SCREENING DECISION REPORT
NIRB FILE No.: 26UN010

NPC File No.: 151033

November 04, 2026

Following the Nunavut Impact Review Board's (NIRB or Board) assessment of all materials provided, the NIRB is recommending that a review of Nunavut Nukkiksautiit Corporation's "Iqaluit Nukkiksautiit Project" project proposal, NIRB File No. 26UN010, Application No: www.nirb.ca/project/126346 is not required pursuant to Article 12, Section 12.4.4(a) of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (*Nunavut Agreement*) and s. 92(1)(a) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*).

Subject to the Proponent's compliance with the terms and conditions as set out below, issued in accordance with s. 92(2)(a) of *NuPPAA*, the NIRB is of the view that the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology and are not therefore likely to cause significant public concerns. The NIRB therefore recommends that the responsible Minister(s) accept this Screening Decision Report.

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REGULATORY FRAMEWORK

The primary objectives of the Nunavut Impact Review Board (NIRB) are set out in Article 12, Section 12.2.2 of the *Nunavut Agreement* and s 23 of the *Nunavut Planning and Project Assessment Act* (*NuPPAA*) as follows:

> *(1)(a) to protect and promote the existing and future well-being of the residents and communities of the designated area; and*
> *(b) to protect the ecosystemic integrity of the designated area.*
>
> *(2) the Board must take into account the well-being of residents of Canada outside the designated area.*

When conducting a screening, the NIRB must consider the following to determine whether a review of a project proposal is required (as set out in s. 89(1) of *NuPPAA*):

> *(a) a review is required if, in the Board's opinion,*
> *i. the project may have significant adverse ecosystemic or socio-economic impacts or significant adverse impacts on wildlife habitat or Inuit harvest activities,*
> *ii. the project will cause significant public concern, or*
> *iii. the project involves technological innovations, the effects of which are unknown; and*
> *(b) a review is not required if, in the Board's opinion,*
> *i. the project is unlikely to cause significant public concern, and*
> *ii. its adverse ecosystemic and socioeconomic impacts are unlikely to be significant, or are highly predictable and can be adequately mitigated by known technologies.*

Subsection 89(2) of the *NuPPAA* notes that the considerations set out in paragraph 89(1)(a) prevail over those set out in paragraph 89(1)(b).

As set out under Article 12, Section 12.4.4 of the *Nunavut Agreement* and s. 92(1) of the *NuPPAA*, upon conclusion of the screening process, the Board must provide its written report to the Minister indicating one of three options:

(a) a review of the project is not required;

(b) a review of the project is required; or

(c) the project should be modified or abandoned.

On February 2, 2026, the NIRB received a referral to screen Nunavut Nukkiksautiit Corporation's "Iqaluit Nukkiksautiit Project" project proposal (the Project Proposal) from the Nunavut Planning Commission (Commission). The Commission determined that the Project Proposal is outside the area of an applicable regional land use plan and is a significant modification to the previously screened works and activities associated with NIRB File Nos. 24YN048 and 25YN033 because it proposes the construction of a new hydroelectric facility and associated infrastructure.

Pursuant to Article 12, Sections 12.4.1 and 12.4.4 of the Nunavut *Agreement* and s. 87 of the *Nunavut Planning and Project Assessment Act* (*NuPPAA*), the NIRB commenced screening the project proposal and assigned it NIRB File No. 26UN010.

Key steps in the assessment included:

Table 1: Key Steps in the NIRB's Assessment Process

Date	Stage
February 2, 2026.	Receipt of project proposal.
February 9, 2026.	Request to complete public registry online and provide information pursuant to s. 144(1) of the *NuPPAA*.
February 16, 2026.	Receipt of online application from Proponent.
March 3, 2026 – August 4, 2026.	The application was returned to the Proponent on several occasions for revisions and additional information required to carry out the screening pursuant to s. 144(1) of the *NuPPAA*. Revised submissions were received on March 9, April 13, July 3 and August 4, 2026.
August 4, 2026.	Proponent responded to information request(s) and provided additional information.
August 6, 2026.	Scoping pursuant to s. 86(1) of the *NuPPAA*.
August 12, 2026.	Notice of Screening and Comment Request.
September 3, 2026	Receipt of comments from interested parties.
September 8, 2026	Proponent provided with an opportunity to address comments and concerns received during the commenting period.
September 18, 2026	Proponent provided its response to comments and concerns received during the commenting period.
September 22, 2026	Ministerial extension requested from the Minister of Arctic and Northern Affairs.
September 29, 2026	NIRB requested additional information from the Proponent to support completion of the screening.
October 8, 2026	Proponent provided its response to the NIRB's September 29, 2026, additional information request.

The following parties submitted comments on the proposal:

- Qikiqtani Inuit Association (QIA)
- Government of Nunavut (GN)
- Government of Canada (GoC)

For more detail regarding the comments submitted see the following sections: Summary of Comments Received and Public Comments and Concerns with respect to Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional and Community Knowledge.

No members of the public, community organizations, or other interested parties provided comments to the NIRB during the Board's screening of the Project Proposal.

PROJECT SCOPE, WORKS AND ACTIVITIES

All documents received and pertaining to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/126346.

Project Scope

Location	South Qikiqtani region, within the Kuugaaluk River system on the Hall Peninsula, approximately 60–66 kilometers northeast of Iqaluit.
Objective	The Proponent intends to develop a hydroelectric project with an installed generating capacity of up to 30 megawatts to provide renewable electricity to Iqaluit and reduce reliance on imported diesel fuel.
Timeline	Construction phase: Approximately May 2028, to September 2031. Operations phase: Approximately October 2031, to December 2099.

As required under s. 86(1) of the *NuPPAA*, the scope of the "Iqaluit Nukkiksautiit Project" Project Proposal as set out by Nunavut Nukkiksautiit Corporation, involved the following undertakings, works, or activities:

- Construction and operation of a hydroelectric facility with an installed generating capacity of up to 30 megawatts (MW), including a dam, reservoir, powerhouse, turbines, generators, spillways, intake structures, penstock, tailrace, low-level outlet, and other water-control structures.
- Development and operation of a reservoir of approximately 7,136 hectares at the proposed Full Supply Level, with water levels managed to support power generation while maintaining downstream flows.
- Assessment of three potential all-season access road route alternatives, followed by construction and operation of one selected final route approximately 66 kilometers long, with the final route to be selected following further design, Inuit engagement, environmental fieldwork, and regulatory review.
- Construction and operation of an approximately 66-kilometre, 69 kilovolt transmission line generally following the final selected all-season access road alignment, including related substations and electrical interconnection infrastructure.

- Construction and use of temporary construction facilities, including construction camps, laydown areas, staging areas, material borrow areas, quarry areas, crushing and screening areas, fuel-storage areas, waste-management areas, helicopter landing areas, and other temporary work areas.
- Operation of a temporary construction camp to accommodate approximately 50 personnel under typical conditions and up to approximately 90 personnel during peak construction.
- Use of heavy construction equipment, vehicles, pumps, drills, cranes, crushers, screens, concrete equipment, fuel/service units, and other support equipment required for road construction, quarrying, dam construction, transmission-line construction, and related civil works.
- Extraction, processing, and transport of construction materials from proposed quarry and borrow sources, including rock, earth fill, sand, gravel, riprap, concrete aggregate, and engineered fill. Suitable material within the future reservoir inundation area would be used where practicable.
- Blasting for hard-rock quarries, localized rock cuts, dam foundation works, powerhouse foundation, spillway and intake excavations, and portions of the penstock alignment.
- Transportation of equipment, fuel, construction materials, and manufactured components to Iqaluit by sealift, with transport to the Project site by road once suitable access is available. Limited early mobilization may occur using authorized temporary access methods.
- Use of helicopters during construction and operations, including designated and temporary helicopter landing areas, and limited or emergency fixed-wing or float-equipped aircraft use where safe natural landing conditions are available. No constructed temporary or permanent fixed-wing landing strip is proposed.
- Use, storage, and transport of fuel and hazardous materials, including diesel, gasoline, propane, aviation fuel if required, lubricants, hydraulic fluids, explosives, and other construction-related materials, using appropriate storage, containment, inspection, and spill-response measures.
- Water use for construction, camp operations, concrete production, dust control, equipment washing, and other site-support activities. Operational water passing through the turbines would be non-consumptive and returned downstream.
- Management of domestic waste, construction waste, recyclable materials, hazardous waste, sewage, greywater, and contaminated soil or snow if generated, through temporary onsite storage, transport to authorized facilities in Iqaluit where accepted, or shipment south to approved receiving facilities where required.
- Operation and maintenance of the hydroelectric facility using automated controls and remote monitoring from Iqaluit, with onsite attendance for inspections, maintenance, dam safety, emergency response, and operational checks.
- Progressive removal, restoration, or reclamation of temporary construction areas once no longer required, and future decommissioning and closure planning for Project infrastructure.

Inclusion or Exclusion of Scoping List

The NIRB accepts the above description of works and activities as defined in the project application. However, the NIRB also notes that road use was described very generally in the initial application which was clarified during the assessment by the Proponent as:

- Road use during construction: controlled access, with access coordinated around active work zones, heavy equipment movements and other hazards.
- Road access during operations: managed access for permitted users, with coordination requirements and restrictions.

In addition, the Proponent clarified that despite the general description in the application, unrestricted public access was not contemplated in the project design. Therefore, the Board notes that open public access to the road is not within the scope of the Project activities covered by the terms and conditions or recommendations framed in this decision.

SUMMARY OF COMMENTS RECEIVED

For the convenience of reviewers, the NIRB has provided the following summary of the comments received during the public comment period for this file. However, parties are advised the summary below is not exhaustive and has been provided in this format for the convenience of reviewers only. The full documents are available in their entirety as posted on the NIRB's Public Registry from the following link: www.nirb.ca/project/126346.

Qikiqtani Inuit Association (QIA)

- QIA considered that the Project is likely to arouse significant public concern and recommended that the Project proceed to Review.
- QIA noted that the Project remains at the planning and preliminary design stage and that several Project components, operating details, mitigation measures and monitoring programs remain under development.
- QIA identified potential adverse effects related to hydrology, fish and fish habitat, wildlife, permafrost and terrain, Inuit harvesting, travel and access, socio-economic conditions and cumulative effects.
- QIA considered that additional information is required to characterize the significance of potential effects and determine whether effective and feasible mitigation measures are available, particularly for reservoir filling and operation, downstream flows and water quality, fish and aquatic habitat, wildlife movement, permafrost and terrain conditions, and Inuit harvesting and socio-economic conditions.

Government of Nunavut (GN)

- The GN recommended that the Project proceed to Review under Part 5.
- The GN noted that the scale, footprint and duration of the Project have the potential to result in significant adverse ecosystemic and socio-economic effects.
- The GN identified potential effects on Arctic char populations and habitat associated with changes in water flow, water levels and water quality.

- The GN raised concerns regarding potential effects on the recovering Baffin Island caribou herd from disturbance, increased access and increased harvesting pressure.
- The GN also identified potential effects on harvesting activities, access and food security and noted that these matters may be of significant public concern.

Government of Canada (GoC)

- Fisheries and Oceans Canada identified potential effects on fish and fish habitat, including Arctic char, associated with altered flows in the Kuugaaluk River and downstream aquatic systems, noted that the current information is insufficient to fully evaluate the scale and duration of those effects, and indicated that significant public concern may arise in relation to these effects.
- Health Canada identified the potential for methylmercury exposure through country foods associated with reservoir inundation.
- Environment and Climate Change Canada identified potential effects related to surface water quality and quantity, migratory birds, species at risk, reservoir inundation, erosion and sedimentation, spills, wastewater and other Project-related pathways.
- Natural Resources Canada identified considerations related to permafrost, geotechnical conditions, seismic hazards, slope stability and long-term infrastructure performance.
- Transport Canada confirmed that the proposed dam would be considered a Major Work under the Canadian Navigable Waters Act and noted that road and transmission-line watercourse crossings may also require further assessment and approvals.

PUBLIC COMMENTS AND CONCERNS WITH RESPECT TO INUIT QAUJIMANINGIT, INUIT QAUJIMAJATUQANGIT, TRADITIONAL AND COMMUNITY KNOWLEDGE

The following is a summary of the comments and concerns received with respect to Inuit Qaujimaningit, Inuit Qaujimajatuqangit, Traditional or Community Knowledge:

Comments received during the screening identified the importance of Inuit harvesting, travel, access, wildlife and country foods in the Project area.

QIA identified potential effects on Inuit harvesting, travel and access associated with changes to fish and fish habitat, wildlife movement, reservoir operations and new Project infrastructure. QIA also noted that further engagement and additional information would be required as Project design and effects information advance.

The GN identified concerns regarding potential effects on harvesting activities, access and food security, including effects that could result from changes to Arctic char habitat and increased access to areas used by the recovering Baffin Island caribou herd. The GN also noted that similar concerns had been raised by local Hunters and Trappers Organization members.

