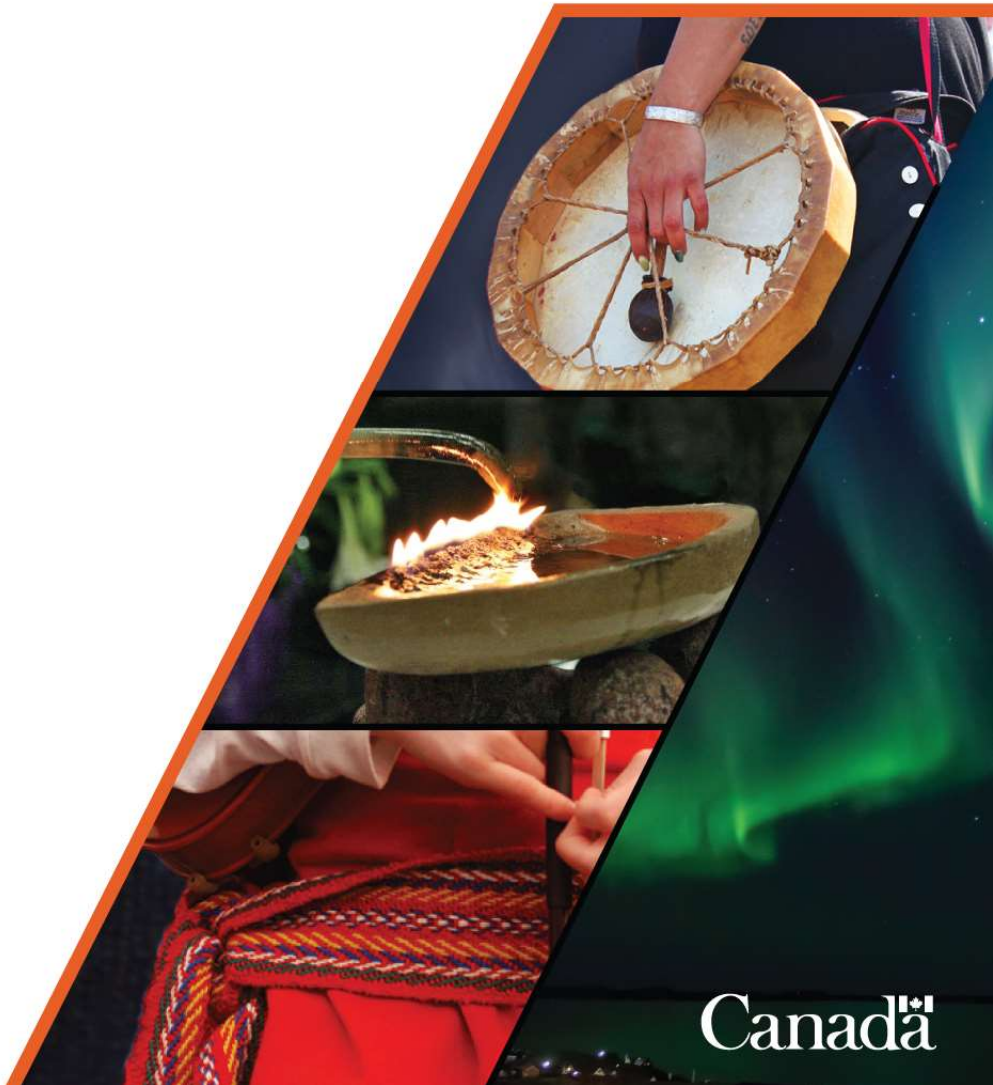




CIRNAC Comments to NIRB

Re: Notice of Screening for Hamlet of Gjoa Haven's "Municipal Quarry Project" Project Proposal



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

Your file - Votre référence
25QN060
Our file - Notre référence
GCdocs# 141470798

November 21, 2025

Dustin Sim
Screening 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 Gjoa Haven's "Municipal Quarry Project" Project Proposal

Dear Dustin Sim,

On October 31, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Hamlet of Gjoa Haven's "Municipal Quarry Project" 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: Acid Rock Drainage and Metal Leaching

While geochemical testing was reportedly conducted in 2025, results are not included in the screening record. Aggregate with Acid Rock Drainage and Metal Leaching (ARD/ML) potential may be unsuitable for construction use, as it can contribute to the widespread distribution of contaminants and complicate future mitigation efforts, particularly in wet, thaw-sensitive terrain where water movement may accelerate leachate transport. The Quarry Management Plan still references a placeholder. ARD/ML characterization should inform permitting decisions and material handling strategies to ensure environmental protection and compliance. CIRNAC suggests the Proponent considers:

- Validating geochemical findings to support quarry permitting as required;
- Identifying material handling measures where geochemical conditions indicate potential for acid generation or metal leaching; and,
- Considering water quality monitoring where site conditions and material properties suggest a potential for contaminant transport.



CIRNAC #2: Permafrost Stability

Field observations at GH-105/106 recorded refusal on frozen ground and water accumulation in test pits during early July, indicating that summer excavation will intersect wet, thaw-sensitive ground. In the absence of site-specific practice for benching, pad preparation, drainage that avoids ponding within the work area, and seasonal staging, quarrying may contribute to settlement, face instability, and sediment release that are more difficult to reverse in-season. The Quarry Management Plan states that “any thawed runoff will drain and pooling is unlikely to occur” (Section 4.5), yet test pit results suggest that meltwater accumulation is possible, and drainage may not be as reliable as assumed. The current quarry plan reads as a framework and does not operationalize permafrost measures. The Proponent may wish to consider:

- Adopting seasonal staging and workface/pad practices that are suited to thaw-sensitive conditions and that prioritize ground stability;
- Ensuring drainage practices that prevent ponding in the work area (e.g., grading, temporary swales, or sump pumping) to limit water accumulation and reduce thaw-related instability; and,
- Establishing site checks that allow for timely adjustment or temporary pause where ground conditions indicate softening or instability.

CIRNAC #3: Spill Prevention

The spill contingency plan is scoped to a sewage lagoon context and does not reflect quarry fuel handling (diesel, lubricants, glycol), mobile refuelling, cold-weather response, or on-road spill scenarios involving equipment and vehicles. These activities are expected to occur throughout the life of the project and present routine risks that require clear procedures and response capacity. The current spill plan does not address storage configuration, transfer-area protection, equipment staging, and staff training in a manner that supports predictable management and inspection. CIRNAC recommends that the Proponent consider updating the existing spill contingency to reflect quarry-related activities, including fuel storage and transfer protocols, mobile refueling procedures, cold-weather spill response measures, response equipment staging and accessibility, vehicle operation, and staff training and inspection routines.

CIRNAC #4: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue consulting with the Gjoa Haven Hunters' & Trappers' Association, the Kitikmeot Inuit Association, 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 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 quarries; 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

