
	NSMA	vi. Regional Study Area (RSA): The NSMA agrees with the Nunavut Impact Review Board that the spatial dimensions of the Regional Study Area should vary. However, the NSMA recommends that one component of the regional study area be spatially defined to include the annual and historic range of the Bathurst caribou.	No change	Proponent not required to address the entire historic range of the herd.
7.5.2 Temporal Boundaries; Section 7.11 Cumulative Effects Assessment	NSMA	The NSMA recommends that the Proponent consider dynamic and varied options for VEC temporal boundaries. The NSMA recommends that one component of the temporal boundary cover the Bathurst caribou herd cycle of abundance (i.e., 30-60 years) throughout their annual and historic range.	No change; material already present	8.1.11.1 bullet x. requires "Description of the distribution and population levels of caribou in the RSA and LSA. Consideration should be given to the cyclic nature of caribou as well as the shifts in annual caribou ranges over time, with baseline information collection covering appropriate temporal and spatial scales for an accurate understanding of current population health;"
7.7.1 Study Strategy and Methodology, pg. 40	KIA	Prior to designing baseline studies, comparable data or results should be used to estimate data variability (for the type of data being collected), and an estimate of effect size of biological significance should be determined. The required sample sizes for baseline data to detect such a change with a power of 0.80 can then be calculated in advance.	No change; content already present	Comment noted.
7.8 and 7.14 Impact Assessment Approach pg. 41, 46	KIA	**Suggested edit** The Impact Assessment should include, for each VEC, a description of what would constitute a significant adverse effect, using the standard significance criteria to aid in interpreting the proponent's assessment of significance by reviewers and to inform the adaptive management process.	No change	The NIRB does not define this. In the EIS, the Proponent defines and determines what constitutes a significant adverse effect, and for agencies to judge the adequacy of the determination during the technical review period.
	GNWT	**Please remove** "as a *result of reliance* on emergency *or medical services"* from bullet ii. At this point there is no confirmation of the potential transboundary impacts the developer anticipates the project may have.	Change incorporated	
8.1.1.2. Air Quality pg. 49	KIA	Bullet iii. While the formation of secondary particulates cannot be readily modeled they do pose a potential impact to the LSA and RSA and should be assessed to develop suitable mitigation strategies. **Suggested Edit: change wording to read:** assessment of dispersion of Project emissions using a LSA and RSA, using appropriate modeling, and discussion of related impacts and mitigation strategies. Assessment should also address potential of formation of secondary particulates and their impacts and mitigation strategies'	No change	Appears to be a technical review item, likely to be requested at a later point in the Review.
	KIA	Bullet v. Assessment of impacts to air quality needs to be completed over the lifetime of the project to consider changes in emission inventories across all project phases to assess the long term effects of the project. **Suggested edit:** Assessment of effects on air quality from Project emissions during various project stages over the projects lifetime including airborne dust (TSP, PM10 and PM2.5 and/or metals) and criteria air contaminants such as SO2, NOx, CO, VOCs, O3, etc.'	No change; content already present	Section 6.0 Project Components and Activities gives direction for the EIS content to include "discussion requirements for Project components and all activities associated with each project component through the life of the Project".

Section	Source	Comment	Action	Justification
	KIA	Fugitive dust considerations: 1. Deposition of fugitive dust from road surfaces and stockpiles may potentially impact vegetation and caribou near the mine operations and should be reviewed to determine whether the potential for an impact on vegetation and wildlife exists and develop mitigation strategies if necessary. Suggested edit: **add wording:** "Review of available studies/research on the potential impacts and seasonal variability of fugitive dust from Project components and activities including ground transportation and wind erosion on forage and uptake by caribou." This portion of the assessment will need to be cross- referenced in the vegetation and wildlife sections and vice versa.	No change; content already present	Section 7.4 Use of Existing Information directs the Proponent to include this material in the EIS content. Potential sources and impacts of fugitive dust already included in sections pertaining to project activities, potential impacts on each valued ecosystem component, and where required in the environmental plans.
