

September 5, 2025

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Dear Francis Emingak:

**RE: *Opportunity to address comments received regarding Government of Nunavut's "Qikiqtarjuaq Marine Infrastructure Project" proposal***

The Government of Nunavut is proposing to construct a deep-sea port facility in Qikiqtarjuaq, Nunavut (the Project). CBCL Limited (CBCL) was retained by the Government of Nunavut to provide architectural and engineering services for the Project. The Qikiqtarjuaq Marine Infrastructure Project proposal was submitted to the Nunavut Impact Review Board (NIRB) on June 23, 2025. After checking the application for completeness, NIRB accepted the proposal for screening (NIRB File No. 25XN030) pursuant to the *Nunavut Planning and Project Assessment Act*.

On July 3, 2025, NIRB issued a Notice of Screening for Government of Nunavut's "Qikiqtarjuaq Marine Infrastructure Project" proposal and invited interested parties to submit comments on the proposal by July 25, 2025. On August 8, 2025, NIRB issued a letter providing the Government of Nunavut an opportunity to respond to comments that were received from the following interested parties and requested a response by August 22, 2025:

- ▶ Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
- ▶ Environment and Climate Change Canada (ECCC)
- ▶ Fisheries and Oceans Canada (DFO)
- ▶ Transport Canada

On August 19, 2025, NIRB granted a two-week extension to September 5, 2025, for the Government of Nunavut to respond to the comments. CBCL has prepared the following responses to the summarized comments, on behalf of the Government of Nunavut, with detailed responses to comments from each interested party provided in an attachment to this letter.

**Summary of Responses to Comments Received from NIRB (letter dated August 8, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)**

Item #	Summary of Comment / Concern	Proponent Response
1	Concern that potential volumes of fuel and hazardous material spills can cause long-lived contamination. Requested information be provided during the water licence application process regarding the proposed emergency response plans for the construction and operation of the facility.	Section 7.0 of the Qikiqtarjuaq Marine Infrastructure Project Proposal states the commitment to develop a Construction Environmental Management Plan (CEMP) and an Operation Environmental Management Plan (OEMP). The CEMP will be submitted to the Nunavut Water Board (NWB) with the licence application for the Project prior to port construction and the OEMP will be submitted to the NWB prior to port operation. The CEMP and OEMP will detail environmental protection requirements and emergency response plans and approaches to spill response on land and in water, including spill response equipment and clean-up materials to be available on-site during transfer of fuel or hazardous substances. The CEMP and OEMP will include measures for onshore equipment refueling and servicing, and outline requirements for spill cleanup training. Details on the specific locations of where onshore equipment is to be refueled and serviced and the planned schedules for training for spill cleanup will be provided to the NWB after the construction contractor is selected and prior to commencement of construction for construction-related details, and prior to operation for operation-related details.
2	Spill response equipment and clean-up materials should be employed during any transfer of fuel or hazardous substances.	As stated in the response to comment 1, above, a CEMP and an OEMP will be submitted to the NWB prior to port operation. The CEMP and OEMP will outline requirements and procedures to employ spill response equipment and clean-up materials during transfer of fuel or hazardous substances.
3	Operational procedures, equipment maintenance and operator training be provided at the start of each field season.	As stated in the response to comment 1, above, an OEMP will be submitted to the NWB prior to port operation. The OEMP will outline operational procedures, equipment maintenance, and operator training at the start of each port operational season.
4	Quarry operations and lay-down area runoff may introduce fines to the Broughton Channel that may raise turbidity and total suspended solids, depress dissolved oxygen and may mobilize trace metals or nutrients. Implementation of	Section 7.4.2 of the Qikiqtarjuaq Marine Infrastructure Project Proposal outlines mitigation measures to prevent or reduce potential adverse effects on the marine environment. This includes implementation of an erosion and sediment control plan to control movement of soils and sediment, as well as turbidity monitoring, during construction. Further details on the erosion and sediment control measures and water quality monitoring will be provided in the CEMP, which will be submitted to the NWB prior to construction.

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	erosion and sediment control measures and monitoring water quality during in-water works should be conducted.	
5	No indication of emission standards for the equipment that will be used for construction phase. Consideration should be given to source construction equipment that would meet Tier 4 emission standards.	<p>The equipment that will be used during construction of the project will be sourced by the contractor. The Government of Nunavut will consider contractors that will commit to sourcing equipment that meets the Tier 4 emission standards that comply with the Off-Road Compression-Ignition Engine Emission Regulations. However, the decision on what equipment will be used during construction will be made by the contractor. There may be logistical and practical reasons for using equipment that is already in the region and/or equipment for which use is not limited by colder temperatures that may be encountered during the construction period.</p> <p>Procedures for equipment maintenance and monitoring during construction will be outlined in the CEMP, which will be submitted to the NWB prior to construction.</p>
6	The project is located near two National Wildlife Areas and lighting from the project could be a major attractant for marine birds and may result in collision with lit structures or their support structures, vessels, or with other birds, especially during periods of fog, drizzle, and haze.	<p>Lighting will be required during the project construction and operation for safety and security. Lighting will comply with Standard 621 Obstacle Marking and Lighting - Canadian Aviation Regulations (CARs) and requirements of the Canadian Coast Guard for lighting of aids to navigation. Where feasible, lighting will incorporate the following features recommended by Fatal Light Awareness Program (FLAP) Canada:</p> <p>Outdoor night lighting</p> <ul style="list-style-type: none"> <li>▶ Will be shielded, downward-directed fixtures</li> <li>▶ Will use lighting in the warm colour spectrum</li> <li>▶ Will be limited to areas required for safety and security</li> <li>▶ Will avoid use of spot, architectural, and advertising lighting during bird migration seasons (late May through June, and late July through October)</li> </ul> <p>Indoor lighting</p> <ul style="list-style-type: none"> <li>▶ Will be turned off in unused interior spaces</li> <li>▶ Where practical, will use task lighting rather than overhead lighting</li> </ul>

