

FEIS Concordance Table

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
1.0	Purpose		1.0
1.1	NIRB Review		1.0
2.0	Project Definition		2.0
3.0	Overview		3.0
3.1	Presentation of EIS	The proponent shall provide an EIS that is complete, including scientific works and the Proponents sector studies, and all other sources of information including traditional knowledge	FEIS Section 3.0; NIRB Submission Letter – April 4 (Appendix F.1)
		All scientific and sectoral studies shall be rendered current and shall be numbered and dated prior to their submission for examination	FEIS Section 3.0
		Maps, other than those used for orientation and context, shall be contained in a separate volume.	NIRB Submission Letter – April 30 (Appendix F.2)
		The EIS shall, wherever necessary for a full understanding, be supplemented by a series of complementary documents providing technical and scientific support and containing appropriate bibliographic references	FEIS Section 3.0
		The Proponent shall prepare and incorporate in the EIS a complete and detailed annotated bibliography of all studies and reports, including community consultations, carried out in relation to the Project, and shall make such studies and reports available.	FEIS Section 3.0
		The EIS shall be made available both electronically, if possible on searchable CD-ROM, and in hard copy.	FEIS Section 3.0
3.2	Conformity	The Proponent is expected to observe the intent of the Guidelines, which will then lead to the preparation of a draft EIS. Specific issues or directions described in the Guidelines must be easily identifiable in the draft EIS and incorporated into the final EIS.	FEIS Section 3.0
3.3	Length	The <i>Guidelines for Environmental Impact Statements</i> (NIRB, 1997b, Appendix F) do not permit the Proponent's EIS to exceed 150 pages without the permission of the NIRB.	FEIS Section 3.0
3.4	Format	The EIS shall be double-spaced, and its sections numbered.	FEIS Section 3.0
		Subject to any other instructions given by NIRB, the following format shall be adopted, based on NIRB (1997a) and adapted as much as possible to the specific circumstances of the Meadowbank Project:	FEIS Section 3.0
		•Title page	FEIS Section 3.0
		•Executive summary	FEIS Section 3.0
		•Popular summary	FEIS Section 3.0
•Table of contents, including list of tables, list of figures, list of maps, list of acronyms	FEIS Section 3.0		
3.4	Format	•Concordance table	FEIS Section 3.0 NIRB Submission Letter – April 30 (Appendix F.2)
		•The proponent	FEIS Section 3.0
		•Sustainable development and precautionary principle	FEIS Section 3.0
		•Baseline data collection	FEIS Section 3.0
		•Traditional knowledge	FEIS Section 3.0
		•Public consultation	FEIS Section 3.0
		•Regional context	FEIS Section 3.0
		•Regulatory regime	FEIS Section 3.0
		•Land tenure	FEIS Section 3.0
		•Project justification	FEIS Section 3.0
		•Project description	FEIS Section 3.0
		•Alternatives including "no-go"	FEIS Section 3.0
		•Description of physical environment	FEIS Section 3.0
		•Description of biological environment	FEIS Section 3.0
		•Description of socio-economic environment	FEIS Section 3.0
		•Spatial boundaries	FEIS Section 3.0
		•Temporal boundaries	FEIS Section 3.0
		•Data acquisition methodology and documentation, covering biophysical and socio-economic aspects	FEIS Section 3.0
•Data analysis and reporting	FEIS Section 3.0		
•Impact assessment methodology, including determination of impact significance, covering biophysical and socio-economic aspects	FEIS Section 3.0		
•Indicators and criteria	FEIS Section 3.0		

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •Impact assessment, distinguishing biophysical and socio-economic aspects •Cumulative effects assessment •Summary of impacts •Environmental management and mitigation •Residual effects •Monitoring or post-project analysis, and follow-up •Auditing and continual improvement •Closure and reclamation •Value-adding opportunities •Outstanding issues •List of consultants •List of organizations and individuals to whom copies of the Project proposal were sent •Glossary •Literature cited •Appendices 	FEIS Section 3.0
3.5	Data Presentation	<p>The Proponent shall provide charts, diagrams, aerial and other photographs and maps wherever useful to clarify the text</p> <p>Where feasible, maps shall be of a common scale and projection to facilitate comparisons</p>	FEIS Section 3.0
3.6	Summaries		FEIS Section 3.0
3.6.1	Executive Summary	<p>The Proponent shall prepare an Executive Summary that describes the key Project elements and key findings of the EIS, with particular reference to the overall conclusions of the assessment and a clear rationale relating those conclusions to the predicted impacts and the measures proposed to address them</p> <p>The Executive Summary shall focus on items of known or expected public concern and shall focus on the significant potential impacts of the Project and the methods proposed to address them.</p> <p>It shall also address outstanding issues and the strategies proposed to address them. The Executive Summary shall form part of the EIS, but it shall also be made available as a separate document.</p>	FEIS Section 3.0; FEIS Executive Summary
3.6.2	Popular Summary	<p>The Popular Summary shall have the same general structure and objectives as the Executive Summary, but it shall be written in non-technical language and shall include such things as glossary and additional explanatory text to assist non-specialists in appreciating the content of the EIS as a whole</p> <p>The Proponent shall consider presenting the Popular Summary in hard copy and, if possible, in the form of a video. The Popular Summary shall form part of the EIS, but it shall also be made available as a separate document.</p>	FEIS Section 3.0; FEIS Popular Summary
3.7	Translation	The Popular Summary shall be translated into the local languages and dialects prevalent in the Kivalliq Region. Maps should indicate common and accepted place-names usually referred to by the local populations in their own language, in addition to their official toponyms.	FEIS Section 3.0
4.0	Substantive Directives		FEIS Section 4.0
4.1	The Proponent	<p>The Proponent shall identify itself and shall explain current and proposed ownership of rights and interests in the Project, operational arrangements, and corporate and management structures.</p> <p>It shall specify the mechanisms used to ensure that corporate policies are respected.</p> <p>It shall present its environmental policy and that of any parent company and shall specify whether and how it applies to all businesses for which it has an operating responsibility, to employees, to contractors, and to suppliers.</p> <p>It shall also describe its reporting systems.</p>	FEIS Section 4.1 FEIS Section 4.1 NIRB Submission Letter – April 30 (Appendix F.2) FEIS Section 4.1
4.1	The Proponent	<ul style="list-style-type: none"> •The Proponent shall describe its past experience in exploration or mining with particular reference to: •Its record of compliance with governmental policies and regulations pertaining to environmental and socio-economic issues 	FEIS Section 4.1 FEIS Section 4.1

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Mine safety, major accidents, and spills and emergencies, including responses	FEIS Section 4.1
		•Its record in honouring commitments on environmental and socio-economic matters in the event of planned or premature mine closure, whether temporary or permanent, or change of ownership	FEIS Section 4.1
		•Relations with Aboriginal peoples, including prior experience with Impact and Benefits Agreements if appropriate	FEIS Section 4.1
		•Operations in Arctic and Sub-arctic regions	FEIS Section 4.1
		•Its record in incorporating environmental and socio-economic considerations into construction, operations, temporary closure, final closure, and postclosure	FEIS Section 4.1
		•Corrective actions undertaken in the past, distinguishing between those taken voluntarily and those taken at the insistence of a third party	FEIS Section 4.1 NIRB Submission Letter – April 4 (Appendix F.1)
		•The provision of security to ensure payment of compensation in the event of accidents.	FEIS Section 4.1 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall identify and describe any obligations or requirements that it must meet to post a bond or other form of financial security to ensure payment of compensation in the event of accidents that directly or indirectly result in major damage by the Project to the environment, as well as to cover the cost of planned or premature closure, whether temporary or permanent.	FEIS Section 4.1 NIRB Submission Letter – April 4 (Appendix F.1)
		If the Proponent does not have prior experience in exploration or mining, particularly for this region, it shall explain the safeguards that it intends to put in place to compensate for that lack.	FEIS Section 4.1
4.2	Sustainable Development and Precautionary Principle	The Proponent shall explain how the Project will be made compatible with:	FEIS Section 4.2
		•The preservation of ecosystem integrity and the maintenance of biological diversity for Nunavut and the Project region	FEIS Section 4.2
		•Respect for the right of future generations to the sustainable use of Nunavut's resources	FEIS Section 4.2
		•The attainment of durable social and economic benefits in the Kivalliq Region	FEIS Section 4.2
		•The well-being of the residents of Canada outside the Nunavut Settlement Area	FEIS Section 4.2
		The Proponent shall discuss the precautionary principle; namely that, where there are threats of serious or irreparable damage, a lack of scientific certainty shall not be invoked as a reason for not implementing measures to prevent environmental degradation. In particular, it shall illustrate how that principle was applied to Project design and management, and how it would be applied during the construction, operation, temporary closure, final closure, and post-closure phases. Claims must be fully documented, and undertakings must be sufficiently specific to be verifiable.	FEIS Section 4.2
	Sustainable Development and Precautionary Principle	If possible, the Proponent shall demonstrate how the Project relates to any international commitments that Canada has made respecting sustainable development and the precautionary principle.	FEIS Section 4.2
4.3	Baseline Data Collection	The EIS shall use an ecosystem-based approach, meaning that it shall describe the ecological function of each ecosystem component and shall indicate the ecological pathways of the impacts that it predicts.	FEIS Section 4.3; Baseline Supporting Documents
		The Proponent shall present baseline data, including Traditional Knowledge about the existing biophysical and socio-economic environments, including changes in baseline conditions due to exploration activities related to the Project.	FEIS Section 4.3; ; Baseline Supporting Documents
		The EIS shall explain methodologies for baseline data collection, evaluate the adequacy and confidence levels of the baseline data, identify all significant gaps in knowledge and understanding and the associated uncertainties, and identify the steps to be taken to fill such gaps. Where technical, scientific, or Traditional Knowledge debate continues with respect to key issues, the Proponent shall provide a balanced discussion of the issues and state its position.	FEIS Section 4.3; NIRB Submission Letter – April 30 (Appendix F.2); ; Baseline Supporting Documents

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission	
	Baseline Data Collection	The Proponent shall strive to give sufficient time depth to baseline data, in order to permit the identification of natural fluctuations, trends and cyclical and other recurrent phenomena. Some species populations fluctuate in abundance every 3 to 4 years, for other populations longer	FEIS Section 4.3; Baseline Supporting Documents	
		It shall also strive to evaluate the degree to which the baseline data characterize ecosystems that are relatively free of impacts and shall specify, where relevant, the sources of prior impacts where those can be identified with reasonable confidence, so as to assist in evaluating the thresholds of ecosystem components.	FEIS Section 4.3; Baseline Supporting Documents	
		Further, the Proponent shall present the likely future conditions of baseline data in the absence of the Project.	FEIS Section 4.3; NIRB Submission Letter – April 4 (Appendix F.1); Baseline Supporting Documents	
4.4	Traditional Knowledge	The Proponent shall present and justify its definition of Traditional Knowledge in the Kivalliq Region and shall explain the methodology used to collect it, including the format and location of meetings, the types of background information provided at meetings, the level of community participation, the design of studies on Traditional Knowledge, and the selection process for participants in such studies, and shall summarize what kinds of Traditional Knowledge were collected.	FEIS Section 4.4; Traditional Knowledge Report; Public Involvement Report	
		The Proponent shall indicate whether special efforts were made to collect Traditional Knowledge from women.	FEIS Section 4.4; Traditional Knowledge Report	
		The Proponent shall discuss how it treated Traditional Knowledge in baseline data collection, impact prediction and significance assessment, and the development of mitigation and monitoring programmes.	FEIS Section 4.4; Traditional Knowledge Report	
		It shall explain how it integrated Traditional Knowledge and western-based science, including the manner in which it reconciled any apparent discrepancies between the two	FEIS Section 4.4; Traditional Knowledge Report	
		Any assumptions shall be identified and justified	FEIS Section 4.4; Traditional Knowledge Report	
	Traditional Knowledge	Further, the Proponent shall describe any other past or current Traditional Knowledge studies in which it has participated or played a supporting role.	FEIS Section 4.4; Traditional Knowledge Report	
		The Proponent shall describe a program to pursue the collection of Traditional Knowledge and to integrate it into ongoing baseline data collection, mitigation, and monitoring programmes, and shall describe the roles and responsibilities of all concerned individuals and organizations in collecting, analyzing, interpreting, and synthesizing data, including Traditional Knowledge	FEIS Section 4.4; NIRB Submission Letter – April 30 (Appendix F.2)	
		The Proponent shall also discuss procedures for community-based monitoring of social, cultural, and ecological conditions in order to determine if, when, and how mining can contribute to community sustainability (Wisner, 1996).	FEIS Section 4.4; Traditional Knowledge Report	
	4.5	Public Consultation	Public consultation is required when:	FEIS Section 4.5
			•identifying current and historical patterns of land- and resource-use	FEIS Section 4.5; Traditional Knowledge Report; Public Involvement Report
•identifying Valued Ecosystem Components (“VECs”) and Valued Socio-Economic Components (“VSECs”)			FEIS Section 4.5; Traditional Knowledge Report; Public Involvement Report	
		•determining criteria for evaluating the significance of potential impacts	FEIS Section 4.5; NIRB Submission Letter – April 4 (Appendix F.1); Traditional Knowledge Report; Public Involvement Report	

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •deciding upon mitigating measures •formulating compensation packages 	FEIS Section 4.5; NIRB Submission Letter – April 30 (Appendix F.2); Traditional Knowledge Report; Public Involvement Report
			FEIS Section 4.5; Traditional Knowledge Report; Public Involvement Report
		<ul style="list-style-type: none"> •identifying and implementing monitoring measures, including post-project audits 	FEIS Section 4.5; NIRB Submission Letter – April 30 (Appendix F.2); Traditional Knowledge Report; Public Involvement Report
	Public Consultation	<p>The Proponent shall explain where, how, why, and with whom it conducted public consultation, documenting its efforts to inform participants how the information that they supplied was or will be used. It shall demonstrate an understanding of the rights, interests, values, aspirations, and concerns of the potentially affected communities, with particular reference to those emanating from the NLCA, and an ability to recognize and respect them in planning and executing the Project.</p>	FEIS Section 4.5; Traditional Knowledge Report; Public Involvement Report
		<p>Moreover, the Proponent shall explain the results of the consultation process, how the consultation process has influenced its decisions, and how it intends to address the unresolved concerns expressed.</p>	FEIS Section 4.5; Traditional Knowledge Report; Public Involvement Report
		<p>The Proponent shall describe the communications programme that will be implemented if the Project is approved, with particular reference to initiatives to communicate changes to information, plans, or strategies. It shall also discuss how the public, particularly the residents of the Kivalliq Region, could contribute to Project implementation, including the design of management and monitoring strategies.</p>	FEIS Section 4.5; Traditional Knowledge Report; Public Involvement Report
4.6	Regional Context	<p>The Proponent shall describe in general terms the regional biophysical and socio-economic environments of the Central Kivalliq Region and Nunavut as a whole, including:</p>	FEIS Section 4.6
		<ul style="list-style-type: none"> •ecological land classifications 	FEIS Section 4.6; Baseline Physical Ecosystem Report; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> •ecological processes and relationships 	FEIS Section 4.6; Baseline Physical Ecosystem Report; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> •the status of ongoing land claims discussions in the southern part of the Central Kivalliq Region 	FEIS Section 4.6; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •the location of other precious metal finds and other existing and potential developments 	FEIS Section 4.6; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •current and future land-use plans 	FEIS Section 4.6
		<p>The proponent should follow current directions or guidelines from the NPC, especially the Keewatin Regional Land-Use plan.</p>	FEIS Section 4.6
4.7	Regulatory Regime	<p>The Proponent shall present its understanding of the regulatory regime in which it would be operating by identifying all relevant federal, territorial, and local environmental and socio economic standards, laws, regulations, policies, and fiscal regimes relating to Project approval, construction, operations, monitoring, and closure, such as the NLCA, the Mine Site Reclamation Policy for Nunavut (DIAND), and the Metal Mining Effluent Regulations (Environment Canada), among others.</p>	FEIS Section 4.7; NIRB Submission Letter – April 30 (Appendix F.2)
		<p>It shall further explain how such requirements would be met and what specific governmental permits and approvals would be required.</p>	FEIS Section 4.7