The Government of Canada also identified potential effects on Inuit harvesting and country foods. DFO noted that Arctic char is an important subsistence and commercial resource for Inuit in the

region, while Health Canada identified potential methylmercury exposure through country foods as an issue of interest to local communities and harvesters.

The Project Proposal indicates that Inuit Qaujimajatuqangit and community knowledge have informed Project siting, road and transmission routing, seasonal timing, identification of caribou movement corridors, traditional travel routes, fish movement and overwintering areas, harvesting locations, and culturally important landforms. NNC also indicates that the incorporation of Inuit Qaujimajatuqangit is ongoing and will continue as Project planning and assessment advance.

PROPONENT'S RESPONSES TO PUBLIC COMMENTS AND CONCERNS

Due to the concerns and questions identified in the comments received from parties, on September 8, 2026, the NIRB provided an opportunity for the Proponent to respond to the concerns raised during the commenting period. The following is a summary of the Proponent's responses received on September 18, 2026:

- NNC acknowledged that the Project remains at the preliminary design stage and indicated that Project design, component locations, reservoir operations, access arrangements, mitigation and monitoring would continue to be refined as engineering, baseline studies and engagement advance.
- NNC acknowledged concerns raised regarding potential effects on fish and fish habitat, wildlife, Inuit harvesting, travel and access, and indicated that ongoing aquatic, terrestrial and socio-economic studies would further assess these effects.
- NNC acknowledged concerns regarding the long Project life and changing climate and indicated that site-specific assessment, monitoring and adaptive management would be used to address uncertainty related to hydrology, permafrost, wildlife, reservoir operation and mitigation effectiveness.
- NNC committed to continued engagement with potentially affected Inuit, the Amaruq Hunters and Trappers Association in Iqaluit, the Pangnirtung Hunters and Trappers Organization and other interested parties, and indicated that Inuit Qaujimajatuqangit would continue to inform Project planning, alternatives evaluation, effects assessment, mitigation, monitoring and follow-up.
- NNC acknowledged potential effects on Arctic char, Baffin Island caribou, harvesting, access and food security and indicated that these pathways would be further evaluated through aquatic, terrestrial and socio-economic assessment programs.
- NNC acknowledged the potential for reservoir inundation to affect methylmercury exposure through country foods and indicated that baseline tissue, soil and water sampling would continue, with the need and scope of any human health risk assessment to be determined in consultation with Health Canada.
- NNC indicated that further assessment would evaluate cumulative and time-dependent effects and would characterize the magnitude, duration, geographic extent, reversibility and significance of potential effects, together with appropriate mitigation, monitoring and follow-up measures.

PROPONENT RESPONSE TO NIRB'S ADDITIONAL INFORMATION REQUEST

Following review of the Project Proposal, comments received during screening, and NNC's September 18, 2026, response, the NIRB determined that additional information was required to support completion of the screening assessment. On September 29, 2026, the NIRB requested additional clarification regarding Project scale, preliminary management and monitoring plans, reservoir operation and downstream flows, fish species, and management of the proposed all-season road and Inuit harvesting.

NNC provided its response on October 8, 2026. The response included:

- Additional information illustrating the physical scale of the proposed dam, including a comparison of the proposed dam length with the Iqaluit International Airport runway.
- Additional screening-level information on preliminary management and monitoring approaches. NNC indicated that management and monitoring plans would continue to be developed and refined for the appropriate stage of Project development, with construction-specific, operational, and closure-related plans to be developed as the Project advances.
- A preliminary approach to monitoring reservoir operations and downstream flows, including monitoring of reservoir water levels, turbine flows, minimum instream flow releases and/or bypass flows, and the use of monitoring results to inform potential operational adjustments. NNC also indicated that monitoring parameters, response thresholds and operating measures would continue to be developed through assessment, permitting and detailed design.
- Clarification that Arctic char are the only fish species identified to date within the river system and proposed reservoir. NNC noted that this does not establish the absence of other species or whether Arctic char within the system remain in freshwater or migrate to the sea.
- A conceptual approach to managing access to the proposed all-season road during construction and operations, including Inuit land-user and harvester access, potential changes in harvesting patterns, wildlife interactions, travel safety, and the incorporation of Inuit Qaujimajatuqangit into monitoring and adaptive management.
- NNC indicated that the road-access policy has not yet been established and that final arrangements would require further discussion with HTOs, Inuit land users, landowners and responsible authorities. NNC also indicated that species-specific wildlife thresholds and protocols, monitoring frequency and duration, response triggers, incident reporting, and other road-management details would continue to be developed as engagement, assessment and design advance.

PROPONENT COMMITMENTS

Within the various documents that comprise the Project Proposal, the Proponent has committed to the following:

- Continue baseline studies related to hydrology, fish and fish habitat, wildlife, permafrost, vegetation, archaeology, air quality, noise and socio-economic conditions.
- Continue engagement with potentially affected Inuit, the Amaruq Hunters and Trappers Association in Iqaluit and the Pangnirtung Hunters and Trappers Organization, QIA and other interested parties as Project design and assessment advance, and maintain records of issues raised, how they were considered and matters that remain outstanding.
- Refine Project design, mitigation, monitoring and adaptive-management measures as additional engineering, environmental, Inuit Qaujimajatuqangit and engagement information become available.
- Assess potential effects on Arctic char, fish habitat, downstream flows and aquatic connectivity through ongoing aquatic and hydrology studies, including consideration of construction, reservoir filling and operational conditions.
- Assess potential methylmercury and country-food exposure pathways associated with reservoir inundation, supported by ongoing tissue, soil and water sampling.
- Incorporate Inuit Qaujimajatuqangit and input from Inuit land users and HTOs into Project design, routing, seasonal timing, mitigation, monitoring and adaptive management.
- Develop Project-specific environmental and social management plans, including plans related to spill prevention and response, waste management, wildlife mitigation, water management, erosion and sediment control, community involvement, and closure and reclamation.
- Further develop the road-management framework through engagement, assessment and design, including responsibilities, monitoring frequency and duration, response triggers, incident reporting and a process for reviewing effectiveness with relevant parties.
- Monitor potential interactions between the all-season road, caribou and other wildlife using wildlife studies, Inuit knowledge, road-user observations and incident records, and develop species-specific thresholds and protocols as the Project advances.
- Consider potential changes in access and harvesting patterns associated with the all-season road and work with HTOs and relevant authorities to identify appropriate indicators, monitoring and response measures.

- Continue to evaluate cumulative effects and identify mitigation, monitoring, follow-up and adaptive-management measures as the Project advances.

Develop and update a Closure and Reclamation Plan informed by engineering assessments, environmental studies, regulatory requirements and engagement with rightsholders and stakeholders.

REGULATORY REQUIREMENTS

The following Acts, Regulations and Guidelines may apply to the Project and should be considered as Project planning, permitting and regulatory review advance:

1. The *Fisheries Act* (http://laws-lois.justice.gc.ca/eng/acts/F-14/index.html).
2. The *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (http://laws-lois.justice.gc.ca/eng/acts/n-28.8/).
3. The *Migratory Birds Convention Act* (http://laws-lois.justice.gc.ca/eng/acts/M-7.01/), the *Migratory Birds Regulations* (https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1035/index.html)
4. The *Species at Risk Act* (https://laws-lois.justice.gc.ca/eng/acts/s-15.3/.). Attached in **Appendix A** is a list of Species at Risk in Nunavut.
5. The *Wildlife Act (Nunavut)* and its corresponding regulations (http://www.canlii.org/en/nu/laws/stat/snu-2003-c-26/latest/snu-2003-c-26.html).
6. The *Nunavut Act* (http://laws-lois.justice.gc.ca/eng/acts/N-28.6/). The Proponent must comply with the proposed terms and conditions listed in the attached **Appendix B**.
7. The *Transportation of Dangerous Goods Act* (http://laws-lois.justice.gc.ca/eng/acts/t-19.01/) and the *Transportation of Dangerous Goods Regulations* (http://www.tc.gc.ca/eng/tdg/clear-tofc-211.htm).
8. The *Canadian Environmental Protection Act* (http://laws-lois.justice.gc.ca/eng/acts/C-15.31/).The Proponent is advised that the *Canadian Environmental Protection Act* lists calcium chloride (CaCl) as a toxic substance. The Proponent should assess alternatives to the use of CaCl as a drill additive, including biodegradable and non-toxic additives.
9. The *Storage Tank System for Petroleum Products and Allied Petroleum Products Regulations* (http://laws-lois.justice.gc.ca/eng/regulations/SOR-2008-197/FullText.html). The Proponent must identify their tank system to Environment and Climate Change Canada and installation of new systems must comply with the regulations' design requirements.
10. The *Aeronautics Act* (http://laws-lois.justice.gc.ca/eng/acts/A-2/) and the *Canadian Aviation Regulations* (https://www.tc.gc.ca/eng/acts-regulations/regulations-sor96-433.html).
11. The *Canadian Navigable Waters Act* (https://laws.justice.gc.ca/eng/acts/N-22/).
12. The *Territorial Quarrying Regulations* (http://www.canlii.org/en/ca/laws/regu/crc-c-1527/latest/crc-c-1527.html) or equivalent.
13. The *Explosives Act* (https://laws-lois.justice.gc.ca/eng/acts/e-17/) and *Explosives Regulations* (https://laws-lois.justice.gc.ca/eng/regulations/SOR-2013-211/index.html).
14. The *Guidelines for the use of Explosives in or near Canadian Fisheries Waters* (http://publications.gc.ca/site/eng/82558/publication.html).
15. The *Northern Land Use Guidelines, Volume 07: Pits and Quarries* (http://publications.gc.ca/site/eng/360991/publication.html).
16. Solid Waste Management for Northern and Remote Communities (Environment and Climate Change Canada, 2017) (https://www.canada.ca/en/environment-climate-

change/services/managing-reducing-waste/municipal-solid/environment/northern-remote-communities.html).

17. Environmental Guidelines for the Management of Contaminated Sites, Department of the Environment, Government of Nunavut, Revised December 2014 (https://www.gov.nu.ca/sites/default/files/contaminated_sites_remediation_2014.pdf).
18. Environmental Guidelines for the Management of Hazardous Waste, Government of Nunavut, Revised October 2010 (https://www.gov.nu.ca/sites/default/files/Guideline%20-%20General%20Management%20of%20Hazardous%20Waste%20%28revised%20Oct%202010%29_0.pdf).

ASSESSMENT OF THE PROJECT PROPOSAL IN ACCORDANCE WITH PART 3 OF *NUPPAA*

The comments received during the NIRB's assessment of the Project Proposal appeared to be premised on a central assumption that the NIRB's criteria for requiring a review under Article 12, Section 12.4.2(a) of the *Nunavut Agreement* and s. 89(1)(a) of the *NuPPAA* have been met based on:

1. The large scale of the Project Proposal
2. The novelty of the Project Proposal in Nunavut
3. The need for consultations with Inuit rights holders about the potential for effects on Inuit such as impacts on harvesting and land uses
4. Uncertainty in relation to the potential for interactions with caribou and potential induced effects associated with limited or open public access use of the road versus road use restricted to private access solely for construction and on-going maintenance of the Project Proposal

While the NIRB recognizes that considerable development and refinement of the Project Proposal is required if the Project Proposal advances through Nunavut's integrated regulatory system, the NIRB also recognizes that for most components of the project, this level of detail is not required for the NIRB to complete its screening and determination of whether a review is triggered. The uncertainty of potential interactions between wildlife and the road was clarified sufficiently for this screening level detail by the Proponent specifying it as a limited access road.

The NIRB has carefully considered whether the criteria necessary to trigger a review are present in relation to this Project Proposal in this context and determined the following:

- The NIRB has not previously assessed this type of hydroelectric development, however, the individual components, such as placement of a water dam, filling of a water reservoir, construction and operation of a power centre, transmission lines and service roads and associated quarries are activities that are routinely assessed by the NIRB and for which the potential for effects is well understood.
- The NIRB notes that although this Project Proposal is the first of its kind in Nunavut, there are similar hydroelectric generation facilities using similar well-established technology, impact mitigation, monitoring and adaptive management measures operating in the Canadian Arctic.

- No expressions of concern about the Project Proposal were received by the NIRB from members of the public during the screening process.

As set out in the detailed discussions and for the reasons provided below, and after completing a review of all the information received, taking into account the information provided by the Proponent and parties to date, considering the factors outlined in s. 90 of the *NuPPAA*, NIRB has concluded that the potential adverse ecosystemic and socio-economic impacts identified through the screening are sufficiently predictable and can be adequately mitigated if the Proponent adheres to the NIRB's recommended terms and conditions, monitoring and reporting requirements, adaptive management, continued engagement and terms and conditions resulting from subsequent regulatory processes, such as water licensing and fisheries permitting. Accordingly, the NIRB has determined that if the Project Proposal is carried out in compliance with the recommended terms and conditions it is unlikely to cause significant public concern requiring a Review.

Accordingly, pursuant to Article 12, Section 12.4.4(a) of the *Nunavut Agree*ment and s. 92(1)(a) of the NuPPAA, the Board has concluded that **a review of the Project is not required**, provided that the Project is carried out in accordance with the terms and conditions recommended by the Board and complies with all regulatory requirements.

