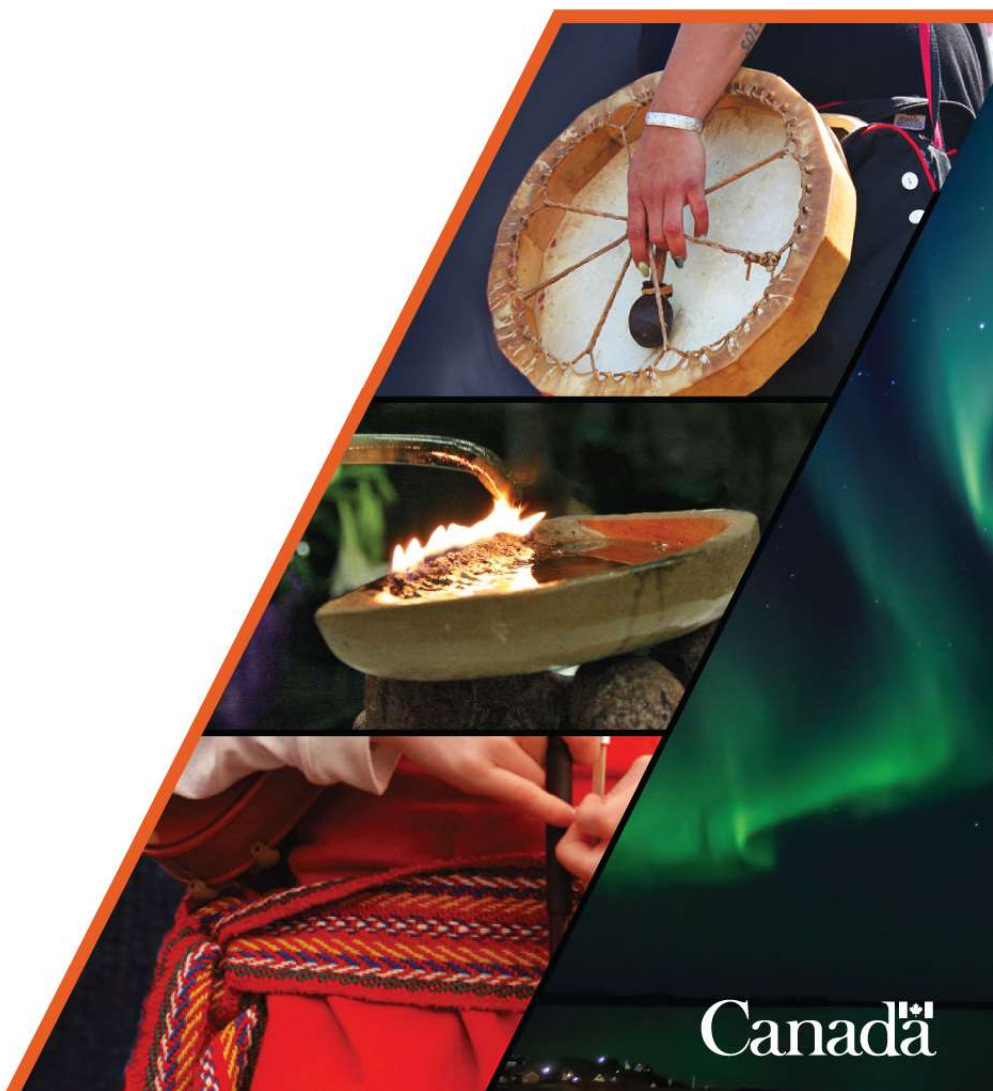




CIRNAC Comments to NIRB

Re: Notice of Screening for Dynamic Ocean Consulting Ltd.'s "Kinngait Field Program" Project Proposal



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

Your file - Votre référence
23YN045
Our file - Notre référence
GCdocs#116070038

August 3, 2023

Mia Otokiak
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 Dynamic Ocean Consulting Ltd.'s "Kinngait Field Program" Project Proposal

Dear Mia Otokiak,

On July 24, 2023, the Nunavut Impact Review Board (NIRB) invited parties to comment on Dynamic Ocean Consulting Ltd.'s "Kinngait Field Program" 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: Marine Excavation Activities

The Proponent indicated that an excavator will be used to dig test pits and that refueling activities will not occur in the study area since the excavator is expected to consume a limited amount of fuel. CIRNAC acknowledges that the Proponent intends to inspect equipment for leaks before operations, but notes that the Proponent did not provide:

- A description and estimated total quantity of the fuel;
- A description and estimated total quantity of other substances that are reasonably expected from excavator operations (e.g., hydraulic fluids); and
- Measures that will be implemented in the event of equipment leaks (e.g., containment measures, removal and disposal of contaminated beach sands from the site).

CIRNAC recommends that the Proponent provides a description and an estimated total quantity of fuel that is anticipated to be used to support project activities, identifies other substances that will be used to support excavator activities, and outlines measures that will be used to manage potential equipment leaks in a manner that minimizes the introduction of contaminants into the marine environment.



The Proponent noted that, following the program, the equipment operator will return the intertidal area to its pre-existing condition and confirm the excavated areas are infilled and compressed as required. It also indicated that a member of the Project Team, which may be supported by members of the community, will investigate the Intertidal Access Area over several tide cycles to confirm there are no noticeable differences in beach condition. But, CIRNAC notes that the Proponent did not specify which measures it will take in responding to unexpected changes in beach conditions following project activities.

CIRNAC recommends that the Proponent develops a response plan in the event of unexpected changes in beach conditions resulting from its project activities (e.g., enhanced sediment resuspension in the water column). The plan includes measures to restore the shoreline in areas of excavator operation (i.e., outside of the intertidal area) to a pre-existing condition, to the extent practicable, in a manner that minimizes shoreline erosion and enhanced sedimentation into the receiving marine environment.

CIRNAC #2: Waste Management Practices

The Proponent indicated that combustible waste will be generated and it will implement a “pack in, pack out” policy for managing waste, but it did not provide detailed information about this policy. CIRNAC recommends the Proponent provides information about its waste management policy, highlighting measures that will minimize negative environmental impacts associated with waste disposal activities.

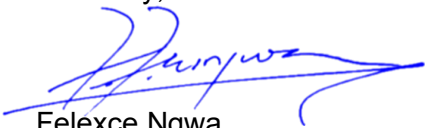
CIRNAC #3: Consultation with Interested Parties

CIRNAC appreciates the effort the Proponent has made in contacting the Aiviq Hunters & Trappers Association and the Mayor of the Hamlet Kinngait, and acknowledges that the project is supported by these interested parties. CIRNAC recommends that the Proponent continues to consult with relevant interested Inuit, hamlets, and community organizations. As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of 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;
- Mitigation measures designed to prevent disturbance to sites with cultural, archaeological and/or environmental significance;
- Training and employment opportunities for 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