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		A list of currently held permits and licences, including dates of issue and expiry, should be appended.	FEIS Section 4.7 NIRB Submission Letter – April 30 (Appendix F.2)
		The Proponent shall also identify relevant self-international regulatory regimes, such as the International Cyanide Management Code for the Gold Mining Industry developed by the United Nations Environment Programme and the International Council on Mining and Metals, and explain how it would comply with them.	FEIS Section 4.7
4.8	Land Tenure	The Proponent shall delineate on a map of suitable scale the legal boundaries of any areas to which it will acquire rights through lease or other tenure arrangements.	FEIS Section 4.8; NIRB Submission Letter – April 30 (Appendix F.2)
		It shall further describe those areas by providing such information as file numbers, start and end dates, fees, name of right holder, renewals, etc.	FEIS Section 4.8; NIRB Submission Letter – April 30 (Appendix F.2)
4.9	Project Justification		FEIS Section 4.9
4.9.1	Project Purpose and Rationale	The Proponent shall state the purpose of the Project and shall explain the rationale for undertaking it.	FEIS Section 4.9.1
4.9.2	Project Need	The Proponent shall justify the need for the Project in terms of the economy of Nunavut and of the Kivalliq Region in particular, its economic viability and potential.	FEIS Section 4.9.2; Baseline Socioeconomic Report; Socioeconomic & Archaeology Impact Assessment Report
		It shall submit any feasibility studies and supporting documentation. The Proponent shall also demonstrate that financing has been secured for all Project phases, including reclamation and security.	FEIS Section 4.9.2; NIRB Submission Letter – April 4 (Appendix F.1)
4.10	Project Description		FEIS Section 4.10
4.10.1	Project Components and Activities	The Proponent shall describe Project components and activities, distinguishing where appropriate between the exploration, construction, operations, and closure phases, including where appropriate:	FEIS Section 4.10.1; NIRB Submission Letter – April 30 (Appendix F.2)
		•Exploratory work	FEIS Section 4.10.1
		•Mineral resources (geology, geochemistry, drilling, and bulk sampling)	FEIS Section 4.10.1
		•Site preparation and clearing, and site plan	FEIS Section 4.10.1
		•Earth works	FEIS Section 4.10.1
		•Blasting, including a description of the types and quantities of explosives that will be used	FEIS Section 4.10.1
		•Roads and airfields	FEIS Section 4.10.1; NIRB Submission Letter – April 30 (Appendix F.2); Access & Air Traffic Management Plan
4.10.1	Project Components and Activities	•Work force requirements, including training required to maximize employment of Nunavummiut	FEIS Section 4.10.1; NIRB Submission Letter – April 4 (Appendix F.1); Human Resources Management Report
		•Air, marine, and land transportation of workers and materials, with estimates of traffic types and frequencies	FEIS Section 4.10.1; NIRB Submission Letter – April 30 (Appendix F.2); Access & Air Traffic Management Plan
		•Use, transportation, handling, and storage of fuel, hazardous materials, concrete, and aggregates	FEIS Section 4.10.1; Hazardous Materials Management Plan
		•Housing	FEIS Section 4.10.1
		•Water supply and sewage- and waste-handling/treatment/disposal facilities	FEIS Section 4.10.1
		•Water retention dykes and natural drainage diversions	FEIS Section 4.10.1
		•Water diversions, intakes, and outlets	FEIS Section 4.10.1
		•Power generation and transmission facilities	FEIS Section 4.10.1
		•Off-site facilities related to expediting, transport, and storage of materials, including waste, and fixed housing and transport facilities	FEIS Section 4.10.1
		•Pits and quarries, including ore-removal methods	FEIS Section 4.10.1
		•Mining methods	FEIS Section 4.10.1

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Processing operations	FEIS Section 4.10.1; NIRB Submission Letter – April 30 (Appendix F.2)
		•Stockpiling of ore and acid rock drainage	FEIS Section 4.10.1; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Management Plan; Project Alternatives Report
	Project Components and Activities	•Stockpiling of overburden and waste rock and acid rock drainage	FEIS Section 4.10.1; Mine Waste & Water Management Plan; Project Alternatives Report
		•Tailings/processed ore handling/treatment/disposal	FEIS Section 4.10.1; Mine Waste & Water Management Plan; Project Alternatives Report
		•Effluents and emissions	FEIS Section 4.10.1; Mine Waste & Water Management Plan; Baseline Air Quality
		•Marine and ocean-going activity, including marine shipping plans	FEIS Section 4.10.1
		•Site rehabilitation	FEIS Section 4.10.1; Reclamation & Closure Plan
		•Project life expectancy	FEIS Section 4.10.1
		The Proponent shall give a rationale for the selection of Project components and activities, with specific consideration given to industry best practices	FEIS Section 4.10.1; Project Alternatives Report
	4.10.1.1	Geology / Mineralogy of the Ore Deposit and Mining Methods	The Proponent shall specifically address the following in describing Project components and activities:
The Proponent shall characterize the ore from the Meadowbank sites, including where appropriate:			FEIS Section 4.10.1.1; Baseline Physical Ecosystem
•Location, including detailed maps of the mine area			FEIS Section 4.10.1.1
•Resource assumptions			FEIS Section 4.10.1.1
•Mineralogy			FEIS Section 4.10.1.1; NIRB Submission Letter – April 30 (Appendix F.2)
•The type of deposit and associated bedrock (including faulting or fracturing)			FEIS Section 4.10.1.1
•Identification of the ore deposit material, dimensions, and location			FEIS Section 4.10.1.1
•The lithologies and mineral associations found in the region			FEIS Section 4.10.1.1
•The average extraction rate and the amount of ore to be processed daily and the expected amount of ore to be extracted each year		FEIS Section 4.10.1.1; NIRB Submission Letter – April 30 (Appendix F.2)	
Geology / Mineralogy of the Ore Deposit and Mining Methods		•A mine management plan indicating the sequence of development of the open pits and underground mine	FEIS Section 4.10.1.1; NIRB Submission Letter – April 30 (Appendix F.2)
		The proposed characteristics of the mine shall be described, bearing in mind the need to control hazards, such as rockfalls.	FEIS Section 4.10.1.1
		Many of the foregoing can be described in the context of a mine management plan	FEIS Section 4.10.1.1; NIRB Submission Letter – April 30 (Appendix F.2)
4.10.1.2		Ore Recovery Plant, Extraction and Concentration	The Proponent shall describe
	•The proposed recovery plant, including processing capacity and methods;		FEIS Section 4.10.1.2
	•The location of the recovery plant and the site-selection criteria, the differing processing stages, and the different compounds emitted to the environment during ore processing, and the related quantities, concentrations, and dispersion paths after emission		FEIS Section 4.10.1.2; NIRB Submission Letter – April 30 (Appendix F.2)
4.10.1.3	Processed Ore Containment (and	•The location of the ore storage pads and plans to control and, if necessary, treat water run-off and seepage.	FEIS Section 4.10.1.2; NIRB Submission Letter – April 30 (Appendix F.2)
		Bearing in mind the final paragraph of Subsection 4.16, the Proponent shall	FEIS Section 4.10.1.3

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
	Tailings Ponds)	<ul style="list-style-type: none"> Describe the processed ore containment management plan, including a comprehensive description of the proposed process, structures, and operations. 	FEIS Section 4.10.1.3; Mine Waste & Water Management Plan; Project Alternatives Report
		<ul style="list-style-type: none"> The Proponent shall include a contingency plan in the event that discharges from the containment area do not meet licensing criteria 	FEIS Section 4.10.1.3; NIRB Submission Letter – April 4 (Appendix F.1)
	Processed Ore Containment (and Tailings Ponds)	<ul style="list-style-type: none"> Describe all aspects of the processed ore composition, including the size and quantities of fines and their predicted settling characteristics, and anticipated water quality, providing data on the quantity and quality of material to be disposed of, and describing conservation and recycling options 	FEIS Section 4.10.1.3; NIRB Submission Letter – April 30 (Appendix F.2); Mine Waste & Water Management Plan; Water Quality Predictions
		<ul style="list-style-type: none"> Present a chemical stability analysis 	FEIS Section 4.10.1.3; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Management Plan
		<ul style="list-style-type: none"> Discuss how geotechnical factors, including permafrost, clay slippage and pooling, the seasonal seepage conditions of sand, and water and ice in pores, were considered in the design and selection of the structures to contain the processed ore. It shall also discuss the stability of the structures, including, if applicable, the question of talik zones 	FEIS Section 4.10.1.3; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Management Plan
<ul style="list-style-type: none"> Describe methods of controlling and monitoring groundwater seepage from the processed ore and other containment area, and the capacity to cope with storms, floods, and other intermittent natural events, using a return period that is adequately conservative (e.g., 1/100 years), including a review of similar operations elsewhere, applicable modelling information, and the results of research on the long-term thermal stability of the underlying permafrost and frozen materials. 	FEIS Section 4.10.1.3; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Management Plan		
4.10.1.4	Overburden and Waste Rock Disposal	The Proponent shall:	FEIS Section 4.10.1.4
		<ul style="list-style-type: none"> Provide a plan for overburden and waste rock handling, including the design and location of the storage sites, describing the options for each. The Proponent shall include a review of similar operations elsewhere, applicable modelling information, and the results of research on the long term thermal stability of the underlying permafrost and frozen materials; 	FEIS Section 4.10.1.4; NIRB Submission Letter – April 30 (Appendix F.2); Mine Waste & Water Management Plan; Project Alternatives Report
		<ul style="list-style-type: none"> Describe the physical and chemical stability of the types of materials to be stored and those to be used for containment construction with regard to the long-term acid-generation potential of the waste rock, bearing in mind the latest monitoring results from mines near by or at least in the same general region, and present a water management plan. It shall also explain the relationship between the timing of acid generation and permafrost encapsulation and cold temperatures, where possible in reference to the region in which the Project will take place; 	FEIS Section 4.10.1.4; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Management Plan; Kinetic Testwork Report; Static Testwork Report
		<ul style="list-style-type: none"> Describe and assess the physical and chemical characteristics of seepage and runoff from the waste rock piles, and describe appropriate control measures. The potential for "rock glacier" phenomena; 	FEIS Section 4.10.1.4; Mine Waste & Water Management Plan; Water Quality Predictions
<ul style="list-style-type: none"> Describe in qualitative and quantitative terms the chemistry of frozen groundwater from joints and fractures in the waste rock disposal area. 	FEIS Section 4.10.1.4; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Management Plan		
4.10.1.5	Water Supply and Management	Bearing in mind the trend described in the final paragraph of Subsection 4.16, the Proponent shall:	FEIS Section 4.10.1.5; Mine Waste & Water Mgmt Plan
		<ul style="list-style-type: none"> Present a water balance and provide a water management plan for the mine, processing facilities, stockpile and containment areas, and infrastructure. The water supply source, on-site use, storage, final discharge to the environment, alteration of drainage patterns, water treatment (including water containing nitrate residues from explosives), diversions, and water conservation and recycling measures shall be addressed; 	FEIS Section 4.10.1.5; Mine Waste & Water Mgmt Plan

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Water balance estimates for the water supply source;	FEIS Section 4.10.1.5; Mine Waste & Water Mgmt Plan
		•Include estimates of mine water volumes and potential uses of the mine water;	FEIS Section 4.10.1.5; Mine Waste & Water Mgmt Plan
		•Address the issue of discharge or seepage of water;	FEIS Section 4.10.1.5; Mine Waste & Water Mgmt Plan
		•Methods used to calculate the above volumes;	FEIS Section 4.10.1.5; Mine Waste & Water Mgmt Plan
		•Describe the facilities for washing bulk trucks and other equipment, as well as any treatment of water used for washing vehicles/equipment; and	FEIS Section 4.10.1.5; NIRB Submission Letter – April 4 (Appendix F.1)
		•Describe how melt water, particularly with high metal content, and hydrocarbons will be managed.	FEIS Section 4.10.1.5; NIRB Submission Letter – April 4 (Appendix F.1)
4.10.1.6	Mine De-watering	If applicable, the Proponent shall provide:	FEIS Section 4.10.1.6
		•Information about de-watering methods, specifying the volumes to be pumped, the areas that may be affected, the quantities of bottom sediment requiring disposal, and the disposal methods;	FEIS Section 4.10.1.6; Mine Waste & Water Mgmt Plan
		•Fish salvage programs;	FEIS Section 4.10.1.6; Aquatic Effects Management Program
		•Mine inflow volumes and quality, considering seepage into the pits, pit water quality, as well as seepage from retention dykes.	FEIS Section 4.10.1.6; NIRB Submission Letter – April 30 (Appendix F.2) ; Mine Waste & Water Mgmt Plan
4.10.1.7	All Weather Roads and Winter Roads	The Proponent shall describe, where useful with the assistance of maps and drawings:	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1)
		•How the selected route(s) correspond to the needs of other developers and of the Nunavummiut;	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1)
		•Proposed construction of all-weather road, including laydown areas, on-site and off-site roads, alternative routes, with particular reference to stream crossings;	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1)
		•The quantities and types of materials required for construction and maintenance;	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1)
		•Construction and maintenance methods for all site roads, frequency of use, road width, and dust-suppression methods;	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1); Air Quality & Noise Mgmt Plan
		•The types and numbers of vehicles to be used to transport materials and ore along the all weather access routes, including the total number of trips expected daily and seasonally;	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1)
		•Accident/incident reporting;	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1); Emergency Response Plan
		•Wildlife impact mitigation procedures and/or structures;	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1); Terrestrial Ecosystem Mgmt Plan; Access & Air Traffic Mgmt Plan
		•Site reclamation.	FEIS Section 4.10.1.7; NIRB Submission Letter – April 4 (Appendix F.1); Reclamation & Closure Plan
4.10.1.8	Airport Facilities	The Proponent shall describe:	FEIS Section 4.10.1.8
		•Airport facilities at the mine site. The duration, frequency, and extent of use of airport facilities and volumes of goods and passengers shall be estimated;	FEIS Section 4.10.1.8; NIRB Submission Letter – April 30 (Appendix F.2); Access & Air Traffic Mgmt Plan