	KIA	Fugitive dust considerations: 2. Discussion of fugitive dust and gaseous emissions primarily focuses on the operational phase of the project and should also include all phases of the project including construction. **Suggested edit: change wording to read:** "Fugitive dust and gaseous emissions from construction activities and land clearing, extraction and ore processing, handling, tailings, waste rock and ore stockpiling, quarries and other Project components and works".	Change incorporated	
	KIA	Fugitive dust considerations: 3. Fugitive dust emissions and project components will vary and be influenced by seasonality. The impact of this variability on emission rates should be taken into account. **Suggested Edit: change wording to read:** "Fugitive dust emissions and seasonal variability from ground transportation and wind erosion at various Project components including the all-weather road, access roads and mine hauling roads."	No change	Appears to request discussion on the seasonal variability of dust and road use.
8.1.2.1 Climate and Meteorology Impact Assessment	KIA	The Proponent can relatively easily determine the greenhouse gas (GHG) emissions from the project. However, since the amounts would likely be negligible relative to other global sources, the impact of project emissions on "global" climate change cannot be discerned. Furthermore, it is not possible to make predictions regarding the impact of the project on meteorology. It is not clear what NIRB means by "a comprehensive study" to assess this impact. NIRB's request to provide an analysis of "…the impact of all components on the project and activities may have on climate and meteorology" cannot be satisfied by the Proponent. Other than a generic discussion on the impacts of GHG on climate, there is nothing else that can be gained from this request. NIRB should review what information the Proponent can provide with respect to GHG. Climate change science has already determined the effects of various GHG on climate parameters. Any changes to climate that occur at the Project site would be due to global emissions and project-related impacts would not be discernible. Suggestions: **Unless NIRB can be more clear in their request, suggest re-wording this section as follows:** "The Proponent is required to present a summary of estimated emissions from the Project that includes GHG's and criteria contaminants such as SO2, NOx, CO, VOCs O3 etc. over the life of the mine. This summary should include: • A breakdown of estimated emissions on an annual basis from various sources. • A discussion of the potential options for reducing or eliminating emissions in the future to reduce impacts on climate change. A discussion on GHG emission from the project in the context of global climate change, including assessing the individual contaminants.	No change; material already present	Section 8.1.1 Air Quality bullets iii and v already includes material.
8.1.7 Groundwater and Surface Water Quality, pg. 55	EC	8.1.7.1 Baseline Information iii. EC recommends that "…. Chemical characteristics should include baseline levels of contaminants and should be compared to relevant water standards/guidelines;" **be changed to** "Chemical characteristics should include baseline levels of contaminants, and should be compared to relevant water standards/guidelines, with identification of those which are naturally elevated;"	Change incorporated	

Section	Source	Comment	Action	Justification
	EC	RE: 8.1.7.1 Baseline Information vi. "Provide baseline levels and any anticipated increases in contaminants associated with the Project in surface water and ground water" **EC recommends that "Provide baseline levels and any anticipated increased in contaminants associated with the Project in surface water and ground water" be changed to** "Provide an outline of baseline water quality conditions within the watershed and the project area, including a summary of baseline data collected with summary statistics and detection limits identified. Outline proposed surface water quality objectives to maintain within the watershed and project area throughout life of project. Outline anticipated impacts (and cumulative effects) to surface and groundwater quality in the watershed."	Change incorporated	
	EC	RE: 8.1.7.1 Baseline Information xi. "Include a discussion of groundwater interactions with lakes in the area". **EC recommends that** "lakes" is changed to "surface water bodies"	Change incorporated	
	EC	RE: 8.1.7.2 Impact Assessment i. **EC recommends that after the first sentence, insert**: "Discussion of contaminants should include figures showing potential sources of contaminants, with approximate distances from surface water and likely path taken in the event of a release. Also provide predictions on how the identified contaminants may interact (synergistically or antagonistically)."	Change incorporated	
