



CIRNAC Comments to NIRB

Re: Notice of Screening for Nunavut Nukkiksautiit Corporation's "Investigative Studies for the Iqaluit Nukkiksautiit Project" Proposal



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

Your file - Votre référence
25YN033
Our file - Notre référence
GCdocs# 138744048

June 25, 2025

Kelli Gillard PAg CTAJ
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 Nunavut Nukkiksautiit Corporation's "Investigative Studies for the Iqaluit Nukkiksautiit Project" Proposal

Dear Kelli Gillard,

On June 6, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Nunavut Nukkiksautiit Corporation's "Investigative Studies for the Iqaluit Nukkiksautiit 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

CIRNAC #1: Best Management Practices for Spill Prevention

CIRNAC is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

The Project will store and use significant fuel volumes on site (10,520 L diesel for heating and 7000 L gasoline for ATVs). While the Proponent indicates the use of lined berms and spill-response kits, the documentation does not yet detail operational controls such as setback distances and routine inspection schedules. CIRNAC suggests the Proponent consider:

- Positioning fuel caches and refueling areas at least thirty-one (31) meters from the ordinary high-water mark of any waterbody;
- Using drip pans and absorbent pads during all transfers;
- Confirming that berm capacity meets or exceeds 110% of the largest single container volume;
- Scheduling and documenting daily visual inspections of containers, hoses, and berm integrity; and,



- Providing refresher spill-response training to all personnel at the outset of each field rotation.

CIRNAC #2: Camp Waste, Greywater and Sewage Management

The camp plan calls for on-site incineration of combustible waste in a smart ash unit, containerized greywater treatment or storage, and sealed tanks for human-waste with regular back-haul to Iqaluit. CIRNAC suggests the Proponent to consider:

- Locating incinerators and ash-storage at least thirty-one (31) meters from the ordinary high-water mark of any water body, with appropriate secondary containment; and,
- Keeping wildlife-proof lids on all waste awaiting back-haul.

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

CIRNAC #3: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to consult with the municipalities of Iqaluit and Pangnirtung, the Amaruq Hunters and Trappers Association, the Pangnirtung Hunters and Trappers Association, and any other relevant organizations or individuals regarding its project proposal. As part of these consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qauijimajatuqangit into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of 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. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

