List of Commitments Generated in the Proponent's Response to Technical Comments on the Madrid-Boston Final Environmental Impact Statement

NIRB Technical Comment ID	Commitment
KIA-FEIS-03	TMAC will speak with the KIA prior to the hearings to come to agreement as to where sedge samples can be collected for baseline purposes. Based on a meeting on April 30, 2018 it was agreed to collect a baseline of 30 samples at Boston and 30 samples at the TIA and additional samples at reference sites. TMAC will produce a sampling plan for review by the KIA prior to construction.
KIA-FEIS-07	TMAC will abide by occupational health and safety regulations, and provide our workers with a safe work environment, including work camp accommodation areas.
KIA-NIRB-09	TMAC commits to conduct vegetation monitoring if the results of dust fall monitoring indicate that there is the potential for effects on tundra vegetation beyond that predicted in the PDA
KIA-NIRB-10	TMAC commits to including a section in the Wildlife Mitigation and Monitoring Plan (WMMP) on invasive plant species detection and management, and report in the annual compliance report.
KIA-FEIS-11	TMAC will quantify road traffic as a number of vehicle passes per day throughout a year on the two main segments of the road (Doris to Madrid and Madrid to Boston) and report annually in the WMMP compliance report (i.e., as per response to GN-20)
KIA-FEIS-11	TMAC will consider the traffic levels, observed effects to large mammals, and reflect on adaptive management options in consultation with the IEAC.
KIA-FEIS-12	TMAC commits to conducting additional migration surveys at the proposed wind turbine pad locations prior to construction (for baseline purposes), and during the appropriate survey time period to meet ECCC (2017) guidance and to capture peak migratory activity for raptors, waterbirds, and upland birds.
KIA-FEIS-12	TMAC commits to designing the transmission line to meet the Edison Institute guidelines for reducing bird mortalities and line strikes.
KIA-FEIS-13	TMAC commits to using the habitat maps that use Terrestrial Ecosystem Mapping for wildlife management purposes and when reporting habitat loss in the annual WMMP report.
KIA-FEIS-14	TMAC will work with DFO, the KIA, and Inuit Environmental Advisory Committee to identify candidate offsetting options with a preference for developing a community-based offsetting program located near Cambridge Bay.

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KIA-FEIS-14	TMAC will undertake field surveys in summer 2018 to ground-truth preliminary offsetting site options, and refine objectives, constraints, and opportunities associated with each site. These activities will contribute to preliminary gain calculations in support of the development of a Fisheries Offsetting Plan.
KIA-FEIS-15	TMAC will apply adaptive management processes during monitoring. Should a high groundwater sensitivity case result in habitat losses that exceed those predicted for the base case, TMAC would apply an offsetting plan (as required by DFO) that is commensurate with these losses.
KIA-FEIS-17	TMAC has re-considered applying an SSWQO for arsenic at this early juncture of the Madrid-Boston Project. Instead, it will monitor potential changes to arsenic in the Project lakes through the AEMP.
KIA-NIRB-19	TMAC agrees to add free cyanide which has a CCME water quality guideline of 0.005 mg/L and total cyanide to the AEMP parameter suite for Aimaokatalok Lake and Reference Lake B.
DFO-3.1.1	TMAC will develop and provide watercourse and site-specific engineering plans to Fisheries and Oceans Canada (DFO), supported by measured or modelled stream flow data prior to construction.
DFO-3.1.1	TMAC will work with DFO, the KIA, and the Inuit Environmental Advisory Committee during the regulatory phase to develop a construction plan for watercourse crossings that will include mitigation measures to reduce impacts to fish and fish habitat during construction.
DFO-3.1.1	TMAC will work with DFO and abide by any monitoring and reporting requirements of the authorization if and when granted.
DFO-3.1.2	TMAC will monitor water levels and flows in fish bearing lakes and streams that are predicted to be potentially impacted by the Project during mining.
DFO-3.1.3	TMAC will work with DFO, the KIA, and the Inuit Environmental Advisory Committee during the regulatory phase to gain consensus on acceptable construction monitoring and reporting for freshwater pipeline infrastructure that will include the mitigation measures to be implemented to reduce impacts to fish and fish habitat during construction. TMAC anticipates that these requirements would be included in an authorization from DFO issued prior to construction.
DFO-3.2.1	Should the Phase 2 Hope Bay Project be approved, during the regulatory phase TMAC will work with DFO-FPP, KIA, and IEAC to develop and finalize a marine offsetting plan which is acceptable to all parties, and complies with the Fisheries Protection Policy Statement (2013) and the Fisheries Productivity Policy: A Proponent's Guide to Offsetting (November 2013). Representative fish species of each trophic level and their habitat utilization will be analyzed to ensure that all potential residual serious harm to fish and fish habitat that are part of or support commercial, recreational or Aboriginal fisheries as a result of the project are accounted for and adequately offset."