Further, the Board's specific consideration and conclusions in relation to the factors set out in ss. 89 and 90 of the *NuPPAA* included the following:

1. The principal potential ecosystemic and socio-economic effects of the Project Proposal are sufficiently understood at the screening stage and the potential for effects can be addressed through the NIRB's recommended terms and conditions, monitoring and reporting requirements, adaptive management and subsequent regulatory processes.

2. Potential effects on wildlife habitat and Inuit harvest activities can be addressed through wildlife and road-management measures, continued engagement with Inuit land users and HTOs, monitoring and adaptive management.

3. Although concerns have been raised regarding potential Project effects, the comments received during the screening did not demonstrate that there was significant public concern with the Project Proposal necessary to trigger a NIRB review.

4. The Project Proposal does not involve technological innovations for which the effects are unknown; the remaining uncertainties relate primarily to site-specific environmental conditions, long-term operation and mitigation effectiveness which remain to be considered during the regulatory phase of project development.

5. Remaining Project Proposal details, including operational road-access arrangements, monitoring thresholds and some design and permitting matters, can continue to be refined during the regulatory phase, but did not prevent the Board from understanding the potential for effects at the screening stage.

6. Recognizing there is some uncertainty in relation to the extent and nature of caribou interactions with the road if it were to be used by the public, the NIRB has assessed the

Project Proposal on the basis that the road use will be restricted to limited access for construction and on-going maintenance of the Project Proposal (Operations). If the Proponent intends to change this use of the road, the NIRB requires notification of the change and such a change may require additional impact assessment by the Board.

7. The NIRB has developed robust recommended terms and conditions to prevent, manage, mitigate and monitor the Project Proposal, including mechanisms for reporting, adaptive management and notification of material changes to the Project scope or changes to road use, and monitoring for project effects.

8. In the development of the NIRB's recommended monitoring terms and conditions, the NIRB recognizes that under the provisions of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (s. 70(2)) and the *NuPPAA* s. 135(2), the Nunavut Water Board (NWB) may, following their water licensing process, specify terms and conditions that impose additional monitoring responsibilities on the NIRB or the Government of Canada if considered necessary by the NWB.

1. *The size of the geographic area, including the size of wildlife habitats, likely to be affected by the impacts.*

   The Project would involve a hydroelectric dam and reservoir of approximately 7,136 hectares, an approximately 66-kilometre all-season access road and associated transmission corridor, together with borrow and quarry areas, construction infrastructure and supporting facilities. Potential effects could extend beyond the direct Project footprint through changes to the Kuugaaluk River system and downstream aquatic conditions, wildlife movement, access and harvesting activities.

   In response to the NIRB's additional information request, NNC provided further information on the physical scale of the dam and clarified its conceptual approach to road access and harvesting. NNC indicated that a controlled-access approach is proposed during construction and that an access-management arrangement would be developed for operations. A decision on unrestricted public access has not been confirmed.

   The geographic extent of potential effects would vary by pathway, with direct effects concentrated within the reservoir and infrastructure corridors, while effects related to downstream aquatic conditions, wildlife movement, harvesting and access could extend beyond the immediate Project footprint.

2. *The ecosystemic sensitivity of that area.*

   The Project is located within a Low Arctic environment that includes aquatic habitat, tundra vegetation, continuous permafrost and habitat used by wildlife, including barren-ground caribou and migratory birds. Potential sensitivities identified during screening include changes to hydrology and water quality, fish and fish habitat, wildlife movement and habitat use, permafrost stability and terrain conditions.

NNC has acknowledged that the long Project life and changing climate require site-specific monitoring and adaptive management. Permafrost conditions, hydrological change and climate-related effects may influence Project infrastructure, downstream flow management and the effectiveness of mitigation over time. These matters would be addressed through Project-specific monitoring, adaptive management and subsequent regulatory processes.

3. *The historical, cultural and archaeological significance of that area.*

   The Project area is used for Inuit travel, harvesting and other land-based activities and includes areas of cultural and archaeological interest. The Project Proposal indicates that Inuit Qaujimajatuqangit has informed Project siting, routing, seasonal timing, wildlife and fish considerations and cultural protection, while archaeological and cultural-resource studies remain ongoing.

   NNC further indicated that further consultation would identify important routes, destinations, seasonal travel patterns and practical access needs, and that input from HTOs and Inuit land users would inform sensitive locations and periods, access arrangements, monitoring indicators and response measures.

4. *The size of the human and the animal populations likely to be affected by the impacts.*

   Potentially affected human populations include Inuit land users, harvesters and residents of Iqaluit and Pangnirtung, as well as other users of the Project area who may rely on associated wildlife, fish and country foods. Potentially affected animal populations include Baffin Island caribou, migratory birds and aquatic species, including Arctic char.

   NNC clarified that Arctic char are the only fish species identified to date within the river system and proposed reservoir, although the information does not establish the absence of other species or whether Arctic char remain in freshwater or migrate to the sea. NNC also indicated that potential changes in road access and harvesting patterns would be assessed and that wildlife monitoring would draw on wildlife studies, Inuit knowledge, road-user observations and incident records.

5. *The nature, magnitude and complexity of the impacts; the probability of the impacts occurring; the frequency and duration of the impacts; and the reversibility or irreversibility of the impacts.*

   The Project Proposal has the potential to result in both short-term construction effects and long-term operational effects. Potential effects identified during screening include changes to river flows and water quality, fish and fish habitat, wildlife movement and habitat use, permafrost and terrain stability, Inuit harvesting, access, travel and socio-economic conditions. Some construction-related effects may be temporary or reversible, while effects associated with reservoir inundation, long-term regulation of downstream flows, permanent infrastructure and changes in access may be longer lasting and less readily reversible.

   The additional information provided by NNC outlines a clearer conceptual approach to downstream-flow management, road access, wildlife management and adaptive management.

Some parameters would continue to be refined, including monitoring thresholds, species-specific wildlife protocols, final operational access arrangements and detailed operating measures.

The Board considers that the nature, duration and principal pathways of potential effects are sufficiently understood at the screening stage. Remaining details can be refined through the recommended terms and conditions, monitoring and reporting requirements, adaptive management and subsequent regulatory processes.

6. *The cumulative impacts that could result from the impacts of the project combined with those of any other project that has been carried out, is being carried out or is likely to be carried out.*

   The Project Proposal identifies potential cumulative interactions with transportation corridors, quarrying and granular-resource extraction, community growth and infrastructure, regional land use, climate-driven changes and other future infrastructure or renewable-energy development. Potential cumulative pathways include effects on surface-water conditions, wildlife movement, terrain stability, harvesting access, travel safety and country-food confidence.

   NNC has identified relevant cumulative-effect pathways and has indicated that monitoring would be used to compare observed conditions with predicted outcomes and Project-specific thresholds. Where conditions differ materially from expectations, mitigation or monitoring would be adjusted through adaptive management.

   The Board considers that the principal cumulative-effect pathways are sufficiently understood at the screening stage and can be addressed through the recommended wildlife, road, permafrost, country-food, community-engagement and annual-reporting requirements. Continued monitoring and engagement would allow cumulative trends and emerging issues to be identified over the life of the Project.

7. *Any other factor that the Board considers relevant to the assessment of the significance of impacts.*

   The Board notes that the additional information provided by NNC gives further detail on reservoir operation and monitoring, road access, wildlife management and Inuit harvesting. NNC has identified preliminary monitoring indicators, response measures and adaptive-management approaches.

   NNC has proposed controlled road access during construction and operations. Unrestricted public access during operations has not been confirmed. For the purposes of assessing effects on wildlife, harvesting and traditional land use, the Board has assessed the Project Proposal based on controlled or managed road access solely for construction and on-going maintenance. If the Proponent intends to allow unrestricted or limited public access to the road, the Proponent would be required to notify the NIRB and depending on the circumstances of that change in road use, the NIRB may require additional impact assessment of the proposed change.

Several operational details about road access would continue to be refined, including seasonal and wildlife-related access controls, species-specific wildlife thresholds and protocols, and arrangements for Inuit land-user and harvester access and passage. These matters can be addressed through the recommended Road Management Plan, Wildlife Mitigation and Monitoring Plan, community engagement requirements, annual reporting and adaptive management.

The NIRB has notes that although site-specific details will continue to be refined during the regulatory phase, when the scope of the road use assessed is limited to controlled or managed road access solely for construction and on-going maintenance, the Board was able to adequately assess the principal potential effects of this component of the Project Proposal at the screening stage. The Board has concluded that the recommended terms and conditions and monitoring requirements provide mechanisms to manage these effects and respond to changing conditions over the long operating life of the Project.

During the Board's screening and in the development of the recommended terms and conditions, the Board has identified that the following issues must be considered, and if applicable, addressed through recommended terms and conditions.

Ecosystem, wildlife habitat and Inuit harvesting activities:

Issue 1:	Freshwater, Fish and Fish Habitat
Potential Effects	The Project may affect freshwater, fish and fish habitat through reservoir inundation, changes to river flows and water levels, downstream flow conditions, water quality and ice conditions, sedimentation and erosion, watercourse crossings, and Project-related discharges. NNC confirmed that Arctic char are the only fish species identified to date within the Kuugaaluk River system and proposed reservoir. Other fish species identified in the Project Proposal have not been verified as present, and it has not yet been established whether Arctic char within the system remain in freshwater or migrate to the sea. DFO identified potential effects on spawning, rearing, migration, connectivity and overwintering habitat, Arctic char populations and downstream ecological linkages. DFO also noted that the available baseline information is insufficient to fully evaluate the scale and duration of potential effects on fish and fish habitat in the Kuugaaluk River and downstream.
Board Views	The Board considers freshwater, fish and fish habitat to be an important issue due to reservoir inundation and long-term regulation of the Kuugaaluk River, which could alter water levels, flow conditions, habitat availability and aquatic connectivity within the reservoir and downstream.

Issue 1:	Freshwater, Fish and Fish Habitat
	NNC has identified the principal aquatic effect pathways and has provided screening-level information on reservoir operation, downstream flow releases, fish and fish habitat, water quality, erosion and sediment control, and proposed monitoring and adaptive-management measures. Some information remains to be refined, including final reservoir operating rules, instream flow requirements, monitoring parameters and response thresholds, as well as the presence and movement of fish species within the system. The Board considers that these matters do not prevent the Board from understanding the principal potential effects at the screening stage and recognizes that these details will be considered in subsequent licensing and permitting processes such as the water licensing stage. The recommended terms and conditions would address the main construction-related aquatic pathways. In particular, the watercourse and waterbody conditions would require appropriate fish-screening for water withdrawals, limit disturbance to streambeds and banks, require erosion and sediment-control measures, and prohibit the deposit of fuel, chemicals, wastes or sediment into water bodies. These conditions would address risks associated with water withdrawal, sedimentation, erosion, spills, discharges and disturbance to aquatic habitat. Additional terms related to quarrying and ground disturbance would require setbacks from water bodies, erosion-control measures, avoidance of obstruction to natural drainage, and management of quarry materials that could result in acid rock drainage or metal leaching. These measures would further reduce potential effects on water quality and aquatic habitat associated with construction activities. Monitoring and reporting requirements would also provide a mechanism to verify the effectiveness of mitigation and allow further refinement as the Project advances. The Proponent would be required to report annually on Project activities, environmental monitoring results, mitigation measures and compliance with the Board's terms and conditions. Additional Project-specific aquatic monitoring requirements can be refined through the Nunavut Water Board licensing process and Fisheries and Oceans Canada's regulatory processes as detailed design and baseline information advance. The Board therefore considers that the principal potential effects on freshwater, fish and fish habitat are sufficiently predictable at the screening stage and can be addressed through the recommended terms

Issue 1:	Freshwater, Fish and Fish Habitat
	and conditions, monitoring, adaptive management and subsequent regulatory processes.
Noted Traditional Knowledge or Inuit Qaujimaningit	The Project Proposal indicates that Inuit knowledge has informed understanding of Arctic char movement, overwintering areas, ice conditions and harvesting locations, as well as consideration of instream flow requirements and aquatic monitoring.
Recommended Measures	**Terms and conditions:** General:1–5 Watercourses/Water Bodies:6–9 Waste Management:10 Fuel and Chemical Storage:11–20 Road and Ground Disturbance:47–49 Aggregate Removal / Quarries: 50–56 Stripping and Trenching: 57–58 Land Use and Restoration:59–63 **Monitoring and Reporting:** Annual Report – Requirement 9 Spill Contingency Plan: Requirements 10 –11

Issue 2:	Wildlife, Wildlife Habitat and Inuit Harvesting
Potential Effects	The Project may affect wildlife and wildlife habitat through reservoir inundation, construction and operation of the access road and transmission corridor, noise, traffic, aircraft activity, habitat disturbance and increased human access. Potential effects include disturbance to Baffin Island caribou and other wildlife, changes to wildlife movement and habitat use, increased access to harvesting areas and potential increased harvesting pressure. The GN identified potential effects on Arctic char, Baffin Island caribou, harvesting activities, access and food security. QIA similarly identified potential effects on wildlife habitat and movement, harvesting, travel and access.
Board Views	The Board considers the proposed all-season road and transmission corridor to be important Project components because they may result in direct habitat disturbance and indirect effects associated with increased access, wildlife disturbance and harvesting pressure. NNC has identified the principal wildlife and harvesting pathways and has provided a conceptual approach to road-access management, wildlife monitoring, Inuit land-user access and adaptive management. The Project Proposal also indicates that Inuit Qaujimajatuqangit has informed road and transmission routing, identification of caribou movement corridors, seasonal timing and wildlife monitoring.