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7	<p>Concerns with potential impacts to species under the Species at Risk Act (SARA). The Proponent has not identified all species at risk that are likely to be present in the Project area, nor has the Proponent identified all adverse effects of the Project on species at risk.</p>	<p>Sections 5.4.4 and 5.4.4 of the Qikiqtarjuaq Marine Infrastructure Project Proposal listed species at risk with potential to occur in the project area; this included all of the species identified by Environment and Climate Change Canada (ECCC) in Table 1 attached to their review letter to the NIRB. It is acknowledged that the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) has assessed Ross's Gull as Endangered; Section 5.4.4 of the Qikiqtarjuaq Marine Infrastructure Project Proposal incorrectly lists the COSEWIC status of this species as Threatened.</p> <p>The Government of Nunavut is aware of species that are present in the project area and actions to comply with the <i>Species at Risk Act</i> will be detailed in a CEMP and OEMP. There is no critical habitat for species at risk within or near the project area and therefore no potential for interaction with critical habitat for species at risk. Three migratory bird species at risk were identified as possibly occurring within or near the project area: Buff-breasted Sandpiper, Ivory Gull, and Red Knot rufa subspecies. ECCC identified Ross's Gull as a species at risk with potential to interact with the project; in the Qikiqtarjuaq Marine Infrastructure Project Proposal this species is considered unlikely to occur in the project area. Potential effects on wildlife were considered in Section 7.2.4 of the Qikiqtarjuaq Marine Infrastructure Project Proposal and mitigation measures were identified; these potential effects and mitigation measures apply to migratory birds, including migratory bird species at risk. Mitigation measures identified in the Qikiqtarjuaq Marine Infrastructure Project Proposal are consistent with the relevant strategies for recovery in published recovery strategies and action plans. Mitigation measures and monitoring to be implemented during construction and operation will be detailed in a CEMP and OEMP, which will be submitted to the NWB, and will include the following:</p> <ul style="list-style-type: none"> <li>▶ Avoidance of species at risk encountered at the project site</li> <li>▶ Monitoring species at risk encountered at the project site, including recording time/date and location of observed species at risk, their behaviour when encountered, and actions taken to avoid disturbance to the species</li> <li>▶ Submission of annual reports of species at risk monitoring activities to the appropriate regulators and organizations with management responsibility for that species</li> </ul>

Item #	Summary of Comment / Concern	Proponent Response
8	Concerns with potential impacts from the proposed activities including pollution incidents to migratory birds and to their habitats during nesting season. Harming birds, their nests or eggs can have long-term consequences for migratory birds, especially through cumulative effects of many different incidences.	<p>Rescheduling of construction activities to occur outside the general nesting period for migratory birds in nesting zone N10 is not feasible. Mitigation measures and monitoring to avoid impacts to migratory birds and/or active nests of migratory birds during construction will be detailed in a CEMP, which will be submitted to the NWB, and will include the following:</p> <ul style="list-style-type: none"> <li>▶ Zero-tolerance policy on harassment, disturbance and feeding of wildlife, including migratory birds</li> <li>▶ Pre-construction wildlife and nest sweeps to identify sensitive features by a qualified professional/biologist who is familiar with Arctic biology</li> <li>▶ Delay of construction activities within a setback from an area identified as sensitive (e.g., active wildlife den or active migratory bird nest) until the animals have left of their own accord and dens/nests are no longer occupied; setback distances will be determined based on government or biologist recommendations</li> <li>▶ Nest/den monitoring as required to determine efficacy of setbacks and mitigation measures</li> </ul>
9	Measures should be identified to avoid bird collisions and electrocution from transmission lines.	<p>The term power transmission lines in the Qikiqtarjuaq Marine Infrastructure Project Proposal should be power distribution lines. The length of the power distribution line extension is approximately 1.5 kilometres from where the line currently terminates at the Qikiqtarjuaq bulk fuel storage facility adjacent to the airport. A standard measure used to avoid bird collisions and electrocution is the installation of bird flight diverters; these are more common on transmission lines, which are taller, rather than distribution lines such as those already in Qikiqtarjuaq. Decisions to install bird flight diverters are typically based on the risk to birds compared to increased cost and, particularly in Arctic conditions, increased risk to power infrastructure as a result of ice and wind loads. To measure and manage the risk to birds, the OEMP will include a procedure to monitor the bird activity and bird collision or electrocution along the 1.5 km power distribution line, evaluation of the risk to birds based on the monitoring results and will include options to consider to mitigate the measured risk.</p>
10	The Proponent is reminded to ensure food, domestic wastes and petroleum-based chemicals are inaccessible to wildlife at all times.	<p>The Qikiqtarjuaq Marine Infrastructure Project Proposal identifies mitigation measures that include waste management and petroleum storage and handling. Mitigation measures to avoid impacts to wildlife during construction will also be detailed in a CEMP, which will be submitted to the NWB.</p>


Item #	Summary of Comment / Concern	Proponent Response
11	The Proponent is reminded that employees and contractors should be made aware of plans and commitments related to preventing spills into near waterbodies.	Section 7.0 of the Qikiqtarjuaq Marine Infrastructure Project Proposal states the commitment to develop a CEMP and an OEMP. These documents will include requirements for contractor, operator, and employee awareness and training on environmental risks and mitigation, cultural awareness, accidental spill response, waste management, and contingency plans, including those to prevent or mitigate spills into waterbodies.
12	The proposed project warrants an in-depth analysis in relation to Fisheries and Oceans Canada's mandate, specifically its potential impacts on fish and fish habitat.	An application will be submitted to Fisheries and Oceans Canada for authorization under the <i>Fisheries Act</i> . The application will include supporting documentation with a description of the proposed work, a description of the fish and fish habitat that could be affected or altered by the work, an analysis of the effects on fish and fish habitat, and details on the measures and standards to avoid or mitigate potential effects to fish and fish habitat. The application will include an analysis of the residual environmental effects and proposed offsetting that may be achieved.
13	Works within navigable waterway are subject to the <i>Canadian Navigable Waters Act</i> and works such as the wharf and infill, and dredging of the sea floor for the wharf will require an approval under the act from Transport Canada. The Proponent would need to complete self-assessments of the navigability of all waterways where works would be occurring.	An application will be submitted to Transport Canada through the Navigation Protection Program external submission site for approval under the <i>Canadian Navigable Waters Act</i> .
14	The Proponent is reminded that any vessel activity needed to support the project must comply with Canada's maritime laws.	The Government of Nunavut acknowledges the requirement for vessel activity to comply with Canada's maritime laws.
15	Domestic shipment of dangerous goods will require training under the Transportation of Dangerous Goods Regulations.	The Government of Nunavut acknowledges the requirement for training under the Transportation of Dangerous Goods Regulations for domestic shipment of dangerous goods.

Francis Emingak  
September 5, 2025

CBCL and the Government of Nunavut appreciate the review and comment by all interested parties during the NIRB public comment period. We trust the responses provided address the comments satisfactorily. If further clarification is required, please do not hesitate to contact the undersigned.

