



# CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's  
“Estimating the abundance of the Foxe Basin polar bear  
subpopulation” Project Proposal



Nunavut Regional Office  
918 Sivumugiaq Street  
Iqaluit, NU, X0A 3H0

Your file - Votre référence  
24YN026  
Our file - Notre référence  
GCdocs# 126760006

July 11, 2024

Mia Beattie  
Impact Assessment Officer  
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 Government of Nunavut's "Estimating the abundance of the Foxe Basin polar bear subpopulation" Project Proposal**

Dear Mia Beattie,

On June 20, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "Estimating the abundance of the Foxe Basin polar bear subpopulation" 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: Fuel Caches and Handling**

The Proponent indicates that 78 fuel caches will be used throughout the Foxe Basin to support project activities, but they did not provide descriptions of the:

- Caches and fuel handling measures (e.g., secondary containment, spill prevention and response measures); and
- Land on which fuel will be stored, including surrounding environment(s) (e.g., proximity to recipient marine and freshwater ecosystems).

CIRNAC recommends that the Proponent describe measures that will be implemented in storing and handling fuel, to minimize environmental impacts. CIRNAC notes that there are best management practices are often captured by land use authorizations and water licence authorizations, which generally include, but are not limited to, storing fuel, as well as refueling of all equipment, a minimum of 31 meters away from the high water mark of any waterbody, and using secondary containment, and the use of drip pans or equivalent device(s), to aid in the prevention of fuel spills.



## **CIRNAC 2: Identification of Environmental Impacts and Mitigation Measures**

In the Environmental Impact Matrix, the Proponent classified impacts to sensitive landforms and vegetation as “negative and mitigable”, while other impacts are classified as “unknown”, including ground stability; permafrost; water quality; and sediment and soil quality.

It is unclear to CIRNAC which measures will be implemented to mitigate any sensitive landform impacts, or why the categories above were listed as “unknown” impacts, given potential spills from fuel storage.

CIRNAC recommends that the Proponent clarify the anticipated environmental impacts resulting from the project, specifically for the components described above, and outline any mitigation measures that will be implemented.

## **CIRNAC 3: Consultation with Interest Parties**

CIRNAC recommends that the Proponent continue to consult with community members and relevant organizations who may have an interest in the project proposal. This would include:

- The eight Nunavut communities identified in the project proposal: Kinngait, Chesterfield Inlet, Coral Harbour, Sanirajak, Igloodik, Kimmirut, Naujaat, and Baker Lake;
- The four Nunavik communities identified in the project proposal that are within the Foxe Basin polar bear subpopulation area: Akulivik, Ivujivik, Puvirnituk, and Salluit;
- The Nunavut Wildlife Management Board; and,
- Makivik.

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 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](mailto:john.macinnis@rcaanc-cirnac.gc.ca).

Sincerely,



Richard Bingley  
A/Manager, Impact Assessment

