

July 30, 2024

Francis Emingak  
Screening Officer  
Nunavut Impact Review Board  
P.O Box 1360  
Cambridge Bay, NU X0B 0C0

**Sent VIA Email: [info@nirb.ca](mailto:info@nirb.ca)**

**Re: Notice of Screening for Qulliq Energy Corporation's "New Kugaaruk Power Plant" Project Proposal**


Hello Francis,

The Government of Nunavut (GN) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments regarding Qulliq Energy Corporation's "New Kugaaruk Power Plant" project proposal, NIRB File # 24XN034.

The GN has reviewed the proposed project and related documents and has one (1) comment to share with the Board, attached to this letter.

The GN appreciates participating in the screening of this project through the NIRB process. Should there be any concerns or need for follow-up, please feel free to contact me at [jbuller@gov.nu.ca](mailto:jbuller@gov.nu.ca).

Qujannamiik,

  
Justin Buller  
Assistant Attorney General

Justin Buller  
Interim Avatiliriniq Coordinator  
Government of Nunavut

GN: Archeology	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	New Kugaaruk Power Plant
References	NIRB 125981/24XN034: Notice of Screening and Comment Request for QEC's "New Kugaaruk Power Plant" Project Proposal
CONCERNS	
<p>Qulliq Energy Corporation (QEC) is proposing to construct and operate a new power plant in the Hamlet of Kugaaruk. The proposed project will include the installation of a five diesel generators facility, the temporary installation of a 4,000L diesel fuel tank, the construction of two 90,000L fuel tanks, a 30m pipeline, a waste disposal and sewage area. Heavy construction equipment will be used for construction.</p> <p>Several locations for the power plant location have been considered and one site identified as Option #4 has been selected. A search of the Nunavut Site Database indicates that there are four (4) archaeological sites recorded in the vicinity of the project area. One of them is a grave located a few meters southwest of proposed Option 4.</p> <p>The proponent has been proactive and Archaeology Permits 2021- 09A and 2022-54A were issued by the Department of Culture and Heritage (CH) to carry out an Archaeological Impact Assessment (AIA) in advance of proposed construction to determine if archaeological sites were in potential conflict with the proposed construction option and to identify any necessary avoidance or mitigation measures.</p> <p>However, it remains unclear if the proposed construction work will require the construction of access road (s) or the enlargement of existing roads and if aggregate will require the use of existing quarries or the exploitation of new quarries.</p>	
RECOMMENDATIONS	
<p><b>Do you have any suggestions or recommendations for this application?</b></p> <p><b>A Class 2 Archaeology Permit is required from the Department of Culture and Heritage.</b></p> <p>The location selected (Option #4) for the construction of the new power plant has been the object of archaeological impact assessment (AIA) studies under permits 2021- 09A and 2022-54A. However, the Department of Culture and Heritage is seeking further information relating to the acquisition of aggregate material and the potential use of access roads.</p>	

During construction activities CH recommends that no activities be conducted in the vicinity (50 m buffer zone) of any archaeological/historical sites. If archaeological sites or features are encountered, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Government of Nunavut Territorial Archaeology Office.

All archaeological and palaeontological sites in Nunavut are protected under the Nunavut Act. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site without the proper authorizations. Moreover, the building of inuksuit is not recommended.

#### **ADDITIONAL COMMENTS**

N/A