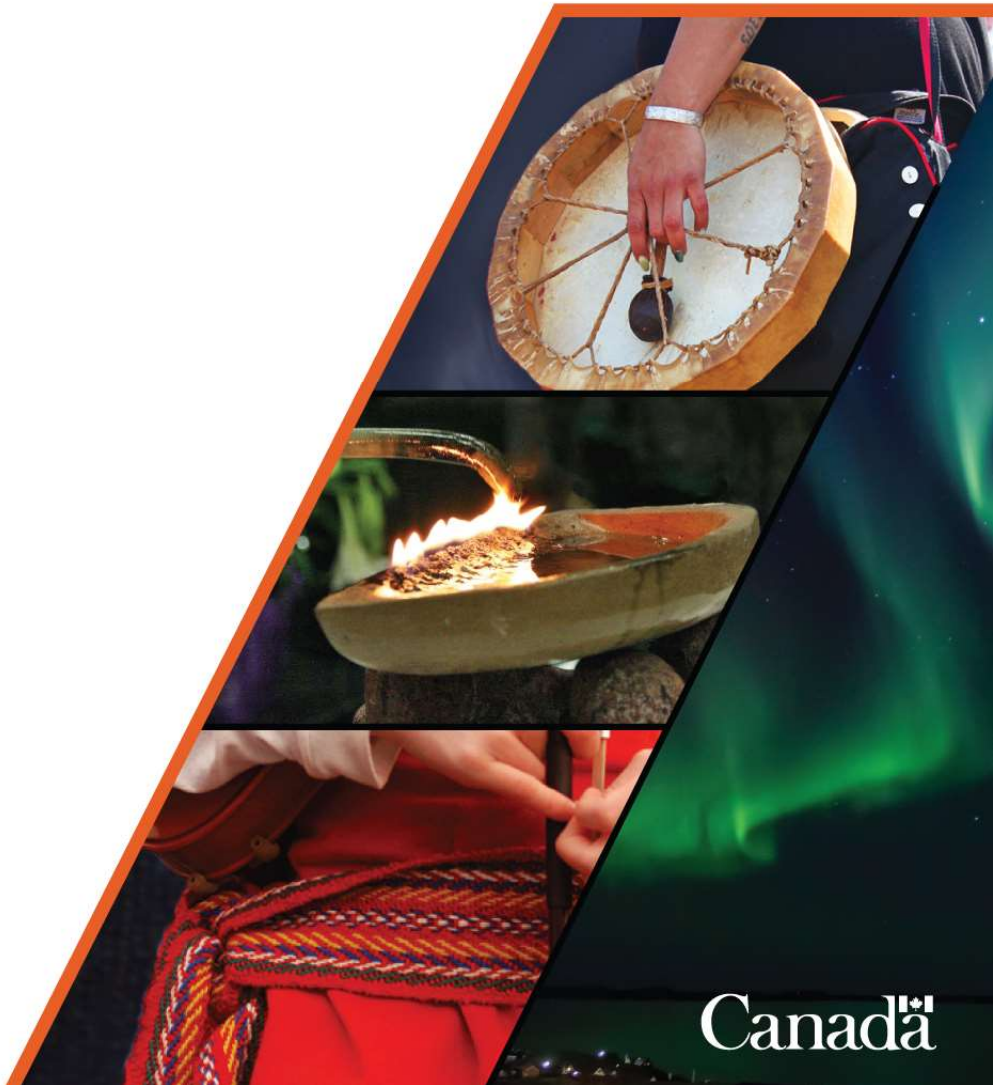




CIRNAC Comments to NIRB

Re: Notice of Screening for Hamlet of Baker Lake's
"Hamlet of Baker Lake Sealift Infrastructure" Project
Proposal



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

Your file - Votre référence
25XN036
Our file - Notre référence
GCdocs# 139673051

August 21, 2025

Robby Qammaniq
Impact Assessment 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 Hamlet of Baker Lake's "Hamlet of Baker Lake Sealift Infrastructure" Project Proposal

Dear Robby Qammaniq,

On July 31, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Hamlet of Baker Lake's "Hamlet of Baker Lake Sealift Infrastructure" 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: Spill Management

Construction of the sealift facilities will involve the use of heavy machinery and generators, requiring substantial fuel and lubricants on site. The project anticipates using up to 400,000 litres of diesel fuel along with smaller amounts of gasoline (1000 L) and hazardous fluids (40 gallons), which will be stored in drums on-site during construction. While the Construction Environmental Management Plan outlines spill prevention and response measures, Arctic conditions slow natural breakdown of hydrocarbons. CIRNAC recommends that the Proponent consider:

- Refueling activities thirty-one (31) meters or more from water bodies over drip trays for any mobile refueling required at the project site;
- Inspecting transfer equipment regularly to prevent chronic leakage; and,
- Providing refresher training to all personnel in fuel and hazardous waste handling procedures, including spill response, and confirm integration of the contractor's spill prevention plan with the Hamlet's existing Spill Contingency Plan to ensure ongoing competence and readiness.



CIRNAC #2: Waste Management and Wildlife Attractants

The waste management plan does not clearly specify procedures for managing solid waste streams, particularly measures to prevent wind dispersal of lightweight debris. Lack of containment and removal planning increases the risks of environmental contamination and wildlife attraction. CIRNAC recommends that the Proponent consider:

- Using secure, wildlife-proof, and weather-resistant waste storage containers for all waste streams; and,
- Implementing measures to prevent wind dispersal.

CIRNAC #3: Terrestrial Habitat and Vegetation Disturbance

The Project will result in permanent disturbance of approximately 1.5 ha of tundra vegetation for the sealift laydown area. Arctic tundra ecosystems have extremely slow natural recovery rates due to short growing seasons and permafrost constraints. The gravel pad and associated fencing will prevent natural revegetation and restrict wildlife access for the life of the project. CIRNAC recommends the Proponent consider:

- Implementing strict work area limits and signage to ensure heavy equipment and material storage stay within the defined project footprint;
- Using progressive restoration techniques where feasible on peripheral disturbed areas; and,
- Conducting post-construction evaluations of the site's periphery to identify any unintended vegetation damage or erosion. If issues are noted, implement remedial measures to encourage natural re-vegetation.

CIRNAC #4: Permafrost and Soil Stability

The construction activities, such as excavation, grading, and placement of 0.3 m of gravel fill, may alter the ground's thermal balance. Although the Proponent's internal assessment marked permafrost as "not affected," changes like vegetation removal, drainage alteration, and gravel cover could deepen thaw and cause terrain instability, especially at pad edges or cut slopes. Potential risks associated with ground disturbance include the development of thermokarst features, increased erosion, and sediment transport that may lead to deposition into Baker Lake. No permafrost monitoring is currently planned, despite regional warming trends that increase vulnerability. CIRNAC recommends that the Proponent consider:

- Integrating permafrost protection features into pad design and construction;
- Adapting construction or maintenance practices if signs of thaw or instability are detected; and,
- Conducting monitoring of ground conditions during and after construction.



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

CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue engaging with the Baker Lake Hunters and Trappers Organization, community members 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:

- Integration of Inuit Qaujimagatuqangit into project planning and implementation;
- Mitigation measures to address potential safety risks to both project personnel and the general public—including community members and visitors—during the construction and operation of the laydown and storage area and its access road;
- Mitigation measures to prevent any disturbance to wildlife and the surrounding 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

