



January 22, 2009

Ms. Payette,

The KIA believes that the guidelines are thorough and appropriate for the scale of the development. However, we do have some comments that may improve the guidelines further.

Our first concern is that by putting these Committees in the guidelines, their very presence suggests by NIRB that they should be established. This prejudices the review process and any future recommendations by the Board.

Any committee has to be carefully planned to have any chance to be useful. Many committees are established without a clear purpose, funding source, commitment of the parties, and/or capacity of the parties. Because of this many fail to deliver useful results. For example, the Jericho Socio-Economic monitoring committee has produced little result, and the Kitikmeot Socio-economic monitoring committee has offered few benefits.

There are already organizations and boards established in Nunavut to deal with matters related to these proposed Committees. For example, the Hunters and Trappers Organizations, the Nunavut Wildlife Board, the GN Department of Wildlife, and the Regional Inuit Associations have a role to play in wildlife issues. Establishing new committees duplicates the roles of these organizations. As well, the Hamlets, GN, and the RIA's already can be consulted by NIRB on social issues, or get involved in the review process without the need for committees.

Section 6.10 (traditional Knowledge) is an improvement from previous draft. KIA will expect more information than the minimum specified in section 6.16.3.1 (Baseline information requirements: Traditional knowledge). In addition to place names, historic and current land use by Inuit, and culture and relationship to the land, KIA will expect to see, at minimum, traditional knowledge collected on the biotic components deemed to be VEC's. These expectations will be clarified between the proponent and KIA when a site specific traditional knowledge study is prepared for the project.

Lastly, the second sentence in the section on Impact and Benefit Agreements (6.17.9.4.5) is vague and difficult to understand, so it should be removed.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Geoffrey Clark', with a stylized, cursive script.

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