



NIRB File No.: 25YN005
NPC File No.: 150627

March 24, 2025

Stephanie Kusch
C/O University of Quebec Rimouski
310 Alles des Ursulines
Rimouski, QC
G5L – 3A1

Sent via email: stephanie_kusch@uqar.ca

Re: Notice of Screening for University of Quebec Rimouski’s “Permafrost Organic Carbon Fluxes to the Canadian Arctic Ocean” project proposal

Dear Stephanie Kusch:

On February 4, 2025, the Nunavut Impact Review Board (NIRB) received a referral to screen University of Quebec Rimouski’s “Permafrost Organic Carbon Fluxes to the Canadian Arctic Ocean” project proposal from the Nunavut Planning Commission (Commission), which noted that the project proposal is outside the area of an applicable regional land use plan. On March 8, 2025, the NIRB received the complete application from the Proponent.

Pursuant to Article 12, Sections 12.4.1 and 12.4.4 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and s. 87 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*), the NIRB has commenced screening this project proposal and has assigned it file number **25YN005** - please reference this file number in all future related correspondence.

PROJECT OVERVIEW

Project Scope:

All documents received and pertaining to this project proposal can be accessed from the NIRB’s online public registry at www.nirb.ca/project/126137.

Project:	Permafrost Organic Carbon Fluxes to the Canadian Arctic Ocean
Region:	Qikiqtani
Location:	Qikiqtarjuaq

Summary of Project Description:	The Proponent intends to conduct experiments to study greenhouse gas production and organic matter transformation as well as sampling of marine sediments to study erosion of permafrost organic carbon into oceanic feedback mechanisms in response to climate change.
Project Proposed Timeline:	July and August from 2025 to 2028

According to the project proposal, the scope of the project includes the following undertakings, works or activities:

- Travel to 30 different land and water sample sites within and outside of the Broughton Island using an all-terrain-vehicle (ATV) and a boat.
- Use knives, trowels, and shovels to dig a 15 x 15 x 30 cm pit to collect permafrost soil samples and then cover them with the excess soil that was displaced,
- Use a 200 cubic centimetre Ponar grab sampler to collect water and seafloor sediments,
- Use a flux chamber to record carbon dioxide emissions, and
- Place the samples onto a glass jar and transport them to the University laboratory for further analysis.

Inclusion or Exclusion of Scoping List

At this time, the NIRB has identified no additional works or activities in relation to the project proposal. As a result, the NIRB will proceed with screening the project based on the scope as described above.

REQUEST FOR COMMENTS

All documents received can be accessed from the NIRB’s online public registry at www.nirb.ca/project/126137 and include:

- *NPC Referral*
- *NPC Application*
- *Non-Tech Summary*
- *NIRB Application*

The NIRB will copy you on screening process related correspondence and upload related documents to the NIRB’s online registry for public access. The NIRB may request additional information at any time during the process.

The NIRB is copying parties and municipalities potentially affected by University of Quebec Rimouski’s project proposal with this letter, and we invite interested parties to comment directly to the NIRB by **April 3, 2025**.

The NIRB would like parties to provide comments regarding:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;
- Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why;
- 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); and
- Any matter of importance to the Party related to the project proposal.

Please note that *proposed* project-specific terms and conditions, should the project proceed, have been attached for consideration and comment ([Appendix A](#)).

CONTACT INFORMATION

Please send your comments to the NIRB via email at info@nirb.ca, via fax at (867) 983-2594 or via the individual project dashboard for this assessment on the NIRB's online public registry at www.nirb.ca/project/126137.

If you have any questions or require clarification, feel free to contact the undersigned at (867) 983 – 4618 or rqammaniq@nirb.ca.

Sincerely,



Robby Qammaniq
Impact Assessment Officer
Nunavut Impact Review Board

Attachments: Appendix A: *Proposed* Project Specific Terms and Conditions

Enclosures (4): Public Notice of Screening (English, and Inuktitut)
Comment Forms (English, and Inuktitut)

cc: Distribution List
Nattiviak Hunters and Trappers Organization
Hamlet of Qikiqtarjuaq
Jared Ottenhof, Qikiqtani Inuit Association
Chris Spencer, Qikiqtani Inuit Association
Conor Goddard, Qikiqtani Inuit Association
Richard Dwyer, Nunavut Water Board
Moshia Cote, Nunavut Research Institute
William Patch, Government of Nunavut, Community and Government Services
Randy Mercer, Government of Nunavut, Community and Government Services
Ken Wasylshen, Government of Nunavut, Community and Government Services
Olivier Forbes-Bouillon, Government of Nunavut, Community and Government Services
Caroline Whittle, Government of Nunavut, Culture and Heritage
Sylvie LeBlanc, Government of Nunavut, Culture and Heritage
Karrin Nichol, Government of Nunavut, Economic Development and Transportation
Tracey McCaie, Government of Canada, Crown-Indigenous Relations and Northern Affairs Canada
Marcus Bermann, Government of Canada, Crown-Indigenous Relations and Northern Affairs Canada
Eva Walker, Government of Canada, Environment and Climate Change Canada
Jose Audet-Lecouffe, Government of Canada, Fisheries and Oceans Canada

Appendix A: Proposed Project Specific Terms and Conditions

The following is a list of project-specific terms and conditions which, should the project proceed, may be recommended to be attached to any approval.