Yours very truly,

CBCL Limited



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Attachments: Attachment A – Response to Comments Received from Transport Canada (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)

Attachment B – Response to Comments Received from Fisheries and Oceans Canada (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)

Attachment C – Responses to Comments Received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)

Attachment D – Responses to Comments Received from Environment and Climate Change Canada (ECCC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)

CC: Justin McDonell, P.Eng., A/ Manager Project Management, Government of Nunavut

Project No: 234414.00

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## Attachment A

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Response to Comments Received from Transport Canada (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)



Responses to Comments Received from Transport Canada (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)			
Comment #	Comment	Recommendation	Response
TC-1	<p>Transport Canada does not have concerns about the proposed project but does note the project is subject to acts and regulations administered by Transport Canada. Details for the most relevant acts and regulations are provided below for the information of the Board and the proponent.</p> <p><b>Canadian Navigable Waters Act</b>  Transport Canada notes that Broughton Channel where the port facility will be located is an extension of the Arctic Ocean. The Arctic Ocean is a scheduled navigable waterway listed in the <i>Canadian Navigable Waters Act</i> (CNWA). Given this, the works, the wharf and infill and dredging of the sea floor for the wharf, will require an approval under the CNWA from Transport Canada. The proponent has not yet discussed the project with Transport Canada's Navigation Protection Program.</p> <p><b>Marine Safety and Security</b>  Any vessel activity needed to support the project must comply with Canada's maritime laws. In the Arctic, the <i>Canada Shipping Act, 2001</i>, the <i>Marine Liability Act</i>, the <i>Arctic Waters Pollution Prevention Act</i>, Arctic Shipping Safety and Pollution Prevention Regulations, and the <i>Marine Transportation Security Act</i> combine to provide Canada's operational regulatory regime governing marine safety, security and environmental protection matters.</p> <ul style="list-style-type: none"> <li>• The <i>Canada Shipping Act, 2001</i> (CSA) provides an overall regime to protect the safety and the environment for vessels operating in waters under Canadian jurisdiction. Its regulations include requirements for a vessel's construction, management of ballast water, pollution control, arrangements for emergency response, and crew qualifications. Pollution response and prevention measures apply in respect of vessels in Canadian waters or waters in the exclusive economic zone of Canada.</li> <li>• The <i>Arctic Waters Pollution Prevention Act</i> (AWPPA) provides enhanced environmental protection with respect to vessels operating in waters under Canadian jurisdiction north of 60° North latitude. Canada has developed new regulations, the Arctic Shipping Safety and Pollution Prevention Regulations (ASSPPR) that incorporate the Polar Code, with the addition of specific Canadian modifications designed to provide clarity on discharge requirements for the prevention of pollution by oil, by sewage, and by garbage from vessels, as well as the control of pollution by noxious liquid substances in bulk. Note that the AWPPA places a complete prohibition (zero discharge) of pollution from ships/vessels in "arctic waters", as defined in the AWPPA, except where regulations authorize otherwise.</li> <li>• The Arctic Shipping Safety and Pollution Prevention Regulations (ASSPPR) should be adhered by vessels transiting in the Canadian Arctic.</li> <li>• The <i>Marine Liability Act</i> sets out a regime that requires vessels operating waters under Canadian jurisdiction to carry insurance to pay for damages from oil spills.</li> <li>• The <i>Marine Transportation Security Act</i> sets out a regime to protect and preserve the efficiency of Canada's marine transportation system against unlawful interference. The Department helps the industry achieve compliance with marine security legislation and regulations through awareness, certification, inspection, and enforcement, and helps ports, marine facilities and vessels implement the International Ship and Port Facility Security (ISPS) Code through the Marine Transportation Security Regulations (MTSRs).</li> <li>• Note: As the facility is not yet operational, it does not currently fall under MTSR regulations. Once operational, Transport Canada will assess any security issues and assist the operator to become compliant.</li> </ul> <p><b>Transportation of Dangerous Goods</b>  The requirements for the domestic marine transportation of dangerous goods are set out in Part 11 of the Transportation of Dangerous Goods Regulations. Please note that Transportation of Dangerous Goods Regulations training is required for the domestic shipment of dangerous goods. Training under the International Marine Dangerous Goods Code is not required for domestic marine transportation of dangerous goods.  Transport Canada administers these acts and regulations and is responsible for monitoring compliance and enforcing their requirements. Proponents and vessels in the Canadian Arctic are required to comply with the above acts and regulations as applicable.</p>	<p><b>Canadian Navigable Waters Act</b>  If they have not already done so, the proponent can submit its application for approval through Transport Canada's Navigation Protection Program external submission site: <a href="https://npp-submissions-demandesppn.tc.canada.ca/auth/login-connexion?ret=/&amp;GoCTemplateCulture=en-CA">https://npp-submissions-demandesppn.tc.canada.ca/auth/login-connexion?ret=/&amp;GoCTemplateCulture=en-CA</a>. Transport Canada will review the application and details of the work and its potential impacts to navigation and if acceptable, issue a CNWA approval with any needed terms and conditions.</p> <p><b>Marine Safety and Security</b>  The proponent should consult the Canadian Coast Guard and Canadian Hydrographic Services (CHS) to ensure the following:</p> <ul style="list-style-type: none"> <li>• Impacts on navigational aids, if any, are identified.</li> <li>• The new facility is included on the appropriate charts, as applicable.</li> <li>• Advising marine traffic of the work being undertaken.</li> </ul>	<p>The Government of Nunavut acknowledges the requirement for vessel activity to comply with Canada's maritime laws and the requirement for training under the Transportation of Dangerous Goods Regulations for domestic shipment of dangerous goods.</p> <p>An application to Transport Canada will be submitted through the Navigation Protection Program external submission site for approval under the <i>Canadian Navigable Waters Act</i>.</p> <p>CCG and CHS will be consulted as recommended.</p>

## Attachment B

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Response to Comments Received from Fisheries and Oceans Canada  
(letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq  
Marine Infrastructure Project (NIRB File No. 25XN030)



Responses to Comments Received from Fisheries and Oceans Canada (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)			
Comment #	Comment	Recommendation	Response
DFO-1	<p>On July 03, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project proposal (NIRB file number: 25XN030). The Department of Fisheries and Oceans Canada (DFO) has reviewed the information submitted to NIRB and considered the potential environmental effects of the proposed project based on its mandate, i.e. the management, protection and conservation of fish and their habitats pursuant to the Fisheries Act and the Species at-Risk Act.</p> <p>DFO is of the opinion that the proposed project warrants an in-depth analysis in relation to our mandate, specifically its potential impacts on fish and fish habitat. This is due to the inclusion in the project proposal of the construction and operation of structures near or in fish habitat (e.g., a deep-sea port facility). DFO's technical expertise pertaining to the Fisheries Act and the Species at-Risk Act will support the NIRB's assessment of this project's potential effects on the receiving environmental and on the valued ecosystem components.</p>		<p>An application will be submitted to Fisheries and Oceans Canada for authorization under the <i>Fisheries Act</i>. The application will include supporting documentation with a description of the proposed work, a description of the fish and fish habitat that could be affected or altered by the work, an analysis of the effects on fish and fish habitat, and details on the measures and standards to avoid or mitigate potential effects to fish and fish habitat. The application will include an analysis of the residual environmental effects and proposed offsetting that may be achieved.</p>

