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NPC File No: 125840  
NIRB File No: 23YN045  
CIRNAC File No: 116070038  
Document No: LET-ADV-04-NIRB Application  
CIRNAC Information Request-  
0003-23.RA

09 August 2023

**Re: Response to Crown Indigenous Relations and Northern Affairs Canada Information Request Through  
Nunavut Impact Review Board Stakeholder Engagement**

## 1. Introduction and Background

Worley Canada Services Ltd. (Advisian) and Pilitak Enterprises (the Project Team) have been retained by the Hamlet of Kinngait (the Hamlet) to construct a marine infrastructure project (the Project). Kinngait is located on Dorset Island near Foxe Peninsula at the southern tip of Baffin Island in the Qikiqtani Region of Nunavut (64° 13.923'N, 76° 32.874'W, see Figure 1-1). The Project Team is undertaking a test pit field program (the Program) in advance of Project construction.

The Program was submitted to the Nunavut Planning Commission 9NPC) on July 11, 2023 (NPC File No. 150141) and the Conformity Determination was issued on July 13, 2023 (NPC, 2023) and the file referred to the Nunavut Impact Review Board (NIRB) (NIRB File No. 23YN045) The Program was accepted for screening on July 20, 2023(NIRB, 2023b), with the Public Comment period running from July 24 to August 3, 2024. Subsequent to the completion of the Public Comment period, the NIRB provided an IR from the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) on August 4, 2023 (NIRB, 2023a).

## 2. Information Request Response

### 2.1 Marine Excavation Activities

The Program will use an excavator will be used to dig test pits over a period of one-half day to understand ground conditions within the Kinngait foreshore area. The IRs received from CIRNAC in regard to marine excavation activities along with a response is provided in Table 2-1.

**Table 2-1: Crown-Indigenous Relations and Northern Affairs Canada Marine Excavation Activities Information Request**

CIRNAC IR	Project Team Response
A description and estimated total quantity of fuel.	The excavator will only be operating for approximately three hours for a one-day period. It is not expected that more than half a tank of fuel would be used for the duration of its time in use (including travel to the foreshore area). Thus, a total of 150 L for the day.
A description and estimated total quantity of other substances that are reasonably expected from excavator operations (e.g., hydraulic fluids).	<p>Fluids are topped up on equipment during regular maintenance and the amount used during a short-term program are not measurable. The activity is being performed in out-of-water tidal conditions and equipment will be inspected prior to heading below the HWL.</p> <p>The equipment will be inspected (leaks) and serviced (lubrication, checking hoses, fluid levels) prior to use which would occur at the shop. There will be no servicing or refuelling of equipment below the HWL.</p>
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).	<p>All equipment to be used for the Program will be required to be equipped with appropriate spill containment and clean-up supplies, including secondary containment able to accommodate 110% of the equipment's fuel stored. This equipment will either be on the excavator in a near by truck.</p> <p>Best Management Practices (BMPs) for working near water will be adhered to, and all Program personnel will be trained in spill response procedures. A Spill</p>

CIRNAC IR	Project Team Response
	<p>Response Plan (SRP) will be in place to outline spill prevention and response procedures, including an outline of communication to pertinent Authorities Having Jurisdiction (AHJs) required should a spill occur. Response procedures will include appropriate handling and disposal of contaminated beach sands.</p>
<p>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).</p>	<p>Changes to beach conditions are not expected given the small footprint of each test pit (1m wide x 3m long x up to 4m deep), with up to nine locations spread out across the foreshore area.</p> <p>The excavation area is sand and will be compressed down with the excavator bucket subsequent to the digging operations. It is highly unlikely there would be concerns for turbidity that would result in Canadian Council of Ministers of the Environment (CCME) exceedances or noticeable turbidity plumes.</p> <p>All test pits will be infilled within the same tide cycle to minimize disturbance. A member of the Program Team, which may include local support will make visual observations of the Intertidal Access Area and test pit locations over several tide cycles to confirm there are no noticeable difference in beach conditions.</p>

## 2.2 Waste Management Practices

Program Team members will review waste management procedures prior to the start of the Program. Waste management measures will at a minimum include the following:

- All waste will be collected, contained, and transported off-site for disposal and/or recycling at an approved facility according to applicable legislation, guidelines, and BMPs.
- All waste material will be removed in a timely manner to prevent the attraction of wildlife.
- Waste materials will, under no circumstances, be deliberately introduced into the marine or terrestrial environment, and any that does will be retrieved.
- The Program will separate and store waste and recyclable materials in a manner that is appropriately labelled, covered, and secured.

- As part of the Program's Spill Response Plan, Program personnel will be responsible for collecting and securely containing potentially hazardous wastes, such as oily rags and hydrocarbon absorbent pads for appropriate disposal.

### 2.3 Consultation with Interested Parties

The Project Team will continue to consult with the Alviq Hunters & Trappers Association (HTA). The Hamlet is the Proponent and so is engaged closely.

## 3. References

NIRB. (2023a). Email: NIRB 125840/23YN045: Comments Received for Dynamic Ocean Consulting's

"Kinngait Field Program" Project Proposal. Sent 4-Aug-23 09:37 (NIRB to Dynamic Ocean [Victoria Burdett-Coutts]).

NIRB. (2023b). NIRB 125840/23YN045: Project Application Acceptance Confirmation for 's "Kinngait Field Program" Project Proposal. Email from NIRB (Francis Emingak) to Dynamic Ocean (Victoria Burdett-Coutts) on 20-Jul-23 19:52

NPC. (2023). Re: NPC File No: 150141 - Kinngait Field Program. Conformity Determination. 13 July 2023

#### 4. Closure

We appreciate the time CIRNAC has taken in reviewing information related to the Program. We trust that this letter provides clarity to your questions and comments. If you require any further information, please do not hesitate to contact Victoria Burdett Coutts (email: [Victoria@dynamicocean.ca](mailto:Victoria@dynamicocean.ca), phone: 778-839-2372).



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