Issue 2:	Wildlife, Wildlife Habitat and Inuit Harvesting
	Some information remains to be refined, including the final road-access policy, seasonal or temporary access restrictions, measures to address increased harvesting pressure, and species-specific wildlife thresholds and response protocols. The Board considers that these matters do not prevent the Board from understanding the principal potential effects at the screening stage. The recommended terms and conditions would address the main wildlife and harvesting pathways by requiring wildlife right-of-way on Project roads, safe vehicle speeds, engagement with the Amaruq Hunters and Trappers Association in Iqaluit and the Pangnirtung Hunters and Trappers Organization regarding wildlife crossings, protection of known caribou movement routes, and suspension or modification of Project activities where necessary to avoid interference with caribou movement or sensitive wildlife periods. The recommended Wildlife Mitigation and Monitoring Plan would require species-specific sensitive periods and areas, mitigation and adaptive-management triggers, and refinement of measures based on monitoring results, changes in road use, Inuit Qaujimajatuqangit and updated scientific information. The Road Management Plan would further require monitoring of project and non-project traffic, speed controls, potential road closures and measures to maintain wildlife movement across the road. Annual reporting would provide a mechanism to track wildlife observations, instances where Project activities are modified because of wildlife, mitigation effectiveness, road use, community use of the area and Inuit land-use interactions. This would allow the Board to evaluate whether mitigation and adaptive-management measures remain effective as the Project advances. The Board therefore considers that the principal potential effects on wildlife, wildlife habitat and Inuit harvesting are sufficiently predictable at the screening stage and can be addressed through the recommended terms and conditions, monitoring, adaptive management and continued engagement.
<u>Noted Traditional Knowledge or Inuit Qaujimaningit</u>	The Project Proposal indicates that Elders and harvesters identified known caribou movement corridors, traditional water crossings, unstable snow and ice conditions, harvesting areas and culturally important landforms. The Proponent states that this information has influenced road and transmission routing, seasonal timing and wildlife monitoring

Issue 2:	Wildlife, Wildlife Habitat and Inuit Harvesting
Recommended Measures	**Terms and Conditions:** General:1–5 Wildlife – General:25–27 Road Management:28–31 Migratory Birds and Raptors:32–33 Aircraft Flight Restrictions:34–39 Caribou and Muskoxen Disturbance:40–46 Road and Ground Disturbance:47–49, Other:69–71 **Monitoring and Reporting**: Wildlife Mitigation and Monitoring Plan: Requirement 1 Road Management Plan: Requirement 2 Annual Report: Requirement 9

Issue 3:	Land, Permafrost and Geotechnical Conditions
Potential Effects	The Project may affect land, soils, permafrost and terrain through reservoir inundation, dam construction, access-road and transmission-line development, borrow and quarry activities, drainage changes and other ground disturbance. The Project Proposal identifies potential interactions with thaw-sensitive soils and ice-rich permafrost, including localized thaw settlement, erosion, slumping, altered drainage and implications for long-term infrastructure performance. NRCan also identified matters related to permafrost, geotechnical conditions, seismic hazards, slope instability and long-term infrastructure stability.
Board Views	The Board considers permafrost and geotechnical conditions to be important because they are relevant both to potential environmental effects and to the long-term stability of major Project infrastructure in a continuous-permafrost environment. NNC has identified the principal permafrost and geotechnical issues and has provided screening-level information on ongoing geotechnical investigations, foundation conditions, slope stability, material suitability, ground temperature, ice content, active-layer conditions and terrain sensitivity. Some information would continue to be refined through detailed engineering, including thermal design criteria, foundation treatments, road embankment design and site-specific monitoring. The Board considers that these matters do not prevent the Board from understanding the principal effect pathways at the screening stage.

Issue 3:	Land, Permafrost and Geotechnical Conditions
	The recommended terms and conditions would address the land and terrain disturbance pathways by requiring Project activities to avoid unnecessary ground disturbance, suspend vehicle movement where rutting or gouging occurs, maintain natural drainage, avoid erosion-prone slopes, manage quarry and borrow activities, and restore disturbed areas to a stable condition following completion of activities. Project-specific quarry management requirements would further require site-specific plans before development of quarry or borrow areas, including testing and management of potential acid rock drainage or metal leaching. An Abandonment and Restoration Plan would provide for restoration and reclamation of disturbed areas as the Project advances. The recommended Permafrost and Geotechnical Monitoring Plan would require the Proponent to identify ice-rich, thaw-sensitive and otherwise unstable terrain; monitor ground temperature, active-layer conditions, settlement, deformation, erosion, slope stability and drainage changes; and establish thresholds or indicators that would trigger further investigation, mitigation or adaptive-management measures. The Plan would also require monitoring of major Project components, including the dam, all-season access road, transmission-line infrastructure, quarry and borrow areas, and other major foundations or earthworks. Annual reporting would provide the Board with information on construction activities, modifications to Project infrastructure, progressive reclamation and compliance with the Board's terms and conditions, allowing the effectiveness of mitigation measures to be tracked over time. The Board therefore considers that the principal potential effects on land, permafrost and terrain are sufficiently predictable at the screening stage and can be addressed through appropriate design, the recommended terms and conditions, monitoring, adaptive management and subsequent regulatory and engineering processes.
Noted Traditional Knowledge or Inuit Qaujimaningit:	The Project Proposal indicates that Inuit knowledge has identified traditional water crossings, unstable snow and ice conditions, travel routes and culturally important landforms, and that this information has influenced routing and access planning
Recommended Measures	**Terms and Conditions:** General: 1–5 Road and Ground Disturbance: 47–49 Aggregate Removal within Existing and New Quarries: 50–56 Stripping and Trenching: 57–58

Issue 3:	Land, Permafrost and Geotechnical Conditions
	Land Use and Restoration of Disturbed Areas: 59–63 Camps: 64–65 **Monitoring and Reporting Requirements:** Quarry Management Plans: Requirements 4–5 Permafrost and Geotechnical Monitoring Plan: Requirement 6 Abandonment and Restoration Plan: Requirement 7 Annual Report: Requirement 9

Socio-economic effects on northerners:

Issue 4:	Human Health, Country Foods, Cultural and Socio-economic Effects
Potential Effects	The Project may affect human health, country foods, cultural values and socio-economic conditions through reservoir inundation, changes to fish and wildlife, increased access, construction activity, workforce demands, and changes in harvesting and land use. Health Canada identified potential methylmercury exposure through country foods associated with reservoir inundation. NNC has acknowledged this pathway and indicated that tissue, soil and water sampling is underway and that the need and scope for any human health risk assessment will be determined as the assessment advances. The Project Proposal also identifies potential effects related to harvesting, land use, travel safety, cultural and archaeological resources, employment, training, accommodation, local business opportunities and community well-being. These socio-economic studies remain under development.
Board Views	The Board considers potential effects on human health, country foods, cultural values and socio-economic conditions to be interconnected because changes to fish, wildlife, access and harvesting may also affect country-food use, travel, cultural practices and community well-being. NNC has identified the principal human-health, country-food, cultural and socio-economic effect pathways and has provided screening-level information on ongoing studies, mitigation, monitoring and engagement. This includes tissue, soil and water sampling related to methylmercury and country-food exposure, as well as ongoing consideration of harvesting, land use, travel, community well-being and socio-economic conditions. Some information would continue to be refined, including the need for, and scope of any human health risk assessment, socio-economic management measures, accommodation strategies, community communication procedures and monitoring commitments. The Board

Issue 4:	Human Health, Country Foods, Cultural and Socio-economic Effects
	considers that these matters do not prevent the Board from understanding the principal effect pathways at the screening stage. The recommended terms and conditions would address several of the principal pathways by requiring continued engagement with local residents and Inuit knowledge holders, protection of Inuit wildlife harvesting and traditional land use, management of road access and wildlife interactions, protection of archaeological and cultural resources, and consideration of local hiring and services. The recommended Wildlife Mitigation and Monitoring Plan and Road Management Plan would provide mechanisms to track changes in wildlife movement, road use, harvesting access and interactions between Project and non-project traffic. Annual reporting would further require information on community consultations, traditional land use and harvesting interactions, wildlife observations, road use, local employment and mitigation measures, allowing potential socio-economic and harvesting effects to be tracked over time. With respect to country foods and human health, the Board considers that ongoing baseline and follow-up monitoring of fish tissue, water and other relevant environmental media would provide a mechanism to assess potential changes in methylmercury and country-food exposure as reservoir design and operations are refined. Where monitoring identifies a potential increase in exposure or human-health risk, the recommended monitoring requirement would require further assessment, including a human health risk assessment where warranted, together with appropriate mitigation, monitoring, communication and follow-up measures in consultation with relevant authorities and affected communities. The Board therefore considers that the principal potential effects on human health, country foods, cultural values and socio-economic conditions are sufficiently understood at the screening stage and can be addressed through the recommended terms and conditions, monitoring, adaptive management and continued engagement.
Noted Traditional Knowledge or Inuit Qaujimaningit	The Project Proposal indicates that Inuit knowledge has identified harvesting areas, travel routes, culturally important places, archaeological areas, country-food concerns and travel-safety considerations. NNC states that this information has influenced Project siting, routing, seasonal timing, cultural protection measures and monitoring.
Recommended Measures	**Terms and Conditions:** General: 1–5 Wildlife – General: 25–27

Issue 4:	Human Health, Country Foods, Cultural and Socio-economic Effects
	Road Management: 28–31 Heritage Sites: 66–68 Other: 69–71 **Monitoring and Reporting Requirements**: Wildlife Mitigation and Monitoring Plan: Requirement 1 Road Management Plan: Requirement 2 Community Consultation Report: Requirement 8 Annual Report: Requirement 9

Issue 5:	Cumulative Effects and Long-term Project Effects
Potential Effects	The Project may contribute to cumulative effects through its interaction with transportation corridors, quarry and borrow development, community growth and infrastructure, regional land use, harvesting and travel routes, other future development, and climate-driven changes. The Project Proposal identifies potential cumulative pathways related to water quality and flow, fish and fish habitat, wildlife movement, permafrost and terrain stability, harvesting access, travel safety, country-food confidence and socio-economic well-being. The Project would also operate over several decades, with permanent civil infrastructure expected to remain in place for a much longer period. NNC has acknowledged that the long Project life and changing climate create uncertainty that must be addressed through site-specific assessment, monitoring and adaptive management.
Board Views	The Board considers cumulative and long-term effects to be important because Project-related changes to hydrology, wildlife movement, access, terrain, harvesting and country-food use may interact with other activities and climate-driven changes over the long operating life of the Project. NNC has completed a screening-level cumulative-effects assessment and has identified relevant activities and pathways, including transportation corridors, quarry and borrow development, community growth and infrastructure, regional land use, harvesting and travel routes, other future development and climate-driven changes. Some aspects of the cumulative-effects assessment would continue to be refined, including regional boundaries, indicators, thresholds and the interaction of Project effects with future activities. The Board considers that these matters do not prevent the Board from understanding the principal cumulative-effect pathways at the screening stage.