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •The airport and infrastructure characteristics, service roads, fuel storage, deicing and containment systems, methods of dust suppression, drinking and waste water disposal systems, and solid waste management plans; 	FEIS Section 4.10.1.8; NIRB Submission Letter – April 30 (Appendix F.2); Access & Air Traffic Mgmt Plan
		<ul style="list-style-type: none"> •Construction methods; 	FEIS Section 4.10.1.8; NIRB Submission Letter – April 30 (Appendix F.2); Access & Air Traffic Mgmt Plan
		<ul style="list-style-type: none"> •Accident/incident response reporting. 	FEIS Section 4.10.1.8; Emergency Response Plan
4.10.1.9	Fuel and Explosives Storage Sites	The Proponent shall describe:	FEIS Section 4.10.1.9
		<ul style="list-style-type: none"> •The location and characteristics of fuel and explosives storage infrastructure and systems, as well as the explosives factory; 	FEIS Section 4.10.1.9; Hazardous Materials Mgmt Plan
		<ul style="list-style-type: none"> •Handling and containment methods; 	FEIS Section 4.10.1.9; Hazardous Materials Mgmt Plan
		<ul style="list-style-type: none"> •The quantities of fuel, explosives, and other similar materials required; 	FEIS Section 4.10.1.9; NIRB Submission Letter – April 30 (Appendix F.2); Hazardous Materials Mgmt Plan
		<ul style="list-style-type: none"> •Accident/incident response reporting; 	FEIS Section 4.10.1.9; Hazardous Materials Mgmt Plan; Emergency Response Plan; Spill Contingency Plan
		<ul style="list-style-type: none"> •Spill response training; 	FEIS Section 4.10.1.9; Emergency Response Plan; Spill Contingency Plan
		<ul style="list-style-type: none"> •Location of spill kits on the site. 	FEIS Section 4.10.1.9; Emergency Response Plan
4.10.1.10	Borrow Pits and Quarry Sites	The Proponent shall:	FEIS Section 4.10.1.10
		<ul style="list-style-type: none"> •Describe and map at a scale of 1:5,000 all sites that are to be used for borrow pits or quarries, including a description and explanation of sites that were studied but rejected; 	FEIS Section 4.10.1.10; NIRB Submission Letter – April 4 (Appendix F.1); Project Alternatives Report
		<ul style="list-style-type: none"> •Estimate the quantities that will be extracted from quarry sites; 	FEIS Section 4.10.1.10; NIRB Submission Letter – April 4 (Appendix F.1)
	<ul style="list-style-type: none"> •Describe access routes to those sites; 	FEIS Section 4.10.1.10; NIRB Submission Letter – April 4 (Appendix F.1)	
4.10.1.11	Borrow Pits and Quarry Sites	<ul style="list-style-type: none"> •Present quarry management plans that describe proposed operations, methods of handling massive ice, and plans to manage water released by the thawing of permafrost and ground ice. 	FEIS Section 4.10.1.10; NIRB Submission Letter – April 4 (Appendix F.1)
4.10.1.11	Waste (Domestic and Hazardous) Management	The Proponent shall describe:	FEIS Section 4.10.1.11
		<ul style="list-style-type: none"> •Plans for sewage treatment and disposal, including the technology to be employed, the location of the facility and any point of discharge, and the volumes and chemical composition of the effluent; 	FEIS Section 4.10.1.10; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Mgmt
		<ul style="list-style-type: none"> •Plans for the handling, storage, treatment, and disposal of solid wastes and sewage sludge; 	FEIS Section 4.10.1.10; NIRB Submission Letter – April 4 (Appendix F.1); Mine Waste & Water Mgmt Plan
		<ul style="list-style-type: none"> •The hazardous waste management plan, including a description of the types and volumes of hazardous wastes to be used or produced by all Project activities. Storage and disposal methods and destinations for each type of hazardous waste, including disposal of containers used to transport or store hazardous materials, shall be described; 	FEIS Section 4.10.1.11; Hazardous Materials Mgmt Plan
		<ul style="list-style-type: none"> •Accident/incident response reporting; 	FEIS Section 4.10.1.11; Emergency Response Plan

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •Spill response training; 	FEIS Section 4.10.1.11; Spill Contingency Plan; Emergency Response Plan
		<ul style="list-style-type: none"> •Location of spill kits on the site. 	FEIS Section 4.10.1.11; Spill Contingency Plan; Emergency Response Plan
4.10.1.12	Power	The Proponent shall describe:	FEIS Section 4.10.1.12
		<ul style="list-style-type: none"> •Any studies into sources of power other than diesel generators that it conducted; 	FEIS Section 4.10.1.12
		<ul style="list-style-type: none"> •The location of the power house in relation to prevailing winds and other infrastructure; 	FEIS Section 4.10.1.12; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •Utility corridors, including transmission lines; 	FEIS Section 4.10.1.12
		<ul style="list-style-type: none"> •All diesel power generation facilities, including sources, volumes and transportation of fuel, transfer points, and equipment and facilities for emergency clean-up; 	FEIS Section 4.10.1.12
		<ul style="list-style-type: none"> •The energy balance for the proposed Project, including strategies for optimization and conservation; and 	FEIS Section 4.10.1.12; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •The anticipated types and quantities of emissions to the atmosphere. 	FEIS Section 4.10.1.12
4.10.2	Project Design	The Proponent shall explain how the physical environment influenced Project design, and how design, engineering, and management plans are consistent with ecosystem function and integrity, bearing in mind the possibility of long-term climatic change.	FEIS Section 4.10.2
4.10.3	Pace, Scale and Timing of Project	The Proponent shall give a rationale for the pace, scale, and timing of the Project, including consideration of technical, marketing, and economic factors,	FEIS Section 4.10.3
		The Proponent shall specify how many tones of ore would be processed each day.	FEIS Section 4.10.3; NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall specify which factors would be considered in deciding whether to develop other ore bodies (e.g., respect of regulations, approval by affected communities of management and reclamation plans, compliance with conditions of Impact and Benefits Agreements (“IBAs”)).	FEIS Section 4.10.3; NIRB Submission Letter – April 4 (Appendix F.1)
4.10.4	Future Development	Notwithstanding the currently planned short life-cycle of the mine, the Proponent shall evaluate, indicating the associated level of uncertainty, the potential for exploration and development of additional ores at the Project site and shall consider the associated impacts.	FEIS Section 4.10.4
		Among other things, the Proponent shall specify the additional quantities of ore that might be mined and any foreseeable expansions of the Project infrastructure.	FEIS Section 4.10.4
		The Proponent shall also consider whether proceeding with the Project, including the associated access infrastructure, might stimulate other development projects, either exploration/mining or other, in the region.	FEIS Section 4.10.4
4.10.5	Technology	The Proponent shall describe the state-of-the-art of proposed technologies and shall evaluate the reliability of each.	FEIS Section 4.10.5
		It shall also discuss programmes to monitor developments in technology in such areas as:	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •tailings management 	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •closure 	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •reclamation and beneficial landscaping of Arctic landscapes 	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •emissions-control 	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •ore processing 	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
4.10.5	Technology	•dams/containment structures	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		•permafrost management	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		•environmental monitoring	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
		•community development	FEIS Section 4.10.5; NIRB Submission Letter – April 4 (Appendix F.1)
4.11	Alternatives	The Proponent shall describe alternatives to the Project, including the “No-go” or no-project alternative	FEIS Section 4.11
		The Proponent shall describe alternatives to the Project, including other locations within the Kivalliq Region or Nunavut, if any, where the Proponent could conduct the types of activities proposed.	FEIS Section 4.11
		It shall also consider alternative ways of carrying out the Project (i.e., alternatives to Project components or activities, including different locations or timings for such activities or components, that might have differing environmental or socioeconomic effects).	FEIS Section 4.11; Project Alternatives Report
		In each case, the Proponent shall give the reasons for selecting the preferred alternative and for rejecting the others, including economic and technical analyses of each alternative and the associated biophysical, social, economic, and cultural impacts.	FEIS Section 4.11; Project Alternatives Report
		The Proponent shall present the preferences of those consulted respecting alternatives to the Project including the “no-go” alternative.	FEIS Section 4.11; NIRB Submission Letter – April 4 (Appendix F.1); Project Alternatives Report
4.12	Description of Physical Environment	The Proponent shall describe the components of the physical environment and the processes affecting them, as they exist without the Project so as to justify its selection of VECs and to serve as a baseline against which the potential impacts of the Project can be measured. Such components and processes shall include:	FEIS Section 4.12; Baseline Supporting Documents
		•Bedrock lithology, morphology, and structures;	FEIS Section 4.12; Baseline Physical Ecosystem Report
		•Geomorphology and soils (including eskers);	FEIS Section 4.12; Baseline Physical Ecosystem Report
		•Permafrost (including areas of discontinuous permafrost, high ice-content soils, ice lenses, thaw-sensitive slopes, talik zones, and stream banks);	FEIS Section 4.12; Baseline Physical Ecosystem Report
		•Evidence of potential for ground and rock instability (e.g., slumping, landslides, and potential slippage planes);	FEIS Section 4.12; Baseline Physical Ecosystem Report
		•Hydrology/limnology (e.g., lakes and streams, lake sediment geochemistry, watershed boundaries, surface water flow, groundwater movement and aquifer recharge zones, flood zones, ice formation and melt patterns);	FEIS Section 4.12; Baseline Aquatic Ecosystem Report
		•Water quality and quantity (from surface and groundwater sources);	FEIS Section 4.12; Baseline Aquatic Ecosystem Report; Baseline Physical Report
		•Sediment and soil quality and quantity;	FEIS Section 4.12; Baseline Terrestrial Ecosystem Report
		•Air quality and noise levels;	FEIS Section 4.12; Baseline Air Quality; Baseline Noise
		•Sites of palaeontological or palaeobotanical significance;	FEIS Section 4.12; Baseline Archaeology Report
		•Current climatic conditions and foreseeable future trends, bearing in mind the final paragraph of Subsection 4.16; and	FEIS Section 4.12
•Any other issues identified through public consultation.	FEIS Section 4.12; Traditional Knowledge Report; Public Involvement Report		

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
4.13	Description of Biological Environment	The Proponent shall describe the components of the biological environment and the processes affecting them, as they exist without the Project so as to justify the selection of VECs and to serve as a baseline against which the potential impacts of the Project can be measured.	FEIS Section 4.13; Baseline Aquatic Ecosystem Report; Baseline Terrestrial Ecosystem Report
4.13.1	Vegetation	<p>The description of vegetation communities, including wetlands, shall include:</p> <ul style="list-style-type: none"> •Ecological zones, including ecozones, and ecoregions, or other appropriate ecological areas; •The local and regional presence of species/communities; •The health of these species/communities and their contaminant loadings; •Rare or regionally unique species or species assemblages, including species with federal, territorial, regional, or local designated status (e.g., vulnerable, threatened, endangered, extirpated, of special concern, as designated by the Committee on the Status of Endangered Wildlife in Canada ("COSEWIC") or other agencies); •Species that perform particularly significant ecological functions; •Species that are valuable for cultural reasons known to the Inuit, and •Any other issues identified through public consultation. 	<p>FEIS Section 4.13.1; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.1; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.1; NIRB Submission Letter – April 4 (Appendix F.1); Baseline Terrestrial Ecosystem Report; Terrestrial Ecosystem Management Plan, Appendix II</p> <p>FEIS Section 4.13.1; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.1; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.1</p> <p>FEIS Section 4.13.1</p>
4.13.2	Wildlife	<p>The Proponent shall describe:</p> <ul style="list-style-type: none"> •The local and regional presence of species populations; •The relative trends in seasonal/annual abundance, and distribution of these species populations; •The health of these species populations and their contaminant loadings; •The seasonal and annual trends in range or habitat use, movements, and population status of these species; •The migratory patterns and routes of these species and the corresponding sensitive periods when the routes cross habitats affected by the Project; •Significant habitats for these species, such as eskers, calving and rearing areas, denning sites, and staging areas, and such special locations as licks, water crossings, and insect relief habitats; •Wildlife management areas or similar areas for these species; •Habitats of any rare or regionally unique species or species with federal, territorial, regional, or local designated status (e.g., vulnerable, threatened, endangered, extirpated, of special concern); •Species that perform particularly significant ecological functions; and 	<p>FEIS Section 4.13.2</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.2; NIRB Submission Letter – April 4 (Appendix F.1); Terrestrial Ecosystem Management Plan, Appendix II</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p> <p>FEIS Section 4.13.2; Baseline Terrestrial Ecosystem Report</p>

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> Any other issues relating to these species identified through public consultation. 	FEIS Section 4.13.2; Traditional Knowledge Report; Public Involvement Report
4.13.3	Birds	The Proponent shall describe:	FEIS Section 4.13.3
		<ul style="list-style-type: none"> The local and regional occurrence of species populations; 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> The relative seasonal/annual abundance and distribution of these species populations; 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> The health of these species populations and their contaminant loadings; 	FEIS Section 4.13.3; NIRB Submission Letter – April 4 (Appendix F.1); Terrestrial Ecosystem Management Plan, Appendix II
		<ul style="list-style-type: none"> The seasonal and annual trends in range or habitat use, movements, and population status of these species; 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> The migratory patterns and routes of these species and the corresponding sensitive periods when the routes cross habitats affected by the Project; 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> Significant habitats for these species, such as breeding and nesting sites and staging areas for raptors, waterfowl, and other avifauna; 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> Established or proposed sanctuaries, refuges, or similar areas for these species; 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> Habitats of any rare or regionally unique species or species with federal, territorial, regional, or local designated status (e.g., vulnerable, threatened, endangered, extirpated, of special concern) or cultural status; 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> Species that perform particularly significant ecological functions; and 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report
		<ul style="list-style-type: none"> Any other issues relating to these species identified through public consultation. 	FEIS Section 4.13.3; Baseline Terrestrial Ecosystem Report; Traditional Knowledge Report; Public Involvement Report
4.13.4	Fish and Other Aquatic Organisms	The Proponent shall describe:	FEIS Section 4.13.4
		<ul style="list-style-type: none"> Periphyton, phytoplankton, zooplankton, and fish; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem
		<ul style="list-style-type: none"> The local and regional occurrence of species populations; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem
		<ul style="list-style-type: none"> The relative seasonal and annual trends in abundance and distribution of these species populations, and the estimated productive capacity of the water bodies; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem; Baseline Fish Habitat
		<ul style="list-style-type: none"> Stream and lake bottom substrates and littoral zones, including aquatic and riparian vegetation; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem; Baseline Fish Habitat
		<ul style="list-style-type: none"> Affected watercourses, including depths, widths, and maximum and minimum flows; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem; Baseline Fish Habitat
		<ul style="list-style-type: none"> The health of these species populations and their contaminant loadings; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem; Terrestrial Ecosystem Management Plan, Appendix II

