



CIRNAC Comments to NIRB

Re: Notice of Screening for City of Iqaluit's "Long Term Water Project - Geotechnical Investigations" Project Proposal



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

Your file - Votre référence
23YN040
Our file - Notre référence
GCdocs#117148845

September 19, 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 City of Iqaluit's "Long Term Water Project - Geotechnical Investigations" Project Proposal

Dear Keith Morrison,

On August 29, 2023, the Nunavut Impact Review Board (NIRB) invited parties to comment on City of Iqaluit's "Long Term Water Project - Geotechnical Investigations" 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: Management Plans for Project Activities

The Proponent indicated that it intends to develop management plans, including a spill contingency plan, a health and safety plan, refueling procedures, and an erosion and sediment control plan for reinstating any impacts resulting from localized boreholes upon the completion of its work.

CIRNAC recommends that the Proponent provides specific details of its fuel, waste, and erosion and sediment control management plans and encourages it to consider the following practices when implementing its project activities, including, but not limited to:

- The refueling of all equipment, as well as the storage of fuel, occur a minimum of thirty-one (31) meters away from the high water mark of any waterbody;
- Construct a secondary containment berm around any fuel storage area, to minimize impacts from potential fuel spills;
- Drip pans or other equivalent device(s) should be used when refueling equipment on the site to aid in the prevention of fuel spills;
- The disposal of greywater and sewage should be distant from any waterbody, to minimize negative impacts on recipient freshwater environments; and



- Effective erosion and sediment control measures, such as silt fences, should be implemented on disturbed areas to prevent enhanced sedimentation in receiving waterbodies.

CIRNAC #2: Fuel and Drilling Fluid Classification

The Proponent indicated in its Geotechnical Investigation Proposal to the NIRB that it will use petrol (gasoline) to complete its investigation, and that non-toxic drilling fluids will be used to prevent contamination of nearby waterbodies. CIRNAC notes that the Proponent did not provide a description of:

- How gasoline will be used to support project activities (i.e., project infrastructure requiring gasoline and an estimated quantity);
- The drilling fluids (i.e., quantities, product information and/or chemical composition(s) of the drilling fluids); and
- Measures it intends to implement in order to minimize chances of introduction of drilling fluids into surface and subsurface freshwater environments (e.g., recipient lakes, groundwater).

CIRNAC recommends that the Proponent provides descriptions of its drilling fluids, how gasoline will be used to support project activities, and measures it intends to implement in order to minimize chances of contamination of the nearby waterbodies.

CIRNAC #3: Rock Sampling and Characterization

The Proponent indicated that overburden will be generated from drilling activities, and that a portion of rocks will be collected for sampling purposes, while the remaining material will be carefully distributed across the area in a manner that ensures no adverse impact on local entities. CIRNAC notes that the Proponent did not indicate whether it intends to characterize the sampled rock for potentially acid-generating (PAG) material or backfill its boreholes. The excavation or exposure of PAG material, particularly sulphide-bearing rocks (e.g., pyrite), can result in acid rock drainage and metal leaching, if the PAG material is exposed to water and oxygen, which could negatively impact receiving freshwater environments.

CIRNAC acknowledges that the proposed geotechnical survey is expected to produce five (5) cubic meters of overburden, but notes that this quantity is expected to increase in future phases of the project (i.e., the construction of water pipelines), if the project is approved by the NIRB, potentially resulting in larger quantities of excavated and exposed PAG material.

CIRNAC recommends that the Proponent clarifies which analyses will be performed on the rock samples, and whether it intends to characterize the PAG material of the underlying bedrock in the study area.

CIRNAC #4: Consultation with Interested Parties

CIRNAC appreciates the effort the Proponent has made in contacting the Amarak Hunters and Trappers Association, Nunavut Tunngavik Incorporated, and the Qikiqtani Inuit Association in Iqaluit. CIRNAC recommends that the Proponent continue to consult with the aforementioned interested parties and any other relevant interested Inuit, community members, and community organizations in Iqaluit who demonstrate an interest in the project.



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,



Vincent Okonkwo
A/Manager, Impact Assessment