## Attachment C

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Responses to Comments Received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)



**Responses to Comments Received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)**

Comment #	Comment	Recommendation	Response
CIRNAC-1	<p>The Proponent forecasts total use of 5700 m3 of diesel and 140 m3 of gasoline, plus propane cylinders and lubricants for camp utilities and equipment. Handling millions of liters over four construction seasons will involve hundreds of fuel truck trips, hose couplings and refueling events. All transfers will occur outdoors in a coastal setting underlain by permafrost. These volumes can cause long-lived contamination if spilled.</p>	<p>CIRNAC recommends that the Proponent:</p> <ul style="list-style-type: none"> <li>· Provide information during the water licence application process regarding their proposed emergency response plans for the construction and operation of the facility, including details on where onshore equipment is to be refueled and serviced, proposed schedules for training for spill cleanup, and approach to spill response on land and in water;</li> <li>· Employ spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) during any transfer of fuel or hazardous substances; and,</li> <li>· Provide operational procedures, equipment maintenance, and operator training at the start of each field season.</li> </ul>	<p>Section 7.0 of the Qikiqtarjuaq Marine Infrastructure Project Proposal states the commitment to develop a Construction Environmental Management Plan (CEMP) and an Operation Environmental Management Plan (OEMP). The CEMP will be submitted to the Nunavut Water Board (NWB) with the licence application for the Project prior to port construction and the OEMP will be submitted to the NWB prior to port operation. The CEMP and OEMP will detail environmental protection requirements and emergency response plans and approaches to spill response on land and in water, including spill response equipment and clean-up materials to be available on-site during transfer of fuel or hazardous substances. The CEMP and OEMP will include measures for onshore equipment refueling and servicing, and outline requirements for spill cleanup training. Details on the specific locations of where onshore equipment is to be refueled and serviced and the planned schedules for training for spill cleanup will be provided to the NWB after the construction contractor is selected and prior to commencement of construction for construction-related details, and prior to operation for operation-related details.</p>
CIRNAC-2	<p><b>Water Quality and Sediment Control</b>                      The Proponent anticipates dredging of approximately 25000 m3 of seabed. Quarry operations and lay-down area runoff may introduce fines to Broughton Channel. The digging, hoisting, and dewatering cycle agitates fine sediments, creating plumes that raise turbidity and TSS, can depress dissolved oxygen by increasing oxygen demand, and may mobilize trace metals or nutrients. If unmanaged, these effects could impair water clarity.</p>	<p>CIRNAC recommends that the Proponent consider:</p> <ul style="list-style-type: none"> <li>· Monitoring water quality during in-water works, including real-time turbidity tracking (thresholds as an adaptive trigger) and periodic checks of TSS, dissolved oxygen, and hydrocarbon sheen, with proposed management and/or mitigation measures prepared if effects are greater than expected;</li> <li>· Implementing erosion and sediment control measures (e.g., silt fences, rip-rap) on disturbed areas to minimize sediments entering waterbodies; and,</li> <li>· Actively reclaiming completed sections by stabilizing disturbed shorelines to minimize erosion and sedimentation, and then removing non-biodegradable erosion and sediment control materials once the site is stabilized.</li> </ul>	<p>Section 7.4.2 of the Qikiqtarjuaq Marine Infrastructure Project Proposal outlines mitigation measures to prevent or reduce potential adverse effects on the marine environment. This includes implementation of an erosion and sediment control plan to control movement of soils and sediment, as well as turbidity monitoring, during construction. Further details on the erosion and sediment control measures and water quality monitoring will be provided in the CEMP, which will be submitted to the NWB prior to construction.</p>
CIRNAC-3	<p><b>Waste Management</b>                      The Proponent proposes to send ~1500 m3 of sewage and ~800 m3 of greywater to the municipal lagoon, with hazardous waste shipped south. Improper handling of these wastes could contaminate land/water and attract wildlife into the work areas.</p>	<p>CIRNAC recommends that the Proponent consider:</p> <ul style="list-style-type: none"> <li>· Providing additional detail during the water licence process on waste management practices during construction and operation of the Project;</li> <li>· Separating, organizing and storing wastes set for southern disposal at least thirty-one (31) m away from a waterbody, for eventual removal and disposal off-site; and,</li> <li>· Training personnel on the waste management procedures.</li> </ul>	<p>The Qikiqtarjuaq Marine Infrastructure Project Proposal identifies mitigation measures that include waste management. The CEMP will be submitted to the NWB with the licence application for the Project prior to port construction and the OEMP will be submitted to the NWB prior to port operation. The CEMP and OEMP will detail environmental protection and waste management requirements. These documents will also include requirements for contractor, operator, and employee awareness and training on environmental risks and mitigation, cultural awareness, accidental spill response, waste management, and contingency plans.</p>