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DFO-3.2.2	As part of the WMMP, TMAC will be preparing maps and descriptions of key bird habitats such as large marine bird colonies and Prince Leopold Island for supply vessel operators. TMAC commits to updating the guidance package for vessel operators to include information on sensitive marine mammal habitats in the Northwest Passage, as described in FEIS Figures 11.2.1 and 11.2.2, and Table 11.2.1. This information will be updated to include data published since the FEIS or provided by DFO.
DFO-3.2.2	TMAC also commits to discussing mitigation measures for marine mammals in the Northwest Passage that are common to all vessels in Arctic waters, or as provided in a DFO guidance document for Arctic waters. All mitigation is contingent on vessel safety.
ECCC-4.1.1	For the purpose of the Madrid-Boston Proposal (Phase 2), TMAC proposes to conduct stack testing of any new incinerator within 6 months of commissioning. Stack testing of existing incinerators is proposed to be performed on an annual basis if there are ongoing significant changes to site activities with the potential to change the composition of the incinerable waste stream (such as during the Construction phase).
ECCC-4.1.1	In the event TMAC has emission exceedances related to incineration, TMAC will investigate to determine the possible source(s) and potential impacts of the exceedances and adaptive management options will be assessed and applied based on the identified contributing factors.
ECCC-4.1.3	Should exceedance of an NO2 standard, objective or prediction be measured, the Hope Bay Air Quality Management Plan will be updated to include specific adaptive management plans for NO ₂ .
ECCC-4.2.1	TMAC agrees to include a section in the 2018 WMMP listing the species at risk, and relevant mitigation.
ECCC-4.2.2	TMAC agrees to add the post-construction monitoring for the proposed wind turbine to the existing discussions with ECCC and interested parties on site-wide bird monitoring.
ECCC-4.2.2	TMAC agrees to investigate and discuss preventative operational mitigation measures for wind turbines during periods of poor visibility at peak bird migration periods.
ECCC-4.2.2	TMAC agrees to submit data sets to the centralized bird/bat monitoring database known as the "Wind Energy, Bird and Bat Monitoring Database".

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	TMAC commits to updating the WMMP Plan to include more detail on the existing monitoring and mitigation for waterbirds in the TIA, including:
	 TMAC will conduct a baseline survey for waterbirds and shorebirds at the TIA, in consultation with ECCC, to characterize the bird community and use of the TIA.
ECCC-4.2.3	 TMAC will monitor water quality in the TIA on a regular basis during operations of the Project as per our existing water licence requirements.
	 If the baseline survey indicates that birds are using the TIA, TMAC will conduct a toxicological risk assessment in consultation with ECCC.
	4) If that risk assessment indicates that there is a reasonable risk to birds due to living in the TIA above baseline conditions then TMAC will monitor for ongoing bird usage of the TIA by birds and will engage with the IEAC and ECCC on methods for deterrence of waterbirds.
ECCC-4.2.4	TMAC is open to having dialog with ECCC on collaboration for common eiders in the Bathurst and Elu Inlets Key Marine Habitat Sites.
ECCC-4.3.6	TMAC has re-considered its position of adopting a copper SSWQO for the Madrid-Boston Project, and will instead monitor potential changes to copper in the Project lakes through the AEMP.
ECCC-4.3.7	TMAC has re-considered applying an SSWQO for arsenic at this early juncture of the Madrid-Boston Project. Instead, it will monitor potential changes to arsenic in the Project lakes through the AEMP.
ECCC-4.3.10	TMAC will update the Madrid-Boston AEMP with an Aquatic Response Framework similar to the approach taken for the Doris AEMP. The updated AEMP will be provided to the interested parties prior to the May Final Hearing in Cambridge Bay.
ECCC-4.3.10	TMAC will improve the harmonization between the AEMP and MMER programs in the updated Madrid-Boston AEMP.
ECCC-4.3.10	TMAC will update the Madrid-Boston AEMP with an Aquatic Response Framework with environmental thresholds that trigger further mitigation/information collecting similar to the approach taken for the Doris AEMP.
ECCC-4.3.11	In progress
ECCC-4.3.12	TMAC maintains that the updating of predictive models will be used as adaptive management to refine closure requirements. This will include the updating of predictive models for Roberts Bay and Aimaokatalok Lake. Specific details for the predictive model recalibration frequency and scope will be determined in the water licensing stage.
GN-03	TMAC will continue to support sexual health awareness and education by providing workers access to sexual health information throughout the life of the Project.