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •The migratory patterns and routes of these species, identifying preferred corridors, and the corresponding sensitive periods when the routes cross habitats affected by the Project; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem; Habitat & Fisheries Assessment – All-Weather Road
		<ul style="list-style-type: none"> •Habitat areas for these species, including spawning, nursery, feeding, and over-wintering areas, and any sensitive periods for each of the habitat areas; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem; Baseline Fish Habitat; Habitat & Fisheries Assessment – All-Weather Road
		<ul style="list-style-type: none"> •Management or other protected areas for these species; 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem
		<ul style="list-style-type: none"> •Habitats of any rare or regionally or locally unique species or species with federal, territorial, regional, or local designated status (e.g., vulnerable, threatened, endangered, extirpated, of special concern); 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem
		<ul style="list-style-type: none"> •Species that perform particularly significant ecological functions; and 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem
		<ul style="list-style-type: none"> •Any other issues relating to these species identified through public consultation. 	FEIS Section 4.13.4; Baseline Aquatic Ecosystem; Baseline Fish Habitat
4.14	Description of Socio-Economic Environment	The Proponent shall describe the components of the socio-economic environment and the processes affecting them, as they exist without the Project so as to justify its selection of VSECs and to serve as a baseline against which the potential impacts of the Project can be measured. It shall present baseline data on a community-by-community basis on such components as:	FEIS Section 4.14; Baseline Socioeconomic Report
		<ul style="list-style-type: none"> •Human health, defined broadly to include mental health and well-being; 	FEIS Section 4.14; Baseline Socioeconomic report
		<ul style="list-style-type: none"> •Demographics; 	FEIS Section 4.14; Baseline Socioeconomic Report
		<ul style="list-style-type: none"> •Archaeological, cultural, heritage, and burial sites, as well as sites identified by Elders as being sacred or spiritual places (e.g., Aglinaqtut). Each site shall be described and delineated on a map, using, where appropriate, the Borden system of designation. Moreover, the identified sites shall be placed within the context of a regional overview of prehistory and history; 	FEIS Section 4.14; Baseline Socioeconomic Report; Baseline Archaeological Report
		<ul style="list-style-type: none"> •Land and resource use, including national parks and similar areas; 	FEIS Section 4.14
		<ul style="list-style-type: none"> •Local and regional economy (distinguishing between the traditional and wage economies and specifying the value or the replacement value of the traditional economy in dollars and in terms of local consumption and cultural and physical wellbeing); 	FEIS Section 4.14; Baseline Socioeconomic Report
		<ul style="list-style-type: none"> •Employment, education, and training; 	FEIS Section 4.14; Baseline Socioeconomic Report
		<ul style="list-style-type: none"> •Services and infrastructure; 	FEIS Section 4.14; Baseline Socioeconomic Report
		<ul style="list-style-type: none"> •Government; and 	FEIS Section 4.14; Baseline Socioeconomic Report
		<ul style="list-style-type: none"> •Other components identified through public consultation. 	FEIS Section 4.14; Baseline Socioeconomic Report
		The Proponent shall provide a rationale for the selection of communities for which baseline data are provided.	FEIS Section 4.14; NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall describe the interactions between the socio-economic and biophysical environments, including the roles of the land- and wage-based economies and the nature of the mixed economy of the North.	FEIS Section 4.14
		The Proponent shall identify and justify indicators, which, to the extent feasible, shall be identical or complementary to those used or being developed by the NPC. Indicators might include the following:	FEIS Section 4.14
<ul style="list-style-type: none"> •Average income of residents; 	FEIS Section 4.14; Baseline Socioeconomic Report		

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Employment levels and participation rates in both the wage-and land-based economies;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Rates of high school completion;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Housing (e.g., number of dwellings, average number of persons per dwelling, average number of persons per bedroom, percentage of units with full plumbing and heating systems);	FEIS Section 4.14; Baseline Socioeconomic Report
4.14	Description of Socio-Economic Environment	•Teen birth rates;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Number of children in care;	FEIS Section 4.14; NIRB Submission Letter – April 30 (Appendix F.2)
		•Number of suicides;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Number, type, and severity of accidents;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Life expectancy;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Types and frequencies of communicable diseases;	FEIS Section 4.14
		•Social Assistance cases;	FEIS Section 4.14; NIRB Submission Letter – April 4 (Appendix F.1)
		•Number of alcohol- and drug-related crimes;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Number of property crimes;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Number of complaints of family violence;	FEIS Section 4.14; Baseline Socioeconomic Report
		•Types and quantities of wildlife harvested; and	FEIS Section 4.14; Baseline Socioeconomic Report
		•Seasonality and geographic distribution of harvesting activities.	FEIS Section 4.14; Baseline Socioeconomic Report
			Whenever relevant, data shall be disaggregated by age, gender, and ethnic affiliation.
	The foregoing is not to suggest that the Proponent is responsible for the current socio-economic situation of the Kivalliq Region or of Nunavut, or that it is expected to resolve any problems that are identified. Nevertheless, a proper understanding of the structure and functioning of the potentially affected societies is needed in order to identify the potential of the Project to affect them, whether positively or negatively, and to ensure that any socio-economic mitigating measures put in place by the Proponent have a reasonable likelihood of attaining their objectives. The indicators selected must be adequate to address all types of foreseeable impacts, including cumulative and residual impacts.	FEIS Section 4.14; Environmental Assessment Supporting Documents	
4.15	Spatial Boundaries	Spatial and temporal boundaries must be determined on the basis of the potential impacts on the particular biophysical or social phenomenon being addressed.	FEIS Section 4.15; Environmental Assessment Supporting Documents
		Ecoregions and ecozones should be considered as factors, where relevant, in determining spatial boundaries.	FEIS Section 4.15; Environmental Assessment Supporting Documents
		The types of data collected and the methodologies, including public consultation and discussions with technical experts, for collecting, presenting, and analyzing such data must, to the extent possible, be consistent with the General Monitoring Program of Article 12 of the NLCA.	FEIS Section 4.15; ; Environmental Assessment Supporting Documents
		The Proponent shall define the spatial boundaries of the maximum area potentially affected by the Project, based on the boundaries for each individual type of impact, taking into account an analysis of such impact pathways as pollutant transport and accumulation mechanisms.	FEIS Section 4.15; Environmental Assessment Supporting Documents
		Spatial boundaries may vary according to seasons and impact pathways. For example, the spatial boundaries for hydrographical studies related to tailings pond design will probably differ from those for studies on caribou migration.	FEIS Section 4.15; Environmental Assessment Supporting Documents

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		The boundaries for socio-economic assessment shall be based on an analysis of the socio-economic effects directly and indirectly associated with the Project	FEIS Section 4.15; NIRB Submission Letter – April 4 (Appendix F.1); Socioeconomic & Archaeology Impact Assessment
		In all cases, priority shall be given to potential impacts within Nunavut, but the NLCA requires that potential impacts outside Nunavut shall also be considered wherever there is reason to anticipate that they might occur.	FEIS Section 4.15; Environmental Assessment Supporting Documents
		The spatial boundaries for assessing the cumulative effects on a VEC or VSEC should be set at the maximum range or distribution of the potential cumulative effects.	FEIS Section 4.15; Environmental Assessment Supporting Documents
4.16	Temporal Boundaries	Like spatial boundaries, temporal boundaries may vary with, among other things, with the type of impact and with season. The establishment of temporal boundaries has two aspects: the time horizon that will be used in predicting change; and the temporal variability and periodicity that characterize the predicted impacts (Whitney and Maclaren, 1985). The time-horizon used for predicting change must be a function of the anticipated duration of the Project, including the final closure and post-closure phases, and its predicted impacts and of the predictive capability of the various disciplines at play.	FEIS Section 4.16; NIRB Submission Letter – April 30 (Appendix F.2); Environmental Assessment Supporting Documents;
		The Proponent shall determine the temporal boundaries separately for the construction, operations, temporary closure, final closure, and post-closure periods.	FEIS Section 4.16; Environmental Assessment Supporting Documents
		The closure period covers decommissioning, abandonment, and reclamation. The post-closure period covers the period after the mine has been decommissioned and the site reclaimed and returned as much as possible to its natural state.	FEIS Section 4.16; Environmental Assessment Supporting Documents
		The temporal boundaries of the post-closure period may encompass many years, depending on the site and on the methods of closure. The Proponent shall give a rationale and justification for the boundaries chosen, including a description of any consultation with members of the public or technical experts.	FEIS Section 4.16; NIRB Submission Letter – April 4 (Appendix F.1); Environmental Assessment Supporting Documents; Public Involvement Report
		In doing so, the Proponent shall recognize that, over the past 50 years, the western Arctic has experienced a warming trend accompanied by increased annual precipitation and increases in the magnitude and frequency of extreme weather events. Some General Circulation Models predict continued warming at high latitudes over the next century. There may be no immediate danger of permafrost degradation, but the Proponent must incorporate that possibility into the design of certain Project components.	FEIS Section 4.16; Physical Ecosystem Impact Assessment; Environmental Assessment Supporting Documents
4.17	Data Acquisition Methodology and Documentation	The Proponent shall specify and justify all sampling methods and statistical processes employed in both the biophysical and social contexts.	FEIS Section 4.17; Environmental Assessment Supporting Documents
		The reliability and scope of the results, the possibility of reproducing the analyses (repeatability), and quality control of laboratory analyses shall be analyzed critically.	FEIS Section 4.17; NIRB Submission Letter – April 4 (Appendix F.1); Environmental Assessment Supporting Documents
		All data based on environmental sampling necessarily involve some variability, which must be determined to assess the reliability and scope of the data. The Proponent shall, for all data obtained from environmental sampling, provide a dispersion or variability coefficient (variance, standard deviation, or preferably 95 % confidence interval, etc.) and indicate the size of the sample used.	FEIS Section 4.17; Environmental Assessment Supporting Documents
		Similarly, when using mathematical models, the Proponent shall indicate the assumptions employed, the prototype used, the accuracy, and the inherent limits of interpretation. As noted in Subsection 4.15 every effort must be made to harmonize the types of data collected and their statistical treatment with the NPCs General Monitoring Program outlined in Article 12 of the NLCA.	FEIS Section 4.17; Environmental Assessment Supporting Documents

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
4.18	Data Analysis and Reporting	Wherever the Proponent makes use of qualitative criteria to compare various design and development options, to describe the environment, or to assess impacts, each of these criteria shall be defined, their relative importance stated, and the differences between the categories (e.g., desirable, acceptable, unacceptable) indicated.	FEIS Section 4.18; Environmental Assessment Supporting Documents
		The Proponent shall justify the classification of each criterion.	FEIS Section 4.18; Environmental Assessment Supporting Documents
		The Proponent shall support all analyses, interpretations of results, and conclusions with a review of the relevant literature, providing all references required and indicating the public availability of all works consulted.	FEIS Section 4.18; Environmental Assessment Supporting Documents
		Any contribution based on Traditional Knowledge shall also be specified and sources identified, subject to any concerns relating to ownership or confidentiality.	FEIS Section 4.18; Traditional Knowledge Report; All Supporting Documents
		The Proponent shall correlate its conclusions about impact significance with any thresholds identified in relevant literature or regional policies.	FEIS Section 4.18; Environmental Assessment Supporting Documents
		The Proponent shall provide clear statements regarding the availability, relevance, and quality of the data.	FEIS Section 4.18; NIRB Submission Letter – April 4 (Appendix F.1) ; Environmental Assessment Supporting Documents
4.19	Impact Assessment Methodology	The Proponent shall explain and justify the methods used for impact prediction, which can include mathematical or mechanical modelling, previous experience, statistical modelling (e.g., variance and correlation analyses), the analysis of sequential series, prediction of tendencies, expert opinion, and Traditional Knowledge.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		All studies used in the prediction of impacts must be specified, a database organized, the original authors identified, and the studies made public.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		All statements based on public consultation shall be justified, and the sources and methodology specified.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		The choice of methodologies and interpretation of results shall be justified in light of current theories, knowledge and standards.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		The Proponent shall assess the direct, indirect, short-term, and long-term impacts of the Project on the biophysical and socio-economic environments, and the interactions between them, focusing on the anticipated response of the VECs and VSECs.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		It shall also assess the degree of uncertainty associated with each predicted effect.	FEIS Section 4.19; Environmental Assessment Supporting Documents
4.19	Impact Assessment Methodology	Impact significance is based on comparing the predicted state of the environment with and without the Project and expressing a judgment as to the importance of the changes identified.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		Assessing the significance of potential impacts is, arguably, the single most important aspect of an Environmental Impact Statement. The determination of significance shall take into account the following attributes of each impact: magnitude; geographic extent; timing; duration; frequency; reversibility; probability of occurrence; effect on ecosystem functioning and integrity; the capacity of resources to meet present and future needs; and the value attached to the impacted VEC or VSEC by those who identified them.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		Hence, the concerned communities, as well as other individuals and organizations, shall be fully consulted in defining impact significance.	FEIS Section 4.19; NIRB Submission Letter – April 4 (Appendix F.1); Public Involvement Report
		The Proponent shall describe how it will ascertain the significance that different interveners assign to each impact and how it will proceed if different interveners ascribe varying significance to VECs, VSECs, or the associated impacts.	FEIS Section 4.19; NIRB Submission Letter – April 4 (Appendix F.1) ; Environmental Assessment Supporting Documents

