



CIRNAC Comments to NIRB

Re: Notice of Screening for Defence Research and Development Canada's "Environmental Behavior of Ammunition Constituents in Arctic Conditions" Project Proposal



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

Your file - Votre référence
23YN038
Our file - Notre référence
GCdocs#116012950

July 31, 2023

Keith Morrison
Manager, Impact Assessment
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 Defence Research and Development Canada's "Environmental Behavior of Ammunition Constituents in Arctic Conditions" Project Proposal

Dear Keith Morrison,

On July 20, 2023, the Nunavut Impact Review Board (NIRB) invited parties to comment on Defence Research and Development Canada's "Environmental Behavior of Ammunition Constituents in Arctic Conditions" 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:

Any matter of importance to the Party related to the project proposal.

CIRNAC #1: Environmental Impacts on Surface and Bedrock Geology

The Proponent indicated in the Environmental Impacts Assessment Matrix of their application to the NIRB that the environmental impact on surface and bedrock geology at the sampling sites will be unknown. The Proponent indicated in their application that a portable X-ray fluorescence spectrometer will be used as a non-destructive measurement technique to conduct soil analysis. It is unclear to CIRNAC why the Proponent indicated that there will be an unknown environmental impact on surface and bedrock geology since they are using a non-destructive measurement technique. CIRNAC recommends the Proponent clarify how their project activities will have an unknown environmental impact on surface and bedrock geology at the sampling sites in Cambridge Bay.

CIRNAC #2: Management of Fuel, Hazardous Material, and Greywater

The Proponent indicated that an all-terrain vehicle (ATV) may be used as a mode of transportation over land, but they did not outline fuel management practices associated with ATV activities.



CIRNAC recommends that, if the Proponent elects to use ATVs to support project activities, the following and any other precautionary measures should be implemented in handling fuel to avoid fuel spills and minimize negative environmental impacts:

- Refueling from a minimum of thirty-one (31) meters away from the high water mark of any waterbody;
- Use drip pans or other equivalent devices when refueling; and
- Have spill kits readily available.

The Proponent mentioned that Alconox, a concentrated anionic detergent, will be used for cleaning their instruments, but they did not specify if any measures will be taken to minimize negative environmental impacts resulting from using it. CIRNAC recommends that any activities involving Alconox (i.e., storage, cleaning equipment) occur a minimum of 31 meters away from the high water mark of any waterbody, to minimize negative environmental impacts on receiving freshwater and marine ecosystems.

CIRNAC #3: Consultation with Interested Parties

CIRNAC recommends that the Proponent consult with relevant interested Inuit, hamlets, and community organizations, prioritizing those in Cambridge Bay. As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qauijimajatuqangit 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;
- Mitigation measures designed to prevent disturbance to sites with: cultural, archaeological and/or environmental significance;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned 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 phases related to this project. Should you have any questions, please contact John MacInnis by e-mail at john.macinnis@rcaanc-cirnac.gc.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