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GN-03	The Proponent shall ensure that all reportable diseases are reported as per the existing regulations. Further the Proponent will develop capacity to reduce public health related diseases that are demonstrated to be linked to camp populations when data is presented to the Proponent regarding regional increases in related diseases.
GN-03	TMAC will continue to inform workers of the range of health services available on-site throughout the life of the Project.
GN-03	The Proponent shall, on a regular and on-going basis, participate in discussions and dialogue with the GN Department of Health in connection with Project activities, policies, or Project-induced public health issues which may have effect on health and social services facilities, programs and services.
GN-04	The Proponent will communicate to the GN available information on major changes to Project-related tax and in the case that any major change occurs, or as needed. This communication will not preclude either party from contacting the other to request an updated estimate of territorial taxes.
GN-05	The Proponent will periodically review the Community Involvement Plan (CIP) and, as required, shall update the CIP to ensure that it reflects current and relevant stakeholders, as well as effective communication and engagement methods with stakeholders throughout the life of the Project.
	The Proponent continues to be an active member in the Hope Bay Socio-Economic Working Group. Invited members of this Working Group shall include the Proponent, the Government of Nunavut, Indigenous and Northern Affairs Canada, and the Kitikmeot Inuit Association. Working Group members may invite new participants to participate, on an as-needed basis.
GN-06	The central focus of the Hope Bay Socio-Economic Working Group shall be on collaborating to ensure that the Hope Bay Socio-Economic Monitoring Plan provides for appropriate Project-specific socio-economic effects monitoring as required throughout the life of the Project. The Hope Bay Socio-Economic Monitoring Plan shall apply to the Project as described in the FEIS.
	The Proponent, reflecting the input of the Hope Bay Socio-Economic Working Group, shall produce an annual Hope Bay Socio-Economic Monitoring Plan report.
GN-06	Within one (1) year of the issuance of a Project Certificate, the Proponent shall submit an updated Hope Bay Socio-Economic Monitoring Plan (SEMP) to the Hope Bay Socio-Economic Working Group for review. The SEMP shall identify updates, changes, and any amendments made to the Terms of Reference for the Hope Bay Socio-Economic Working Group. Updates to the SEMP shall reflect the changing circumstances as outlined in the Hope Bay Final Environmental Impact Statement and Final Hearing Report. Any changes as agreed to by the Hope Bay Socio-Economic Working Group shall be submitted to the Nunavut Impact Review Board.
GN-07 GN-11	The Proponent shall reach out to third parties to deliver financial management programs such as financial literacy, financial planning, and personal budgeting. TMAC will approach Nunavut Housing Corporation and GN Department of Family Services (or other GN departments as appropriate) to solicit input and/or participate in the delivery of programming to Project workers.

