



# CIRNAC Comments to NIRB

Re: Notice of Screening for Tetra Tech Inc.'s "Kugaaruk Sealift Improvements Project" Proposal



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

Your file - Votre référence  
24XN057  
Our file - Notre référence  
GCdocs#132037953

January 24, 2025

Francis Emingak  
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 Tetra Tech Inc.'s "Kugaaruk Sealift Improvements Project" Proposal**

Dear Francis Emingak,

On December 17, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on Tetra Tech Inc.'s "Kugaaruk Sealift Improvements 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 1: Standard Mitigation**

CIRNAC is of the view that the potential adverse effects resulting from the project are likely predictable and mitigable with known technology.

CIRNAC recommends that the Proponent consider implementing best practices to mitigate potential adverse effects from the project related to fuel management and erosion, including, but 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 2: Consultation with Interest Parties**

CIRNAC recommends that the Proponent consult with the interested residents of Kugaaruk regarding the 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;
- 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. Should you have any questions, please contact Courtney White or David Abernethy by e-mail at [courtney.white@rcaanc-cirnac.gc.ca](mailto:courtney.white@rcaanc-cirnac.gc.ca) or [david.abernethy@rcaanc-cirnac.gc.ca](mailto:david.abernethy@rcaanc-cirnac.gc.ca).

Sincerely,



Richard Bingley  
Manager, Impact Assessment

