



CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's
"Amendment to Municipality of Grise Fiord Water Licence
3BM-GRI2025 - Solid Waste Facility" Project Proposal



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

Your file - Votre référence
25XN006
Our file - Notre référence
GCdocs#135152018

April 16, 2025

Kelli Gillard PAg, CTAJ
Acting Manager, Impact Assessment
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 "Amendment to Municipality of Grise Fiord Water Licence 3BM-GRI2025 - Solid Waste Facility" Project Proposal

Dear Kelli Gillard,

On March 27, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "Amendment to Municipality of Grise Fiord Water Licence 3BM-GRI2025 - Solid Waste Facility" 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: Mitigation Measures

CIRNAC is of the view that the potential adverse effects of the project are 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, erosion, and changes in site water flows, including, but not limited to:

- Using drip pans or other equivalent devices when refuelling equipment 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 can support heavy equipment and vehicles, to minimize land disturbance; and
- Diverting stormwater in a manner that minimizes ponding (permafrost degradation) and impacts to receiving aquatic environments.



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

CIRNAC 2: Storage of Hazardous Materials

CIRNAC understands that the Proponent intends to store hazardous waste in seacans before the material is backhauled to an approved facility for final disposal. CIRNAC notes that the Proponent did not specify if it would use any secondary containment for these materials inside the seacans. CIRNAC is of the view that seacans may not be suitable as a stand-alone secondary containment measure, as they may not be leak-proof and capable of containing a spill. CIRNAC recommends that the Proponent consider the implementation of secondary containment measures for materials stored inside seacans awaiting backhaul, to minimize potential impacts from spills on receiving environments.

CIRNAC 3: Waste Management

CIRNAC understands that the Proponent intends to undertake construction to upgrade the existing water supply infrastructure (NIRB File No. 23XN069) and landfill. The information provided by the Proponent suggests construction of both works is planned in parallel. CIRNAC notes that the Proponent did not describe how wastes would be managed while this infrastructure is upgraded, including existing waste in the landfill and new waste that would be generated during construction. CIRNAC recommends that the Proponent clarify the procedures in management of wastes generated during construction to ensure parallel development of a new landfill facility minimizes potential impacts on receiving environments.

CIRNAC 4: Potential for Positive Effects to Inuit Beneficiaries through Employment and Contracting Opportunities

CIRNAC recommends that the Proponent prioritize the employment and contracting of local Inuit beneficiaries and Inuit-owned firms in the implementation of project activities. Such efforts will allow for positive effects, including training and capacity development, to be realized by community members and the local Inuit population. As a result, Grise Fiord community members and Inuit owned firms should be prioritized in any project related employment and contracting opportunities.

CIRNAC 5: Temporary Camp Operations

CIRNAC recommends that the Proponent work closely with its contractor, the Municipality of Grise Fiord, and other interested parties to ensure the project's temporary construction camp will be designed and operated in a manner consistent with the needs and expectations of the Municipality. This includes working to ensure project personnel remain respectful of community customs and the socio-economic wellbeing of community members. Consideration should be given to co-designing acceptable onboarding procedures, ongoing communication practices, monitoring, and follow-up measures to ensure the temporary camp's operations and presence of workers from outside of the community do not contribute toward negative socio-economic impacts in the community.

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 or david.abernethy@rcaanc-cirnac.gc.ca.



Sincerely,

Richard Bingley

Richard Bingley
Manager, Impact Assessment