NIRB Technical Comment ID	Commitment
GN-07	The Proponent will track statistics regarding the delivery of the financial management programming. The Proponent will share relevant data concerning the implementation and success of training and education programs during the Kitikmeot SEMC annual meeting, so long as these data are consistent with and not limited by obligations under the Hope Bay IIBA.
	The Proponent is strongly encouraged to submit staff schedule forecasts to the Nunavut Impact Review Board and to the Government of Nunavut six (6) months prior to each phase of the Project (construction, operations, closure). Staff schedule forecasts should be inclusive of:
GN-08	 Title and number of positions required by department or work area;
0.11 00	Potential start dates;
	 The level of education required (with reference to the specific positions); and
	• Whether on-the-job or other forms of training and certification will be required (with reference to specific positions).
GN-08	In order to ensure alignment with necessary skill-sets needed to work at the Project, the Proponent will consult the Government of Nunavut's Career Development Division during the development of staff schedule forecasts. A new schedule shall be submitted following any significant deviation from original predictions.
GN-08	The Proponent's Human Resources shall make best efforts to collaborate with the Government of Nunavut's Career Development Officer, Regional Manager of Career Development, and Director of Career Development. Semi-annual calls, at minimum, should be initiated by the Proponent with these Government of Nunavut representatives regarding:
	 Employee recruitment and retention issues; Internal and/or partnered training and development of employees; and Long-term labour market plans to facilitate training in communities.
GN-09	The Proponent commits to ongoing discussion with the GN Department of Family Services and other stakeholders regarding training opportunities and requirements to fill the skills-gap of the Kitikmeot workforce.
GN-10	If the Government of Nunavut and the Nunavut Housing Corporation develop an anonymous voluntary housing survey, the Proponent shall make the survey available to Nunavummiut site personnel and the Proponent will return any completed surveys to the Government of Nunavut.
GN-11	The Proponent will support the communication to Project workers of education, training materials, and programs (i.e. homeownership) developed by the Nunavut Housing Corporation that focuses on enhancing employee understanding and access to housing options in the Project LSA.
GN-13	TMAC is currently reviewing and updating the NO2 air quality modelling for the Project to provide a refined assessment of the predicted ambient NO2 concentrations relative to the CAAQS criteria. This additional assessment is expected to be completed by the end of April 2018 and will be provided to the GN and Environment and Climate Change Canada (ECCC).

NIRB Technical Comment ID	Commitment
GN-14	 a) TMAC will conduct noise measurements during quarry blasts at 2.8 and 4 km to confirm predictions. b) TMAC will confirm that the overpressure value of 96 Lpeak dBZ will not be exceeded at 2,800 m from the location of the blast c) TMAC will conduct a behaviour monitoring program during blasts if caribou are observed beyond 2.8 km to evaluate how caribou respond to blasts. d) TMAC will include methods in WMMP to determine potential calving ground overlap with the Project.
GN-15	TMAC commits to an update of the Non-hazardous Waste Management Plan to include appropriate layout drawings of landfill facilities once Issue for Construction designs have been prepared, and 60 days prior to operation of the proposed landfill.
	TMAC commits to an update of the Hazardous Waste Management Plan to: Remove reference to disposal of hazardous waste within the Doris Tailings Impoundment Area; and Remove reference to disposal of bottom ash generated from open burning and incineration in the underground mines.
GN-16	TMAC also clarifies that disposal of hydrocarbon contaminated material and plastic bags from prepackaged explosives containers within the underground mines is currently an approved practice under the existing Doris License and TMAC does not intend to change this. This disposal strategy will therefore remain in the Hazardous Waste Management Plan.
GN-17	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include rare plant mitigation and an annual summary of potential habitat loss when construction occurs in new areas.

