



# Inuktitut

## Mandate of the Qikiqtani Inuit Association

Inuktitut

Safeguard, administer and advance the rights and benefits of the Qikiqtani Inuit; and to promote Inuktitut, the Inuit language and Inuit traditions, environmental values, self-sufficiency, and economic, social and cultural well-being in an open and democratic forum



# Inuktitut Nunavut Water Board – QIA Technical Comments

- Inuktitut
  - QIA submitted 25 Technical Comments on July 15, 2019 and an additional 5 on October 15, 2019.
  - Some Technical Comments contain multiple concerns
  - QIA and Baffinland discussed select Technical Comments October 31, 2019



# Inuktitut Technical Concerns

- Inuktitut

- Status of concerns as of November 5, 2019:
    - Resolved: 5
    - Unresolved: 53
  - Breakdown of unresolved concerns
    - Unresolved: 34
    - Awaiting new Information: 14
    - October 15, 2019 Submission: 5
- Total: 53**



# Inuktitut Resolved Concerns

- Inuktitut
  - # 1.1: Revision of the Interim Reclamation and Closure Plan (ICRP)
  - # 2.1: Environmental Security held for the Project
  - # 10.2: Runoff into Local Watercourses
  - # 12.3: Distribution of North Rail Corrective Actions
  - # 24.3: Construction of North Rail Stream Crossings



# Inuktitut

## Outcome of October 31, 2019 Meeting

- Inuktitut
- QIA is awaiting new information from Baffinland to address concerns raised by:
  - # 3: Water Compensation and other Licensing
  - # 6, 7, 13, 14.1, 14.2, 15: Management and Monitoring Plans
  - # 19, 21: Construction



# Inuktitut Unresolved Technical Comments



# #4 Inuktitut

## Incorporation of IQ in proposed North Railway

- Inuktitut
- Summary
  - QIA is seeking specifics of how Inuit engagement and consideration of Inuit Qaujimanituqangit (IQ) informed the proposed development and monitoring of the North Railway
- Status
  - Unclear how IQ has/will be incorporated into development plans for the North Railway





# #5 Inuktitut

## Fish and Physical Effects of Flow Diversion

- Inuktitut
- Summary
  - QIA is not satisfied with the integration of adaptive management as it relates to flow diversion
  - QIA further believes this information should be incorporated in a management plan
- Status
  - QIA requests updated management plan(s) to address flow diversion concerns



# #8 Inuktitut Management and Monitoring Plans

- Inuktitut
- Summary
  - Baffinland should update the SWAEMP to elaborate on monitoring activities (see Section 10)
  - Baffinland should detail how this informs/prioritizes maintenance activities
- Status
  - QIA requests additional detail regarding frequency of monitoring, triggers for action and consideration of a broader suite of parameters



# #9 Inuktitut Management and Monitoring Plans

- Inuktitut
- Summary
  - Baffinland should resubmit plans that do not delay details/recommended actions until post-approval
- Status
  - QIA requests revised management plans be submitted for consideration



# #10 Inuktitut Management and Monitoring Plans

- Inuktitut
- Summary
  - QIA is seeking additional information on how calcium chloride is monitored to manage runoff into local watercourses
- Status
  - QIA is looking to better understand Baffinland's dust suppressant activities and corresponding monitoring



# #11 Inuktitut Management and Monitoring Plans

- Inuktitut
- Summary
  - QIA believes the amended Water Licence should require Baffinland to monitor the construction, operations and closure of the North Railway
  - QIA requests the geotechnical monitoring program be submitted prior to construction approval
- Status
  - Baffinland does not agree that the Water Licence should require monitoring of the North Railway
  - QIA is awaiting the submission of a geotechnical monitoring program



# #12 Inuktitut Management and Monitoring Plans

- Inuktitut
- Summary
  - Baffinland should share records of inspections, triggers, and corrective actions with reviewers as a reporting requirement of the amended Water Licence
- Status
  - QIA disagrees with Baffinland's assessment that these concerns are addressed in the existing licence
  - QIA is awaiting the submission of a geotechnical monitoring program



# #14 Inuktitut Management and Monitoring Plans

- Inuktitut
- Summary
  - QIA is concerned that the Tote Road has still not been constructed as designed by Hatch (2014)
  - Baffinland has confirmed they will not commit to
- Status
  - QIA's concerns regarding the Tote Road remain outstanding



# #16 Inuktitut Adaptive Management

- Inuktitut

- Summary

- QIA is concerned with the lack of detail in current management plans regarding what monitoring thresholds trigger mitigative action for all relevant water quality parameters