Issue 5:	Cumulative Effects and Long-term Project Effects
	The recommended terms and conditions and monitoring requirements would provide mechanisms to identify and respond to changes over time. In particular, the Wildlife Mitigation and Monitoring Plan would require consideration of long-term trends and cumulative effects and allow measures to be refined in response to changes in road use, monitoring results, Inuit Qaujimajatuqangit, updated scientific information and changing climatic conditions. The Road Management Plan would require monitoring of both Project and non-Project traffic and provide for traffic controls, wildlife-related operational restrictions and potential road closures. This would allow effects associated with changing road use and wildlife interactions to be identified and managed as the Project advances. The Permafrost and Geotechnical Monitoring Plan would provide a mechanism to identify long-term changes in ground temperature, active-layer conditions, settlement, erosion, slope stability and drainage and to trigger further investigation, mitigation or adaptive-management measures where necessary. Country-food and human-health monitoring would similarly provide a mechanism to identify potential changes in methylmercury and country-food exposure associated with reservoir inundation and operation and require further assessment and mitigation where warranted. Annual reporting would bring together information on Project activities, community engagement, harvesting and traditional land use, wildlife monitoring, road use, mitigation effectiveness and compliance with the Board's terms and conditions, allowing the Board to consider emerging trends and the effectiveness of mitigation over time. The Board therefore considers that the principal cumulative and long-term effect pathways are sufficiently understood at the screening stage and can be addressed through the recommended terms and conditions, long-term monitoring, adaptive management, continued engagement and subsequent regulatory processes.
Noted Traditional Knowledge or Inuit Qaujimaningit	The Project Proposal indicates that Inuit Qaujimajatuqangit and community knowledge would inform the selection of cumulative-effects boundaries, valued components and thresholds of concern, including consideration of overlapping land uses, harvesting areas, travel routes and cumulative pressures that may not be captured through scientific datasets.
Recommended Measures	**Terms and Conditions:** General: 1–5 Wildlife – General: 25–27 Road Management: 28–31

Issue 5:	Cumulative Effects and Long-term Project Effects
	Caribou and Muskoxen Disturbance: 40–46 Road and Ground Disturbance: 47–49 Aggregate Removal within Existing and New Quarries: 50–56 Land Use and Restoration of Disturbed Areas: 59–63 Other: 69–71 **Monitoring and Reporting Requirements:** Wildlife Mitigation and Monitoring Plan: Requirement 1 Road Management Plan: Requirement 2 Permafrost and Geotechnical Monitoring Plan: Requirement 6 Abandonment and Restoration Plan: Requirement 7 Community Consultation Report: Requirement 8 Annual Report: Requirement 9

Significant public concern:

Issue 6:	Public Concern
Potential Effects	Concerns have been raised in relation to the scale, duration and potential effects of the Project, including effects on fish and fish habitat, caribou and other wildlife, harvesting, access, food security, travel and land use. QIA indicated that significant public concern is likely and that additional community engagement is needed as Project design and effects information develops. QIA also requested that issues raised through engagement, how they were considered, and any outstanding concerns be documented. NNC acknowledged that further engagement is needed and committed to continued engagement with potentially affected Inuit, the Iqaluit and Pangnirtung Hunters and Trappers Organization, and other interested parties. The GN also identified potential effects on wildlife, harvesting activities, access and food security as matters that may be of significant public concern and noted that related concerns have been raised by local HTO members.
Board Views:	The Board considers public concern to be an important consideration because the concerns raised relate directly to potential Project effects on fish and fish habitat, caribou and other wildlife, harvesting, access, food security, travel and traditional land use. The Board notes that the comments received to date demonstrate that there may be public concern regarding the Project in relation to the specific effect pathways identified above. However, the comments received by the Board during the screening did not include comments from the public identifying significant public concerns in relation to the Project Proposal.

Issue 6:	Public Concern
	NNC has undertaken engagement and committed to continued engagement with potentially affected Inuit, the Amaruq Hunters and Trappers Association in Iqaluit and the Pangnirtung Hunters and Trappers Organization and other interested parties. NNC has also committed to maintaining records of issues raised, how they were considered and matters that remain outstanding as Project design, mitigation and monitoring are refined. The recommended terms and conditions and monitoring requirements would provide mechanisms to address the principal issues underlying the concerns raised, including wildlife and road management, Inuit harvesting and traditional land use, community engagement, country-food monitoring and annual reporting. In the absence of specific issues of public concern being expressed to the NIRB during the screening by the public or community organizations, the Board wanted to ensure that, if public concerns with the Project Proposal do arise that there the Proponent has a mechanism in place to continue to monitor, identify and address such concerns through ongoing engagement, reporting and adaptive management.
Noted Traditional Knowledge or Inuit Qaujimaningit	The Project Proposal indicates that Inuit Qaujimajatuqangit and community input have informed site selection, access routing, seasonal timing, fish and wildlife considerations, cultural values and monitoring. NNC also indicates that additional IQ and engagement will continue to inform Project design, mitigation, monitoring and effects assessment.
Recommended Measures	**Terms and Conditions:** General: 1–5 Wildlife – General: 25–27 Road Management: 28–31 Caribou: 40–46 Heritage Sites: 66–68 Other: 69–71 **Monitoring and Reporting Requirements:** Wildlife Mitigation and Monitoring Plan: Requirement 1 Road Management Plan: Requirement 2 Community Consultation Reporting: Requirement 8 Annual Report: Requirement 9

Technological innovations for which the effects are unknown:

As noted above, the Project Proposal does not propose to use technological innovations with unknown effects. The principal Project components, including the hydroelectric facility, dam,

reservoir, access road, transmission line, quarries and associated infrastructure, involve established technologies and construction methods that are well-known and well understood.

QIA and CIRNAC nevertheless identified uncertainty regarding the predictability and effectiveness of mitigation for the Project Proposal, specifically in an Arctic setting, and in relation to reservoir operation, downstream flows, fish and aquatic habitat, wildlife movement, permafrost and terrain conditions, and Inuit harvesting and socio-economic effects.

The Board considers that these uncertainties relate primarily to site-specific environmental conditions, long-term Project operation and the effectiveness of mitigation and monitoring but are not related to the use of novel or untested technologies. The Board notes that although a hydroelectric development of this type is new to Nunavut, the Board understands that there are similar hydroelectric developments operating in Canada's arctic. In the Board's view, as this Project Proposal proposes to use well-established hydroelectric generation technology, these concerns can be addressed through the implementation of the recommended terms and conditions, Project-specific monitoring plans, adaptive-management requirements and subsequent regulatory processes.

The Board therefore considers that the Project does not involve technological innovations for which the effects are unknown.

As illustrated above and further detailed in the regulatory framework guiding the NIRB in making its decisions, the Board considers that the potential adverse ecosystemic and socio-economic effects identified during screening are sufficiently understood and can be addressed through the recommended terms and conditions, monitoring and reporting requirements, adaptive management, continued engagement, and subsequent regulatory processes.

The Board therefore considers that the Project may proceed without a Review, subject to the terms and conditions recommended by the Board.

TERMS AND CONDITIONS

General

1. Nunavut Nukkiksautiit Corporation (the Proponent) shall maintain a copy of the Project Terms and Conditions at the site of operation at all times and make it accessible to enforcement officers upon request.
2. The Proponent shall operate in accordance with all commitments stated in correspondence provided to the Nunavut Planning Commission (NPC File No.: 151033) and the NIRB (Online Application Form, February 16, 2026; additional information, August 4, 2026). This information should be accessible to enforcement officers upon request.
3. The Proponent shall operate the site in accordance with all applicable Acts, Regulations and Guidelines.
4. The Proponent shall ensure that it meets the standards and/or limits as set out in the authorizing agencies' permits or licences as required for this project.

5. The Proponent shall ensure that all personnel, staff and contractors are adequately trained prior to commencement of all project activities, and shall be made aware of all operational plans, management plans, guidelines and Proponent commitments relating to the project.

Water courses/Water bodies (including fresh and marine waters)

6. The Proponent shall ensure any water intake hoses used for construction or domestic use not related to power generation are equipped with a screen of appropriate mesh size to ensure that there is no entrapment of fish. Small lakes or streams should not be used for water withdrawal unless authorized by the appropriate authorizing agency.
7. Unless included within the scope of the project proposal as assessed, the Proponent shall ensure that no additional disturbance of the stream bed, lakebed or the banks of any definable watercourse occurs.
8. The Proponent shall implement erosion and sediment suppression measures on all areas during all project activities in order to prevent sediment or fugitive dust from entering any water body or surrounding environment. Erosion prevention measures may include berms or silt fences.
9. The Proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes (including wastewater) or sediment into any water body. The Proponent should have in place an Emergency Spill Response Plan that is approved by the appropriate authorizing agency(ies).

Waste Management

10. The Proponent shall manage all hazardous and non-hazardous waste including food, domestic wastes, debris and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.

Fuel and Chemical Storage

11. The Proponent shall locate all fuel and other hazardous materials a minimum distance away from the high-water mark of any water body and environmentally sensitive areas as required by the appropriate authorizing agencies. The materials shall be stored in such a manner as to prevent their release into the environment.
12. The Proponent shall use adequate secondary containment or a surface liner (e.g., self-supporting insta-berms and fold-a-tanks) when storing barreled fuel and chemicals at all locations.
13. The Proponent shall ensure that re-fuelling of all equipment occurs a minimum distance away from the high-water mark of any water body as required by the appropriate authorizing agencies.
14. Fuel and hazardous material storage areas and fuel lines should be clearly marked with signs or flagging to avoid accidental breaks and punctures, and to ensure areas remain visible during the winter months.
15. All fuel and chemical storage containers must be clearly marked with the Proponent's name for ease of identification.
16. The Proponent shall routinely inspect and document the conditions of fuel and hazardous material storage containers and containment areas as required by the appropriate authorizing

agencies. Fuel containment areas shall be kept clear of debris, water and snow to facilitate inspections for leaks.

17. The Proponent shall have a Spill Contingency Plan in place at all fuel storage or transfer locations and shall ensure that appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) are readily available.
18. The Proponent shall follow the authorizing agencies' direction for management and removal of hazardous materials and wastes (e.g., contaminated soils, sediment and waste oil).
19. The Proponent shall ensure that wildlife deterrent systems are utilized at the time of a spill incident in order to avoid wildlife (terrestrial or marine) and migratory birds from being contaminated.
20. The Proponent shall ensure that all spills of fuel or other deleterious materials of 100 litres or more must be reported immediately to the 24-hour Spill Line at (867) 920-8130.

Air Quality

21. The Proponent shall take appropriate dust suppression measures in conducting all activities for this Project including using approved dust suppression additives and techniques as necessary to maintain ambient air quality.
22. The Proponent shall eliminate unnecessary idling to reduce greenhouse gas emissions as much as possible.

Noise

23. All construction and road vehicles must be fitted with standard and well-maintained noise suppression devices.
24. The Proponent shall design and implement noise mitigation measures necessary to prevent and manage noise associated with project activities, equipment, and components during construction and normal operations (e.g., use of noise barriers, acoustic insulation, exhaust silencers).

Wildlife – General

25. The Proponent shall not substantially alter, damage or destroy any wildlife habitat in conducting this operation unless authorized by the appropriate authorizing agencies.
26. The Proponent shall not chase, weary, harass or molest wildlife. This includes persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or disturbing large groups of animals.
27. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.

Road Management

28. The Proponent shall ensure that all wildlife have the right-of-way on any roads or trails. Vehicles are required to slow down or stop and wait to permit the free and unrestricted movement of wildlife across roads or trails at any location.

29. The Proponent shall enforce safe speed limits for vehicles travelling along the road to ensure drivers have sufficient time to react in a safe manner if wildlife are encountered on or adjacent to the road or trail.

30. The Proponent shall ensure that drivers maintain spacing appropriate for driving and road conditions, and speed limits, to ensure drivers have time to safely react to any wildlife on the road.

31. The Proponent shall engage with the Amaruq Hunters and Trappers Association in Iqaluit and the Pangnirtung Hunters and Trappers Organization, the Qikiqtani Inuit Association and other relevant community organizations to ensure that safety barriers, berms, and designed crossings associated with any project roads are constructed and operated to reflect Inuit Qaujimaningit and Community knowledge and ensure the safe passage of land users, caribou and other terrestrial wildlife.

Migratory Birds and Raptors Disturbance

32. The Proponent shall carry out all phases of the project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's *Avoidance Guidelines*. The Proponent's actions in applying the *Avoidance Guidelines* shall be in compliance with the *Migratory Birds Convention Act, 1994* and with the *Species at Risk Act*.

33. The Proponent shall not disturb or destroy the nests or eggs of any birds. If active nests of any birds are discovered or located (i.e., with eggs or young), the Proponent shall avoid these areas until nesting is complete and the young have naturally left the vicinity of the nest by establishing a protection buffer zone[1] appropriate for the species and the surrounding habitat.

Aircraft Flight Restrictions

34. The Proponent shall not alter flight paths to approach wildlife and avoid flying directly over animals.

35. The Proponent shall plan flight paths that minimize flights over known habitat likely to have birds or concentrations of wildlife. Aircraft should avoid critical and sensitive wildlife areas at all times by choosing alternate flight corridors.

36. The Proponent shall restrict aircraft/helicopter activity related to the project to a minimum flight altitude of 610 metres (2,100 ft) above ground level except during landing, take-off or if there is a specific requirement for low-level flying, which does not disturb wildlife or migratory birds.

37. The Proponent shall avoid known concentrations of birds (e.g., bird colonies, moulting areas) by a lateral distance of 1.5 kilometre. If avoidance is not possible maintain a minimum flight altitude of 1,100 metres (3,500 feet) over these areas.

1 Recommended setback distances to define buffer zones have been established by Environment and Climate Change Canada for different bird groups nesting in tundra habitat and can be found at www.ec.gc.ca/paom-itmb.

38. The Proponent shall ensure that aircraft/helicopter do not, unless for emergency, touch-down in areas where wildlife are present.

39. The Proponent shall advise all pilots of relevant flight restrictions and enforce their application over the project area, including flight paths to/from the project area.

Caribou and Muskoxen Disturbance

40. The Proponent shall avoid interfering with any paths or crossings known to be frequented by caribou during periods of migration as identified by current land use plans in place and/or by Inuit Qaujimaningit.