**Responses to Comments Received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)**

Comment #	Comment	Recommendation	Response
CIRNAC-4	<p>Acid Rock Drainage and Metal Leaching (ARD/ML)</p> <p>CIRNAC notes that the Project Proposal does not provide information on the ARD/ML potential of rock cuts, quarries, embankment, armouring, or any other materials with acid-generating potential.</p>	<p>CIRNAC recommends that the Proponent conduct an assessment of the ARD/ML potential of materials, and clarify what contingencies would be used if ARD rock is identified.</p> <p>The assessment could be provided as part of the Annual Report or as a standalone memo within a timeframe that NIRB determines to be appropriate.</p>	<p>A CEMP will be developed and will be submitted to the NIRB prior to port construction. The CEMP will include requirements for ARD/ML testing and mitigation plans.</p>
CIRNAC-5	<p>Permafrost and Groundwater</p> <p>CIRNAC notes that the proposed analysis for permafrost degradation and hydrogeology focuses on quarries and lacks detail on other relevant infrastructure associated with the Project. The Project Proposal states that "... potential for differential earth settlement due to permafrost melting under future climate change scenarios will be integrated into the engineering and design of the wharf, buildings, and access road." CIRNAC is of the view that refining the Project areas associated with the permafrost melting would improve the analysis for the prediction and assessment of permafrost degradation and impact on hydrogeology.</p>	<p>CIRNAC recommends that the Proponent consider how it will:</p> <ul style="list-style-type: none"> <li>· Assess Project impacts on groundwater quantity and quality before receiving the water licence for the Project; and,</li> <li>· Manage any artesian groundwater flows using appropriate control measures to prevent uncontrolled discharge.</li> </ul>	<p>To protect exposed permafrost, all excavated areas will be promptly covered with a 500 mm layer of R5 riprap. Port buildings and laydown areas will be constructed on thick (&gt;1.5m) quarried aggregate pads that will protect from permafrost degradation.</p> <p>The geology of Qikiqtarjuaq is mapped as plutonic granitoid rock, overlain in some areas by a thin veneer of granular till. Field surveys have shown that till cover in the area of the port site is generally thick (&gt;10m), and at the quarried site frost-shattered rock is the predominant material type. Based on similar settings and observations of seepage faces in the summer months, an active layer likely develops otop of the permafrost in the summer months, with an expected thickness of less than 2 m.</p> <p>Groundwater flow in unfrozen plutonic rock occurs through poorly connected systems of individual fractures. Most openings (fractures) in granite rock exhibit an average aperture thickness of a few millimetres up to 1 to 2 cm, limiting flow rates and generally limiting the amount of stored groundwater. The most active flow zones tend to occur near the ground surface where freeze-thaw cycles can create a more permeable, fractured layer. In the study area, any groundwater flow would occur within the upper 2 m of the till and/or frost-shattered rock during thaws of the active layer. The site setting and geology mapping appear to preclude the possibility of any deeper aquifers in the area of interest.</p> <p>A CEMP will be developed and will be submitted to the NIRB and NWB prior to port construction. The CEMP will include details on permafrost protection and management of site water during construction.</p>

**Responses to Comments Received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)**

Comment #	Comment	Recommendation	Response
CIRNAC-6	<p>Terrestrial Habitat Disturbance and Progressive Reclamation The Project's construction will permanently alter some terrestrial habitat. A new quarry and access road (200 m) will disturb tundra terrain and remove surface materials. CIRNAC notes that the long-term loss of upland and shoreline habitat, characterized as minor by the Proponent, is important as the recovery of high-arctic vegetation is extremely low.</p>	<p>Therefore, CIRNAC recommends adopting best management practices to minimize the impacts, including:</p> <ul style="list-style-type: none"> <li>· Strict footprint fencing and signage to confine disturbance;</li> <li>· Salvaging organic soils for later site contouring and natural revegetation;</li> <li>· Carrying out progressive reclamation to minimize time and extent of disturbance; and</li> <li>· At the end of operations, remove all materials and debris from the site and, to the extent possible, return the disturbed area to a stable, useable condition.</li> </ul> <p>CIRNAC also seeks clarification on whether the pit will be closed at the end of the mining schedule, or if interim stabilization measures are planned in the event the Municipality chooses to operate it as a community quarry.</p>	<p>The Government of Nunavut recognizes the sensitivity of high-arctic vegetation to recovery. The permanent infrastructure consists of the port and the access road from the existing road to the port. These will be built in areas that are mostly previously disturbed or have very little vegetation cover and construction in these areas is not expected to modify the recovery potential of the lands that may be temporarily disturbed. CIRNAC's recommendations include fencing of the project footprint to confine disturbance. This approach to reduce the impact on vegetation and habitat during construction is not practical with the steep elevation gradient adjacent to most of the planned work areas (i.e., port, access road, quarry) and would increase the construction footprint to install a fence. For the Qikiqtarjuaq Marine Infrastructure Project construction, a minimally-invasive approach to demarcate the construction area is proposed and will be detailed in a CEMP. The CEMP will also include procedures for the following:</p> <ul style="list-style-type: none"> <li>- Soil salvaging for restoration of temporarily disturbed areas, including site contouring and natural revegetation</li> <li>- Progressive reclamation of areas temporarily disturbed for construction</li> <li>- Removal of construction materials and debris from the site and, to the extent practical, restoration of temporarily disturbed areas to a stable, useable condition</li> </ul>
CIRNAC-7	<p>Environmental Monitoring There is a lack of clarity regarding what data will be collected and submitted in the Environmental Monitoring Report.</p>	<p>CIRNAC recommends more detail be provided on environmental data collection and reporting.</p>	<p>A CEMP will be developed and will be submitted to the NIRB and NWB prior to port construction. The CEMP will include details on environmental monitoring, data collection, and reporting during construction.</p>
CIRNAC-8	<p>Consultation with Interested Parties</p>	<p>CIRNAC recommends that the Proponent continue its efforts to consult with the Municipality of Qikiqtarjuaq, the Qikiqtarjuaq Hunters and Trappers Association, local Qikiqtani Inuit Association representatives, and any other relevant organizations or individuals on its Project Proposal. As part of these consultation activities, several issues should be considered, including, but not limited to:</p> <ul style="list-style-type: none"> <li>· Incorporation of Inuit Qauijimajatuqangit into Project activities;</li> <li>· Mitigation measures to prevent any disturbance to wildlife and the environment;</li> <li>· Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;</li> <li>· The experience of community members who practice traditional and recreational activities within or in close proximity to Project area;</li> <li>· Training and employment opportunities for Inuit and community members;</li> <li>· Procurement opportunities for local and Inuit-owned businesses;</li> </ul> <p>and,</p> <ul style="list-style-type: none"> <li>· Regular updates on the status of Project activities.</li> </ul>	<p>Communication and consultation will continue with the Municipality of Qikiqtarjuaq and other interested stakeholders on the design and construction of the Qikiqtarjuaq Marine Infrastructure Project. In October 2024, the Government of Nunavut formed a Working Group for the project that includes the Municipality of Qikiqtarjuaq, Qikiqtarjuaq Hunters and Trappers Association (HTA), and local representatives of the Qikiqtani Inuit Association (QIA). The Working Group receives regular updates on the project progress and will continue to receive updates through construction.</p> <p>Engagement and consultation to date has included gathering and incorporation of Inuit Qauijimajatuqangit (IQ) into the project design and communication of potential impacts on and mitigation measures for the following:</p> <ul style="list-style-type: none"> <li>- Wildlife, including terrestrial and marine wildlife (fish, birds, mammals)</li> <li>- Traditional and recreational activities</li> <li>- Cultural and archaeological resources</li> </ul> <p>The Government of Nunavut's Nunavummi Nangminiqagtunik Ikajuuti (NNI) Policy mandates training for Inuit workers by incorporating procurement criteria that considers benefits to Inuit-owned, Nunavut-based, or local businesses.</p>

