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Building Nunavut Together
Nunavuliuqatigiingniq
Bâtir le Nunavut ensemble

July 23rd, 2024

Kelli Gillard
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 Kelli Gillard,

On June 18, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's "Estimating the abundance of the Foxe Basin polar bear subpopulation" Project Proposal.

On June 24, 2024, we received an email indicating that the mayor of Coral Harbour, Patterk Netser, had some comments and questions and a community member from Coral Harbour, Leonard Nester, had additional comments. These were addressed in a response letter sent by email with accompanying relevant documents (letters of support) on July 19, 2024.

On July 12, 2024, we received a second notice via email that Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).

We appreciate the comments from all parties. This letter addresses the comments received from CIRNAC.

1: Fuel Caches and Handling

- Our proposal outlines the fuel caches that will be used during the field program.
- All fuel is stored in standard fuel drums that prevent access to wildlife.
- All fuel is stored greater than 31 meters above the high-water mark of any water body.
- All re-fuelling will occur away greater than 31 meters from any high-water mark of any waterbody given that all drums are stored away from the high watermark of any waterbody.
- Emergency spill kits are carried within the Twin Otter during transporting and caching fuel to prevent any spills, should they occur. During field research activities emergency spill supplies are available in the helicopter to deal with any spills should they occur. In addition, major spill kits are also available at the nearest Conservation Office.

- Fuel drums will remain on the land less than a year.

2: Identification of Environmental Impacts and Mitigation Measures

- As outlined in the proposal, the field effort will involve flying over the Foxe Basin subpopulation identifying and counting polar bears and collecting biopsy samples. Biopsy sample collection will involve momentarily landing to collect the sample.
- The fuel caching may have some more direct impacts on the environment.
- In the case of sensitive landforms and vegetation, the impact was deemed to be negative but mitigatable.
    - Vegetation may be temporarily affected over the course of the field program by being obstructed by the fuel drum. Care was taken to place drums, when possible, on rocky outcrops rather than in vegetated areas.
    - Similarly, sensitive landforms could be affected by fuel caches. However, this can be mitigated during the fuel cache location selection process.
- The project impact on ground stability, permafrost, water quality, and sediment and soil quality were deemed unknown.
    - The effect of fuel caches on these factors are unknown. We do not anticipate having any fuel spills.
    - The caches sizes vary from 2 to 10 drums, with smaller caches at remote fuel caches (2 to 5) larger caches in communities or at established camps (8 to 10).
    - The rationale to not include any specific impacts on water quality, hydrology, limnology, sediment and soil quality was based on our experience that we have with fuel caching initiatives. Safety and proper drum storage is always a very high priority, especially as it relates to potential spills. We recognize that there is a potential for a spill, however, to date we have yet to have any issues.
    - The impacts on soil and hydrology are limited because the drums will be stored greater than 31 meters away from any water source and the high-water mark of any water body.
    - We concluded that the potential impact on soil, hydrology and sediment are therefore very limited, but are unknown, as no specific assessment has been conducted to determine the effects.
    - Due to the numerous factors, and their possible additive or negating effect on one another, the effect on the various environmental factors is unknown.

3: Consultation with Interest Parties

- We recognize the importance of consulting with affected proponents.
- Full consultation with Hunter's and Trapper's Organizations (HTOs) of affected communities is a standard approach in all territorial research projects. During initial project consultations we provide an overview of the project and research plans, discuss methodology, and seek input and consensus on the methods. We include Inuit Qauijimajatuqangit and local knowledge in project design. We invite local HTO-selected individuals to participate in field activities to have employment and training opportunities and for accountability purposes. We update the HTO throughout the project, providing regular updates on the status of the project. We provide procurement opportunities through goods and services required when in community. Once field seasons are completed, we provide updated information to all co-management partners. When a project is completed, we provide results in writing and through in-community consultation meetings.
- We have consultations with all affected communities, including the eight communities of Nunavut (Kinngait, Chesterfield Inlet, Coral Harbour, Sanirajak, Igloolik, Kimmirut, Naujaat, and Baker Lake) and the four communities of Nunavik (Akulivik, Ivujivik, Puvirnituq, and Salluit).
- We have received letters of support from eleven of the twelve affected communities, including Kinngait, Coral Harbour, Sanirajak, Igloolik, Kimmirut, Naujaat, Baker Lake, Akulivik, Ivujivik, Puvirnituq, and Salluit.
- The Nunavut Wildlife Management Board is aware of this work and is monetarily supporting the project through the Nunavut Wildlife Research Trust.
- Makivvik and the Nunavik Marine Region are also aware of the work, as proposal submissions were made for access and research.

We trust that these comments address the concerns brought forward by CIRNAC. If there are any other questions please do not hesitate to contact us via email at aroberto-charron@gov.nu.ca and abohart@gov.nu.ca.

Regards,

A. Roberto-Charron

Amélie Roberto-Charron and Alyssa Bohart
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