	EC	RE: 8.1.7.2 Impact Assessment iii. "Potential impacts on groundwater quality and surface water quality in surrounding lakes and rivers from surface runoff and seepage, traffic on Project roads, and from dust from road traffic" **EC recommends that** "surrounding lakes and rivers" is changed to "surrounding lakes, rivers and streams" (as creeks and intermittent streams will also be of concern). EC also recommends that potential sources of contaminants are identified on a site plan.	Change incorporated	
	EC	RE: 8.1.7.2 Impact Assessment v. "Potential impacts on groundwater quality and surface water quality of lakes and rivers from discharges of Project waste water treatment plants. A solute transport model based on numerical groundwater flow modelling should be used for ground water quality predictions and appropriate models selected (with rationale) to predict: o Water quality from specific sources; o Water quality discharged to the environment; and o Dispersion, dilution and assimilation of effluent discharged to the environment;" **EC recommends that** "lakes and rivers" is changed to "surrounding lakes, rivers, and streams"	Change incorporated	
	KIA	**Suggested edit to bullet x:** provide a site water budget including an assessment of variance in groundwater inflows based on a range of hydraulic conductivities of host rock and a range of surface flows based on observed climatic variance to inform the certainty in the site water budget.	No change	

Section	Source	Comment	Action	Justification
8.1.10.1 Vegetation	KIA	Fugitive dust on vegetation can be ingested by wildlife and humans. However, health impacts on animals or humans cannot simply be predicted by observing an increase in the concentration of metals found in or on plants; the changes in predominant metal species, which can occur through mining procedures that alter metal species present, can result in the same "metal" being considered more or less toxic. For example arsenopyrite is a form of arsenic that is relatively benign; however, when separated from pyrite, and particularly when in the form of As III and V, it becomes cytotoxic. If only the concentration of "total arsenic" is measured, as suggested in these guidelines, a complete alteration in toxicity could occur (e.g., arsenopyrite being converted to toxic forms) with no change in the overall concentration of arsenic measured, and there would be no way to tell that this has occurred. **Bullet vi. Suggested Edit:** EIS guidelines should include the assessment of not just the metal contamination and concentration in/on vegetation before, during, and after the project, but also measures of the specific metal species. Otherwise, there is potential for an area to completely change in toxicity (due to changes in dominant metal species) with no measureable changes in concentration. These same considerations should be taken when measuring concentrations of metal contaminants in meat that may be ingested by humans as well; both total concentration as well as the concentrations of metal species comprising that total need to be measured to know if it is safe.	No change	Guidelines provide direction regarding vegetation and terrestrial environment, possible issue to be raised during the technical review stage depending on the material presented in the EIS.
8.1.11 Terrestrial Wildlife and Wildlife Habitat; Section 7.4 Use of Existing Information	NSMA	Recommends that the Proponent include discussion related to nascent cooperative cumulative effects and transboundary research, monitoring, and mitigation developments occurring in the north with other resource extraction projects, the Government of Nunavut, the Government of the Northwest Territories, impacted Aboriginal parties, etc. The NSMA would like the Proponent to consider becoming part of, drawing upon, and disseminating knowledge through these networks.	No change	Comments noted; Proponent has discretion to outline in the EIS how or if they would do this, adequacy of information to be addressed during technical review.
	KIA	Also related to workplace health and safety - Wildlife, particularly birds, can be attracted to areas due to lights. This can bring wildlife into closer proximity to humans, where their risk of adverse interactions with humans, human-made structures, chemicals and mobile equipment may increase. **Suggested edit:** add assessment of potential impacts of lighting on wildlife.	Change incorporated	Section 8.1.11 Terrestrial Wildlife and Wildlife Habitat bullet vii already contained requirement; Section 8.1.12 Bird and Bird Habitat bullet ix wording updated.