**Responses to Comments Received from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)**

Comment #	Comment	Recommendation	Response
CIRNAC-9	Management of Potential Construction Camp	CIRNAC recommends that the Proponent work closely with its contractors, the Municipality of Qikiqtarjuaq, and other interested parties to ensure that any potential construction camp is managed in a way that reflects local needs and expectations. This includes selecting an appropriate location and promoting respectful behaviour among Project personnel, particularly with regard to community customs and socio-economic well-being.	<p>The Government has consulted with the Municipality of Qikiqtarjuaq on the construction camp, including the proposed location which was recommended by Municipality representatives. The proposed location was presented to interested stakeholders and the local community.</p> <p>The contractor selected to construct the Qikiqtarjuaq Marine Infrastructure Project will be required to follow and update, as required, a CEMP. The CEMP will include requirements for contractor and employee awareness and training on environmental risks and mitigation, including cultural awareness, community concerns, and communications.</p>

## Attachment D

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Responses to Comments Received from Environment and Climate Change Canada (ECCC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)



**Responses to Comments Received from Environment and Climate Change Canada (ECCC) (letter dated July 25, 2025) on the Government of Nunavut's Qikiqtarjuaq Marine Infrastructure Project (NIRB File No. 25XN030)**

Comment #	Comment	Recommendation	Response
ECCC-1	<p>Section 7.1.1 outlines mitigation measures proposed for the construction and postconstruction phases. There is no indication of emission standards for the equipment that will be used for the construction phase. Some equipment will need to be externally sourced, and thus there is an opportunity to employ equipment that use engines meeting Tier 4 emission requirements which have fewer air quality impacts. Planned construction during the warmer months avoids issues that may affect Tier 4 compliant engines during the colder months.</p>	<p>ECCC recommends that externally sourced construction equipment be powered by engines meeting Tier 4 emission standards where practical and feasible.</p>	<p>Section 7.0 of the Qikiqtarjuaq Marine Infrastructure Project Proposal states the commitment to develop a Construction Environmental Management Plan (CEMP).</p> <p>The equipment that will be used during construction of the project will be sourced by the contractor. The Government of Nunavut will consider contractors that will commit to sourcing equipment that meets the Tier 4 emission standards that comply with the Off-Road Compression-Ignition Engine Emission Regulations. However, the decision on what equipment will be used during construction will be made by the contractor. There may be logistical and practical reasons for using equipment that is already in the region and/or equipment for which use is not limited by colder temperatures that may be encountered during the construction period.</p> <p>Procedures for equipment maintenance and monitoring during construction will be outlined in the CEMP, which will be submitted to the NWB prior to construction.</p>
ECCC-2	<p>The Proponent indicates that “although increases in ambient light will be mitigated to an extent, navigation lights and lighting around the port and access road will result in a net increase in ambient light during operation of the port. The potential effects of the predicted increase in ambient light on wildlife are expected to be negligible and there will be a significant positive effect on safety and security for the community”.</p> <p>This project is located near two National Wildlife Areas (NWAs): Qaulluit NWA (~60km) and Akpait NWA (~105km). These NWAs protect key habitat for migratory seabirds and marine mammals. Lighting can be a major attractant for marine birds and may result in collisions with lit structures or their support structures, vessels, or with other birds, especially during periods of fog, drizzle, and haze. Disoriented birds are prone to circling a light source and may deplete their energy reserves and either die of exhaustion, drop into the ocean, or drop to the ground (or a hard surface) where they are at risk of predation.</p>	<p>ECCC recommends the proponent clarify how light disturbance on sensitive wildlife and birds will be mitigated at the project site(s).</p> <p>ECCC recommends that during the breeding and migratory periods for migratory birds in this area (late-May to October), the Proponent:</p> <ul style="list-style-type: none"> <li>· use the minimum amount of pilot, warning and obstruction lighting needed on tall structures. Warning lights should flash and completely turn off between flashes;</li> <li>· use the fewest number of site-illuminating lights possible in the project area;</li> <li>· if strobe lighting is required at night, use only the lowest intensity and the smallest number of flashes per minute allowable by Transport Canada;</li> <li>· reduce lighting levels during severe weather events that may force birds to land in areas that would cause injury, harm, or death;</li> <li>· avoid or restrict the time of operation of exterior decorative lights such as spotlights and floodlights whose function is to highlight features of buildings or to illuminate an entire building. These lights, especially on foggy or rainy nights, can attract birds to the project area across large distances.</li> </ul>	<p>Section 7.0 of the Qikiqtarjuaq Marine Infrastructure Project Proposal states the commitment to develop a CEMP and an Operation Environmental Management Plan (OEMP). The CEMP and OEMP will detail environmental protection and mitigation measures during construction and operation.</p> <p>Lighting will be required during the project construction and operation for safety and security. Lighting will comply with Standard 621 Obstacle Marking and Lighting - Canadian Aviation Regulations (CARs) and requirements of the Canadian Coast Guard for lighting of aids to navigation. Where feasible, lighting will incorporate the following features recommended by Fatal Light Awareness Program (FLAP) Canada:</p> <p>Outdoor night lighting</p> <ul style="list-style-type: none"> <li>- Will be shielded, downward-directed fixtures</li> <li>- Will use lighting in the warm colour spectrum</li> <li>- Will be limited to areas required for safety and security</li> <li>- Will avoid use of spot, architectural, and advertising lighting during bird migration seasons (late May through June, and late July through October)</li> </ul> <p>Indoor lighting</p> <ul style="list-style-type: none"> <li>- Will be turned off in unused interior spaces</li> <li>- Where practical, will use task lighting rather than overhead lighting</li> </ul>