NIRB Technical Comment ID	Commitment
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following: In consultation with the Government of Nunavut:
	TMAC will design and implement a program to monitor the Project's effects on the seasonal movements of caribou (including speed, direction, and tortuosity) and ZOI at a regional scale, using collar data. This program may be focused on monitoring Project effects during migratory periods of the Dolphin and Union and/or Beverly/Ahiak caribou herds, or as appropriate for ZOI analysis. The analysis will encompass all components of the Project, including mine sites and roads.
GN-18	Methods and data analyses will be guided by relevant literature and Traditional Knowledge. Data collection will be timed to coincide with the operations phase of the Project and will encompass the period when road traffic rates peak.
	Analyses of collar data to estimate Project effects on caribou movements and ZOI will be conducted and reported at least once during the operations phase of the Project (once sufficient data have been acquired). These analyses may be repeated periodically throughout the life of the Project if changes in Project scale, intensity or nature occur.
	To ensure that the data available to carry out this program are sufficient to detect potential Project effects, TMAC can partner with the Government of Nunavut on a collaring program for the Dolphin and Union herd. TMAC can match GN funding for the Dolphin and Union collaring program up to a maximum annual amount to be determined in an updated MOU. The study will continue until sufficient data have been collected, statistical power has been determined.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
	The Project's effects on caribou movements will be monitored at a local scale using behavioral observations from height-of-land surveys and a snow track study.
GN-18	The design of these monitoring programs will be developed in consultation with the Government of Nunavut and the Inuit Environmental Advisory Committee, will use methods supported by peer reviewed literature and will consider statistical power.
	The snow track study will be designed to estimate or index the permeability of Project roads to caribou. These programs may be discontinued after definitive results are obtained or if statistical power cannot be achieved by means of reasonable sampling design and effort, as determined by NIRB.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-19	The road characteristics data will be used as appropriate in annual WMMP reports as a measure of potential project disturbance.
	In addition, after construction is completed, TMAC will confirm that the constructed road meets design criteria listed in the FEIS, including height and slope. Any variance from design criteria will be made available to interveners.

NIRB Technical Comment ID	Commitment
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-19	Periodically during the Project, analyses of caribou road crossing behaviour will be conducted to examine crossing locations in relation to wildlife crossing structures. These analyses will use available data from collars, snow track surveys, and height-of-land monitoring. Results will be presented in annual reports.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-19	TMAC will implement a program to monitor and report snow bank heights along Project roads. This program will allow estimation of mean height and variance at a series of designated monitoring locations that are representative of snow conditions along the roads. This program will continue until operational snow management is characterized.
GN-19	TMAC confirms that the Madrid to Boston transmission line remains part of the project. The benefits of the transmission line include reduced diesel handling and consumption (and associated traffic reduction) and a very minimal impact and sensory disturbance.
	TMAC feels it is not an efficient use of the regulatory process to remove a project component that is known at this time.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-20	A traffic monitoring and reporting program will be implemented to accurately estimate the rates and composition of all traffic using each of the Project's road segments (as identified in FEIS Vol. 3, table 4.5-1) annually and seasonally. This information shall be used for comparison with the traffic rates predicted in the FEIS and to support Project monitoring for wildlife effects.
GN-20	The peak traffic rates as presented in table 4.5-1 in FEIS Vol. 3 (or those identified by the Proponent, during the Project's NIRB review) shall be established as Project monitoring thresholds. If the annual or seasonal traffic rates estimated from Project monitoring exceed the established thresholds by greater than 25% in two consecutive monitoring periods, TMAC shall conduct a revised assessment of the potential impacts of this excess traffic on wildlife. The monitoring data, analysis of effects shall be submitted in the annual WMMP compliance report for NIRB consideration.
GN-21	Addressed in suggested revision to GN-18.
GN-22	TMAC commits to update the WMMP with additional detail on the plan for height of land monitoring.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-23	Prior to construction activities during denning season, surveys will be conducted to locate active dens within 1 km of the Project. Survey design will be informed by maps of high quality denning habitat that were included within the FEIS.

NIRB Technical Comment ID	Commitment
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-23	If an active den is located within 1 km of construction activities, construction activities shall not begin until 1) a den-site protection plan is developed in consultation with a Government of Nunavut Conservation Officer. The plan will consider a 1 km no blasting or drilling buffer, 750 m for operation of heavy equipment, and 250 m for light vehicle traffic. Exceptions to these minimums may be implemented as part of a den-specific management plan and may require a permit from the Government of Nunavut under sections 74 of the Nunavut Wildlife Act.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
	During construction and operations, regular ground-based observations will be conducted regularly during the denning season to identify active den sites within 1 km of the Project that may require mitigation.
GN-23	All active dens within 1 km shall have a den-specific management plan, developed in consultation with the GN Department of Environment (FEIS Annex Vol.8-3, s.2.4, Table 2.4-1).
	A den-specific management plan may include mitigation measures such as increased monitoring (to assess responses to disturbance and den success), speed limit reductions and posting of signs in proximity to the den, driver notifications, and avoidance during denning or den emergence.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-24	Should construction of new areas occur in the raptor breeding period, TMAC will conduct a pre-construction survey of potential cliff-nesting habitat within 2 km of the Proposed Phase 2 development prior to construction to ensure sites have been accounted for from previous surveys.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-24	a) If an active cliff nest is located within 1 km of planned construction activities, construction activities shall not begin until 1) a nest-site protection plan is developed in consultation with a Government of Nunavut Conservation Officer. The plan will consider a 1 km no blasting or drilling buffer, 750 m for operation of heavy equipment, and 250 m for light vehicle traffic. Exceptions to these minimums may be implemented as part of a nest-specific management plan and may require a permit from the Government of Nunavut under sections 72 and 74 of the Nunavut Wildlife Act.
	Where a raptor builds a nest on project infrastructure such as a service building, the recommended cessation of construction activities within a no-disturbance buffer does not apply but development of a nest-specific management plan is recommended.