41. The Proponent shall not locate any operation or undertake activities that could block or cause any diversion to migration of caribou or muskoxen.

42. The Proponent shall implement mobile caribou conservation measures and immediately cease activities that may interfere with the migration or calving of caribou or muskox, until the caribou or muskox have passed.

43. The Proponent shall not construct or operate any camp, any fuel cache, nor conduct blasting within ten (10) kilometres of any designated caribou water crossings nor conduct drilling operations within five (5) kilometres of any designated caribou water crossings.

44. If pregnant caribou cows, cows with young calves, or groups of 50 or more caribou are observed within one (1) kilometer of project operations at any time, the Proponent shall suspend construction activities in the vicinity, low level overflights, drilling, blasting/trenching, use of the access road, use of snowmobiles and all terrain vehicles, until caribou are no longer within the one (1) kilometer radius.

45. During the period of May 15 to July 15, if caribou group(s) the Proponent shall suspend all operations and activities outside the immediate vicinity of the camps. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances, low-level over flights, blasting, and use of mobile equipment including snowmobiles and all terrain vehicles, and personnel walking within sight of the caribou group(s), until the caribou are no longer in the immediate area. Should the results of localized monitoring satisfy the land use inspector the project operations may resume without disturbing pregnant caribou cows or cows with young calves the suspension may be lifted for the periods specified.

46. During the period of April 14 to June 1 when muskoxen are present, the Proponent shall not approach muskoxen closer than one (1) kilometer. This includes all operations, including low-level over flights, blasting, and use of snowmobiles and all-terrain vehicles outside the immediate vicinity of the camps.

Road and Ground Disturbance

47. The Proponent shall not move any equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging. Overland travel of equipment or vehicles must be suspended if rutting occurs.

48. The Proponent shall ensure snowbank heights along the road/trail are managed to allow wildlife visibility and passage. Further, the Proponent shall ensure breaks are created along

snowbanks along the road/trail at regular intervals to allow for safe passage of caribou and other terrestrial wildlife.

49. The Proponent shall not move any equipment or vehicles without prior testing the thickness of the ice to ensure the lake, river or stream is in a state capable of fully supporting the equipment or vehicles.

Aggregate Removal within Existing and New Quarries

50. The Proponent shall not remove any material from below the ordinary highwater mark of any lake or stream except as necessary for construction of the project components included within the scope of the project proposal and shall maintain an undisturbed buffer zone as required by the appropriate authorizing agencies between quarry site and any high water mark of any water body to ensure erosion control.
51. The Proponent shall install silt fences/curtains down stream of any quarry activities.
52. The Proponent shall ensure there is no obstruction of natural drainage, flooding or channel diversion from quarry/pit access, stockpiles, or other structures or facilities unless authorized by the appropriate authorizing agencies.
53. The Proponent shall locate screening and crushing equipment on stable ground, at a location with ready access to stockpiles.
54. The Proponent shall clearly stake and flag pit and quarry boundaries, so they remain visible to other land users.
55. The Proponent shall locate quarry/pit facilities so as to avoid all recreational sites and public use areas, and to protect unique geographical features and natural aesthetics.
56. The Proponent shall identify if quarries may have material that may cause acid rock drainage (ARD) or metal leaching (ML) and shall avoid the use of this material. The Proponent shall have operational plans in place for the management and mitigation of ARD/ML should such material be encountered during construction and/or operations.

Stripping and Trenching

57. The Proponent shall not conduct any trenching activities within a minimum distance of the normal high-water mark of any water body unless authorized by the appropriate authorizing agency.
58. The Proponent shall pump accumulated water in blast trenches to a natural depression sump, with berms built if necessary. Water should be analyzed in accordance with the discharge criteria as set out by the appropriate authorizing agencies before discharging into the environment.

Land Use and Restoration of Disturbed Areas

59. The Proponent shall use existing trails where possible during project activities on the land.
60. The Proponent shall ensure that the land use area is kept clean and tidy at all times.
61. The Proponent shall avoid disturbance on slopes prone to natural erosion, and shall use alternative locations if such slopes are identified.

62. The Proponent shall remove all garbage, fuel and equipment at the end of each field season and/or upon completion of work and/or upon abandonment.

63. The Proponent shall ensure that all disturbed areas are restored to a stable or pre-disturbed state using Best Available Technology Economically Achievable (BATEA) upon completion of work and/or abandonment.

Camps

64. The Proponent shall ensure that all camps are located on durable surfaces, such as gravel or sand that is consolidated and can withstand repeated, heavy use. Measures shall be put in place to prevent erosion, trail formation and damage to the ground.

65. The Proponent shall not erect camps or store materials on the surface ice of lakes or streams, except that which is for immediate use.

Heritage Sites

66. The Proponent shall ensure that archaeological and paleontological sites are not purposely or inadvertently disturbed by clients or staff as a result of project activities.

67. The Proponent shall ensure that all clients and staff are aware of the Proponent's responsibilities and requirements regarding archaeological or palaeontological sites that are encountered during land-based activities. This should include briefings explaining the prohibitions regarding removal of artifacts, and defacing or writing on rocks and infrastructure.

68. No activities shall be conducted in the vicinity (50 metres buffer zone) of any archaeological/historical sites. If archaeological sites or features are encountered, activities shall immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Government of Nunavut-Department of Culture and Heritage.

Other

69. The Proponent should engage with local residents regarding planned activities in the area and should solicit available Inuit Qaujimaningit and information regarding current recreational and traditional usage of the project area which may inform project activities. Posting of translated public notices and direct engagement with potentially interested groups and individuals prior to undertaking project activities is strongly encouraged.

70. The Proponent shall ensure that project activities do not interfere with Inuit wildlife harvesting or traditional land use activities.

71. The Proponent should, to the extent possible, hire local people and access local services where possible.

Wildlife Mitigation and Monitoring Plan

1. 90 days prior to construction, the Proponent shall submit an updated Wildlife Mitigation and Monitoring Plan (WMMP) to the Nunavut Impact Review Board. The Proponent shall maintain the WMMPP throughout all phases of the Project. The plan shall include detailed monitoring, mitigation, and adaptive management measures for wildlife, and shall detail considerations for: species-specific sensitive wildlife periods and areas; activities known to affect wildlife; specific triggers for mitigation and adaptive management intervention; and implementation of all commitments made throughout the NIRB assessment of the Project Proposal. The Proponent shall demonstrate appropriate refinements to the WMMP's design throughout the life of the Project, as necessary to allow for the identification of long-term trends and cumulative effects where project interactions with wildlife are identified. Updates to the WMMP may be triggered by significant changes in project development plans including additional transmission lines, and service roads, changes in road use, monitoring results indicating biologically-meaningful changes, significant updates to the scientific understanding of management methods relevant to wildlife at the project site, Inuit Qaujimaningit, Traditional Knowledge, changes in climatic conditions that might subject wildlife to unexpected impacts, or as otherwise necessary.

Road Management Plan

2. The Proponent shall develop and implement a Road Management Plan. The Road Management Plan shall be provided to the Nunavut Impact Review Board (NIRB) 90 days prior to construction commencing. An annual summary of the monthly maximum, minimum and average traffic levels shall be provided to the NIRB in the Proponent's annual report. The Road Management Plan shall:

    a) consider traffic use during construction and operations, and monitoring of traffic use by both project and non-project vehicles;

    b) indicate dust control measures that may be necessary in all phases of the project;

    c) determine speed limits and other measures required to minimize dust generation and impacts on wildlife;

    d) identify operational constraints if wildlife are present, including potential road closures; and

    e) measures to reduce or eliminate impediments to land users and wildlife being able to cross roads during migration or other movements.

Air Quality Monitoring and Management Plan

3. The Proponent shall develop and implement an Air Quality Monitoring and Management Plan (AQMMP). The AQMMP shall be provided to the NIRB 90 days prior to construction commencing and shall:

a. include clear objectives and specify air quality monitoring thresholds that will trigger adaptive management responses and actions, specifically including dust generation and dust control;
b. In the implementation of the AQMMP, the Proponent shall demonstrate through active and passive monitoring of dustfall, for criteria air contaminant concentrations, and vegetation, soil and snow chemistry sampling, that dustfall, suspended particulate matter, and other chemicals remain within predicted levels and, where applicable, within levels or limits established by all applicable guidelines and regulations;
c. If exceedances occur, the Proponent shall provide an explanation for the exceedance, a description of planned mitigation, and shall conduct additional monitoring to evaluate the effectiveness of mitigative measures; and
d. The Proponent shall also develop, implement, and report on the quality assurance and quality control protocols used to ensure data reliability and proper functioning of equipment.

Quarry Management Plans

4. The Proponent shall develop site-specific quarry operation and management plans in advance of the development of any potential quarry site or borrow pit. The plan should be submitted to the Nunavut Impact Review Board and CIRNAC and the GN at least 30 days prior to the use of borrow or quarry sites for review. Information regarding the Proponent's fulfillment of this requirement and identifying any amendments to existing site-specific quarry operation and management plans shall be provided annually in the Proponent's annual report to the Nunavut Impact Review Board.
5. Any Quarry Management Plan shall include provisions for the testing and management of potential acid rock drainage or metal leaching from planned quarries.

Permafrost and Geotechnical Monitoring Plan

6. The Proponent shall develop and implement a Permafrost and Geotechnical Monitoring Plan for Project infrastructure located in areas of permafrost or terrain sensitivity. The Plan shall be provided to the Nunavut Impact Review Board prior to commencement of major construction activities and shall be updated, as appropriate, as detailed design and site-specific geotechnical information become available.

   At a minimum, the Plan shall:

   a. identify areas of ice-rich, thaw-sensitive or otherwise unstable terrain that may be affected by Project construction and operations;
   b. describe monitoring methods for ground temperature, active-layer conditions, settlement, deformation, erosion, slope stability and changes to surface drainage, as applicable;
   c. identify Project components requiring monitoring, including the dam and associated structures, all-season access road, transmission-line infrastructure, quarry and borrow areas, and other major foundations or earthworks;
   d. establish monitoring frequencies, thresholds or indicators that would trigger further investigation, mitigation or adaptive-management measures;

e. describe measures that may be implemented where monitoring identifies thaw settlement, erosion, slope instability, drainage alteration or other geotechnical concerns;
f. incorporate relevant results from ongoing geotechnical investigations, engineering studies, climate information and Inuit Qaujimajatuqangit, where applicable; and
g. include a summary of monitoring results, identified trends, corrective measures and any changes to mitigation or monitoring in the Proponent's annual report to the NIRB.

Abandonment and Restoration Plan

7. The Proponent develop an Abandonment and Restoration Plan capturing closure requirements and processes as well as temporary closure scenarios. A copy of this plan shall be provided to the Nunavut Impact Review Board, Crown Indigenous and Northern Affairs Canada and Government of Nunavut- Department of Environment prior to undertaking activities in the project area.

Community Consultation Report

8. The Proponent shall submit a Community Engagement Strategy Plan and a Public Consultation Report to the Nunavut Impact Review Board as follows:
    a. Community Engagement Strategy Plan must be provided prior to the commencement of construction and include:
        i. information about how the Proponent will inform and consult with potentially affected communities about the Project on an on-going basis through all stages of project development
        ii. information about how the Proponent will ensure any concerns identified during community engagement are recorded and addressed; and
        iii. specifying how potentially affected communities will be kept informed about monitoring results for the Project.

    b. Public Consultation Report must be provided as a component of the Annual Report and must include:
        i. copies of materials presented to community members during consultations;
        ii. a description of issues discussed and concerns raised; and
        iii. advice offered to the Proponent or knowledge shared with the Proponent, as well as any follow-up actions that were required or taken to address issues and concerns.

Annual Report

9. The Proponent shall submit a comprehensive annual report with copies provided to the Nunavut Impact Review Board by March 31st of each year of permitted activities through the construction period and through Operations. The Board notes this requirement may be updated closer to closure of the site which is not covered in the scope of approved works here-in.