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Comment #	Comment	Recommendation	Response
ECCC-3	<p>Species at risk are assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) or added to Schedule 1 of the Species at Risk Act (SARA) on a regular basis. It is important for proponents to ensure they are aware of what species are present in the project area and take appropriate actions to ensure compliance with the SARA. Section 79 of SARA requires the assessor and decision body to ensure that where a project is likely to affect a listed species or its critical habitat, all adverse effects of the project are identified and considered in the assessment of the project. Appropriate measures must be taken to avoid or lessen those effects and include monitoring. Measures should be consistent with applicable recovery documents. Section 79 applies to all listed species on Schedule 1 of SARA including those listed as Special Concern, Threatened, Endangered and Extirpated. As a matter of best practice, COSEWIC-assessed species should be assessed similarly to those listed under SARA. The Proponent has not identified all species at risk that are likely to be present in the Project area, nor has the Proponent identified all adverse effects of the Project on species at risk. The attached table contains a list of the species that are likely to be encountered in the Project area that have been assessed as at risk by COSEWIC or listed on Schedule 1 of SARA. The Project may have adverse effects on listed species including impacts due to noise or other sensory disturbances and could result in wildlife injury or mortality and wildlife attraction.</p>	<p>ECCC recommends the Proponent:· Identify adverse effects of the Project on the species at risk likely to be affected and their critical habitat;· Ensure that measures are taken to avoid or lessen those adverse effects and monitor them to inform adaptive management. If the Proponent encounters species at risk, the primary mitigation measure should be avoidance. ECCC recommends:· Mitigation and monitoring measures be consistent with applicable species at risk Recovery Strategies and Action Plans or Management Plans.· At a minimum, monitoring should include recording timing and location of observed species at risk, their behavior when encountered, and actions taken by the Proponent to avoid disturbance to the species, its habitat, and/or its residence.· The Proponent submit monitoring reports to the appropriate regulators and organizations with management responsibility for that species.</p>	<p>Sections 5.4.4 and 5.4.4 of the Qikiqtarjuaq Marine Infrastructure Project Proposal listed species at risk with potential to occur in the project area; this included all of the species identified by ECCC in Table 1 attached to their review letter to the NIRB. It is acknowledged that the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) has assessed Ross's Gull as Endangered; Section 5.4.4 of the Qikiqtarjuaq Marine Infrastructure Project Proposal incorrectly lists the COSEWIC status of this species as Threatened.</p> <p>The Government of Nunavut is aware of species that are present in the project area and actions to comply with the <i>Species at Risk Act</i> will be detailed in a CEMP and OEMP.</p> <p>There is no critical habitat for species at risk within or near the project area and therefore no potential for interaction with critical habitat for species at risk. Three migratory bird species at risk were identified as possibly occurring within or near the project area: Buff-breasted Sandpiper, Ivory Gull, and Red Knot <i>rufa</i> subspecies. ECCC identified Ross's Gull as a species at risk with potential to interact with the project; in the Qikiqtarjuaq Marine Infrastructure Project Proposal this species is considered unlikely to occur in the project area.</p> <p>Potential effects on wildlife were considered in Section 7.2.4 of the Qikiqtarjuaq Marine Infrastructure Project Proposal and mitigation measures were identified; these potential effects and mitigation measures apply to migratory birds, including migratory bird species at risk. Mitigation measures identified in the Qikiqtarjuaq Marine Infrastructure Project Proposal are consistent with the relevant strategies for recovery in published recovery strategies and action plans. Mitigation measures and monitoring to be implemented during construction and operation will be detailed in a CEMP and OEMP, and will include the following:</p> <ul style="list-style-type: none"> <li>- Avoidance of species at risk encountered at the project site</li> <li>- Monitoring species at risk encountered at the project site, including recording time/date and location of observed species at risk, their behaviour when encountered, and actions taken to avoid disturbance to the species</li> <li>- Submission of annual reports of species at risk monitoring activities to the appropriate regulators and organizations with management responsibility for that species</li> </ul>

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Comment #	Comment	Recommendation	Response
ECCC-4	<p>The Migratory Birds Regulations (MBR) prohibit the disturbance or destruction of migratory birds and their nests or eggs. The project occurs during the nesting and migration season for migratory birds which extends from late May to October for this region (Nesting zone N10).</p> <p>Migratory birds, their nests and their eggs can be inadvertently harmed, killed, disturbed or destroyed because of many activities including, but not limited to, clearing of shoreline, removal of some arctic vegetation, draining or flooding land, or using fishing gear. Harming of individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different incidences.</p>	<p>ECCC recommends the Proponent carry out all phases of the project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests and eggs.</p> <p>ECCC recommends Proponents not conduct potentially destructive or disruptive activities at key locations or during key periods to avoid negative impacts to migratory birds. In this regard, the Proponent should take into account ECCC's Guidelines to Avoid Harm to Migratory Birds and visit Fact Sheet Nest Protection Under the Migratory Birds Regulations, 2022 and Frequently Asked Question, Migratory Birds Regulations, 2022 for more information on the amended Migratory Bird Regulations and updates to nest protections.</p>	<p>Rescheduling of construction activities to occur outside the general nesting period for migratory birds in nesting zone N10 is not feasible. Mitigation measures and monitoring to avoid impacts to migratory birds and/or active nests of migratory birds during construction will be detailed in a CEMP, which will be submitted to the NWB, and will include the following:</p> <ul style="list-style-type: none"> <li>- Zero-tolerance policy on harassment, disturbance and feeding of wildlife, including migratory birds</li> <li>- Pre-construction wildlife and nest sweeps to identify sensitive features by a qualified professional/biologist who is familiar with Arctic biology</li> <li>- Delay of construction activities within a setback from an area identified as sensitive (e.g., active wildlife den or active migratory bird nest) until the animals have left of their own accord and dens/nests are no longer occupied; setback distances will be determined based on government or biologist recommendations</li> <li>- Nest/den monitoring as required to determine efficacy of setbacks and mitigation measures</li> </ul>
ECCC-5	<p>The Proponent indicates that habitat alteration and/or disturbance may be required during the general nesting period as part of project activities. The Project is located in Nesting Zone N10. In this area, migratory birds may be found nesting and/or migrating from late May to October. During this period, activities that may disturb or alter nesting habitat may increase the risk of destruction of the nests and eggs of migratory birds. It is important to note that nesting and migration periods may vary from year to year due to climatic conditions and some species may nest outside the dates provided if conditions are favourable. If there are occupied migratory bird nests where work is planned, activities that could disturb or destroy nests should be avoided, adapted, rescheduled or relocated. The best way to avoid disturbing or destroying active nests is to avoid conducting harmful activities during the breeding season. Determining the presence of nesting migratory birds may help reduce risks, but active nest searches are not recommended as the ability to detect nests is very low while the risk of disturbing and/or damaging active nests is high.</p> <p>As detailed in ECCC's Guidelines to Avoid Harm to Migratory Birds, nest surveys to determine nest occupancy may only be appropriate when all these conditions are met:</p> <ul style="list-style-type: none"> <li>· Conducted by skilled and experienced observers;</li> <li>· Using appropriate methodology;</li> <li>· Only a few nesting spots or a small community of migratory birds is expected; and</li> <li>· The activities will take place in simple habitats.</li> </ul> <p>Proponents are reminded that migratory bird species may nest on</p>	<p>ECCC recommends the Proponent avoid habitat disturbance during the general nesting and migration period, which extends from late May to October for this region.</p> <p>ECCC recommends the Proponent consider options such as avoiding, adapting, rescheduling or relocating activities. If a nest containing a migratory bird or egg is discovered/disturbed, the Proponent must:</p> <ul style="list-style-type: none"> <li>· Halt all disruptive activities in the nesting area until nesting is complete and the young have fledged; and</li> <li>· Establish a protective buffer zone around the nests.</li> </ul> <p>The buffer zone must be determined by a setback distance appropriate for the species, the intensity of the disturbance, and the surrounding habitat until the young have naturally and permanently left the vicinity of the nest. Proponents are encouraged to follow the guidance on ECCC's Guidelines to Avoid Harm to Migratory Birds.</p>	<p>See response to comment 8, above.</p> <p>Mitigation measures and monitoring to avoid impacts to migratory birds and/or active nests of migratory birds during construction will be detailed in a CEMP, which will be submitted to the NWB, and will include the following:</p> <ul style="list-style-type: none"> <li>- Pre-construction wildlife and nest sweeps to identify sensitive features by a qualified professional/biologist who is familiar with Arctic biology</li> <li>- Delay of construction activities within a setback from an area identified as sensitive (e.g., active wildlife den or active migratory bird nest) until the animals have left of their own accord and dens/nests are no longer occupied; setback distances will be determined based on government or biologist recommendations</li> <li>- Nest/den monitoring as required to determine efficacy of setbacks and mitigation measures</li> </ul>