8.2.1 Economic Development and Opportunities, pg. 68	KIA	Baseline Information: Needed for more complete/accurate/relevant understanding of existing regional economic & conditions and factors that may be affected by the Project. **Suggested edit: add baseline information, to include**: i. Current regional economic dependencies: industries and sectors. ii. Current sources of Kitikmeot regional revenues. iii. Current regional income and earnings in comparison to the rest of Nunavut and to Canada [NOTE: reference IS made to household income and earnings in S. 8.2.2.1 [Employment baseline information item iii. P. 69]; however, it is required under an economic impact assessment to capture the effects of increased spending of employees and family members at regional levels in this section. iv. Cost of living in the north.	No change	Comments noted; Sabina encouraged to review and address those comments received by parties within its EIS.
	KIA	Explicit inclusion of discussion on income and earnings. Increased income (and, in turn, disposable income and spending) from employment at mine is related to economic impacts**. Suggested edit: add baseline information:** i. Potential impacts related to increased income and spending from workers in RSA.	No change	Appears to be covered within bullet "v. Overview of Nunavut's Real Gross Domestic Product, rate of Gross Domestic Product (GDP) growth, Consumer Price Index, import/export and trade balance of goods, personal savings rate, and business investment."
	KIA	Inclusion of tax revenues in economic impact assessment. Tax revenues will affect regional study area. Suggested edit: add impact assessment information: vii. Assess impact of increased tax revenue income in RSA	No change	Appears to be beyond scope and ability of Proponent to include within EIS.

Section	Source	Comment	Action	Justification
8.2.2 Employment	KIA	Baseline Information: An understanding of what industry citizens are employed by, and also the regional employment vs. unemployment rates in comparison to NU and Canada is required for most relevant effect assessments of employment**. Suggested edit: add employment baseline information:** i. Current employment and unemployment rates at regional, territorial and national levels.	No change	Information previously requested in bullets i and ii of labour supply statistics
	KIA	Impacts Assessment: Missing socio-cultural aspect of potential effects related to employment. Socio-cultural workforce issues (e.g., intercultural misunderstanding at the least, and overt racism at the worst; common in remote and/or Indigenous regions) need to be assessed; mitigated and managed. **Suggested edit: add employment impact assessment information:** vi. Effects assessment of a mixed workforce (i.e., Nunavummiut/ Aboriginal, non-Aboriginal/ Foreign International)	Change incorporated	
8.2.2.3 Topics of Discussion [p.69] item i.	KIA	Effect of change in income "Discussion topic" recommended to be an assessed and mitigated effect. It is believed that the potentially adverse effects from increased income could be mitigated for by the Proponent with appropriate socio-economic management plans (i.e. Employee financial management education programs; company-community organization partnership programs etc.) **Suggested edit: Move this 'topic of discussion' to section above 8.2.2.2 Impact Assessment and re-word to:** "Assessment of potential effects of increased income on workers, families and communities" Also, any educational component must consider both the cultural context and available services (e.g., financial management training must understand Inuit cultural sharing concepts and the availability or lack of financial services).	No change	Including this in the Topics of Discussion does not mean that the Proponent is restricted from addressing a potential impact.
8.2.3.1 Education and Training Baseline Information	KIA	Socio-cultural context required for education and training baseline conditions description. Qualitative research and description of the socio-cultural issues and values surrounding education and training would present a more complete picture of the status of Education and Training in the Kitikmeot Region; which would in turn support a more relevant/accurate effects assessment related to education. **Suggested edit: Add additional information for education and training baseline:** v. A description of the socio-cultural context and elements related to primary, secondary, post-secondary and adult education; access to education; and education-related community specific issues.	No change	Information encompassed in 8.2.3.1 bullet iv. iv. "Education and skill levels of the residents in the Project RSA, and experience of the local labour force in different demographic categories based on available data."
