



#### 4. Specific Comments

For each issue identified provide the following:

1. Identify the issue in detail and where appropriate the location within the FEIS (document, section and page number);
2. State (if known) the Proponent's conclusion related to the issue;
3. State your conclusion related to the issue and your justification;
4. Provide a brief discussion on the issue's importance to the impact assessment process; and
5. Provide a recommendation to the Board on the issue.

#### 5. Summary of Recommendations

Finally, submissions must contain a bulleted summary of the recommendations to the Board as they pertain to the key areas of the review, including other environmental impact assessment areas if relevant.

#### Language of Documents

NIRB requires executive summaries be translated into both **Inuktitut** and **Inuinnaqtun**. NIRB requests that parties arrange for their own executive summary translation.

The Final Hearing will be conducted in Inuktitut, Inuinnaqtun and English, with simultaneous translation. NIRB is also required by law to conduct public hearings in French in accordance with the *Official Languages Act*. Please notify NIRB at least two weeks before the Final Hearing should you require interpretation in French. Additionally, those who require special audio-visual equipment at the Final Hearing are requested to inform NIRB at least two weeks before the Final Hearing so that arrangements can be made in advance.

#### Deadline for filing submissions

NIRB would like to remind parties that the deadline for written submissions is **January 18, 2006**. Recognizing the logistics in hiring an interpreter, executive summary translations will be accepted up until **January 24, 2006**.

Should you have any questions please do not hesitate to contact me.

Yours truly,

*(Original signed by)*

Stephen Lines, P.Biol., DEIA  
Technical Advisor

Encl. NIRB's 10 minimum EIS requirements (below)

c.c. Honourable Andy Scott, Minister INAC

Proponents must comply with the following 10 minimum requirements for an Environmental Impact Statement:

**1. Statement of Consultation Principles and Practices**

The Proponent must conduct pre-project consultations with locally affected persons. Where at all possible, information about the project must be distributed, and comments collected with a view to resolving any differences. Discussions should include, but not be limited to, land uses, policies, resource uses, archaeological areas, infrastructure, and terrain sensitivities. Inuit cultural concerns must be highlighted throughout. The Proponent shall explain where, how, why, and with whom it conducted public consultation, and shall demonstrate an understanding of the rights, interests, values, aspirations, and concerns of the potentially affected communities. All comments from the public must be summarized, documented, and presented in the EIS.

**2. Definition of Project**

A definition of the project must include a discussion of any connected or subsequently related projects in order to reveal the primary purpose and better understand complex or multi-staged related proposals.

**3. Statement of Project's Purpose**

Based on the concepts of the Precautionary Principle and Sustainable Development, an EIS must contain a statement explaining the need for, and the purpose of the project. Where further economic development is needed for a given area, the Board expects the deficiencies in the economic status quo to be stated.

**4. Anticipated Impacts Analysis**

A comprehensive impact assessment must be carried out. The analysis should include short and long-term, direct and indirect, positive and negative, cumulative, eco-systemic, socio-economic, archaeological and cultural impacts. This element of the EIS must include a mitigation analysis that explains how the impacts could be avoided, minimized, cured, eliminated, or compensated for.

**5. Cumulative Effects Analysis (CEA)**

A comprehensive examination of all cumulative effects must be included in an EIS. Cumulative effects refer to the impact on the biophysical and socioeconomic environment that results from the incremental impact of a development when added to other past, present, and Reasonably Foreseeable Future Developments, regardless of what agency or person undertakes such other developments. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

**6. Significant Effects Analysis**

The Board must be advised of the significant impacts of the project, with and without any proposed mitigation measures. This should be based upon:

- the project setting, taking into account the location's unique biophysical and socioeconomic characteristics, and
- the severity of the impacts, taking into account, but not limited to public health, land use plans, protected areas, habitat, or species, public concern, etc.

Ultimately, the Board will decide which effects are significant and report to the Minister accordingly.

## **7. Project Alternatives**

This requirement includes, but goes well beyond, alternative means of carrying out the project that might be economically and technically feasible and the environmental effects of those alternative means. This assessment must include the “no-go” or “no-build” alternative, as well as the “preferred” alternative. The “no-go” alternative is not only a potentially stand-alone option; it also serves as a baseline for comparison with other development alternatives that might reasonably be proposed in the circumstances.

## **8. Sustainability Analysis**

The EIS must contain an analysis of the ability of renewable resources affected by the project to sustain current and future generations in Nunavut and Canada.

## **9. Monitoring or Post-Project Analysis (PPA)**

The purpose of a PPA is to:

- measure the relevant effects of a project on the eco-systemic and socio-economic environments of the Nunavut Settlement Area;
- determine whether and to what extent the land or resource use in question is carried out within the predetermined terms and conditions;
- provide the information base necessary for agencies to enforce terms and conditions of land or resource use approvals; and
- assess the accuracy of the predictions contained in the project impact statement.

## **10. Trans-Boundary Impact Analysis**

Where relevant, an EIS must include an assessment of all significant adverse biophysical or socioeconomic transboundary impacts. Transboundary impacts refer to those impacts which occur across municipal, provincial or international boundaries.