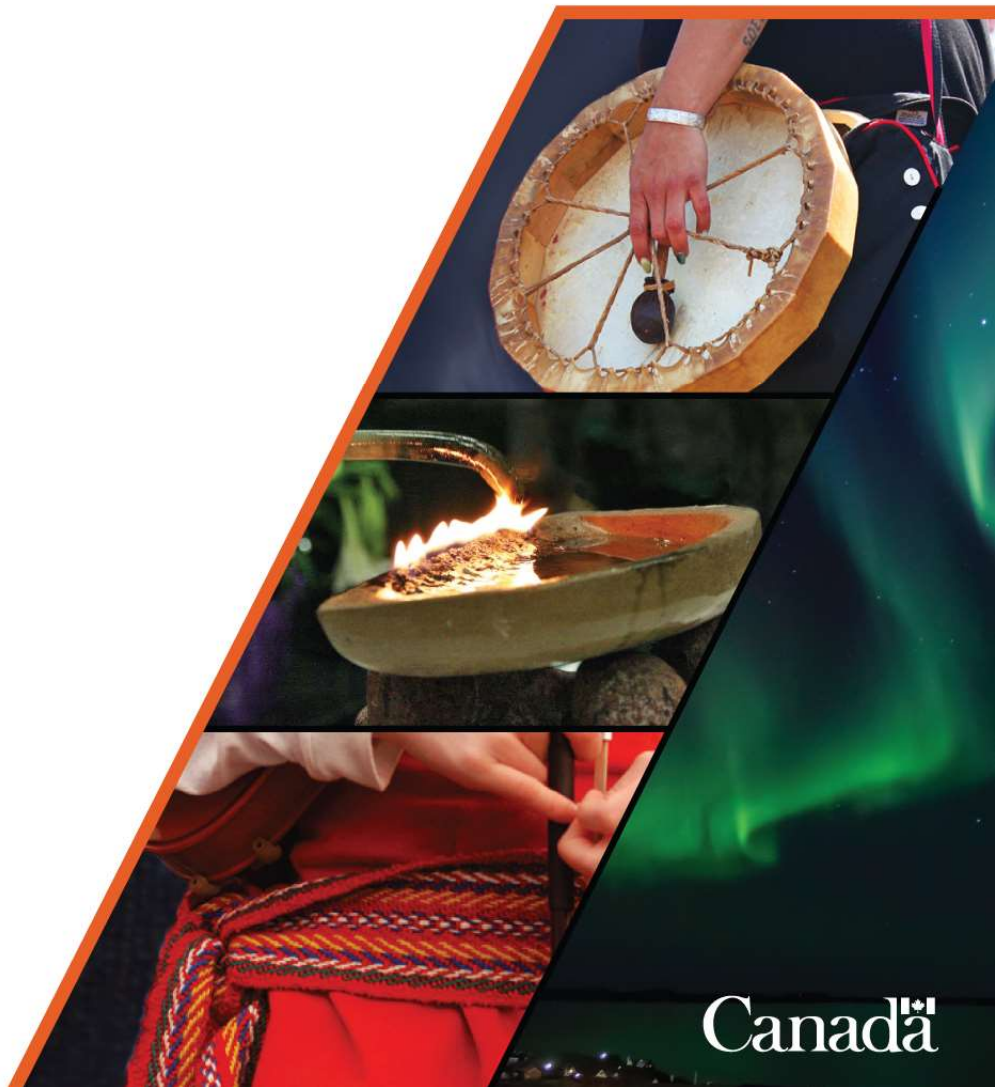




CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's
"The Kivalliq-Baffin Connector Horizontal Directional
Drilling Engineering Support Program" Project Proposal



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

Your file - Votre référence
25YN061
Our file - Notre référence
GCdocs# 138991215

October 28, 2025

Amir Pourmahabadian
Senior 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 Government of Nunavut's "The Kivalliq-Baffin Connector Horizontal Directional Drilling Engineering Support Program" Project Proposal

Dear Amir Pourmahabadian,

On October 7, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "The Kivalliq-Baffin Connector Horizontal Directional Drilling Engineering Support Program" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

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

CIRNAC #1: Sediment and Water Quality

The Project involves Horizontal Directional Drilling (HDD) entry points and associated works near the shoreline. The Environmental Management Plan references Canadian Council of Ministers of the Environment (CCME) Water Quality Guidelines and states that turbidity exceedances are not anticipated, citing a 30 m compliance monitoring zone and the relatively small drill-head footprint (≈150 mm). However, the Plan does not clearly outline how potential sediment or drilling fluid releases from land-based activities will be monitored and managed. CIRNAC recommends that the Proponent consider implementing best management practices, including:

- Establishing background water quality conditions before drilling and documenting monitoring results regularly; and,
- Tracking borehole fluid returns continuously to detect losses that could cause sediment release.



CIRNAC #2: Waste Management

The Project adopts a “pack in, pack out” approach for equipment and materials, including segregation and labeling of wastes, returning drill cuttings to boreholes, and using biodegradable fluids, while sewage will be managed through existing facilities. However, the application lacks detailed provisions for waste management, as it does not identify designated reception facilities for solid waste streams, specify handling and segregation protocols. CIRNAC recommends the Proponent considers:

- Storing wastes in designated areas away from waterbodies in line with relevant authorizations; and,
- Containing and stabilizing drilling fluids and cuttings, and confirming disposal pathways for residual materials.

CIRNAC #3: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue consulting with the Municipality of Resolute Bay and any other relevant organizations or individuals regarding the project proposal. As part of these consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujjimajatuqangit and Community Knowledge, in addition to scientific ways of knowing 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;
- Planning efforts for the closure of the existing municipal solid waste facility; 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