8.2.4. Contracting and Business Opportunities	KIA	Baseline: Identification of Contracting and Business Opportunities at NSA level in addition to RSA. To maximize the potential positive economic benefits of the Project, it will be important to identify all Nunavut-based and Inuit owned businesses, services and contractors with capacity to supply the Project (priority on the Kitikmeot Regional Communities; however if there are capacity issues, the NSA requires assessing for potential opportunities). **Suggested edit:** Add additional information for contracting and business opportunities baseline:	No change	Submission suggestion not clear; remain as initially provided noting this may also be interpreted to refer to Nunavut and NWT in addition to the Kitikmeot region.
	NSMA	Impact Assessment: Recommends that the Proponent assess the effects, positive and negative, and opportunities stemming from the Project's contracting and business opportunities for the impacted Aboriginal parties and their business subsidiaries, such as the NSMA and MÉTCOR, through the lifespan of the Project.	Content already present; no change made	
Fisheries-Waste Disposal into Water bodies pg. 59	KIA	Need to understand if the water body contains fish and the potential for Inuit harvesting rights to be affected. **Suggested edit:** add potential impacts to fish and fish habitat from waste disposal.	No change; content already included	Section 8.1.9.2 bullet i. and Section 8.1.13 bullet iv.
8.2.6.2 Traditional Activity and Knowledge, pg. 72	KIA	Missing consideration of effects of employment on Inuit employee's ability to participate in traditional/cultural activities. **Suggested edit: add additional information in TK impact assessment:** x. Assessment of impacts due to Inuit workers' ability/inability to participate in TK/IQ cultural activities.	No change; content already included	Section 8.2.2.2 bullet iii "iii.

Section	Source	Comment	Action	Justification
8.2.9.2Health and Wellbeing Impact Assessment	KIA	Inclusion of Inuit values and initiatives related to health and wellbeing. Currently, only focus is on negative social and health issues. It is important to describe currently existing local and regional Inuit values and initiatives that that promote and support community social, cultural health and wellbeing. **Suggested edit: add additional information for baseline:** v. Description of local and regional community and cultural values and initiatives that promote and support regional and family health and cohesion.	Change incorporated	8.2.9.3 Topics for Discussion
	KIA	Inclusion of effects of workplace / community cross-cultural conflict & racism on health and wellbeing. A common issue from similar mines in the north is cross-cultural tensions, conflict and racism. These socio-cultural effects need to be described, assessed and mitigated for. **Suggested edit: add additional information for impact assessment:** ix. Potential effects on individual, family and community health and wellbeing from workplace and community cross-cultural tension, conflict, and/or racism.	Change incorporated	
8.2.10 Community Infrastructure and Public Services	KIA	More complete description of all aspects of regional infrastructure and public services needed that will be relevant for the impact assessment. **Suggested edit: add additional baseline information:** i. Description of community, cultural and recreation programs ii. Description of existing transportation modes and travel routes / roads a. Discussion of costs to build infrastructure, transportation costs, and effect on public services iii. Description of existing communication systems and services and utilities iv. Description of community & regional waste management systems	Change incorporated	
9.3 Monitoring and Mitigation Plans, pg. 80	EC	RE: i. "Objectives of the monitoring program, applicable laws, regulations and/or Acts;" **EC recommends that the following be inserted as a new item ii.** "A monitoring framework should be developed which includes the various monitoring requirements which will be in place (e.g. Aquatic Effects Monitoring, MMER Environmental Effects Monitoring, Fisheries Compensation Monitoring, any special studies) and presents a harmonized approach to monitoring."	Content already present; no change made	T6: The Environmental Monitoring Plan (as outlined in Section 9.1) requires this framework of oversight and coordination of all of the Environmental plans.