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		If it is impossible to attain a consensus on the significance of certain impacts, the Proponent shall present the range of viewpoints expressed and shall present and justify its preference, if any.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		The dynamic change of ecosystems and their components must also be considered in determining impact significance. Changes in ecosystems can be cyclical, gradual, or the result of disasters; they can be local, regional, universal, anticipated, or unexpected.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		The significance of an effect on an ecosystem component can, therefore, change through time and can vary according to the "state of health" of the ecosystem or the component at the time of the impact. EISs often "freeze" ecosystems and societies at a specific moment in time, often providing "snapshots" when collecting baseline data, and therefore evaluate the significance of the potential impacts upon them at that specific time. The Proponent shall evaluate the significance of potential impacts in the light of data on the dynamism and the current "state of health" of ecosystems and their components and societies and their predictable evolution in the light of, among other phenomena, global climate change.	FEIS Section 4.19; Environmental Assessment Supporting Documents
4.19	Impact Assessment Methodology	Consistent with the ecosystem approach required above, the Proponent shall strive to highlight the interactions within and between ecosystem components, and overall trends, in an effort to increase understanding of the dynamism of the ecosystems in question and the nature and severity of the predicted impacts.	FEIS Section 4.19; Environmental Assessment Supporting Documents
		The Proponent shall identify potential impacts separately for each Project phase, including exploration. It shall also assess the potential impacts arising from accidental events and malfunctions. Any terms used to describe the significance of impacts, such as "low", "medium", or "high", must be clearly defined, where possible in quantitative terms.	FEIS Section 4.19; Environmental Assessment Supporting Documents
4.20	Indicators and Criteria	The Proponent shall identify the indicators and/or criteria selected for assessing the potential impacts of the Project, including its cumulative impacts, and shall justify their selection.	FEIS Section 4.20; Environmental Assessment Supporting Documents; Cumulative effects Assessment
		In doing so, the Proponent shall describe the role played by consultation with members of the public and technical experts.	FEIS Section 4.20; NIRB Submission Letter – April 4 (Appendix F.1)
		In every case where a potential impact or an area of ignorance or uncertainty is identified, the Proponent must give a clear commitment in the appropriate section of the EIS as to how it will address it.	FEIS Section 4.20; Environmental Assessment Supporting Documents
		The Proponent must clearly distinguish the impacts at each stage of the Project, including temporary closure, final closure and post-closure.	FEIS Section 4.20; Environmental Assessment Supporting Documents
4.21	Impact Assessment	The Proponent must clearly distinguish the impacts at each stage of the Project, including temporary closure, final closure and post-closure.	FEIS Section 4.21; NIRB Submission Letter – April 30 (Appendix F.2) ; Environmental Assessment Supporting Documents
		Consistent with the principle expressed in the first paragraph of Subsection 4.3, the consequences of each predicted impact for the functioning and integrity of its ecosystem must be considered in addition to the consequences for the VEC or VSEC in question.	FEIS Section 4.21; Environmental Assessment Supporting Documents
4.21.1	Project Components and Activities		FEIS Section 4.21.1
4.21.1.1	Underground Mining	The Proponent shall assess the potential impacts of underground mining, taking into account the following:	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Mine permeability	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•The immediate and downstream effects of de-watered areas on habitat, aquatic organisms, and water circulation	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment; Aquatic Ecosystem/ Fish Habitat Impact Assessment
		•Plans for managing mine water and groundwater seepage into the mine	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Salinity and general characterization of groundwater	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Permafrost intrusion and winter operations	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•The effects on receiving water bodies of water pumped from the mine	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Any effects of exposure to air or water on ore	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Rock stability	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•The impacts of blasting on air and water quality, with particular reference to dust and wastewater containing nitrites or nitrates from explosives	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
4.21.1.2	Processed Ore Containment (and Tailings Ponds)	The Proponent shall assess the potential impacts of the processed ore containment area, taking into account:	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Its design, location, and capacity	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•The permeability of the impoundment structure and the effectiveness of seepage containment	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•The technique and plans for filling the facility, including winter operations	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•The characteristics and toxicity of the processed ore, including fines, and windblown dust	FEIS Sections 4.10 and 4.11; ; Physical Ecosystem Impact Assessment; NIRB Submission Letter – April 4 (Appendix F.1); Kinetic and Static Testwork Reports
		•Effluent treatment and discharge	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Any effects of talik development on the long-term stability of the processed ore containment area	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		Typical questions that arise include:	FEIS Sections 4.10 and 4.11
		•Current and predicted water quality	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Discharge point for effluent	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Microclimate	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Fish and fish habitat	FEIS Sections 4.10 and 4.11; Aquatic Ecosystem/ Fish Habitat Impact Assessment
		•Need for control or retention structures	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•Anticipated volume of tailings in relation to the storage capacity of the lake	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 30 (Appendix F.2); Physical Ecosystem Impact Assessment
		•Use/rejection of polishing pond	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
4.21.1.2	Processed Ore Containment (and Tailings Ponds)	•Supernatant retention time and natural cyanide destruction rates in Arctic environments.	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		Particular attention shall be paid to potential impacts on wildlife, including caribou, muskox, and waterfowl.	FEIS Sections 4.10 and 4.11; Terrestrial Ecosystem Impact Assessment
4.21.1.3	Waste Rock, Ore and Overburden Storage	The Proponent shall assess the potential impacts of the waste rock, ore, and overburden storage, taking into account:	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		•The design (height, topography, spatial extent, volume, etc.) and location of the waste rock, ore, and overburden storage sites;	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 30 (Appendix F.2); Mine Waste & Water Management Plan; Physical Ecosystem Impact Assessment
		•The characteristics of the material to be stored	FEIS Sections 4.10 and 4.11; Mine Waste & Water Management Plan; Physical Ecosystem Impact Assessment
		•Plans for transporting and handling materials	FEIS Sections 4.10 and 4.11; Mine Waste & Water Management Plan; Physical Ecosystem Impact Assessment
		•The characteristics and volumes of seepage, techniques for collecting and disposing of seepage, and the effectiveness of drainage containment	FEIS Sections 4.10 and 4.11; Mine Waste & Water Management Plan; Physical Ecosystem Impact Assessment
		•Acid rock drainage	FEIS Sections 4.10 and 4.11; Mine Waste & Water Management Plan; Physical Ecosystem Impact Assessment; Kinetic and Static Testwork Reports
		•The metal content of frozen groundwater in the waste rock	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 4 (Appendix F.1) ; Mine Waste & Water Management Plan; Physical Ecosystem Impact Assessment
		•Windblown dust	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 4 (Appendix F.1); Air Quality & Noise Impact Assessment; Physical Ecosystem Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •The suitability of the overburden as a substrate for reclamation activities 	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 4 (Appendix F.1); Reclamation & Closure Plan
		<ul style="list-style-type: none"> •The potential for re-vegetation 	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 4 (Appendix F.1); Reclamation & Closure Plan
		Particular attention shall be devoted to potential disruptions to the movements of wildlife.	FEIS Sections 4.10 and 4.11; Terrestrial Ecosystem Impact Assessment
4.21.1.4	Processing and Plant Infrastructure	The Proponent shall assess the potential impacts of the processing and plant infrastructure, including:	FEIS Sections 4.10 and 4.11
		<ul style="list-style-type: none"> •Noise from plant operations and transportation to and from the plant 	FEIS Sections 4.10 and 4.11; Noise Impact Assessment
		<ul style="list-style-type: none"> •Runoff from the plant or stored materials 	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment; Water Quality Predictions
		<ul style="list-style-type: none"> •Sources and disposal of water and effluent 	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		<ul style="list-style-type: none"> •Wastes produced and their storage 	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
		<ul style="list-style-type: none"> •Chemicals used, with particular reference to hazardous materials 	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment; Hazardous Material Management Plan
		Particular attention shall be devoted to potential disruptions to the movements of wildlife.	FEIS Sections 4.10 and 4.11; Terrestrial Ecosystem Impact Assessment
4.21.1.5	Natural Drainage Diversion	The Proponent shall assess the potential impacts of any diversions of natural drainage systems	FEIS Sections 4.10 and 4.11; Aquatic Ecosystem & Fish Habitat Impact Assessment; Physical Ecosystem Impact Assessment
		The analysis must consider the challenges encountered by other mines and comparable operations in constructing drainage diversions (such as mass erosion and melting ice lenses and the resulting nutrient loadings in water bodies), and the potential for mobilizing sediments and disturbing terrain.	FEIS Sections 4.10 and 4.11; Aquatic Ecosystem & Fish Habitat Impact Assessment; Physical Ecosystem Impact Assessment
		Particular attention shall be paid to the impacts on fish, waterfowl, and aquatic mammals resulting from the modification or redirection of natural flows.	FEIS Sections 4.10 and 4.11; Aquatic Ecosystem & Fish Habitat Impact Assessment; Terrestrial Ecosystem Impact Assessment
4.21.1.6	Sewage and Solid Waste Management	The Proponent shall assess the potential impacts of solid waste and sewage, identifying whether either might act as an attractant to certain species of wildlife.	FEIS Sections 4.10 and 4.11; Terrestrial Ecosystem Impact Assessment
		The analysis shall consider the challenges encountered by comparable mining operations in treating and disposing of sewage and solid waste in a northern ecosystem, as well as the nutrient levels, biological oxygen demand, and winter oxygen levels of any receiving water bodies.	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		The Proponent shall also consider the potential impacts of any recycling options, back hauling, landfill segregation, and leaching.	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 30 (Appendix F.2) ; Physical Ecosystem Impact Assessment
4.21.1.7	Hazardous Materials Management	The Proponent shall assess the potential impacts associated with the transporting, handling, storing, using, and disposing of hazardous materials, including explosives, hydrogen cyanide, and hydrocarbons.	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment; Hazardous Materials Management Plan
		The analysis shall include the potential impacts on water quality from blasting residues, and the possibility that some such materials may act as attractants to some species of wildlife.	FEIS Sections 4.10 and 4.11; Terrestrial Ecosystem Impact Assessment
4.21.1.8	Power	The Proponent shall assess the potential impacts associated with power production, transmission and distribution	FEIS Sections 4.10 and 4.11; Physical Ecosystem Impact Assessment
4.21.1.9	Air and Ground Traffic	The Proponent shall assess the potential impacts, including those resulting from interactions with wildlife, relating to air and road traffic, taking into account the type, frequency, and timing of traffic, particularly low-flying fixed- and rotary-wing aircraft, noise levels, and, in the case of road traffic, stream crossings.	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 30 (Appendix F.2); Impact Assessment Supporting Documents
4.21.1.10	Borrow Pits and Quarry Sites	The Proponent shall assess the potential impacts of borrow pits and quarry sites, including noise and dust levels, slope stability, thawing of permafrost and ground ice, melt water runoff, habitat loss, and interactions with wildlife.	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 30 (Appendix F.2); ; Physical Ecosystem Impact Assessment
4.21.1.11	Other Site Facilities and Infrastructure	The Proponent shall assess the potential impacts, including those resulting from interactions with wildlife, of all other site facilities and associated infrastructure.	FEIS Sections 4.10 and 4.11; Terrestrial Ecosystem Impact Assessment
4.21.1.12	Processing Operations	The Proponent shall assess the potential impacts of processing operations, including those resulting from interactions with wildlife.	FEIS Sections 4.10 and 4.11; Terrestrial Ecosystem Impact Assessment
4.21.1.13	Accidents and Malfunctions	The Proponent shall assess the potential impacts, including those resulting from interactions with wildlife, of accidents and malfunctions, including worst-case scenarios, and shall evaluate their probability of occurrence.	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 30 (Appendix F.2) ; Terrestrial Ecosystem Impact Assessment
		Internal and external reporting procedures shall also be described.	FEIS Sections 4.10 and 4.11
4.21.1.14	Exploration Programme	The Proponent shall assess the potential impacts of exploration activities, whether by the Proponent or others that utilize Project infrastructure.	FEIS Sections 4.10 and 4.11; NIRB Submission Letter – April 4 (Appendix F.1); Impact Assessment Supporting Documents
4.21.1.15	Temporary Closure, Final Closure and Reclamation Programmes	The Proponent shall assess the potential impacts associated with temporary closure, final closure, and reclamation of the Project.	FEIS Sections 4.10 and 4.11; Reclamation & Closure Plan; Impact Assessment Supporting Documents
4.21.2	Physical and Biological Environmental Components		FEIS Section 4.21.2
4.21.2.1	Terrain and Landscape	The Proponent shall assess the potential impacts on such factors as terrain stability, permafrost and ground ice (including ground ice in eskers, kames, or deltas used as quarries or borrow pits), ice lenses, seismicity, rock heave, and geochemistry.	FEIS Section 4.21.2.1; Physical Ecosystem Impact Assessment
		Attention shall be paid to sites of palaeontological and palaeobotanical significance.	FEIS Section 4.21.2.1; Socioeconomic & Archaeology Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		The Proponent shall pay attention to such potential impacts as disturbance to the active layer of permafrost and the resultant ecological effects, permanent changes in the local use of the landscape by wildlife, and permanent aesthetic and physical changes to the landscape.	FEIS Section 4.21.2.1; Terrestrial Ecosystem Impact Assessment; Physical Ecosystem Impact Assessment
		Other potentially important impacts are those on eskers (e.g., by quarrying for granular material) and the resultant effects on wildlife. Eskers are important to wildlife, as they provide migration routes for caribou, offer habitat for small mammals, and are used by carnivores, including Grizzly bears, foxes and wolves, for travelling, denning, and feeding.	FEIS Section 4.21.2.1; Terrestrial Ecosystem Impact Assessment
		The Proponent shall also discuss the use	FEIS Section 4.21.2.1
4.21.2.1	Terrain and Landscape	The Proponent shall also discuss the use of Traditional Knowledge in assessing eskers in relation to both wildlife use and as burial grounds, as studies have shown that eskers are in some areas the landforms with the greatest archaeological potential.	FEIS Section 4.21.2.1; Socioeconomic & Archaeology Impact Assessment; Traditional Knowledge Report
4.21.2.2	Air	The Proponent shall quantify the gaseous emissions from fuel consumption, air-borne dust from road transportation, blasting and crushing operations, and wind erosion of waste rock dumps and exposed tailings, and shall discuss the possible effects of such activities (e.g., effects on lichen, effects on workers' safety).	FEIS Section 4.21.2.2; Air Quality & Noise Impact Assessment
		The analysis shall also address the following:	FEIS Section 4.21.2.2
		•The atmospheric dispersion of emissions on a local and regional scale;	FEIS Section 4.21.2.2; Air Quality & Noise Impact Assessment
		•Atmospheric conversion processes of emissions (e.g., secondary particulates) and linkages between chemicals, the environment, and human health	FEIS Section 4.21.2.2; Air Quality & Noise Impact Assessment
		•Potential biological receptors, such as vegetation and wildlife;	FEIS Section 4.21.2.2; Terrestrial Ecosystem Impact Assessment
		•The potential for the release of any "greenhouse" gases;	FEIS Section 4.21.2.2; Air Quality & Noise Impact Assessment
		•The effects on plant phenology and wildlife if changing albedo alters the timing or pattern of snow melt.	FEIS Section 4.21.2.2; Terrestrial Ecosystem Impact Assessment
		Relevant indicators may include the <i>Canadian Environmental Quality Guidelines</i> and <i>Guidelines Respecting Ambient Air Standards for Sulphur and Total Suspended Particulate Matter in the Northwest Territories</i> , under the <i>Environmental Protection Act</i> .	FEIS Section 4.21.2.2; Air Quality Impact Assessment
4.21.2.3	Water Quality and Quantity	The Proponent shall assess the potential impacts on surface and ground waters.	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		The analysis shall include the impacts on water quality and quantity, catchment areas, and permafrost in relation to:	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Site facilities and infrastructure;	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•In-filling and blasting	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Collecting and treating wastewater and surface runoff	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Mine water	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Groundwater seepage	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Water management (inputs, outputs, re-use)	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Contaminant loading and dispersion (including surface runoff and airborne contaminants)	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Acid rock drainage, metal leaching (including metal leaching from frozen groundwater in the waste rock), and geochemistry;	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Sedimentation (plumes and dispersion)	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•Changes in water flow caused by stream diversions or otherwise	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
4.21.2.3	Water Quality and Quantity	•Processed ore containment area operation, discharge, and de-watering	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		•The release of contaminants, including ores, that could affect water quality and/or potable water, and human health	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
4.21.2.3	Water Quality and Quantity	•The contamination of waste rock drainage by residual nitrogen in the form of nitrates or nitrites from ammonium-nitrate-based explosives.	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
		Moreover, the Proponent shall indicate where day-to-day operational problems might occur, particularly regarding runoff control and treatment, and predict the effects of a worst-case scenario in which there is an uncontrolled release of contaminants, including, for example, hydrocarbons, nitrate-contaminated water, or cyanide into the aquatic environment.	FEIS Section 4.21.2.3; NIRB Submission Letter – April 4 (Appendix F.1) ; Physical Ecosystem Impact Assessment
		The Proponent shall identify water quality objectives from the perspectives of socioeconomic/ human health and ecological health. For example, the receiving water criteria of the Canadian Council of Ministers of the Environment and the <i>Canadian Environmental Quality Guidelines</i> for fresh water and aquatic life for total suspended solids, total arsenic, total copper, and any other relevant metals shall be referred to for comparative purposes.	FEIS Section 4.21.2.3; Physical Ecosystem Impact Assessment
4.21.2.4	Vegetation	The Proponent shall assess the potential impacts on	FEIS Section 4.21.2.4
		•Local plant communities (i.e., vascular, non-vascular, wetland, and riparian)	FEIS Section 4.21.2.4; Terrestrial Ecosystem Impact Assessment
		•Plant phenology	FEIS Section 4.21.2.4; Terrestrial Ecosystem Impact Assessment
		•Any rare, endangered, or highly valued species;	FEIS Section 4.21.2.4; Terrestrial Ecosystem Impact Assessment
		•Wildlife dependent, whether seasonally or otherwise, on specific habitats or species of vegetation	FEIS Section 4.21.2.4; Terrestrial Ecosystem Impact Assessment
		The analysis shall address the loss of vegetation due to mine development and haul and access roads, covering of vegetation by waste rock dumps, and contaminant uptake by vegetation.	FEIS Section 4.21.2.4; Terrestrial Ecosystem Impact Assessment
		The Proponent shall include a quantitative account of the loss of plant communities in different ecozones, and ecoregions.	FEIS Section 4.21.2.4; Terrestrial Ecosystem Impact Assessment
4.21.2.5	Wildlife	Special consideration shall be given to species listed as vulnerable, endangered, or a species of special concern by COSEWIC, to those that residents of the Kivalliq Region record as being vulnerable or endangered locally or regionally, and to species of particular social, cultural, and economic importance, including those for human consumption purposes.	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		The analysis of the potential impacts shall include:	FEIS Section 4.21.2.5