    The annual report must contain at least the following information:

a) A summary of activities undertaken for the year, including:
   - any construction activities or modifications to existing project infrastructure
   - a description of local hires, contracting opportunities and initiatives;
   - flight altitudes, frequency of flights and anticipated flight routes, if applicable;
   - site photos;

b) A work plan for the following year during the construction period, including any progressive reclamation work undertaken;

c) A log of instances in which community residents occupy or transit through the project area for the purpose of traditional land use or harvesting. This log should include the location and number of people encountered, activity being undertaken (e.g., berry picking, fishing, hunting, camping, etc.), date and time; and any mitigation measures or adaptive management undertaken to prevent disturbance;

d) A discussion of issues related to wildlife and environmental monitoring, including the number of cease-work orders required as a result of proximity to caribou and any other wildlife;

e) A brief summary of WMMP results as well as any mitigation actions that were undertaken. In addition, the Proponent shall maintain a record of wildlife observations while operating within the project area and include it as part of the summary report. The summary report based on wildlife observations should include the following:
   1. Locations (i.e., latitude and longitude), species, number of animals, a description of the animal activity, and a description of the gender and age of animals if possible.
   2. Prior to conducting project activities, the Proponent should map the location of any sensitive wildlife sites such as denning sites, calving areas, caribou crossing sites, and raptor nests in the project area, and identify the timing of critical life history events (i.e., calving, mating, denning and nesting).
   3. Additionally, the Proponent should indicate potential impacts from the project, and ensure that operational activities are managed and modified to avoid impacts on wildlife and sensitive sites.

f) An analysis of the effectiveness of mitigation measures for wildlife;

g) A summary of Road Management Plan results including overall use (including project and non-project related traffic).

h) Summary of any heritage sites encountered during the construction activities, any follow-up action or reporting required as a result and how project activities were modified to mitigate impacts on the heritage sites;

i) Summary of Inuit land use in/near the project area that was identified by the Proponent, or that was brought to the Proponent's attention, and an explanation of how project activities were modified to mitigate the potential for impacts on Inuit land use; and

j) Any relevant studies, research or relevant baseline or monitoring of fish tissue, water and other relevant environmental media to assess potential changes in methylmercury and country-food exposure associated with reservoir inundation and operation. If this monitoring identifies a potential increase in exposure or human-health risk, the Proponent

shall undertake further assessment, including a human health risk assessment where warranted, and develop appropriate mitigation, communication and follow-up measures in consultation with relevant authorities and affected communities.

k) A summary of how the Proponent has complied with conditions contained within this Screening Decision, and all conditions as required by other authorizations associated with the project proposal.

Spill Contingency Plan

10. The Proponent shall update its Spill Contingency Plan to include the up to date emergency contact numbers for the Government of Nunavut-Department of Environment, Manager of Environmental Protection (867-975-7748) and Environment and Climate Change Canada, Enforcement Branch (867-975-4644).

11. The Proponent shall implement the recommendations found in the 2003 CCME Guidance Document PN 1326 entitled "*Environmental Code of Practice for Above Ground and Underground Storage Tank Systems containing Petroleum Product and Allied Petroleum Products*".

OTHER NIRB CONCERNS AND RECOMMENDATIONS

Change in Project Scope

1. Responsible authorities or the Proponent shall notify the Nunavut Planning Commission and the NIRB of any changes in operating plans or conditions, including phase advancement, significant change in physical size of project components, or changes in planned access or road use associated with this project prior to any such change.

Copy of licences, etc. to the Board and Commission

2. The NIRB respectfully requests that responsible authorities submit a copy of each licence, permit or other authorization issued for the Project to the NIRB to assist in enabling possible project monitoring that may be required. Please forward a copy of the licences, permits and/or other authorizations to the NIRB directly at info@nirb.ca or upload a copy to the NIRB's online registry at www.nirb.ca.

Use of Inuit Qaujimaningit

3. The Proponent is encouraged to work with local communities and knowledge holders to inform project design, to carry out the project, and to confirm or validate the perspectives represented in publications, film or other media produced as part of the project. Care should be taken to ensure that Inuit Qaujimaningit and local knowledge collected for the project is used with permission and is accurately represented.

Bear and Carnivore Safety

4. The Proponent should review the Government of Nunavut's booklet on Bear Safety, which can be downloaded from this link: http://gov.nu.ca/sites/default/files/bear_safety_-_reducing_bear-people_conflicts_in_nunavut.pdf. Further information on bear/carnivore detection and deterrent techniques can be found in the "*Safety in Grizzly and Black Bear Country*" pamphlet, which can be downloaded from this link:

https://www.enr.gov.nt.ca/sites/enr/files/resources/safety_in_grizzly_and_black_bear_country_english.pdf.

5. There are polar bear and grizzly bear safety resources available from the Bear Smart Society with videos on polar bear safety available in English, French and Inuktitut at http://www.bearsmart.com/play/safety-in-polar-bear-country/. Information can also be obtained from Parks Canada's website on bear safety at the following link: http://www.pc.gc.ca/eng/pn-np/nu/quttinirpaaq/visit/visit6/d.aspx or in reviewing the "*Safety in Polar Bear Country*" pamphlet, which can be downloaded from the following link: http://www.pc.gc.ca/eng/pn-np/nu/quttinirpaaq/visit/visit6/~/media/pn-np/nu/auyuittuq/pdf/shared/PolarBearSafety_English.ashx.
6. Any problem wildlife or any interaction with carnivores should be reported immediately to the local Government of Nunavut, Department of Environment Conservation Officer in Iqaluit at (867) 975-7788 or Pangnirtung at (867) 473-8937, as appropriate.

Species at Risk

7. The Proponent review Environment and Climate Change Canada's "Environment Assessment Best Practice Guide for Wildlife at Risk in Canada", available at the following link: http://www.sararegistry.gc.ca/virtual_sara/files/policies/EA%20Best%20Practices%202004.pdf. The guide provides information to the Proponent on what is required when Wildlife at Risk, including *Species at Risk*, are encountered or affected by the project.

Migratory Birds

8. The Proponent review Canadian Wildlife Services' "Key migratory bird terrestrial habitat sites in the Northwest Territories and Nunavut", available at the following link: http://publications.gc.ca/site/eng/317630/publication.html and "Key marine habitat sites for migratory birds in Nunavut and the Northwest Territories", available at the following link: http://publications.gc.ca/site/eng/392824/publication.html. The guide provides information to the Proponent on key terrestrial and marine habitat areas that are essential to the welfare of various migratory bird species in Canada.
9. For further information on how to protect migratory birds, their nests and eggs when planning or carrying out project activities, consult Environment and Climate Change Canada's Incidental Take web page and the fact sheet "Planning Ahead to Reduce the Risk of Detrimental Effects to Migratory Birds, and their Nests and Eggs" available at: http://publications.gc.ca/collections/collection_2013/ec/CW66-324-2013-eng.pdf.

Incineration of Wastes

10. The Proponent review Environment and Climate Change Canada's "Technical Document for Batch Waste Incineration", available at the following link: http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&n=F53EDE13-1. The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting.

Transport of Dangerous Goods and Waste Management

11. Environment and Climate Change Canada recommends that all hazardous wastes, including waste oil, receive proper treatment and disposal at an approved facility.

12. The Proponent shall ensure that proper shipping documents (waste manifests, transportation of dangerous goods, etc.) accompany all movements of dangerous goods. Further, the Proponent shall ensure that the shipment of all dangerous goods is registered with the Government of Nunavut Department of Environment, Department of Environment Manager. Contact the Manager (867) 975-7748 to obtain a manifest if dangerous goods including hazardous wastes will be transported.

13. The Proponent shall provide an authorization or letter of conformation of disposal be obtained from the owner/operator of the landfill to be used for disposal of project-related wastes.

Remotely Piloted Aircraft Systems, Unmanned Air Vehicles and Non-Recreational Drones

14. The Proponent should review Transport Canada's site on the rules for flying drones in Canada at https://www.tc.gc.ca/en/services/aviation/drone-safety/new-rules-drones.html.

Aircraft Identification

15. The Proponent shall provide the community of Iqaluit and Pangnirtung the planned helicopter activities, including photo(s) of the helicopter to be used, approximate flight paths, plans and times as available prior to commencement of activities to ensure community members are aware of the planned activities.

Winter Roads/Trails

16. If ice bridges are constructed, the Proponent follow the mitigation measures outlined in Fisheries and Oceans Canada's Operational Statement for Ice Bridges, available at the following internet address: http://www.dfo-mpo.gc.ca/pnw-ppe/fpp-ppp/guide-eng.html.

17. Cutting or filling of crossing approaches below the highwater mark will require prior review and approval by Fisheries and Oceans Canada - Fish Habitat Management Branch.

Caribou Management

18. Territorial and federal government agencies in Nunavut should work together with Regional Inuit Associations, co-management boards and industry to develop an action plan to identify and mitigate potential cumulative effects of human land use activities, including road traffic and use of the road by hunters from Iqaluit, on barren-ground caribou. This assessment of cumulative effects should occur at a regional scale (i.e., larger than individual project areas).

Crown Indigenous and Northern Affairs Canada, and Government of Nunavut

19. Crown Indigenous and Northern Affairs Canada (CIRNAC) and the Government of Nunavut (GN) following devolution, impose mitigation measures, conditions and monitoring requirements pursuant to the Federal Land Use Permit, which require the Proponent to respect the sensitivities and importance of the area. These mitigation measures, conditions and monitoring requirements should be in regard to the location and area; type, location, capacity and operation of facilities; use, storage, handling and disposal of chemical or toxic material; wildlife and fisheries habitat; and petroleum fuel storage.

20. CIRNAC and the GN consider the importance of conducting regular Land Use Inspections, pursuant to the authority of the Federal Land Use Permit, while the project is in operation. The Land Use Inspections should be focused on ensuring the Proponent is in compliance with the conditions imposed through the Federal Land Use Permit.

21. CIRNAC and the GN forward to the NIRB copies of any decisions by Inspectors which allow project activities to continue in areas of caribou presence between dates indicating work stoppages are necessary (exemptions from Caribou Protection Measures).
22. It is recommended to CIRNAC and the GN that no extension be issued to the Land Use Permit until the Annual Report and Public Consultation Report are received.

CONCLUSION

The foregoing constitutes the Board's screening decision with respect to Nunavut Nukkiksautiit Corporation's "Iqaluit Nukkiksautiit Project" project proposal, NIRB File No. 26UN010, Application No: www.nirb.ca/project/126346. The NIRB remains available for consultation with the Minister regarding this report as necessary.

Dated November 4, 2026 at Iqaluit, NU.



Albert Ehaloak, Chairperson

Attachments: Appendix A: Species at Risk in Nunavut
Appendix B: Archaeological and Palaeontological Resources Terms and Conditions for Land Use Permit Holders

APPENDIX A: SPECIES AT RISK IN NUNAVUT

Due to the requirements of Section 79(2) of the *Species at Risk Act*, S.C. 2002, c. 29 *(SARA)*, and the potential for project-specific adverse effects on listed wildlife species and its critical habitat, measures should be taken as appropriate to avoid or lessen those effects, and the effects need to be monitored. Project effects could include species disturbance, attraction to operations and destruction of habitat. This section applies to all species listed on Schedule 1 of *SARA*, as listed in the table below, or have been assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), which may be encountered in the project area. This list may not include all species identified as at risk by the Territorial Government. The following points provide clarification on the applicability of the species outlined in the table.

- Schedule 1 is the official legal list of Species at Risk for *SARA*. *SARA* applies to all species on Schedule 1. The term "listed" species refers to species on Schedule 1.
- Schedule 2 and 3 of *SARA* identify species that were designated at risk by the COSEWIC prior to October 1999 and must be reassessed using revised criteria before they can be considered for addition to Schedule 1.
- Some species identified at risk by COSEWIC are "pending" addition to Schedule 1 of *SARA*. These species are under consideration for addition to Schedule 1, subject to further consultation or assessment.

If species at risk are encountered or affected, the primary mitigation measure should be avoidance. The Proponent should avoid contact with or disturbance to each species, its habitat and/or its residence. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk Registry at http://www.sararegistry.gc.ca for information on specific species.

Monitoring should be undertaken by the Proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested.

For species primarily managed by the Territorial Government, the Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize effects to these species from the project.

Mitigation and monitoring measures must be undertaken in a way that is consistent with applicable recovery strategies and action/management plans.

Schedules of *SARA* are amended on a regular basis, so it is important to check the *SARA* registry (www.sararegistry.gc.ca) to get the current status of a species.

Updated: September 2024

Terrestrial Species at Risk[2]	COSEWIC Designation	Schedule of *SARA*	Government Organization with Primary Management Responsibility[3]
Buff-breasted Sandpiper	Special Concern	Schedule 1	Environment and Climate Change Canada (ECCC)
Common Nighthawk	Threatened	Schedule 1	ECCC
Eskimo Curlew	Endangered	Schedule 1	ECCC
Harlequin Duck	Special Concern	Schedule 1	ECCC
Harris's Sparrow	Special Concern	Schedule 1	ECCC
Horned Grebe	Special Concern	Schedule 1	ECCC
Ivory Gull	Endangered	Schedule 1	ECCC
Olive-sided Flycatcher	Threatened	Schedule 1	ECCC
Peregrine Falcon	Special Concern	Schedule 1	ECCC
Red Knot Islandica Subspecies	Special Concern	Schedule 1	ECCC
Red-necked Phalarope	Special Concern	Schedule 1	ECCC
Ross's Gull	Threatened	Schedule 1	ECCC
Rusty Blackbird	Special Concern	Schedule 1	ECCC
Short-eared Owl	Special Concern	Schedule 1	ECCC
Porsild's Bryum	Threatened	Schedule 1	Government of Nunavut (GN)
Transverse Lady Beetle	Special Concern	No Schedule	GN
Caribou (Dolphin and Union Population)	Endangered	Schedule 1	GN
Caribou (Barren-ground Population)	Threatened	No Schedule	GN
Caribou (Torngat Mountains Population)	Endangered	No Schedule	GN
Grizzly Bear (Western Population)	Special Concern	Schedule 1	ECCC
Peary Caribou	Endangered	Schedule 1	GN
Polar Bear	Special Concern	Schedule 1	ECCC
Wolverine	Special Concern	Schedule 1	GN
Atlantic Walrus (High Arctic Population)	Special Concern	No Schedule	Fisheries and Oceans Canada (DFO)
Atlantic Walrus (Central/Low Arctic Population)	Special Concern	No Schedule	DFO
Beluga Whale (Cumberland Sound Population)	Threatened	Schedule 1	DFO
Beluga Whale (Eastern Hudson Bay Population)	Endangered	No Schedule	DFO
Beluga Whale (Eastern High Arctic-Baffin Bay Population)	Special Concern	No Schedule	DFO
Beluga Whale (Western Hudson Bay Population)	Special Concern	No Schedule	DFO
Atlantic Cod (Arctic Lakes Population)	Special Concern	No Schedule	DFO
Fourhorn Sculpin (Freshwater Form)	Data Deficient	Schedule 3	DFO
Lumpfish	Threatened	No Schedule	DFO
Thorny Skate	Special Concern	No Schedule	DFO

2 The Department of Fisheries and Oceans has responsibility for aquatic species.

3 Environment and Climate Change Canada (ECCC) has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the Migratory Birds Convention Act (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of the Territorial Government. Populations that exist in National Parks are also managed under the authority of the Parks Canada Agency.

