



# CIRNAC Comments to NIRB

Re: Notice of Screening for Kivalliq Inuit  
Association “Kivalliq Hydro-Fibre Link  
Baseline Research” Project Proposal



Nunavut Regional Office  
P.O. Box 100  
Iqaluit, NU, X0A 0H0

Your file - Votre référence  
21YN027  
Our file - Notre référence  
GCdocs# 95902310

July 2, 2021

Guillaume Daoust  
Technical Advisor I  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU, X0B 0C0  
via NIRB public registry

**Re: Notice of Screening and Comment request for Kivalliq Inuit Association's  
"Kivalliq Hydro-Fibre Link Baseline Research" Project Proposal**

Dear Guillaume Daoust,

On June 11, 2021 the Nunavut Impact Review Board (NIRB) invited parties to comment on Kivalliq Inuit Association's "Kivalliq Hydro-Fibre Link Baseline Research" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

**Whether the Project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);**

**CIRNAC #1: Water Consumption**

The Proponent indicates in the water consumption table that no water consumption is planned during the proposed activities. However, CIRNAC notes that the Proponent also indicates that they have not yet applied to the Nunavut Water Board for Approval to Use Water/Deposit Water Without a License. It is unclear if this implies that the Proponent is planning to use water to conduct the proposed activities.



CIRNAC recommends that the Proponent clarify if water will be withdrawn for use during the project.

## **CIRNAC #2: Waste Management**

The Proponent indicates in the Waste Management Table that “*packaging associated with sampling materials will be collected and disposed at municipal waste sites*”. CIRNAC notes that the Proponent does not indicate any other waste that may be produced. It is unclear if the Proponent will generate other waste streams during the proposed activities.

Further, it is unclear if the proposed project will include camping activities, which may involve the creation of a sump or management of camp wastes, or if the project will require sumps for potential drill waste generated during project activities.

CIRNAC recommends that the Proponent clarify if other types of wastes will be generated during project activities, and how such waste will be managed to minimize impacts to the environment.

## **CIRNAC #3: Fuel and the Identification of Environmental Impacts Matrix**

CIRNAC notes that the Proponent has not indicated any mitigation measures for potential spills that may occur during the proposed activities, and that the Identification of Environmental Impacts matrix does not indicate the potential of negative effects on the environment.

Given that there is a potential for impacts of fuel spills on the environment, CIRNAC recommends that the Proponent provide rationale for not identifying potential negative effects due to fuel spills in the Identification of Environmental Impacts matrix.

Furthermore, the Proponent should identify measures to mitigate potential impacts of fuel spills on the environment.

### **Any matter of importance to the Party related to the project proposal:**

## **CIRNAC #4: Potential for Positive Effects to Inuit Through Employment, Training, and Procurement Opportunities**

CIRNAC recommends that the Proponent prioritize the employment and training of local Inuit as well as procurement with Inuit-owned businesses when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. As a result, Inuit and Inuit-owned businesses situated in the communities of the Kivalliq region should be prioritized in any project-related employment and procurement opportunities that may be made available.

## **CIRNAC #5: Records of Community Engagement**

CIRNAC recommends that the Proponent continue to keep record of its community engagement activities throughout the project proposal’s implementation. Maintaining this



record will support openness and transparency in efforts undertaken to identify and resolve issues of importance to affected communities. Due to the transboundary nature of the proposal, future iterations of the submitted record of community engagement should be expanded to include interactions with Indigenous groups who have overlapping claims within the study area. Summaries of discussion topics, commitments, and resolutions should be identified.

**CIRNAC #6: Consultation with interested and affected parties.**

CIRNAC recommends that the Proponent consult with Indigenous groups with overlapping claims within the study area as well as other interested parties including but not limited to: the relevant Indigenous governments within the Northwest Territories and Manitoba who have signed onto overlapping claims within the study area, transboundary wildlife management groups like the Beverly and Qamanirjuaq Caribou Management Board, local Hunters and Trappers Organizations, as well as community members and other interested organizations. Issues that should be considered as part of any consultation activities include:

- Incorporation of Indigenous knowledge and Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities within or in close proximity to the project area;
- Training and employment opportunities for community members;
- Procurement opportunities for local businesses, and
- Regular updates on the status of project activities.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Courtney White by e-mail at [courtney.white@canada.ca](mailto:courtney.white@canada.ca), or David Abernethy by telephone at (867) 222-1610 or email at [david.abernethy@canada.ca](mailto:david.abernethy@canada.ca).

Sincerely,



Felexce Ngwa  
Manager, Impact Assessment