NIRB Technical Comment ID	Commitment
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-24	All potential nest sites within 1 km of project activities will have a nest-specific management plan, developed in consultation with the GN Department of Environment.
	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
GN-25	Fixed-wing landings/take-offs at Project airstrips will be recorded. These data will be reported in the annual WMMP compliance report. The reported information will be used to verify EIS predictions regarding flight frequency.
GN-25	The Wildlife Mitigation and Monitoring Plan (WMMP) will be revised to include the following:
	Helicopter flight logs will be collected and will be reported in the annual WMMP compliance report. The reported information will be used to (1) verify the accuracy of EIS predictions about the frequency and distribution of helicopter traffic; (2) verify assumptions about helicopter traffic that were made in the noise modeling study; and (3) facilitate other Project effects monitoring programs such as wildlife ZOI and movement studies.
GN-25	The Project's Wildlife Mitigation and Monitoring Plan shall be revised to clarify the following:
	That the 600m horizontal avoidance buffer for operation of helicopters near caribou also applies to helicopters on the ground such that engine starts and takeoffs of helicopters will be suspended when caribou are observed within the buffer distance, subject to the operational safety discretion of the pilot.
GN-26	The WMMP will be revised to clarify that driver rules used for caribou (as detailed in the WMMP; Figure 2.2-1 Driver Mitigation for Caribou) will be applied to muskoxen.
HC-4.1.4	NO_2 mitigation: Wind power generation may be pursued, which would be expected to reduce NOx emissions due to reduced power plant operation.
HC-4.1.4	NO ₂ mitigation: Consideration of taller stacks at the Madrid North and Boston power plants to promote greater dispersion.
HC-4.1.4	NO ₂ mitigation: Consideration for additional NOx emissions reductions during detailed Project design. These may include energy efficiency methodologies, allowances in design for inclusion of future control technologies in power plant design, etc.
TC-4.1.1	TMAC will comply with the regulations under Subpart 7 (307.01) of the Canadian Aviation Regulations (CARs).

NIRB Technical Comment ID	Commitment
INAC-FC#7	TMAC shall collaborate with the Hope Bay Socio-Economic Working Group (SEWG) to ensure that the Hope Bay Socio-Economic Monitoring Program provides for appropriate Project-specific socio-economic effects monitoring of the potential effect of competition for labour. Specific indicator(s) will be developed as agreed to by the SEWG, and considering the input of the Kitikmeot Socio-economic Monitoring Committee, to track and report on the extent to which Project-related competition for labour may impact Kitikmeot communities. Activities related to monitoring and development of mitigation, including use and disclosure of information and data, will adhere to the SEWG Terms of Reference.
INAC-FC#8	TMAC shall collaborate with the Hope Bay Socio-Economic Working Group (SEWG) to ensure that the Hope Bay Socio-Economic Monitoring Program provides for appropriate Project-specific socio-economic effects monitoring of Project procurement of local and regional businesses and competition for access to local and regional businesses by existing customers. Specific indicator(s) will be developed as agreed to by the SEWG, and considering the input of the Kitikmeot Socio-economic Monitoring Committee, to track and report on the extent to which the Project procures from Kitikmeot businesses and the extent to which existing customers are unable to access goods and services, consistent with the provisions of the Hope Bay Inuit Impact and Benefit Agreement (IIBA). Activities related to monitoring and development of mitigation, including use and disclosure of information and data, will adhere to the SEWG Terms of Reference.