- Status

- Baffinland's response framework only responds to exceedances of TSS and turbidity
- QIA is concerned by the lack of mitigative measures for remaining water quality parameters





# #17 Inuktitut

## Fish and Physical Effects of Flow Diversion

- Inuktitut
- Summary
  - QIA is concerned that Baffinland has not conducted and/or shared site-specific fish passage assessments along the proposed North Railway
  - There is limited evidence to suggest the North Railway is designed to minimize impacts to fish
- Status
  - This concern remains outstanding



# #18 Inuktitut Fish and Culvert Passage

- Inuktitut

- Summary

- QIA is concerned that Baffinland will not complete the Fish Passage Monitoring Program during the Water Licence process
- This information has implications for the design and construction of the North Railway
- QIA is also concerned by the less rigorous approach to monitoring along the North Railway in comparison to the Mine Site

- Status

- This concern remains outstanding



# #20 Inuktitut

## Construction – Initial Conditions

- Inuktitut
- Summary
  - QIA requests that permafrost conditions be assessed prior to any construction approvals for the North Railway deviation at Kanajjuq
- Status
  - This concern remains outstanding



# #22 Inuktitut

## Construction – Settlement

- Inuktitut
- Summary
  - QIA is concerned by Baffinland's proposed usage of satellite imagery (once per year), to identify areas showing increased settlement
- Status
  - QIA is seeking additional evidence to prove the viability of this technique for the North Railway
  - If adopted, QIA recommends findings be reported publicly to the NWB on an annual basis



# #23 Inuktitut

## Adaptive Management - SWAEMP

- Inuktitut
- Summary
  - QIA is concerned by the lack of monitoring for medium/high risk diversions and fish-bearing streams in proposed management plans
  - It is unclear to what extent the proposed monitoring program will be included in management plans
- Status
  - These concerns remains outstanding



# #24 Inuktitut

## Construction – Stream Crossings

- Inuktitut
- Summary
  - QIA recommends the NWB develop a new section of the Water Licence devoted to:
    - Stream crossings,
    - North Railway construction
    - Relevant reporting requirements
- Status
  - These concerns remains outstanding



# #25 Inuktitut

## Construction – Engineered Mitigation and Design

- Inuktitut

- Summary

- QIA is seeking a timeline for completion of modelling, testing, final design and final approval of the North Railway
- QIA recommends bi-weekly reporting during construction on deviations from approved construction drawings
- QIA requests that the North Railway Long-term Monitoring and Maintenance Plan be considered during the Water Licence amendment process

- Status

- These concerns remains outstanding
- The requested timeline may require adjustment based upon the final rail alignment around Kanajjuq



# #26 Inuktitut

## Engagement with Inuit Communities

- Inuktitut
- Summary
  - QIA has serious concerns with the adequacy of engagement with Inuit relating to discussions around water use, water quality and water flow
  - QIA has requested additional detail on meetings where the proposed amendment to the Water Licence was/will be a central topic
- Status
  - These concerns remains outstanding





# #27 Inuktitut

## Inadequate IQ Baseline Data Collection

- Inuktitut
- Summary
  - QIA believes Baffinland has underestimated Inuit values and use due to inadequate collection and consideration of IQ
  - Consequently, there is limited information available to support the assessment of effects on Inuit use and values for water
- Status
  - These concerns remains outstanding



## #28 Inuktitut Inadequate Assessment of Impacts to Inuit Water Rights

- Inuktitut
- Summary
  - QIA is concerned by Baffinland's limited consideration of Section 20.3.3 of the Nunavut Agreement when determining if the proposed project will substantially affect the quality, quantity or flow of waters flowing through IOL
- Status
  - These concerns remains outstanding



# #29 Inuktitut IQ and Snow Management

- Inuktitut
- Summary
  - QIA is seeking to better understand how IQ was considered and integrated into the updated Snow Management Plan (May, 2019)
- Status
  - This concern remains outstanding



# #30 Inuktitut IQ and Monitoring

- Inuktitut
- Summary
  - QIA is concerned by the limited consideration of IQ in the Environmental Protection Program and Aquatic Effects Monitoring Plan
- Status
  - These concerns remains outstanding



# Inuktitut

## Looking forwards

Inuktitut

QIA remains committed to working with Baffinland, intervenors and the Nunavut Water Board during the ongoing Phase 2 Water Licence Amendment process. Thank you.

