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May 15, 2012

マッシタパイ Arctic Bay

Bernie MacIsaac Director of Lands and Resources Qikiqtani Inuit Association P.O. Box 1340 Igaluit, Nunavut, XOA 0H0

Pralac Cape Dorset

りんりくかから Clyde River

₽C2₽₹ Grise Fiord Christy Wickenheiser **Environmental Specialist** National Energy Board 444 Seventh Ave SW Calgary, AB T2P 0X8

Dear Mrs. Wickenheiser.

following documents:

5095 Hall Beach RE: TGS/PGS/MKI 2D Seismic Survey offshore Baffin Bay/Davis Strait 2012 Comments

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50P-19 Sanikiluag The Qikiqtani Inuit Association (QIA) is responding to the proponent's information requests responses required by the National Energy Board, QIA has reviewed the

1. RPS Energy Environmental Assessment

- 2. NEB Request 1 Proponent Response (March 2, 2012)
- 3. NEB Request 2 Proponent Response (May 3, 2012)

As such, QIA have concluded that the current consultation strategy is a step in the right direction, but many important aspects of the strategy are not yet defined and require further information to adequately demonstrate an appropriate engagement strategy for affected communities.

Aboriginal Traditional Knowledge Study

QIA would like to bring to the attention of the proponent that any research (including Traditional Knowledge Collection) being conducted in Nunavut requires an authorization from the Nunavut Research Institute.

QIA information request: has the proponent received the proper authorization?

QIA has been involved in numerous Traditional Knowledge studies related to protected areas creation and mining development. Traditional Knowledge Studies in Nunavut is known as Inuit Qaujimajatuqangit (IQ): Inuit Knowledge.

2.O. Box 1340 Iqaluit, Nunavut, XOA 0H0, Phone 867 975 8400 Fax 867 979 1643 www.qia.ca



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The process of capturing IQ requires careful and thorough planning, in order to ensure that the knowledge is not influenced by individual proposed projects and ensure that the IQ gained will be verified by the knowledge holders, that the IQ is returned to the knowledge holders and the communities where the information is collected. The proponent does not provide the methodology of IQ collection, ensuring that proper knowledge holders participate, how the information will be verified by IQ holders and the community at large in order to be considered Inuit Qaujimajatuqangit.

QIA procedures to capture IQ require a multi-step process to ensure that IQ is properly vetted by those providing the knowledge and verify that information with other IQ holders and the community at large. QIA anticipates multiple contacts with the community in order to properly ensure that IQ is accepted by the IQ holders and by the community members. The proposed methodology may well possibly limit the possible transmission IQ to the proponent.

QIA considers IQ collection a privilege and not a right. QIA considers IQ holders as subject matter experts in their understanding and knowledge of their environment and interactions between all living beings. QIA will also want to ensure that IQ holders are properly compensated for their expert advice.

QIA information request: what methodology, timing (clear timeline of interaction with affected communities) and verification of IQ has the proponent developed and how this information will be incorporated into the design of the project and how will that information be communicated back to the community before an authorization has been granted?

Based on the level of concerns expressed by affected communities, QIA cannot see how the proponent will be able to satisfy the communities concerns with one planned community trip (June 3rd or June 10th and be between 14-18 days) and synthesize the IQ knowledge and community concerns into their program design in order to give the affected communities a better understanding of the project and possible effects the project will have?

Timing of Consultations and Frequency

QIA has made the proponent aware that consultations in the late spring and summer months should be avoided due to the preferences from affected communities. Short spring and summer months are spent preparing and traveling to favoured hunting and gathering locations. This current strategy will ensure that any consultations will be poorly attended and lead to possible mistrust of the proponent's intentions by the communities.

QIA does not believe one trip will be adequate to address the level of concerns expressed by affected communities, not to mention the proposed Aboriginal Traditional Knowledge Study and incorporate the combined information into an Environmental Assessment and present that



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information to the affected communities for their consideration before seeking an authorization.

Recommendations

QIA is proposing the proponent develop a multi-stage process and clearly define the process to the communities. QIA proposes the proponent go into the affected communities in November 2012 to present their project, show how they have addressed previous concerns, gather feedback, current concerns and gather IQ. Inform the communities that the proponent will analyze and incorporate newly captured information into their project design and return in February 2013. The proponent returns to the affected communities in February 2013 to present the mitigation measures adopted based on the concerns expressed. Outline to the communities subsequent contacts as, this project is proposing 5 years of seismic data acquisition.

QIA has attached Appendix 1 the communication strategy the proponent developed for the community consultations in 2011. The proponent provided this document to QIA 10 days before the scheduled consultation and as a result community members were unaware of the meetings and therefore could not attend. QIA finds this unacceptable due to the level of past concerns, QIA requests that the proponent take out advertisement in the Nunatsiaq News and Nunavut News North and other local media well in advance to properly inform affected communities.

During the community consultations in 2011 a number of questions relating to the shooting of actual lines and how they avoided interactions with marine mammals went unanswered, as the proponents members that attended the consultations stated that they are not science people and could not answer the questions. QIA requests that the proper scientific persons be on hand during consultations to answer this and similar questions that went unanswered where the proponent can provide answers based on the proposed seismic program.

QIA feels that the process the proponent has proposed for community consultations is inadequate and request the National Energy Board require the proponent to conduct a clearly defined multi-stage process to address affected communities concerns.

Should you have any questions or comments, please direct them to Nigel Qaumariaq, Environmental and Regulatory Affairs Advisor at 867-975-8428.

Kindest regards,

Bernie MacIsaac Director of Lands

Qikiqtani Inuit Association

Appendix 1

A representative of RPS Energy of Behalf of Multi Klient Invest (MKI) will be in your community on the following dates for Public Meeting to share information on a potential 2D Seismic Survey offshore Baffin Bay for the 2011 season.

Community 1	Date	Location	Time
Clyde River	Wed, May 25 th	Community Centre	7:00pm
Pond Inlet	Thurs, May 26th	Community Centre	7:00pm

Please listen to your local Radio Station for further updates or you may contact:

Darlene Davis 1545 Birmingham Street Halifax, Nova Scotia, B3J 2J6 Tel: (902) 492-0281 davisd@rpsgroup.com

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