9.4.4 Site Water Management Plan, pg. 83	EC	Existing text: "The Proponent shall develop a Site Water Management Plan for the Project. This plan shall provide a consolidated source of information on the strategies to be applied to intercept, collect, contain, conserve, monitor and prevent the release of potentially contaminated waters. This plan shall also include a discussion of all major sources of water from the Project including process effluent, open pit water, underground mine water, site and stockpile drainage/runoff, and sewage/grey waste water and is to be associated with the baseline data and impact assessment required by Subsection 8.1.6.1. The plan shall at a minimum, consider the following:" **EC recommends that "This plan shall also include a discussion of all major sources of water" be changed to** "This plan shall also include a discussion, including water balance, outlining all major sources of water."	Change incorporated	T6: seems reasonable

Section	Source	Comment	Action	Justification
9.4.6 Mine Waste Rock and Tailings Management Plan	EC	The Proponent has proposed the use of a water body frequented by fish for mine waste disposal. In order to allow the use of a natural, fish-frequented water body for tailings and waste rock disposal, the Metal Mining Effluent Regulations (MMER) would need to be amended to add the water body(ies) to Schedule 2 of the Regulations. As part of this process, it is recommended that the Proponent conduct an assessment of alternatives for mine waste disposal, using the guidance and methodology provided by Environment Canada. EC would be pleased to brief the Board more fully on the Schedule 2 Amendment process, the Guidelines for the Assessment of Alternatives for Mine Waste Disposal, and how the consultations associated with a Schedule 2 listing may be best integrated into the Board's review of the Back River Project. **EC recommends that the following be inserted into the opening paragraph of 9.4.6.** "The Proponent is proposing the use of a natural water body frequented by fish for the disposal of mine waste and therefore is strongly encouraged to conduct an assessment of alternatives for mine waste disposal. It is recommended that the Proponent refer to Environment Canada's Guidelines for the Assessment of Alternatives for Mine Waste Disposal (2011) for additional information and guidance."	No change; content already present	T6: This should be part of their alternatives discussion, as the Plan is constructed based on the chosen alternative only. The resource referenced in this column is already included in Section 6.4 Alternatives.
	EC	iii. "Description of analyses implemented in the development of the proposed pond design and runoff and seepage management plans, include description and analysis of the water balance; the physical and chemical characteristics of seepage and runoff from surrounding area, as well as the thermal condition of the pond and surrounding ground; and consideration in the design of control measures to ensure seepage and runoff do not impact the surrounding environment;" **EC recommends that** "tailings supernatant chemistry through life of the facility" be added after "water balance"	Change incorporated	
9.4.9 Incineration Management Plan	NSMA	Recommends that the Proponent assess and present a comprehensive impact analysis of the Project's Incineration Management Plan. The NSMA would want the Proponent to mitigate the possible transboundary impacts of waste incineration and release of dioxins and furans. The Proponent should undertake the following analysis of their Incineration Management Plan. The analysis should include the following: i. Discussion and description of stack testing within their Incineration Management Plan; ii. Potential impacts on ground and surface water quality from the deposition of particulate matter containing dioxins and furans; iii. Potential impacts on sediment quality from the deposition of particulate matter containing dioxins and furans; and iv. Potential impact on terrestrial habitat: o Direct and indirect impacts on the Bathurst caribou from consuming particulate matter containing dioxins and furans.	No change; content already present	Section 9.4.9 currently reads: The Proponent shall develop an Incineration Management Plan which is consistent with the guidance provided in Environment Canada's (EC) *Technical Document for Batch Waste Incineration* (EC, 2010). The Plan shall include but not be limited to the following: i. Standards/requirements for emissions from incinerator operation; ii. Incineration technologies to be used, facilities and equipment to be used; iii. Personnel training programs for incinerator management and operation; and iv. Collection and reporting of operational data and maintenance records.
9.4.10 Roads Management Plan, pg. 87	GNWT	The GNWT acknowledges that the proposed Roads Management Plan contains a provision to discuss potential future uses (e.g., potential public use). The Roads Management Plan may be the tool used to address the GNWT's concerns about future uses. The GNWT requests the **following bullet be added** to section 9.4.10 of the Draft EIS Guidelines: *"A discussion* of *harvest* access *and potential future harvest resulting from the road.*"	No change; content already present	Section 8.1.11 Terrestrial Wildlife and Wildlife habitat bullet ii, iv, and v request the discussion for both road and air traffic.