General

1. University of Quebec Rimouski (the Proponent) shall maintain a copy of the Project Terms and Conditions at the site of operation at all times and make it accessible to enforcement officers upon request.
2. The Proponent shall operate in accordance with all commitments stated in correspondence provided to the Nunavut Planning Commission (NPC File No.: 150627), and the NIRB (Online Application Form, March 8, 2025). This information should be accessible to enforcement officers upon request.
3. The Proponent shall operate the site in accordance with all applicable Acts, Regulations and Guidelines.
4. The Proponent shall ensure that it meets the standards and/or limits as set out in the authorizing agencies' permits or licences as required for this project.
5. The Proponent shall ensure that all personnel, staff and contractors are adequately trained prior to commencement of all project activities, and shall be made aware of all operational plans, management plans, guidelines and Proponent commitments relating to the project.

Water Courses/Water bodies

6. The Proponent shall ensure that water extraction from any fish-bearing waterbody is done with appropriate care and caution. Small lakes or streams should not be used for water withdrawal unless approved by the appropriate authorizing agency.
7. The Proponent shall ensure that no disturbance of the stream bed, lakebed or the banks of any definable watercourse be permitted, except where deemed necessary for maintaining project-specific operational commitments or approved by a responsible authority in cases of spill management.
8. The Proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes (including wastewater) or sediment into any water body. The Proponent should have in place an Emergency Spill Response Plan that is approved by the appropriate authorizing agency(ies).

Waste Management

9. The Proponent shall manage all hazardous and non-hazardous waste including food, domestic wastes, debris and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.

Fuel and Chemical Storage

10. The Proponent shall locate all fuel and other hazardous materials a minimum distance away from the high-water mark of any water body and environmentally sensitive areas as required by the appropriate authorizing agencies. The materials shall be stored in such a manner as to prevent their release into the environment.
11. The Proponent shall ensure that re-fuelling of all equipment occurs a minimum distance away from the high-water mark of any water body as required by the appropriate authorizing agencies.
12. The Proponent shall have a Spill Contingency Plan in place at all fuel storage or transfer locations and shall ensure that appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) are readily available.

Wildlife – General

13. The Proponent shall not substantially alter or damage or destroy any wildlife habitat in conducting this operation unless otherwise authorized by the appropriate authorizing agencies.
14. The Proponent shall not chase, weary, harass or molest wildlife. This includes persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or disturbing large groups of animals.
15. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.
16. The Proponent shall ensure that all wildlife have the right-of-way on any roads or trails. Vehicles are required to slow down or stop and wait to permit the free and unrestricted movement of wildlife across roads or trails at any location.

Migratory Birds and Raptors Disturbance

17. The Proponent shall carry out all phases of the project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's *Avoidance Guidelines*. The Proponent's actions in applying the *Avoidance Guidelines* shall be in compliance with the *Migratory Birds Convention Act, 1994* and with the *Species at Risk Act*.

18. The Proponent shall avoid the seaward site of seabird colonies and areas used by flocks of migrating waterfowl, a minimum distance away on the recommendation of the appropriate authorizing agencies.
19. The Proponent shall not pursue seabirds or waterbirds swimming on the water surface and shall avoid concentrations of these birds if encountered on the water.

Caribou and Muskoxen Disturbance

20. The Proponent shall avoid interfering with any paths or crossings known to be frequented by caribou during periods of migration as identified by current land use plans in place and/or by Inuit Qaujimaningit.

Land Use and Restoration of Disturbed Areas

21. The Proponent shall use existing trails where possible during project activities on the land.
22. The Proponent shall ensure that the land use area is kept clean and tidy at all times.
23. The Proponent shall remove all garbage, fuel and equipment at the end of each field season and/or upon completion of work and/or upon abandonment.
24. The Proponent shall ensure that all disturbed areas are restored to a stable or pre-disturbed state using Best Available Technology Economically Achievable (BATEA) upon completion of work and/or abandonment.

Marine-Based Activities

25. The Proponent shall not attempt to intersect or interfere with the movements of marine mammals. This includes ensuring that there are no wake zones within 250 metres and a minimum of 100 metre no go zone around marine mammals. Strategic positioning of vessels ahead of the path being traveled by mobile mammals and waiting for the mammals to pass is also prohibited.
26. The Proponent shall maintain a distance of 100 metres if a Polar Bear is encountered on land or ice while conducting activities from a zodiac or other small craft; all interaction with Polar Bears should be avoided if possible.
27. The Proponent shall suspend all project activities should any dead fish or wildlife (both marine and terrestrial), or any injured wildlife be observed during any works or activities in and around the marine waters. Activities may only be resumed on the recommendation of the authorizing agencies.
28. The Proponent shall report all incidents, injuries or sightings of marine mammals to the appropriate authorizing agencies.

Heritage Sites

29. The Proponent shall ensure that archaeological and paleontological sites are not purposely or inadvertently disturbed by clients or staff as a result of project activities.
30. The Proponent shall ensure that all clients and staff are aware of the Proponent's responsibilities and requirements regarding archaeological or palaeontological sites that are encountered during land-based activities. This should include briefings explaining the prohibitions regarding removal of artifacts, and defacing or writing on rocks and infrastructure.
31. No activities shall be conducted in the vicinity (50 metres buffer zone) of any archaeological/historical sites. If archaeological sites or features are encountered, activities shall immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Government of Nunavut-Department of Culture and Heritage.

Other

32. The Proponent should engage with local residents regarding planned activities in the area and should solicit available Inuit Qaujimaningit and information regarding current recreational and traditional usage of the project area which may inform project activities. Posting of translated public notices and direct engagement with potentially interested groups and individuals prior to undertaking project activities is strongly encouraged.
33. The Proponent shall ensure that project activities do not interfere with Inuit wildlife harvesting or traditional land use activities.
34. The Proponent should, to the extent possible, hire local people and access local services where possible.