



# CIRNAC Comments to NIRB

Re: Notice of Screening for Qillaq Innovations' "Sealift Laydown Area" Project Proposal



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

Your file - Votre référence  
24XN035  
Our file - Notre référence  
GCdocs#

January 10, 2025

Robby Qammaniq  
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 Qillaq Innovations' "Sealift Laydown Area" Project Proposal**

Dear Robby Qammaniq,

On December 3, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on Qillaq Innovations' "Sealift Laydown Area" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

**Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures).**

CIRNAC is of the view that, while potential adverse effects resulting from the project are likely predictable and mitigable with known technology, the Proponent has not clearly defined potential impacts of the project or proposed mitigation measures. For example, in the Identification of Environmental Impacts Matrix (the Matrix), the Proponent indicates that impacts to water quality and sediment and soil quality are expected to be "negative and mitigable" during the construction phase of the project, but it did not clearly describe project activities that would contribute to negative impacts (e.g., fuel spills, in-water works) or proposed mitigation measures. CIRNAC also notes that the Matrix does not appear to describe potential impacts from the construction and operation of the proposed laydown access road.

CIRNAC recommends that the Proponent clearly describe potential impacts that are reasonably expected from the project and proposed mitigation measures. Some best management practices that the Proponent should consider to mitigate potential adverse effects from the project, include, but are not limited to:

- Refuelling of all equipment, as well as the storage of fuel, a minimum of thirty-one (31) meters away from the high water mark of any waterbody;



- Using a secondary containment or a surface liner when storing barreled fuel and chemicals at all locations;
- Using drip pans or other equivalent devices when refuelling equipment on the site to aid in the prevention of fuel spills;
- Having spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, and absorbents) readily available during any transfer of fuel or hazardous substances;
- Implementing sediment control measures on disturbed areas before, during, and after construction;
- Selecting ground that is capable of supporting heavy equipment and vehicles, to minimize land disturbance; and
- Isolating the work area for in-water works (e.g., silt curtain), to contain suspended sediment.

**Any matter of importance to the Party related to the project proposal.**

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 or David Abernethy by e-mail at [john.macinnis@rcaanc-cirnac.gc.ca](mailto:john.macinnis@rcaanc-cirnac.gc.ca) or [david.abernethy@rcaanc-cirnac.gc.ca](mailto:david.abernethy@rcaanc-cirnac.gc.ca).

Sincerely,



Courtney White  
A/Manager, Impact Assessment