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Comment #	Comment	Recommendation	Response
	<p>the ground, in ground cavities, in grasses, shrubs, cliffs, human-made structures, and other sites, and that nest sites are often cryptic or camouflaged, making them difficult to locate.</p>		
ECCC-6	<p>The Proponent indicates that domestic, non-hazardous waste and/or petroleum-based chemicals may be kept on site. Food, domestic wastes and petroleum-based chemicals (e.g. greases, gasoline, glycol-based antifreeze) can attract predators of migratory birds such as foxes, ravens, gulls and bears. Although these animals may initially be attracted to the novel food sources, they often will also eat eggs and young birds in the area. These predators can have significant negative effects on the local bird populations.</p>	<p>ECCC recommends the Proponent make food, domestic wastes and petroleum-based chemicals (e.g. greases, gasoline, glycol-based antifreeze) inaccessible to wildlife at all times.</p>	<p>The Qikiqtarjuaq Marine Infrastructure Project Proposal identifies mitigation measures that include waste management and petroleum storage and handling. Mitigation measures to avoid impacts to wildlife during construction will also be detailed in a CEMP.</p>
ECCC-7	<p>The Proponent indicates that fuel and/or other hazardous materials may be stored, handled or transported near a water body that may be used by migratory birds. ECCC advises the Proponent that section 5.1 of the <i>Migratory Birds Convention Act</i> prohibits persons from depositing substances harmful to migratory birds in waters or areas frequented by migratory birds or in a place from which the substance may enter such waters or such an area.</p>	<p>ECCC recommends the Proponent ensure their employees and contractors are made aware of plans and commitments related to storing, handling and transporting of petroleum products and other hazardous substances and take all necessary precautions to prevent spills.</p>	<p>Section 7.0 of the Qikiqtarjuaq Marine Infrastructure Project Proposal states the commitment to develop a CEMP and an OEMP. These documents will include requirements for contractor, operator, and employee awareness and training on environmental risks and mitigation, cultural awareness, accidental spill response, waste management, and contingency plans, including those to prevent or mitigate spills into waterbodies.</p>

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Comment #	Comment	Recommendation	Response
ECCC-8	<p>The Proponent indicates that oil (227L), fuel (5,850m3 of diesel, gas, and propane) and petrochemicals (80m3 of acetylene) will be stored/transported near/in marine environments where migratory birds may congregate. Ships docked at a deepwater port can also contain large volumes of petrochemical products. This creates the potential for the release of pollutants into migratory bird habitats. Migratory birds are particularly vulnerable to pollution incidents (e.g. oil spills, etc.) in their feeding areas. Proponents should determine what steps would be taken to mitigate the impacts of pollution incidents on migratory birds and their important habitats. Having this information outlined and available not only benefits wildlife but also gives clear direction to staff and contractors on what to do during a pollution incident if wildlife are nearby.</p>	<p>ECCC recommends the Proponent incorporate into existing emergency response plans:</p> <ul style="list-style-type: none"> <li>· Steps to protect wildlife (including migratory birds) in the event of a pollution incident and keep wildlife out of contaminated areas;</li> <li>· Equipment and resources available for incident response; and</li> <li>· Measures to take if wildlife comes in contact with the contaminants.</li> </ul>	<p>The CEMP and OEMP will detail environmental protection requirements and emergency response plans and approaches to spill response on land and in water, including spill response equipment and clean-up materials to be available on-site during transfer of fuel or hazardous substances. The CEMP and OEMP will include measures for onshore equipment refueling and servicing, and outline requirements for spill cleanup training. Details on the specific locations of where onshore equipment is to be refueled and serviced and the planned schedules for training for spill cleanup will be provided to the NWB after the construction contractor is selected and prior to commencement of construction for construction-related details, and prior to operation for operation-related details.</p>
ECCC-9	<p>The Project involves the construction of new power lines. Transmission lines are a known source of bird mortality due to collisions and electrocution. The most vulnerable bird species for collisions are those with larger wingspans and body mass. Birds with larger body mass, such as waterfowl, may have increased difficulty navigating quickly to avoid difficult to see obstructions such as power lines.</p>	<p>ECCC recommends the Proponent identify measures for avoiding bird collisions and electrocution. Mitigations could include line placement and orientation, marking of lines (e.g., bird flight diverters) to provide visual cues and design of structures.</p>	<p>The term power transmission lines in the Qikiqtarjuaq Marine Infrastructure Project Proposal should be power distribution lines. The length of the power distribution line extension is approximately 1.5 kilometres from where the line currently terminates at the Qikiqtarjuaq bulk fuel storage facility adjacent to the airport. A standard measure used to avoid bird collisions and electrocution is the installation of bird flight diverters; these are more common on transmission lines, which are taller, rather than distribution lines such as those already in Qikiqtarjuaq. Decisions to install bird flight diverters are typically based on the risk to birds compared to increased cost and, particularly in Arctic conditions, increased risk to power infrastructure as a result of ice and wind loads. To measure and manage the risk to birds, the OEMP will include a procedure to monitor the bird activity and bird collision or electrocution along the 1.5 km power distribution line, evaluation of the risk to birds based on the monitoring results, and will include options to consider to mitigate the measured risk.</p>