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •Habitat loss or alteration (e.g. fragmentation, connectivity) •Mortality (including sport hunting by Project staff) 	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•Displacement and/or crowding	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•Disruption of movement (e.g. migratory, or within home ranges)	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•Altered inter-specific relationships (e.g., predator-prey), including those with humans	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•Noise or other forms of disturbance on the ground or by aircraft;	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•Bioaccumulation and biomagnification of toxins	FEIS Section 4.21.2.5 NIRB Submission Letter – April 4 (Appendix F.1); Terrestrial Ecosystem Impact Assessment
		The Proponent shall assess the implications of the above on the overall health of wildlife populations, communities, and ecosystems.	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment; Terrestrial Ecosystem Management Plan, Appendix II
4.21.2.5 a	Caribou	Potential impacts on caribou could include:	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•disruption of movements and migration corridors (due to the mine site, roads, or air traffic, particularly low-level flying by fixed- or rotary-wing aircraft)	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•deflection of migratory routes from traditional hunting areas	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•loss or alteration of habitat or calving grounds; deaths or injuries due to collisions with vehicles;	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•disturbance when feeding or resting	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•the possibility that caribou may be trapped in the tailings	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		The Proponent shall evaluate how the potential effects could affect caribou harvesting, as well as the potential effects of diverting caribou around the mine site on their energy balance, which, among other things, can affect the quality of the meat and reproductive success.	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		This evaluation should also consider different seasons and life processes (e.g., migration, calving, winter foraging), focusing on periods when thermoenergetic factors may be important determinants of population trends.	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		Indicators could include: the number of caribou using a specific crossing, calving ground, or winter range; the number of caribou in a herd; physical condition as evidenced by body or marrow fat or other indicators; and the level of contaminants in tissues and organs.	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
4.21.2.5 b	Grizzly Bear	Grizzly bears are listed as a species of special concern by COSEWIC based on their low densities and productivity. Baseline data shall relate to such topics as:	FEIS Section 4.21.2.5
		•movements	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•habitat use	FEIS Section 4.21.2.5 ; Terrestrial Ecosystem Impact Assessment
		•diet	FEIS Section 4.21.2.5 ; Terrestrial Ecosystem Impact Assessment
		•den locations (dens are often found near eskers)	FEIS Section 4.21.2.5 ; Terrestrial Ecosystem Impact Assessment
		The effects of camp infrastructure, attractant sources, including the possibility of habituation, and human-bear interactions shall be considered.	FEIS Section 4.21.2.5 ; Terrestrial Ecosystem Impact Assessment
		The cumulative effects of habitat loss and of the increased frequency of interactions with humans shall also be considered.	FEIS Section 4.21.2.5 ; Terrestrial Ecosystem Impact Assessment; Cumulative Effects Assessment
4.21.2.5 c	Musk-Oxen	Potential impacts on musk-oxen may include:	FEIS Section 4.21.2.5
		•loss or alteration of habitat	FEIS Section 4.21.2.5 ; Terrestrial Ecosystem Impact Assessment
		•collisions with vehicles	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
		•susceptibility of herds to mine-related sources of disturbance during calving	FEIS Section 4.21.2.5 ; Terrestrial Ecosystem Impact Assessment
4.21.2.5 d	Wolves, Wolverines and Foxes	Potential impacts may relate to habitat, including denning and other critical areas. Wolverines are listed as a species of special concern by COSEWIC based on their low densities and productivity.	FEIS Section 4.21.2.5; Terrestrial Ecosystem Impact Assessment
4.21.2.6	Birds	Potential impacts on birds include:	FEIS Section 4.21.2.6
		•loss	FEIS Section 4.21.2.6; Terrestrial Ecosystem Impact Assessment
		•alteration of habitat, such as staging or nesting habitats (e.g., wetlands)	FEIS Section 4.21.2.6; Terrestrial Ecosystem Impact Assessment
		•alienation of habitat, such as staging or nesting habitats (e.g., wetlands)	FEIS Section 4.21.2.6; Terrestrial Ecosystem Impact Assessment
		•disruption of migration routes	FEIS Section 4.21.2.6; Terrestrial Ecosystem Impact Assessment
		•disturbance by human activity such as blasting and air and road traffic the alteration of habitats	FEIS Section 4.21.2.6; Terrestrial Ecosystem Impact Assessment
4.21.2.7	Aquatic Organisms and Habitats	•bioaccumulation	FEIS Section 4.21.2.6 NIRB Submission Letter – April 4 (Appendix F.1)
		The analysis of potential impacts on aquatic organisms and habitats shall include:	FEIS Section 4.21.2.7
		•The productive capacity of aquatic ecosystems, with particular reference to species of fish that are important for recreational or subsistence purposes;	FEIS Section 4.21.2.7; Aquatic Ecosystem & Fish Habitat Impact Assessment
		•Water quality, bearing in mind the <i>Canadian Environmental Quality Guidelines</i>	FEIS Section 4.21.2.7; Aquatic Ecosystem & Fish Habitat Impact Assessment
		•Habitat loss, alteration, or alienation	FEIS Section 4.21.2.7; Aquatic Ecosystem & Fish Habitat Impact Assessment
		•Rare and/or sensitive aquatic organisms and habitats	FEIS Section 4.21.2.7; Aquatic Ecosystem & Fish Habitat Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Mortality (including sport fishing by Project workers)	FEIS Section 4.21.2.7; Aquatic Ecosystem & Fish Habitat Impact Assessment
		•Noise and blasting	FEIS Section 4.21.2.7; Aquatic Ecosystem & Fish Habitat Impact Assessment
		•Bioaccumulation and biomagnification of toxins The Proponent shall evaluate potential impacts against the <i>Policy for the Management of Fish and Fish Habitat (1986) as well as the applicable Metal Mining Regulations (June 2002)</i> .	FEIS Section 4.21.2.7; NIRB Submission Letter – April 4 (Appendix F.1); Aquatic Ecosystem & Fish Habitat Impact Assessment; terrestrial Ecosystem Management Plan, Appendix II FEIS Section 4.21.2.7; Aquatic Ecosystem & Fish Habitat Impact Assessment
4.21.3	Biodiversity	The Proponent shall consider potential impacts on the biodiversity and richness of local and regional flora and fauna.	FEIS Section 4.21.3; Terrestrial Ecosystem Management Plan
4.21.4	Social, Economic and Cultural Components	The Proponent shall assess the potential impacts on socio-economic and cultural components, taking into account the following:	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		•The health of the workers, their families, and other residents (human health includes physical, psychological, emotional, spiritual, and mental health)	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		•Demographics, such as Project-induced changes in population numbers, migration, and distribution, and the effects of those changes, including interactions between local residents and non-residents	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		•The traditional way of life of the residents of the Region especially their use of the land for economic, cultural, and other purposes, including the Project's contribution, if any, to increased levels of contaminants in traditional foods	FEIS Section 4.21.4; NIRB Submission Letter – April 30 (Appendix F.2) ; Socioeconomic & Archaeology Impact Assessment
		•The cultural well-being of the communities, based on indicators defined in collaboration with the concerned communities	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		•The social life of the concerned communities, family and community stability, problems of substance abuse, and crime and violence, including the effects of a major employment base away from the communities	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		•Archaeological, burial, cultural, heritage, and sacred sites	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		•Changes in	FEIS Section 4.21.4
		(a) hunting, trapping, or guiding areas	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(b) commercial, Nunavummiut, and sport fishing areas	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(c) conservation areas, territorial and federal parks, International Biological Program sites, or other ecological reserves or preserves	FEIS Section 4.21.4; terrestrial Ecosystem Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		(d) recreation and tourism areas and recognized scenic areas	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(e) the "wilderness experience" (including the potential for compromising the development of protected areas in the region)	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(f) navigable waters	FEIS Section 4.21.4; NIRB Submission Letter – April 4 (Appendix F.1)
		(g) industrial and commercial areas	FEIS Section 4.21.4
		The Proponent shall pay particular attention to local perceptions of the preceding effects:	FEIS Section 4.21.4
		•The likely evolution of the local, regional, territorial, and national economies over the life of the Project, having regard to direct, indirect, and induced effects on income and employment, in particular the effects on:	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
4.21.4	Social, Economic and Cultural Components	(a) wage and salary employment by skills category over the life of the Project (including estimates of Nunavummiut and other participation)	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(b) opportunities for local, regional, and territorial businesses to supply goods and services both directly to the Project and to meet the demand created by the expenditure of new income by employees and suppliers;	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(c) opportunities to diversify the economic base of Nunavut to produce and to supply new goods and services;	FEIS Section 4.21.4; NIRB Submission Letter – April 30 (Appendix F.2); Socioeconomic & Archaeology Impact Assessment
		•Opportunities for participation by Nunavummiut workers from the Central Kivalliq Region and Nunavut in wage and salary employment, considering such factors as: (d) prices and the cost of living;	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(a) the number of jobs to be created and the required skills	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(b) the effect of competition for labour between the Project and existing businesses, institutions, and traditional activities	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(c) the adequacy of training opportunities available to Nunavummiut to take advantage of jobs created by the Project, including apprenticeship opportunities and training organized by the Proponent	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(d) the extent to which the skills of the available workers match job requirements; the level of interest in mining work	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(e) commuting arrangements for workers	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		(f) barriers to employment, such as issues pertaining to the care of children and Elders	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		•Increased pressure on existing social, institutional, and community services, transportation facilities and services, and infrastructure •Any permanent changes to infrastructure and services	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> Revenues accruing to federal, Nunavut, and local governments, and net incremental costs imposed on governments by the Project, including savings realized and incremental costs of infrastructure and services; 	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		<ul style="list-style-type: none"> Community and local government organizations 	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
4.21.4	Social, Economic and Cultural Components	<p>The impact of an industrial development in this region, particularly where human populations are low, is directly related both to its pace and scale. For example, given the small and relatively untrained work force, the scale of the Project might affect employment benefits, whereas its pace, if abrupt, could cause social or cultural disruption and prove to be more significant than its scale. The Proponent shall address the potential for social and cultural disruption by, among other things, discussing social problems and evaluating the potential impacts of the Project on exacerbating or relieving such problems</p>	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		<p>The fear that the difficulties of coping with prolonged absences of family members might increase stress in families already dealing with cultural disruption should also be addressed.</p>	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		<p>If a community, such as Baker Lake or Rankin Inlet, is to serve as the main point of hiring for non-Nunavummiut, Nunavummiut living there might suffer from the effects of immigration by job-seekers, which could include housing shortages, prostitution, an increase in poverty, and strains on community resources to deal with such issues. Even if the foregoing are not considered to be probable direct effects of the proposed Project, they should be addressed in the assessment of its indirect and cumulative effects.</p>	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
		<p>The Proponent must evaluate how the temporary or final closure of the mine would affect workers and communities. For example, how does it perceive its responsibility to its work force and the local economy once operations shut down either temporarily or permanently? Would it put in place a programme of work force adjustment for the last few years of operations, assuming that the Project life extends, to provide such things as employee assistance, career counselling, educational subsidies, and re-training programmes? It would be desirable to use an input-output model to assess potential economic impacts, including indirect and induced effects.</p>	FEIS Section 4.21.4; Socioeconomic & Archaeology Impact Assessment
4.21.5	Impacts of the Environment on the Project	<p>The Proponent shall discuss the potential impacts of the environment on the Project, considering such things as:</p>	FEIS Section 4.21.5
		<ul style="list-style-type: none"> seismicity 	FEIS Section 4.21.5
		<ul style="list-style-type: none"> severe weather events 	FEIS Section 4.21.5
		<ul style="list-style-type: none"> global climate change 	FEIS Section 4.21.5
		<p>The discussion must specifically describe and assess how the potential for climate change (global warming) could affect permafrost and soils with high ice content and the long-term impacts of such changes on Project infrastructure, particularly the processed ore containment impoundment and waste rock piles.</p>	FEIS Section 4.21.5
4.22	Cumulative Effects Assessment	<p>The Proponent shall provide a brief overview of the theory and practice of Cumulative Effects Assessment ("CEA") especially as it applies to the ecosystem model of evaluating environmental impacts,</p>	FEIS Section 4.22; Cumulative Effects Assessment
		<p>and shall justify the methodology adopted in relation to the design of the Project, its management, and the proposed approach to impact assessment.</p>	FEIS Section 4.22; Cumulative Effects Assessment
		<p>The Proponent shall demonstrate how Project-specific CEA fits into regional planning initiatives.</p>	FEIS Section 4.22; Cumulative Effects Assessment
		<p>It shall assess the potential cumulative effects of the Project to determine its impacts in combination with past, current, or probable future developments of mines and other projects within a designated distance of the site of the Project determined in conformity with Subsection 4.15.</p>	FEIS Section 4.22; Cumulative Effects Assessment

