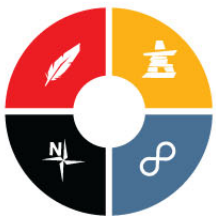




# CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's "Arviat New Quarry Sites" Project Proposal



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

Your file - Votre référence  
24QN027  
Our file - Notre référence  
GCdocs#129549650

October 3, 2024

Tundra Kuliktana  
Screening 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 "Arviat New Quarry Sites" Project Proposal**

Dear Tundra Kuliktana,

On September 11, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "Arviat New Quarry Sites" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) 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: Acid-generating Properties of Quarry Materials**

The Proponent provided information on the quality and quantity of potential borrow material in and around Arviat. CIRNAC notes that the document titled "Aggregate Resource Assessment New Sewage Lagoon Arviat, NU" (hereafter Aggregate Resource Report) does not provide any information on the acid-generating properties of potential quarry materials from Aggregate Prospect No. 1 and No. 3, which are understood to represent the new quarry sites. Potentially acid-generating (PAG) materials, particularly sulphide-bearing material (e.g., pyrite), can result in acid rock drainage and metal leaching (ARD/ML), if the material is exposed to water and oxygen, which could negatively impact receiving environments.

It is unclear to CIRNAC if the acid-generating properties of quarry materials (i.e., aggregate, overburden) have been determined or how the potential impacts of ARD/ML are considered throughout the expected lifecycle of the quarries. Characterizing the acid-generating properties of quarry materials would help inform site management practices and reclamation planning (e.g., non-acid generating cover materials), minimizing potential impacts. CIRNAC recommends that the Proponent clarify whether it has, or intends to, characterize the acid-generating properties of quarry material in the study area, and if so, what plans are developed to protect the environment from potential ARD/ML.



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

The Identification of Environmental Impacts Matrix provides an overview of anticipated impacts of the project. The Proponent indicates that some impacts are not anticipated (e.g., to water quality), while others are identified as “negative and mitigable” and “unknown”. CIRNAC notes that though the project is of activities that generally have known best management practices and mitigation measures, the Proponent does not seem to identify them clearly.

In the Aggregate Resource Report, the Proponent indicated that there was groundwater in four of the six test pits and permafrost in five of the test pits of Aggregate Prospect No. 2, with an esker within the Aggregate Prospect No. 3.

It is unclear if the Proponent has considered the potential impacts onto groundwater quality and permafrost from run-off or excavation activities. Further it is unclear if water will be managed to prevent pooling and run-off water.

CIRNAC recommends that the Proponent provide further information on 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: Potential for Positive Effects to Inuit through Employment, Training, and Contracting Opportunities**

CIRNAC recommends that the Proponent prioritize the employment, training, and contracting of local Inuit and Inuit firms when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. Members of the community of Arviat should be prioritized in any project-related employment, training, and contracting opportunities that may be made available.

## **CIRNAC #4: Consultation with Interest Parties**

CIRNAC recommends that the Proponent maintain open communication with the Hamlet of Arviat, as well as community members and relevant organizations regarding its project proposal. 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 have recreational cabins and make use of the land in areas near the proposed quarry sites;
- 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 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.ca](mailto:david.abernethy@rcaanc-cirnac.ca).

Sincerely,

A handwritten signature in blue ink that reads "Richard Bingley". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Richard Bingley  
A/Manager, Impact Assessment

