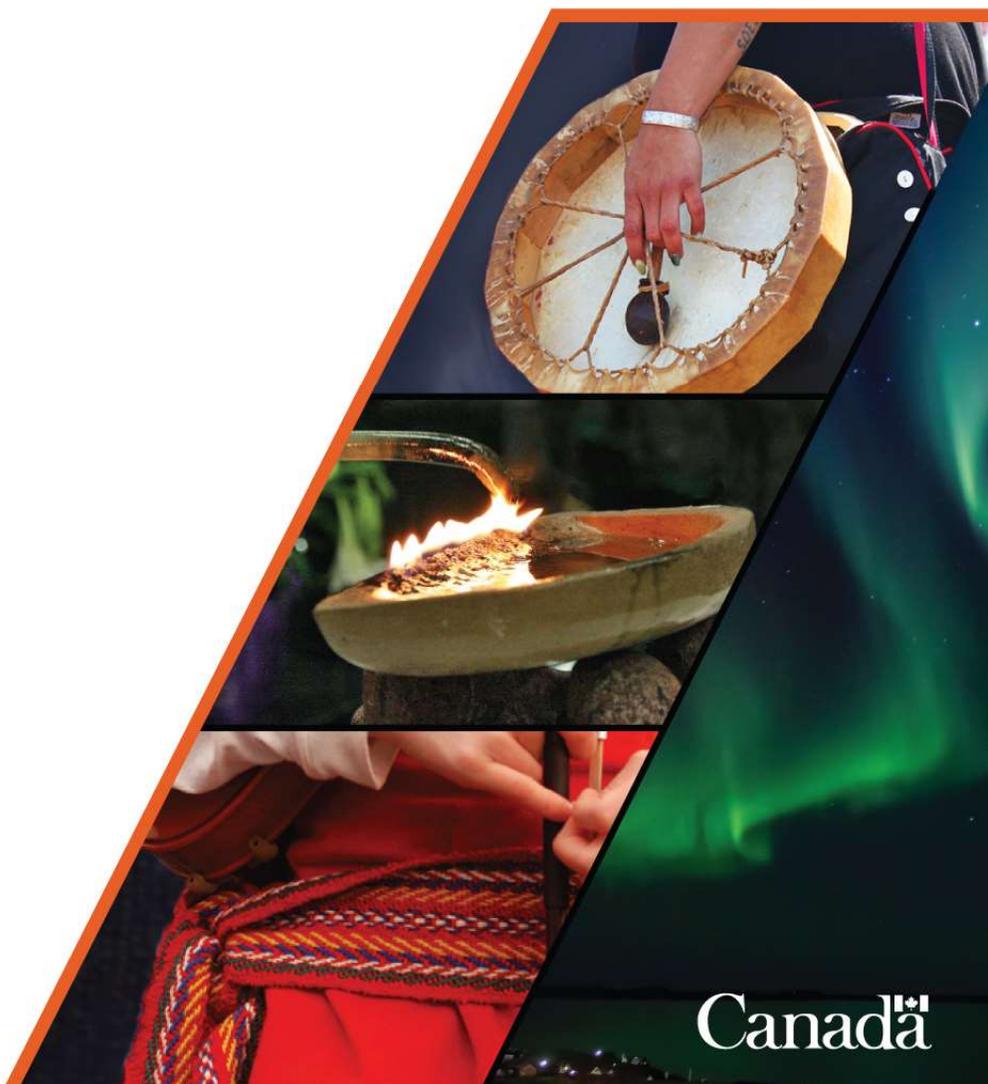


# CIRNAC Comments to NIRB

Re: Notice of Screening for Canadian North Resources Inc.'s  
"Ferguson Lake, Nunavut, Environmental Baseline Studies"  
Project Proposal



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

Your file - Votre référence  
24YN037  
Our file - Notre référence  
GCdocs#132800917

February 4, 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 Canadian North Resources Inc.'s "Ferguson Lake, Nunavut, Environmental Baseline Studies" Project Proposal**

Dear Robby Qammaniq,

On January 14, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Canadian North Resources Inc.'s "Ferguson Lake, Nunavut, Environmental Baseline Studies" project proposal (the Project). Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the Project and offers the responses below pertaining to the NIRB's request:

**Any matter of importance to the Party related to the project proposal including whether any cumulative ecosystemic and socio-economic impacts could result from the impacts of the proposed project combined with those of any other project that has been carried out, is being carried out or is likely to be carried out inside the designated area, or wholly or partly outside the designated area.**

**CIRNAC 1: Potential for Cumulative Effects**

CIRNAC is of the view that the potential for significant cumulative effects resulting from the Project on valued ecosystem components within the Department's mandate is low. The potential direct impacts of the Project, such as those resulting from the generation and disposal of waste (e.g., sewage, greywater) and fuel spills, are predictable and mitigable with known technology, and authorizations, such as the Type B Water Licence No. 2BE-FER2227, describe best practices associated with waste disposal and spill contingency planning, minimizing the potential for Project residual effects and cumulative effects.

Future developments may need to be analysed further for potential negative impacts to the abundance, health, and reproductive capacity of terrestrial wildlife in the Kivalliq region, particularly caribou and muskoxen. For example, the establishment of a new transportation route that would connect the project area to either the community of Baker Lake or Arviat and



possibly, other projects in the region, has the potential to create negative pressures on wildlife populations.

CIRNAC recommends that the Proponent, in its research efforts, continue to gather information as to how its development project may create additional negative pressures on terrestrial wildlife in the region while interacting with stakeholders to consult and engage on its planned environmental studies. Together with interested stakeholders, the Proponent should make use of collected information to develop management plans that would be utilized, should a new transportation route be developed in support of the Ferguson Lake Project.

### **CIRNAC 2: Consultation with Interest Parties**

CIRNAC recommends that the Proponent consult with the Hunters and Trappers Associations and Hamlet Councils of the communities of Baker Lake and Arviat, the Kivalliq Wildlife Board, and any other relevant organizations and individuals regarding its project proposal. As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujimagatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife, particularly caribou and muskoxen, and the environment;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to 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 3: Management Practices Designed to Prevent Disturbance to Wildlife**

CIRNAC recommends that the Proponent adhere to applicable regulatory requirements and accepted practices to prevent and/or mitigate any potential disturbances to wildlife that may result project activities. Meaningful efforts should be made to work with interested stakeholders, including the Kivalliq Inuit Association, Government of Nunavut's Department of Environment, the Kivalliq Wildlife Board, and the Hunters and Trappers Associations of Baker Lake and Arviat to ensure acceptable management practices are applied. In particular, efforts should be made to develop an acceptable approach for the operation of a helicopter to prevent any negative impacts to caribou and muskoxen from sensory disturbances (visual and sound).

CIRNAC appreciates the opportunity to provide comments. 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,



Richard Bingley  
Manager, Impact Assessment