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		The Proponent shall determine which other human activities have affected or are likely to affect the same VECs, VSECs, or ecosystems as the Project.	FEIS Section 4.22; Cumulative Effects Assessment
		The Proponent shall then predict the impacts of the Project in combination with those of the other past, present, and reasonably foreseeable future projects, using the most appropriate methodology on a case-by-case basis that is capable of incorporating all of the relevant impacts.	FEIS Section 4.22; Cumulative Effects Assessment
		At a minimum, it shall consider the cumulative effects of: other existing and reasonably foreseeable mines and exploration camps in the region.	FEIS Section 4.22; Cumulative Effects Assessment
		The term "probable future development" is defined to mean: projects or activities that are currently under regulatory review, and those that will be submitted for regulatory review in the near future, as determined by the existence of a project description in the possession of a government department or agency. Nevertheless, where less precise information about a possible development exists, the Proponent shall refer to it and shall offer its opinion on whether it might need to be taken into account at a later date.	FEIS Section 4.22; Cumulative Effects Assessment
		The Proponent shall give due consideration to trans-boundary impacts, including the effects of the Project outside Nunavut and the interactions between the effects of the Project and the effects of projects located outside Nunavut. Trans-boundary effects originating from the Project should be clearly identified.	FEIS Section 4.22; Cumulative Effects Assessment
4.22	Cumulative Effects Assessment	The discussion of cumulative effects shall include a comparison of the incremental contribution of the Project to regional thresholds for VECs and VSECs, as established by the Proponent or by any other authoritative source, and shall indicate to what degree a threshold is likely to be approached or exceeded.	FEIS Section 4.22; Cumulative Effects Assessment
		It shall also acknowledge the influence of biophysical cumulative effects on socioeconomic systems, and shall evaluate how cumulative socio-economic effects might influence the regional environment.	FEIS Section 4.22; Cumulative Effects Assessment
		The Proponent shall describe and justify all assumptions, models, and information limitations and associated levels of uncertainty.	FEIS Section 4.22; NIRB Submission Letter – April 4 (Appendix F.1) ; Cumulative Effects Assessment
		It shall explain its approach to handling the uncertainty associated with CEA.	FEIS Section 4.22; Cumulative Effects Assessment
4.23	Summary of Impacts	The Proponent shall present a documented summary of the potential impacts, addressing fully their significance in the light of Subsection 4.19.	FEIS Section 4.23
		The summary shall clearly highlight those impacts judged to be of greater importance and those that may require extensive mitigation measures and monitoring.	FEIS Section 4.23; NIRB Submission Letter – April 4 (Appendix F.1)
4.24	Environmental Management and Mitigation		FEIS Section 4.24
4.24.1	Overview	The Proponent shall present environmental management plans to prevent or mitigate all the potential impacts of the Project identified in Subsection 4.21, and shall identify residual effects. Mitigation is defined as the elimination, reduction, or control of the adverse effects of the Project. It includes restitution for any damage to the environment ...through replacement, restoration, compensation, or any other means.	FEIS Section 4.24.1; Management Plan Supporting Documents
		In the case of water, the Proponent shall take into account Article 20 of the NLCA.	FEIS Section 4.24.1; Management Plan Supporting Documents
		The description of mitigation measures shall include:	FEIS Section 4.24.1; Management Plan Supporting Documents
		•procedures to avoid environmentally sensitive areas or seasons,	FEIS Section 4.24.1; Management Plan Supporting Documents

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•contingency programmes to respond to accidents and emergencies,	FEIS Section 4.24.1; Management Plan Supporting Documents
		•restorative procedures to be implemented on disturbed sites,	FEIS Section 4.24.1; Management Plan Supporting Documents
		•compensation programmes for damage caused by the Proponent's activities to the environment, property, or the land- and resource-use of others.	FEIS Section 4.24.1; Management Plan Supporting Documents
		Any impacts that cannot be mitigated should be clearly identified.	FEIS Section 4.24.1; Management Plan Supporting Documents
		Management plans shall target at a minimum the following, as well as any other VECs or VSECs identified by the Proponent or any other stakeholder/intervenor/participant:	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Tailings;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Waste rock;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Domestic and industrial solid wastes;	FEIS Section 4.24.1; NIRB Submission Letter – April 4 (Appendix F.1); Management Plan Supporting Documents
		•Spill contingency plan (transport and storage of fuels and other hazardous materials) •Liquid waste;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Hazardous waste (including the use, handling, transportation, storage, production, and disposal of toxic substances, chemicals, and fuel);	FEIS Section 4.24.1; NIRB Submission Letter – April 30 (Appendix F.2); Management Plan Supporting Documents
		•Acid rock drainage;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Emergency response plan	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Water supply (including potable and process water)	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Landscape;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Permafrost;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Water quality;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Water management plan, including natural and on-site drainage;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Air quality;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Vegetation;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Caribou and their habitats	FEIS Section 4.24.1; Management Plan Supporting Documents

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•Grizzly bears and other scavengers and wildlife potentially attracted to the site	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Other bird and wildlife species and their habitats;	FEIS Section 4.24.1; Management Plan Supporting Documents
4.24.1	Overview	•Aquatic organisms and habitats	FEIS Section 4.24.1; Management Plan Supporting Documents
4.24.1	Overview	•Archaeological sites and sacred or spiritual sites;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Traffic;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Nunavummiut involvement; •Human resources;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Public involvement, including a communications strategy	FEIS Section 4.24.1; NIRB Submission Letter – April 4 (Appendix F.1)
		•Education and orientation;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Occupational health and safety	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Emergency response and contingency plans (including plans for wildlife encounters, fires, aircraft/vehicle crashes, medical emergencies, mine rescue, hazardous materials spills, malfunctions of key Project components, natural disasters, and discoveries of historic resources);	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Site rehabilitation;	FEIS Section 4.24.1; Management Plan Supporting Documents
		•Ability to post full security	FEIS Section 4.24.1; NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall evaluate the costs and economic and technical feasibility of the mitigation measures considered, specify who would be responsible for their implementation, and provide a timetable for implementing them.	FEIS Section 4.24.1; Management Plan Supporting Documents
		The Proponent shall discuss the flexibility of the proposed environmental management plans to respond to changes in the mine development plan, the regulatory regime, the natural or socio-economic environment, technology, research results, or the understanding of Traditional Knowledge.	FEIS Section 4.24.1; Management Plan Supporting Documents
		It shall discuss how the results from the environmental management plans would be used in applying adaptive environmental management, and identify criteria or indicators to trigger management action.	FEIS Section 4.24.1; Management Plan Supporting Documents
		The Proponent shall give a rationale for the proposed management plans and shall assess their likely effectiveness.	FEIS Section 4.24.1; Management Plan Supporting Documents
It shall also give a rationale for the rejection of mitigation measures and justify trade-offs between cost savings and effectiveness.	FEIS Section 4.24.1; Management Plan Supporting Documents		
It shall provide a risk assessment of those economic or other conditions that might impair the effectiveness of mitigation measures.	FEIS Section 4.24.1; Management Plan Supporting Documents		

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
4.24.1	Overview	Adaptive environmental management revises traditional conceptions conditioning environmental impact review procedures. Its principles are outlined by Holling (1978) and refer to intra-ecological connections, spatial behaviour of events, erratic alterations in natural systems, and dynamic variability. Holling also identifies several misconceptions commonplace in the environmental review process. Moreover, the Proponent shall discuss the negotiation of an agreement or agreements with the concerned communities that would permit them to participate fully in the planning, execution, and evaluation of mitigation measures.	FEIS Section 4.24.1; NIRB Submission Letter – April 4 (Appendix F.1) ; Management Plan Supporting Documents
4.24.2	Management of Impacts on Physical Environment	The present Subsection is <i>only</i> illustrative of what might be done. The Proponent should present specific measures for each VEC that is likely to be significantly impacted.	FEIS Section 4.24.2; Management Plan Supporting Documents
4.24.2.1	Caribou	Mitigation measures for impacts on caribou could include:	FEIS Section 4.24.2; Management Plan Supporting Documents
		<ul style="list-style-type: none"> •Fencing of roads, landing strips, and other potentially dangerous areas •Education of employees 	FEIS Section 4.24.2; Management Plan Supporting Documents
		<ul style="list-style-type: none"> •Speed restrictions (the Proponent must show how they will be enforced) during caribou migration to reduce the risk of vehicles' colliding with caribou; 	FEIS Section 4.24.2; Management Plan Supporting Documents
		<ul style="list-style-type: none"> •Designing roads and other infrastructure in ways that discourage caribou from interacting with them. 	FEIS Section 4.24.2; Management Plan Supporting Documents
		The Proponent shall integrate mitigation measures into a detailed caribou management and monitoring plan.	FEIS Section 4.24.2; Management Plan Supporting Documents
		The use of Traditional Knowledge in minimizing the effects of the Project on caribou (e.g., diverting caribou from tailings) and in establishing a monitoring programme shall be discussed.	FEIS Section 4.24.2; Management Plan Supporting Documents
		The Proponent shall discuss how it intends to use and/or support such initiatives as the Bathurst Caribou Management Committee.	FEIS Section 4.24.2; NIRB Submission Letter – April 4 (Appendix F.1); Management Plan Supporting Documents
4.24.2.2	Fish	The Proponent shall discuss measures to compensate for the loss of aquatic habitat, including habitat replacement.	FEIS Section 4.24.2; Management Plan Supporting Documents
		The principle of No Net Loss (Policy for the Management of Fish Habitat, Department of Fisheries & Oceans, 1986) for fish habitat shall be applied.	FEIS Section 4.24.2; Management Plan Supporting Documents
4.24.2.3	Bears	Mitigation measures designed to prevent bears from becoming habituated to the mine site might include fencing, the removal of solid wastes, and devices to frighten them.	FEIS Section 4.24.2; Management Plan Supporting Documents
4.24.3	Management of Impacts on Socio-Economic Environment	The Proponent shall present policies and programmes to minimize potential negative socioeconomic effects and to optimize potential positive effects.	FEIS Section 4.24.3; Socioeconomic & Archaeology Mgmt Plan
		The general areas that shall be considered are:	FEIS Section 4.24.3
		<ul style="list-style-type: none"> •human resources 	FEIS Section 4.24.3; NIRB Submission Letter – April 4 (Appendix F.1) ; Socioeconomic & Archaeology Mgmt Plan; Human Resources
		<ul style="list-style-type: none"> •occupational health and safety 	FEIS Section 4.24.3; Occupational Health & Safety Mgmt Plan

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •Nunavummiut involvement •public involvement •IBAs. 	<p>FEIS Section 4.24.3; Human Resources, Public Involvement reports; Socioeconomic & Archaeology Mgmt Plan</p> <p>FEIS Section 4.24.3 NIRB Submission Letter – April 4 (Appendix F.1) Socioeconomic & Archaeology Mgmt Plan</p> <p>FEIS Section 4.24.3</p>
4.24.3.1	Human Resources	<p>The Proponent shall prepare a Human Resources Plan, which might consider: human resources legislation; organization planning; succession and career plans; compensation plans and profit-sharing; benefit programmes (e.g., health care plan, work clothing and safety equipment, vacation leave); work rotation and pay schedules; health and safety programmes; hiring practices and procurement; skills and entry requirements; training and development; control of movements to and from the Project site; on-site public safety with respect to firearms, while respecting the rights and needs of harvesters from adjacent communities to travel freely through the country; alcohol and drugs; smoking; sexual and gender harassment; employment for women; human resource information systems; labour relations (e.g., procedure for submitting grievances or concerns, disciplinary procedures); employee communications; incorporation of relevant IBA terms and conditions; and the use of and payment for municipal facilities and services in local communities.</p> <p>The Proponent shall also develop an Education and Orientation Plan to help all employees to understand their responsibilities in environmental and health and safety management.</p> <p>The Proponent shall give special consideration to promoting the participation of Nunavummiut in Project employment and related business opportunities by addressing, for example: employment preferences to Nunavummiut; recruitment strategies to overcome entry barriers; education and training programmes (e.g., partnerships with local schools and other educational institutions, on-the-job learning, and apprenticeships); cross-cultural orientation; preference to northern usinesses; commuting arrangements; northern allowances; the types of food available to workers at the mine site; and the pursuit of on-site sport hunting and fishing by non- Nunavummiut employees, while respecting the rights and needs of Nunavummiut employees to harvest and pursue traditional activities and all applicable regulations, including the use of local guiding services.</p>	<p>FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1); Human Resources report</p> <p>FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1); Human Resources report</p> <p>FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1); Human Resources report</p>
4.24.3.1	Human Resources	<p>The Proponent might note that hunting and fishing are usually prohibited at the Nunavut mining sites. And for example, recreational angling was determined to have the greatest single potential impact on fish populations of all the activities associated with the Diavik project. For this reason, prohibiting recreational angling by all employees at or near the Project site might go a long way towards avoiding impacts on fisheries resources.</p> <p>The Proponent shall discuss the extent to which its policies regarding such things as preferential hiring, northern allowances, safety, and alcohol and drugs would be applied to contractors and sub-contractors.</p> <p>It shall also discuss criteria for selecting contractors</p>	<p>FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)</p> <p>FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1); Human Resources report</p> <p>FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)</p>

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		Some mines have initiated a Job Development Strategy under the stewardship of northern businesses, which aims to identify and cultivate employment and business opportunities for northern workers and entrepreneurs that reflect the goals and desires of northern residents and of the business community. The strategy also has the potential for creating opportunities for those who prefer not to work at the mine site. The Proponent should evaluate the feasibility of becoming a partner in the Job Development Strategy or, if that is not feasible, coordinating its activities with it so as to avoid competition and duplication.	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall describe a programme to invest a specified portion of the wealth created by the Project in the natural and human capital of the region. Such a programme can be likened to an economic diversification or development trust fund.	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall also consider the necessity and/or desirability of an economic transition fund upon final closure of the mine.	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		Should said fund be necessary/desirable, the Proponent shall set out how it would be established.	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall describe mitigation and monitoring measures to reduce social and cultural disruption, which could include:	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •work schedules that are adapted to traditional activities; 	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
4.24.3.1	Human Resources	<ul style="list-style-type: none"> •the provision of no-cost commuting to allow workers to continue to live in their own communities and to participate in their traditional economic and cultural activities; 	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
4.24.3.1	Human Resources	<ul style="list-style-type: none"> •assistance to communities to address social problems, whether solely related to the Project or not 	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •counselling services to employees and their families regarding financial management, substance abuse, and work-related stress management. 	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall discuss environmental management and monitoring techniques designed to mitigate potential cumulative effects and to increase understanding of cumulative effects.	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		That discussion shall include follow-up plans to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures.	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent's responsibilities shall reflect the Project's anticipated contribution to cumulative environmental effects from an ecosystem perspective.	FEIS Section 4.24.3.1 NIRB Submission Letter – April 4 (Appendix F.1)
4.24.3.2	Occupational Health and Safety	The Proponent shall present an Occupational Health and Safety Plan that focuses on good safety practices, safety awareness, risk management, mine rescue, employee involvement, and management commitment.	FEIS Section 4.24.3.2; Occupational Health & Safety Plan
		It shall address:	FEIS Section 4.24.3.2; Occupational Health & Safety Plan
		<ul style="list-style-type: none"> •safety reporting 	FEIS Section 4.24.3.2; Occupational Health & Safety Plan
		<ul style="list-style-type: none"> •safety orientation 	FEIS Section 4.24.3.2; Occupational Health & Safety Plan
		<ul style="list-style-type: none"> •hazard analysis 	FEIS Section 4.24.3.2; Occupational Health & Safety Plan
		<ul style="list-style-type: none"> •training in first-aid, cardio-pulmonary resuscitation, firefighting and -prevention, and spill response 	FEIS Section 4.24.3.2; Occupational Health & Safety Plan