APPENDIX B: ARCHAEOLOGICAL AND PALAEONTOLOGICAL RESOURCES TERMS AND CONDITIONS FOR LAND USE PERMIT HOLDERS

INTRODUCTION

The Department of Culture and Heritage (CH) routinely reviews land use applications sent to the Nunavut Water Board, Nunavut Impact Review Board and the Indigenous and Northern Affairs Canada. These terms and conditions provide general direction to the permittee/proponent regarding the appropriate actions to be taken to ensure the permittee/proponent carries out its role in the protection of Nunavut's archaeological and palaeontological resources.

TERMS AND CONDITIONS

1) The permittee/proponent shall have a professional archaeologist and/or palaeontologist perform the following **Functions** associated with the **Types of Development** listed below or similar development activities:

	Types of Development (See Guidelines below)	**Function** (See Guidelines below)
a)	Large scale prospecting	Archaeological/Palaeontological Overview Assessment
b)	Diamond drilling for exploration or geotechnical purpose or planning of linear disturbances	Archaeological/Palaeontological Overview Assessment and/or Inventory and Documentation and/or Mitigation
c)	Construction of linear disturbances, Extractive disturbances, Impounding disturbances and other land disturbance activities	Archaeological/Palaeontological Overview Assessment and/or Inventory and Documentation and/or Mitigation

Note that the above-mentioned functions require either a Nunavut Archaeologist Permit or a Nunavut Palaeontologist Permit. CH is authorized by way of the *Nunavut and Archaeological and Palaeontological Site Regulations*[4] to issue such permits.

[4] P.C. 2001-1111 14 June, 2001

2) The permittee/proponent shall not operate any vehicle over a known or suspected archaeological or palaeontological site.
3) The permittee/proponent shall not remove, disturb, or displace any archaeological artifact or site, or any fossil or palaeontological site.
4) The permittee/proponent shall immediately contact CH at (867) 934-2046 or (867) 975-5500 should an archaeological site or specimen, or a palaeontological site or fossil, be encountered or disturbed by any land use activity.
5) The permittee/proponent shall immediately cease any activity that disturbs an archaeological or palaeontological site encountered during the course of a land use operation until permitted to proceed with the authorization of CH.
6) The permittee/proponent shall follow the direction of CH in restoring disturbed archaeological or palaeontological sites to an acceptable condition. If these conditions are attached to either a Class A or B Permit under the Territorial Lands Act Indigenous and Northern Affairs Canada directions will also be followed.
7) The permittee/proponent shall provide all information requested by CH concerning all archaeological sites or artifacts and all palaeontological sites and fossils encountered in the course of any land use activity.
8) The permittee/proponent shall make best efforts to ensure that all persons working under its authority are aware of these conditions concerning archaeological sites and artifacts and palaeontological sites and fossils.
9) If a list of recorded archaeological and/or palaeontological sites is provided to the permittee/proponent by CH as part of the review of the land use application the permittee/proponent shall avoid the archaeological and/or palaeontological sites listed.
10) Should a list of recorded sites be provided to the permittee/proponent, the information is provided solely for the purpose of the proponent's land use activities as described in the land use application, and must otherwise be treated confidentially by the proponent.

LEGAL FRAMEWORK

As stated in Article 33 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (*Nunavut Agreement*):

Where an application is made for a land use permit in the Nunavut Settlement Area, and there are reasonable grounds to believe that there could be sites of archaeological importance on the lands affected, no land use permit shall be issued without written consent of the Designated Agency. Such consent shall not be unreasonably withheld. [33.5.12]

Each land use permit referred to in Section 33.5.12 shall specify the plans and methods of archeological site protection and restoration to be followed by the permit holder, and any other conditions the Designated Agency may deem fit. [33.5.13]

Palaeontology and Archaeology
Under the *Nunavut Act*[5], the federal government can make regulations for the protection, care and preservation of palaeontological and archaeological sites and specimens in Nunavut. Under the *Nunavut Archaeological and Palaeontological Sites Regulations*[6], it is illegal to alter or disturb any palaeontological or archaeological site in Nunavut unless permission is first granted through the permitting process.

Definitions
As defined in the *Nunavut Archaeological and Palaeontological Sites Regulations*, the following definitions apply:

> *"archaeological site" means a place where an archaeological artifact is found.*
>
> *"archaeological artifact" means any tangible evidence of human activity that is more than 50 years old and in respect of which an unbroken chain of possession or regular pattern of usage cannot be demonstrated, and includes a Denesuline archaeological specimen referred to in section 40.4.9 of the Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement).*
>
> *"palaeontological site" means a site where a fossil is found.*
>
> *"fossil" includes:*
> *Fossil means the hardened or preserved remains or impression of previously living organisms or vegetation and includes:*
> *(a) natural casts;*
> *(b) preserved tracks, coprolites and plant remains; and*
> *(c) the preserved shells and exoskeletons of invertebrates and the preserved eggs, teeth and bones of vertebrates.*

Guidelines for Developers for the Protection of Archaeological Resources in the Nunavut Territory

(**Note:** Partial document only, complete document at: www.ch.gov.nu.ca/en/Archaeology.aspx)

Introduction
The following guidelines have been formulated to ensure that the impacts of proposed developments upon heritage resources are assessed and mitigated before ground surface altering activities occur. Heritage resources are defined as, but not limited to, archaeological and historical sites, burial grounds, palaeontological sites, historic buildings and cairns Effective collaboration between the developer, the Department of Culture, and Heritage (CH), and the contract archaeologist(s) will ensure proper preservation of heritage resources in the Nunavut Territory.

[5] s. 51(1)
[6] P.C. 2001-1111 14 June, 2001

The roles of each are briefly described.

CH is the Nunavut Government agency which oversees the protection and management of heritage resources in Nunavut, in partnership with land claim authorities, regulatory agencies, and the federal government. Its role in mitigating impacts of developments on heritage resources is as follows: to identify the need for an impact assessment and make recommendations to the appropriate regulatory agency; set the terms of reference for the study depending upon the scope of the development; suggest the names of qualified individuals prepared to undertake the study to the developer; issue an archaeologist or palaeontologist permit authorizing field work; assess the completeness of the study and its recommendations; and ensure that the developer complies with the recommendations.

The primary regulatory agencies that CH provides information and assistance to are the Nunavut Impact Review Board, for development activities proposed for Inuit Owned Lands (as defined in Section 1.1.1 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (*Nunavut Agreement*)), and the Indigenous and Northern Affairs Canada, for development activities proposed for federal Crown Lands.

A developer is the initiator of a land use activity. It is the obligation of the developer to ensure that a qualified archaeologist or palaeontologist is hired to perform the required study and that provisions of the contract with the archaeologist or palaeontologist allow permit requirements to be met; i.e. fieldwork, collections management, artifact and specimen conservation, and report preparation. On the recommendation of the contract archaeologist or palaeontologist in the field and the Government of Nunavut, the developer shall implement avoidance or mitigative measures to protect heritage resources or to salvage the information they contain through excavation, analysis, and report writing. The developer assumes all costs associated with the study in its entirety.

Through his or her active participation and supervision of the study, the contract archaeologist or palaeontologist is accountable for the quality of work undertaken and the quality of the report produced. Facilities to conduct fieldwork, analysis, and report preparation should be available to this individual through institutional, agency, or company affiliations. Responsibility for the curation of objects recovered during field work while under study and for documents generated in the course of the study as well as remittance of artifacts, specimens and documents to the repository specified on the permit accrue to the contract archaeologist or palaeontologist. This individual is also bound by the legal requirements of the *Nunavut Archaeological and Palaeontological Sites Regulations*.

Types of Development

In general, those developments that cause concern for the safety of heritage resources will include one or more of the following kinds of surface disturbances. These categories, in combination, are comprehensive of the major kinds of developments commonly proposed in Nunavut. For any single development proposal, several kinds of these disturbances may be involved

- *Linear disturbances: including the construction of highways, roads, winter roads, transmission lines, and pipelines;*
- *Extractive disturbances: including mining, gravel removal, quarrying, and land filling;*
- *Impoundment disturbances: including dams, reservoirs, and tailings ponds;*
- *Intensive land use disturbances: including industrial, residential, commercial, recreational, and land reclamation work, and use of heritage resources as tourist developments.*
- *Mineral, oil and gas exploration: establishment of camps, temporary airstrips, access routes, well sites, or quarries all have potential for impacting heritage resources*.

Types of Studies Undertaken to Preserve Heritage Resources

Overview: An overview study of heritage resources should be conducted at the same time as the development project is being designed or its feasibility addressed. They usually lack specificity with regard to the exact location(s) and form(s) of impact and involve limited, if any, field surveys. Their main aim is to accumulate, evaluate, and synthesize the existing knowledge of the heritage of the known area of impact. The overview study provides managers with baseline data from which recommendations for future research and forecasts of potential impacts can be made. A Class I Permit is required for this type of study if field surveys are undertaken.

Reconnaissance: This is done to provide a judgmental appraisal of a region sufficient to provide the developer, the consultant, and government managers with recommendations for further development planning. This study may be implemented as a preliminary step to inventory and assessment investigations except in cases where a reconnaissance may indicate a very low or negligible heritage resource potential. Alternately, in the case of small-scale or linear developments, an inventory study may be recommended and obviate the need for a reconnaissance.

The main goal of a reconnaissance study is to provide baseline data for the verification of the presence of potential heritage resources, the determination of impacts to these resources, the generation of terms of reference for further studies and, if required, the advancement of preliminary mitigative and compensatory plans. The results of reconnaissance studies are primarily useful for the selection of alternatives and secondarily as a means of identifying impacts that must be mitigated after the final siting and design of the development project. Depending on the scope of the study, a Class 1 or Class 2 Permit is required for this type of investigation.

Inventory: A resource inventory is generally conducted at that stage in a project's development at which the geographical area(s) likely to sustain direct, indirect, and perceived impacts can be well defined. This requires systematic and intensive fieldwork to ascertain the effects of all possible and alternate construction components on heritage resources. All heritage sites must be recorded on Government of Nunavut Site Survey forms. Sufficient information must be amassed from field, library and archival components of the study to generate a predictive model of the heritage resource base that will:

- allow the identification of research and conservation opportunities;

- enable the developer to make planning decisions and recognize their likely effects on the known or predicted resources; and
- make the developer aware of the expenditures, which may be required for subsequent studies and mitigation. A Class 1 or 2 permit is required.

Assessment: At this stage, sufficient information concerning the numbers and locations of heritage resources will be available, as well as data to predict the forms and magnitude of impacts. Assessments provide information on the size, volume, complexity and content of a heritage resource, which is used to rank the values of different sites or site types given current archaeological knowledge. As this information will shape subsequent mitigation program(s), great care is necessary during this phase.

Mitigation: This refers to the amelioration of adverse impacts to heritage resources and involves the avoidance of impact through the redesign or relocation of a development or its components; the protection of the resource by constructing physical facilities; or, the scientific investigation and recovery of information from the resource by excavation or other method. The type(s) of appropriate mitigative measures are dictated by their viability in the context of the development project. Mitigation strategies must be developed in consultation with, and approved by, the Department of Culture and Heritage. It is important to note that mitigation activities should be initiated as far in advance of the construction of the development as possible.

Surveillance and monitoring: These may be required as part of the mitigation program.

Surveillance may be conducted during the construction phase of a project to ensure that the developer has complied with the recommendations.

Monitoring involves identification and inspection of residual and long-term impacts of a development (i.e. shoreline stability of a reservoir); or the use of impacts to disclose the presence of heritage resources, for example, the uncovering of buried sites during the construction of a pipeline.