Section	Source	Comment	Action	Justification
	GNWT	The second point raised by the GNWT was that the proponent should address appropriate seasonal closure(s) of mine and road activity, including travel activity, from late May to late July. This could be necessary to reduce impacts on barren-ground caribou during spring, calving and post-calving periods for the Bathurst barren-ground caribou herd, and spring and summer migration of the Beverly and Ahiak herds. The GNWT is of the opinion that the proposed area of development is a key migration and seasonal staging area for these periods, and that every effort should to be put into place to mitigate impacts to barren-ground caribou. This point was not addressed by NIRB in their justification for rejecting the GNWT's proposed change to the EIS guidelines. Bullet vi of section 9.4.10 does address mitigation measures for impacts to wildlife. However, given the importance of key life stages of caribou herds, we would also request that the following sentence be added to section 9.4.10 to ensure that concerns about caribou are **specifically addressed**: *"Mitigation measures and protocols to* be *implemented during key migration and* seasonal *life* stages *for barren-ground caribou in order to mitigate potential impacts, especially during spring and summer migrations and calving and post-calving periods"*.	No change; content already present	Contains request for the two plans listed below to coordinate re: Road Management Plan vi. Mitigation measures and protocols to be implemented during construction and operations to mitigate potential impacts to wildlife, including explicit thresholds for mitigation of potential wildlife interactions, collisions and follow-up procedures; WMMP xii. Procedures and structures designed to mitigate/manage potential impacts to wildlife and wildlife movement (e.g. caribou crossings and migration routes) during construction and operations;
9.4.16 Aquatic Effects Management Plan, pg. 91	KIA	Suggested edit: aquatic Effects Management Plan must also include a schedule of monitoring, reporting, a process for revising the plan and response to the results identified in the AEMP.	No change; content already present	Requirement outlined in Section 9.3 Monitoring and Mitigation Plans and is applicable to all the plans outlined
9.5.1 Business Development Plan	KIA	For meaningful mitigation (or positive effect enhancement planning), a commitment as well as strategy, is needed as a statement (note: it is understood that such commitments may be outlined in a confidential IBA). **Suggested edit:** i. Commitments (e.g., workforce percentage) and strategies for local/regional preferential hiring and contracting.	Change incorporated	
9.5.5 Human Resource Plan	KIA	HR Plans: Need education/training sessions in addition to 'policies' wherein diversity and equality are explicitly referenced. Inter-cultural and cross-cultural issues (and other workplace issues) need to be addressed with more than a policy in terms of meaningful mitigation and management of potentially adverse cross-cultural dynamics in the workplace. **Suggested edit:** viii. Policies **and training sessions** regarding: onsite public safety and well-being; **cross-cultural awareness, communication and relations; diversity & equality; sexual harassment**; firearms management; alcohol and drug control measures etc…..{rest of sentence fine]	Some change incorporated	List of items updated, but it is up to the Proponent to note whether its policy will include training or not, and then would be for the technical review to check the robustness of the proposed plan.
	KIA	HR Plan: Added item needed to address post-mine unemployment/skill transferability. Item needs to be included to reflect probable adverse effect of mine closure on employment/unemployment and community well-being/sustainability. **Suggested edit: Add an additional HR Plan item:** xiv. Skill transferability training and employment counselling upon mine closure *and* during temporary mine closures.	Change incorporated	
9.6 Mine Closure and Reclamation	NSMA	Recommends that the Proponent draw upon Inuit Qaujimajatuqangit, Métis Traditional Knowledge, and the TK from other impacted Aboriginal groups when establishing goals and final land use objectives and visions for the reclaimed area.	No change	The land will specifically be permitted and under the management of either Crown or RIA. See revision above (Section 7.2).