



NIRB File No.: 25YN061
NPC File No.: 150863

November 17, 2025

Government of Nunavut – Department of Transportation & Infrastructure
P.O. Box 1000, Station 1360
Iqaluit, NU X0A 0H0

Sent via email: vburdett-coutts@gov.nu.ca

Re: **Opportunity to address comments received regarding Government of Nunavut – Department of Transportation & Infrastructure (GN-TIN)’s “Kivalliq-Baffin Connector Horizontal Directional Drilling (HDD) Feasibility Study”**

Dear Victoria Burdett-Coutts:

On September 17, 2025 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen GN-TIN’s “Kivalliq-Baffin Connector Horizontal Directional Drilling (HDD) Feasibility Study” project proposal from the Nunavut Planning Commission (NPC or Commission). On October 7, 2025 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by October 30, 2025.

On or before October 30, 2025 the NIRB received comments from the following interested parties:

- *Transport Canada (TC)*
- *Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)*
- *Environment and Climate Change Canada (ECCC)*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB’s online public registry at <https://www.nirb.ca/project/126222>

A *summary* of the public concerns reflected in the comment submissions relate to the following:

Transport Canada Comments

Transport Canada has **no concerns** with the feasibility study and does **not** advise for or against screening approval. However, the proponent must ensure compliance with federal navigation and marine safety regulations.

The work will occur in **navigable waters** (Arctic Ocean), so the proponent must:

- Confirm whether activities qualify under the **Minor Works Order**.
- If they do **not** qualify, then a **Canadian Navigable Waters Act approval** is required.
- **Contact Transport Canada's Navigation Protection Program** to confirm requirements.

Any vessels used must comply with:

- **Canada Shipping Act**
- **Arctic Waters Pollution Prevention Act** (zero discharge in Arctic waters)
- **Arctic Shipping Safety and Pollution Prevention Regulations** (Polar Code requirements)
- **Relevant insurance and security regulations**

Vessels must hold an appropriate **Polar Ship Certificate**.

If ROVs or marine-mounted drill rigs are used, they must meet applicable safety standards.

Transport Canada recommends early coordination with:

- **Canadian Coast Guard**
- **Canadian Hydrographic Service**

CIRNAC Comments

CIRNAC does not oppose the project, but identifies **three areas** where more clarity and mitigation planning should be demonstrated by the proponent

1. Sediment and Water Quality Management

The project involves HDD entry points near shorelines. The plan references CCME guidelines but **does not clearly explain** how drilling fluid losses or sediment release will be monitored. CIRNAC recommends:

- Establishing **baseline water quality** before drilling.
- **Monitoring borehole fluid returns** to detect any losses that could lead to sediment discharge.

2. Waste Management

The proposal uses a “pack in, pack out” approach but **lacks detail** on where waste will be taken, how it will be stored, and how drilling fluids/cuttings will be handled.

CIRNAC recommends:

- **Designated and secure waste storage areas**, away from water.
- **Clear disposal pathways for drilling fluids and cuttings.**

3. Community and Inuit Engagement

CIRNAC encourages **continued consultation** with the Municipality of Resolute Bay and others. Engagement should include:

- Incorporating **Inuit Qaujimajatuqangit and community knowledge**.
- Mitigation planning for **wildlife, environment, and cultural/heritage sites**.
- **Training and employment** opportunities for Inuit.
- **Local procurement** where possible.
- Regular **project updates** to the community.

ECCC Comments – Summary

ECCC does **not oppose** the project but provides recommendations to strengthen mitigation related to air emissions, drilling additives, turbidity monitoring, species at risk, and migratory birds.

1. Air Emissions

- Some terrestrial drilling sites are close to communities.
- ECCC recommends using **Tier 3 or preferably Tier 4 engines** for drilling equipment where feasible to reduce emissions.

2. Drilling Fluids

- The plan states drilling fluids will be biodegradable.
- ECCC notes the additive name appears incorrect and requests **clarification that the product is “xanthan gum”** (non-toxic) and not “xanthum.”

3. Turbidity and Drill Cuttings

- Turbidity monitoring approach is not clearly described.
- ECCC recommends:
 - Clarifying **how drill cuttings will be discharged** to avoid sediment plumes.
 - **Providing more detail on turbidity monitoring** methods, equipment, and monitoring frequency.
 - Establishing **baseline turbidity** before work begins.

4. Species at Risk

- The application does not identify all species at risk that may occur in the project area.
- ECCC recommends:
 - **Identifying all applicable species and potential effects**.
 - Ensuring **avoidance and mitigation measures** align with existing recovery strategies.
 - Recording and reporting species observations and mitigation actions.

5. Migratory Birds (General Nesting Season)

- Nesting occurs **mid-May to mid-August** in the project area.
- If nest disturbance is possible, **work should be avoided, adapted, or relocated.**
- If an active nest is found:
 - **Stop work in the area** until the nest is no longer active.
 - **Establish an appropriate buffer** based on species and disturbance type.

6. Migratory Birds – Fuel & Spill Risk

- Ensure contractors are aware of hazardous material handling requirements.
- Emergency response plans should include **steps to protect wildlife during spills.**

7. Drones / Aircraft

- Low-level flights and drones can disturb seabird colonies.
- ECCC recommends:
 - Avoiding known colony areas and high bird concentration zones.
 - Maintaining **1.5–3 km lateral distance** from colonies where possible.
 - If unavoidable, maintaining **flight altitudes of at least 1,100 m** over these areas.

8. Contact and Reporting

- ECCC requests the proponent ensure **Canadian Wildlife Service is included as a contact** for any incidents or monitoring involving migratory birds or species at risk.

The NIRB would like to provide GN-TIN with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister. The NIRB respectfully requests that a response be provided directly to the NIRB by **November 24, 2025.**

If GN-TIN determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at apourmahabadian@nirb.ca.

Sincerely,



Amir Pourmahabadian
Senior Impact Assessment Officer
Nunavut Impact Review Board

cc: Distribution List

Richard Dwyer, Nunavut Water Board
Dustin Fredlund, Nunavut Tunngavik Inc.
Carson Gillis, Nunavut Tunngavik Inc.
Jorgan Aitoak, Nunavut Tunngavik Inc.
Luis Manzo, Kivalliq Inuit Association
Ashley Aupaluktuq-Burton, Kivalliq Inuit Association
Justin Buller, Government of Nunavut
Jared Ottenhof, Qikiqtani Inuit Association
Dianne Lapierre, Government of Nunavut
Sean Joseph, Government of Nunavut
Mosha Cote, Nunavut Research Institute
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs Canada
Marcus Bermann, Crown-Indigenous Relations and Northern Affairs Canada
Environment and Climate Change Canada
José Audet-Lecouffe, Fisheries and Oceans Canada
Peter Unger, Natural Resources Canada
Pierre-Olivier Emond, Natural Resources Canada
Transport Canada
Hamlet of Kimmirut
Mayukalik Hunters & Trappers Association
Hamlet of Kinngait
Aiviq Hunters & Trappers Association
Hamlet of Coral Harbour (Salliq)
Aiviit Hunters & Trappers Organization
Community of Iqaluit
Kimmirut, Mayukalik Hunters and Trappers Organization (HTO)
Kinngait (Cape Dorset), Aiviq Hunters and Trappers Organization (HTO)
Salliq (Coral Harbour), Aiviit Hunters and Trappers Organization (HTO)
Iqaluit, Amaruq Hunters and Trappers Association (HTA)