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> •workplace monitoring and control 	FEIS Section 4.24.3.2; Occupational Health & Safety Plan
		<ul style="list-style-type: none"> •medical surveillance 	FEIS Section 4.24.3.2; Occupational Health & Safety Plan
4.24.3.3	Nunavummiut Involvement	In discussing means to involve Nunavummiut, the Proponent might consider on-site observers (who would be responsible for monitoring certain Project activities), liaison committees (to facilitate communications, consultation, and the resolution of environmental matters), and the compilation, review, and use of Nunavummiut place names and other Traditional Knowledge.	FEIS Section 4.24.3.3
4.24.3.4	Public Involvement	The Proponent shall describe a Public Involvement Plan, the objectives of which shall be to:	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •provide information to the public and concerned communities on Project design and activities 	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •identify mitigation needs 	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •gain understanding of public concerns 	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •develop two-way communications with the concerned communities 	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1)
		<ul style="list-style-type: none"> •obtain input to environmental and health and safety management decisions. 	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1)
		Public involvement techniques could include: mail or hand-outs to households; videos on Project components; communication sessions to explain the results of the EIS; information sessions on specific subjects; corporate public offices in the Region or in Nunavut; open houses; workshops on Project development; meetings with government officials, interest groups, and other parties; presentations to interest groups and the public; community forums; site visits; toll-free telephone lines; a company newsletter; annual environmental reporting; release of Project documents; local monitoring committees; and media releases.	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1); Public Involvement Plan
		Wherever the Proponent undertakes public consultation and involvement, it shall ensure that participants and the public in general are subsequently informed how their views and knowledge were taken into consideration and applied.	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1); Public Involvement Plan; Traditional Knowledge Report
		Appendices to the EIS must contain full documentation on public consultation, including records of any follow-up.	FEIS Section 4.24.3.4 NIRB Submission Letter – April 4 (Appendix F.1); Public Involvement Plan
4.24.3.5	Impact and Benefits Agreement	The EIS must respect all of the provisions of the NLCA relating to impact and benefits agreements, including Article 6, Part 4 of Article 9, Part 3 of Article 20, Article 26, and Article 27.	FEIS Section 4.24.3.5
		The Proponent shall discuss the negotiation of IBAs, including with whom such agreements might be negotiated and whether they will be concluded prior to the construction of the Project.	FEIS Section 4.24.3.5
		The NLCA empowers the NWB to request from the applicant, when considering a water application, information regarding the <i>...steps which the proponent proposes to take to compensate interests adversely affected by water use</i> (NLCA, s. 13.8.1(d)) and the <i>...interests in the lands and waters which the proponent has secured or seeks to secure</i> (NLCA, s. 13.8.1(f)). This might be an issue since the NWB will have water and waste-in-water jurisdiction and otherwise might be conducting joint hearings with the NIRB.	FEIS Section 4.24.3.5
		Issues that shall be covered in IBAs include:	FEIS Section 4.24.3.5

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		•assurances that local communities are able to take advantage of job opportunities	FEIS Section 4.24.3.5
		•training	FEIS Section 4.24.3.5
		•preferential hiring programmes	FEIS Section 4.24.3.5
		•financial transfer payments	FEIS Section 4.24.3.5
		•royalties	FEIS Section 4.24.3.5
		•equity participation	FEIS Section 4.24.3.5
		•new business development and contract arrangements	FEIS Section 4.24.3.5
		•compensation for declines in harvests of fish and wildlife	FEIS Section 4.24.3.5
		•participation in monitoring activities	FEIS Section 4.24.3.5
		•dispute-resolution	FEIS Section 4.24.3.5
	In discussing compensation, the Proponent shall address such issues as eligibility, burden of proof, access by individuals to resources to help them to pursue claims, and dispute-resolution mechanisms.	FEIS Section 4.24.3.5	
4.24.3.6	Pollution Prevention	The Proponent shall highlight any pollution prevention measures to be implemented. Pollution prevention is defined by the Federal Government in the document <i>Pollution Prevention: A strategy for Action</i> (Environment Canada, June, 1995), which links the concept of pollution prevention with sustainable development - a vision that includes a clean healthy environment and a strong, healthy economy, and that focuses on avoiding the creation of pollution rather than trying to manage it after it has occurred.	FEIS Section 4.24.3.6; FEIS Management Plans
4.25	Residual Impacts	Residual impacts are those for which feasible mitigation measures could not be conceived and for which compensation has not yet been determined. They also include the effects that persist after mitigation measures have been successfully applied. Both short-term and long-term residual impacts must be considered.	FEIS Section 4.25
		The Proponent shall describe the residual effects of the Project in a way that permits comparisons with the Project's potential effects in the absence of mitigation, and shall express their significance in the same manner as for the said potential effects, using the same criteria.	FEIS Section 4.25
		It shall also assess the reliability of the planned mitigation measures and the environmental consequences of their failure.	FEIS Section 4.25
4.26	Monitoring and Follow-Up		FEIS Section 4.26; FEIS Management & Monitoring Plans
4.26.1	Overview	The Proponent shall present a Monitoring and Follow-Up Plan that includes compliance, biophysical and socio-economic monitoring programmes, and a follow-up programme to integrate the monitoring results into a coherent programme of action and to evaluate the effectiveness of mitigation measures during operation and after the final closure of the Project. (Compliance monitoring refers to verifying the Proponent's conformity with regulatory standards. Biophysical monitoring involves the monitoring of such biophysical components as air, water, and land. Socio-economic monitoring involves the monitoring of socioeconomic parameters, for example employment of Nunavummiut and other northerners and the purchase of goods and services in the Region.)	FEIS Section 4.26.1 NIRB Submission Letter – April 4 (Appendix F.1); EIS Management & Monitoring Plans
		In every case, the Proponent shall explain what is to be monitored, why it needs to be monitored, and how it will be monitored.	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2); EIS Management & Monitoring Plans
		The Proponent shall discuss:	FEIS Section 4.26.1
		•how its monitoring programme would distinguish between natural environmental changes and those caused by the Project,	FEIS Section 4.26.1 NIRB Submission Letter – April 4 (Appendix F.1)
		•how it would assess the validity of impact predictions, how monitoring results would be used to modify management programmes and Project policies,	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
	•how it would respond to unexpected adverse effects.	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)	

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		It shall also discuss the use of criteria or thresholds to assess impacts (e.g., the use of lichen as an indicator species due to its sensitivity to sulphur dioxide and nitrogen dioxide and its importance in the diet of caribou).	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
		The Proponent shall strive at every phase of the Project to collect data in a manner that is consistent with existing data-bases, including those of the West Kitikmeot Slave Study, the NPC and the Department of Sustainable Development, provided that doing so will not significantly compromise its ability to monitor effectively given Project-specific conditions.	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
		The description of the approach to monitoring shall address:	FEIS Section 4.26.1
4.26.1	Overview	•Monitoring methodologies, standards, objectives and a corresponding datacollection schedule. The schedule shall describe the frequency of datacollection and analysis, sampling locations, and shall distinguish between onand off-site activities, describing the logistics for carrying out both types of activities;	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2); FEIS Management & Monitoring Plans
		•The subjects and parameters to be monitored, and the criteria used in their selection;	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2); FEIS Management & Monitoring Plans
		•The geographic extent of monitoring	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2); FEIS Management & Monitoring Plans
		•Internal and external reporting and response mechanisms and structures, including procedures to be followed in the event that monitored results deviate significantly from predicted results;	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
		•Approaches and methods for monitoring the cumulative effects of the Project;	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2); Cumulative Effects Assessment
		•Integration of monitoring results with other aspects of the Project, including adjustments to operating procedures and refinements to mitigation measures	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
		•Experience gained from prior and current monitoring programmes	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
		•The roles of independent experts, government agencies, communities, holders of Traditional Knowledge, and renewable-resource users, and any joint monitoring programmes	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
		•Procedures to assess the effectiveness of monitoring programmes, mitigation measures, and recovery programmes for disturbed areas	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2) ; FEIS Management & Monitoring Plans
		•The role of communications plans in monitoring, and procedures to communicate the results of monitoring to interested parties.	FEIS Section 4.26.1 NIRB Submission Letter – April 30 (Appendix F.2)
		In the case of post-closure monitoring, the Proponent shall describe how long term monitoring will continue and shall identify who will assume the costs and responsibility, especially in the event of changes of corporate ownership.	FEIS Section 4.26.1 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall consult with all concerned regulatory authorities and stakeholders to maximize the chances that it proposes a clear, comprehensive, and proactive Monitoring and Follow-Up Plan.	FEIS Section 4.26.1 NIRB Submission Letter – April 4 (Appendix F.1)
4.26.2	Community Liaison Committees	If the Proponent proposes that one or more Community Liaison Persons or Committees ("CLCs") be established to participate in monitoring activities, then the following shall be considered:	FEIS Section 4.26.2 NIRB Submission Letter – April 30 (Appendix F.2)

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		<ul style="list-style-type: none"> The level of community support for participating on a CLC. The community shall treat the CLC seriously and the community appointees shall be accountable in practical and identifiable ways to the community. Community appointees shall be given time and assistance to familiarize themselves with all of the relevant aspects of mining; 	<p>FEIS Section 4.26.2 NIRB Submission Letter – April 30 (Appendix F.2)</p>
		<ul style="list-style-type: none"> Reaching a clear understanding among all involved of the role of the CLC, its purpose and its limitations. Impact monitoring shall be clearly defined and written into the mandate of the CLC, and all participants shall agree on the meaning. Consensus shall be reached regarding the framework for the monitoring activities, such as about what is being monitored, what data and how much of it is required, and whether the monitoring activities themselves are sustainable; 	<p>FEIS Section 4.26.2 NIRB Submission Letter – April 30 (Appendix F.2)</p>
		<ul style="list-style-type: none"> Methods for maintaining the CLC's visibility in the community 	<p>FEIS Section 4.26.2 NIRB Submission Letter – April 30 (Appendix F.2)</p>
		<ul style="list-style-type: none"> The Proponent's accountability to the CLC and to the community. The Proponent must be as a matter of policy willing to respond to the findings of monitoring 	<p>FEIS Section 4.26.2 NIRB Submission Letter – April 30 (Appendix F.2)</p>
		<ul style="list-style-type: none"> The provision of information and reporting on the activities of the CLC to the communities. For example, if community members are to be involved in monitoring impacts, they must be adequately informed of the types of effects that they are likely to encounter. Likewise, community members must have access to the results of the monitoring to which they contribute; 	<p>FEIS Section 4.26.2 NIRB Submission Letter – April 30 (Appendix F.2)</p>
		<ul style="list-style-type: none"> The provision of sufficient financial, technical, and administrative resources to the community members so that they can participate in a meaningful way in the CLC. The budget for the CLC should depend on the scale and complexity of the mining operation and should be reassessed from time to time (adapted from Penn, 1996). 	<p>FEIS Section 4.26.2 NIRB Submission Letter – April 30 (Appendix F.2)</p>
		<p>The Proponent shall also set out the mechanisms by which a CLC would be created (e.g., environmental agreements, IBAs).</p>	<p>FEIS Section 4.26.2</p>
4.27	Auditing and Continual Improvement System	<p>The Proponent shall prepare an Auditing and Continual Improvement System to review and continually improve environmental and health and safety management. Such a system shall address:</p>	<p>FEIS Section 4.27 NIRB Submission Letter – April 4 (Appendix F.1)</p>
		<ul style="list-style-type: none"> monitoring and measurement 	<p>FEIS Section 4.27 NIRB Submission Letter – April 4 (Appendix F.1)</p>
		<ul style="list-style-type: none"> non-conformance reporting 	<p>FEIS Section 4.27 NIRB Submission Letter – April 4 (Appendix F.1)</p>
		<ul style="list-style-type: none"> corrective and preventive action plans 	<p>FEIS Section 4.27 NIRB Submission Letter – April 4 (Appendix F.1)</p>
		<ul style="list-style-type: none"> record-keeping and documentation control 	<p>FEIS Section 4.27 NIRB Submission Letter – April 4 (Appendix F.1)</p>
		<ul style="list-style-type: none"> audits of environmental and health and safety management. 	<p>FEIS Section 4.27 NIRB Submission Letter – April 4 (Appendix F.1)</p>
4.28	Closure and Reclamation	<p>The Proponent shall present a Closure and Reclamation Plan that respects all applicable regulations, standards, and policies and addresses the mine, mine rock, overburden, and tailings disposal facilities and areas, water retention and diversion structures, buildings and site infrastructure, fuel and hazardous materials storage facilities, wastes, borrow pits and quarries, roads and airport, and all disturbed areas.</p>	<p>FEIS Section 4.28; Closure & Reclamation Plan</p>
		<p>It shall state its goals for reclamation, such as the re-establishment of stable physical landforms and land-use productivity, and the long-term physical and chemical stability of water resources.</p>	<p>FEIS Section 4.28; Closure & Reclamation Plan</p>
		<p>It shall discuss reclamation methods and the schedule and time frame (e.g., progressive reclamation).</p>	<p>FEIS Section 4.28; Closure & Reclamation Plan</p>

Concordance Table – Continued

NIRB Section No.	NIRB Guideline Section Title	Guideline Direction	Location in Cumberland's EA Submission
		It shall also discuss how the Closure and Reclamation Plan would be updated periodically by, for example, incorporating ongoing research and technological advances.	FEIS Section 4.28 NIRB Submission Letter – April 30 (Appendix F.2) ; Closure & Reclamation Plan
		Moreover, the Proponent shall describe the extent to which it believes that the Project site can be restored to its previous ecological diversity and ecological productivity.	FEIS Section 4.28; Closure & Reclamation Plan
		The Proponent shall specify when a temporary closure should be considered to be permanent.	FEIS Section 4.28 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall discuss a research programme that is consistent and compatible with broader efforts under way within Nunavut to address challenges to reclamation, such as the cold environment, poor soil development, limited topsoil resources, slow growth rates, limited seed production, low soil moisture, and short growing seasons.	FEIS Section 4.28 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall evaluate the cost and feasibility of going beyond mere reclamation by enhancing wildlife habitats and undertaking other forms of beneficial landscaping.	FEIS Section 4.28 NIRB Submission Letter – April 4 (Appendix F.1)
		The Proponent shall discuss post-closure monitoring of such environmental components as wildlife, re-vegetation, landform stability, and water quality. Issues such as the introduction of exotic species of plants for purposes of re-vegetation shall be discussed.	FEIS Section 4.28; Closure & Reclamation Plan; FEIS Management & Monitoring Plans
4.29	Outstanding Issues	The Proponent shall describe any outstanding issues that are not identified elsewhere in the EIS and shall indicate how it intends to address them.	FEIS Section 4.29
4.30	List of Consultants	A list of all the consultants who contributed to the preparation of the EIS, including their role and contact information (mailing address, telephone number, fax number, and e-mail address), shall be presented.	FEIS Section 5.0
4.31	List of Organizations	The Proponent shall prepare a list of the organizations consulted, including: the time, place, and purpose of the consultation; the number and, subject to confidentiality, other details of the participants; and a list, including mailing address, telephone number, fax number, and e-mail address, of all organizations to which the Project proposal was sent.	FEIS Section 5.1
		An appendix shall contain copies of the materials presented at such meetings, showing the date on which they were submitted, photographs of the meetings, and other relevant materials.	FEIS Section 5.1