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Building Nunavut Together  
Nunavut liuqatigiingniq  
Bâtir le Nunavut ensemble

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Government of Nunavut  
Nunavut Kavamat  
Gouvernement du Nunavut

October 16, 2018

Tara Arko  
Director, Technical Services  
Nunavut Impact Review Board  
P.O Box 1360  
Cambridge Bay, NU X0B 0C0

**Sent VIA Email: [info@nirb.ca](mailto:info@nirb.ca)**

**RE: Comment Request for Arctic Research Foundation's "CAT-TRAIN: Arctic Tidal Transect Research and Infrastructure Network" project proposal (NIRB File No. 17UN042)**

Dear Tara Arko,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Arctic Research Foundation's "CAT-TRAIN: Arctic Tidal Transect Research and Infrastructure Network" project proposal.

The GN has reviewed the proposed project and provides our comments in the following appendix.

Should you have any concerns with our comments, please contact me by phone at 867-975-7805 or by email at [kjohnson@gov.nu.ca](mailto:kjohnson@gov.nu.ca)

Qujannamiik,

[Original Signed By]

Krista Johnson  
*Environmental Assessment Coordinator*  
*Government of Nunavut*

GN-01: Presence of Archaeological Sites	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Screening: CAT-TRAIN
References	NIRB Notice of Screening
CONCERNS	
<p>The Department of Culture and Heritage has concerns with the current proposals</p> <ol style="list-style-type: none"> <li>1) The proponent does not identify the precise locations of the three research labs. Thus, CH is unable to determine the presence or absence of recorded archaeological sites in the proposed areas of interest. This is particularly significant as several hundreds of archaeological sites are recorded on both the south and north shores of Dease Strait, in addition to Kiluhiqtuq (Bathurst Inlet).</li> <li>2) The proponent needs to provide appropriate scaled maps indicating the locations of overland routes.</li> <li>3) The proposal lacks details about the specific nature of the scientific activities that are planned to take place.</li> </ol>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The Department of Culture and Heritage recommends that:</p> <ol style="list-style-type: none"> <li>1) The proponent provides a detailed map showing the locations of: (1) the three proposed mobile camps along with their respective geographical coordinates; (2) overland routes. In addition, overland routes</li> <li>2) The proponent provides details about the research programs specifically with regards to archaeology and palaeontology (geology) that will be conducted from the proposed research platforms.</li> <li>3) No research programs be initiated before the proponent secures formal approval and necessary permits for individual research program involving archaeology and palaeontology (geology) with the Department of Culture and Heritage.</li> </ol>	
ADDITIONAL COMMENTS	
<p>With regards to the protection of archaeological and palaeontological sites and specimens the Department of Culture and Heritage would like to reiterate that:</p> <p><b>Protection of archaeological sites:</b></p> <ul style="list-style-type: none"> <li>• No person shall search for archaeological sites or archaeological artifacts, or survey and archaeological site, without a Class 1 or Class 2 permit.</li> </ul>	

- No person shall excavate, alter or otherwise disturb an archaeological site, or remove an archaeological artifact from an archaeological site, without a Class 2 permit.
- No person, other than a person engaged in a search and rescue operation, shall dive, or approach with an underwater submersible, to within 30 m of an archaeological artifact without a Class 2 permit.

**Protection of Palaeontological Sites**

- No person shall search for palaeontological sites or fossils, or survey a palaeontological site, without a Class 1 or Class 2 permit.
- No person shall excavate, alter or otherwise disturb a palaeontological site, or remove a fossil from a palaeontological site, without a Class 2 permit.

GN-02: Waste Disposal	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Waste Disposal
References	<ul style="list-style-type: none"> <li>• 17UN042 Summary of Modifications</li> <li>• PRESSURES ON THE ARCTIC ECOSYSTEM FROM HUMAN ACTIVITIES, Wildlife and Economic Development - Environmental Protection Service, Government of the Northwest Territories, 1998.</li> </ul>
CONCERNS	
<p>The Proponent has stated that they will be utilizing a composting toilet to limit the impacts of human waste. The area within which the Proponent proposes to conduct work is characterized by an arctic climate. Human wastes take decades to degrade because of the extremely slow rate of decomposition in the Arctic environment (Government NWT, 1998). This renders the use of composting toilets for human waste ineffective and unsuitable for this project.</p>	
SUGGESTIONS AND RECOMMENDATIONS	
<p>The GN recommends the Proponent amend its Project Proposal to include the on-site incineration or storage and removal of human waste to an approved disposal facility.</p>	
ADDITIONAL COMMENTS	
NA	