



Hamlet of Gjoa Haven

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December 8, 2025

Dustin Sim

Screening Officer

Nunavut Impact Review Board

Dear Dustin Sim,

**Reference: Opportunity to address comments receive regarding Hamlet of Gjoa Haven’s
“Municipal Quarry Project” proposal**

On October 22, 2025, Nunami Stantec Ltd. (Nunami Stantec) submitted a project proposal to the Nunavut Impact Review Board (NIRB) on behalf of the Hamlet of Gjoa Haven (the Hamlet) for the proposed Quarry Municipal Project to develop four quarries, GH-105, GH-106, GH-107, and 2N (the Project). On October 31, 2025, NIRB circulated the project proposal to interested parties to provide comment on the Project. Comments on the Project were received from Environment and Climate Change Canada (ECCC), Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), and Transport Canada (TC).

The Hamlet and Nunami Stantec appreciate all the regulatory agencies that reviewed and responded to the project proposal with recommendations. This letter serves to respond to the comments received. Generally, the Hamlet and Nunami Stantec are in the process of developing quarry-specific Quarry Management Plans which will outline site-specific development sequences, site conditions, and mitigation measures for approval by the applicable regulators (CIRNAC or GN Community Services). Recommendations from agencies will be enacted through these management plans. Detailed responses to agency comments and recommendations are provided in Table 1.

Table 1 Proponent responses to ECCC, CIRNAC, and TC Project comments

Reference	Regulatory Recommendation	Proponent’s Response
Environment and Climate Change Canada		
Migratory Birds Regulations (MBR) prohibit the disturbance	<ul style="list-style-type: none">List all migratory bird species that may be	The Quarry Management Plans will include a list of species that

Reference	Regulatory Recommendation	Proponent's Response
<p>or destruction of migratory birds and their nests or eggs.</p> <p>The project occurs during the nesting season for migratory birds which extends from late May to mid-August for this region (nesting season N10). 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 trees and other 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>present in the Project area</p> <ul style="list-style-type: none"> • Carry out all phases of the project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing their nests and eggs. 	<p>may be present in the Project area that are protected under the <i>Species at Risk Act</i> and listed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC).</p> <p>Mitigation measures for wildlife, including migratory birds, will be outlined in the Quarry Management Plans. Mitigation measures will follow best management practices including but not limited to: completing stripping outside of the migratory bird nesting season; personnel will not feed, harass, or hunt wildlife while working on the Project, and waste will be stored in odour-proof containers and disposed of to reduce animal attractants.</p>
Crown-Indigenous Relations and Northern Affairs Canada		
<p>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</p>	<p>CIRNAC suggests the Proponent considers:</p> <ul style="list-style-type: none"> • Validating geochemical findings to support quarry permitting as required • Identifying material handling measures where geochemical conditions indicate potential for acid generation or metal leaching • Considering water quality monitoring where site 	<p>Laboratory analytical results from the geochemical sampling (acid rock drainage potential and metal leaching potential) conducted in 2025 indicate very low potential for acid generation due to very high neutralization potential of all samples from all quarries. Analytical results indicate minimal metal leaching potential in reference to Canadian Water Quality Guidelines. Full analytical results and analysis will be reported in the Quarry Management Plans.</p>

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<p>Management Plan still references a placeholder. ARD/ML characterization should inform permitting decisions and material handling strategies to ensure environmental protection and compliance.</p>	<p>conditions and material properties suggest a potential for contaminant transport.</p>	<p>Periodic contact water quality monitoring may be conducted, if required, based community or regulator concerns.</p>
<p>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.</p>	<p>The Proponent may wish to consider:</p> <ul style="list-style-type: none"> • 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 • Establishing site checks that allow for timely adjustment or temporary pause where ground conditions indicate softening or instability. 	<p>The staging and development sequence of the quarries will follow best management practices for permafrost, outlined in the Northern Land Use Guidelines: Pits and Quarries (INAC 2009). Mitigation measures for permafrost degradation will also follow standard practices, including but not limited to grading the pit floor to prevent formation of a pit lake, using snow fencing to reduce windblown snow accumulation, and constructing ditches to direct runoff away from site. Additional detail of the anticipated site-specific development will be included in each of the Quarry Management Plans to be provided to CIRNAC in support of a Land Use Permit and Quarrying Permit.</p>
<p>The spill contingency plan is scoped to a sewage lagoon context and does not reflect</p>	<p>CIRNAC recommends that the Proponent consider updating the</p>	<p>A project-specific Spill Contingency Plan for quarries GH-105, GH-106, GH-107, and</p>

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<p>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.</p>	<p>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.</p>	<p>2N will be developed to address quarry-related activities including fuel storage, transfer, training, reporting, and spill response procedures in accordance with best practices.</p>
<p>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.</p>	<p>As part of the consultation activities, several issues should be considered, including, but not limited to:</p> <ul style="list-style-type: none"> • 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 	<p>The Quarry Management Plan framework has incorporated concerns raised during engagement activities for the Project including addressing access improvements to the quarry sites and outlining training requirements for personnel.</p> <p>Following guidance in the Pit and Quarry Guidelines (INAC 2009) are mitigation measures for disturbances to wildlife, archaeological sites, and other environmental features, and outlining the procedures for closure and reclamation of the quarries.</p>

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	<ul style="list-style-type: none"> • 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 • Regular updates on the status of project activities 	<p>The Hamlet intends to continue to incorporate feedback from local residents and land users, including the Gjoa Haven Hunters' & Trappers' Association and Kitikmeot Inuit Association, throughout the quarries' operation, as the quarries are critical to the Hamlet's ongoing development.</p>
Transport Canada		
None of the projects components involve TC's mandate.	N/A	Thank you for your review.
<p>Sources: GN (Government of Nunavut). 2023. Environmental Guidelines: Spill Contingency Planning and Reporting Regulations. INAC (Indian and Northern Affairs Canada). 2009. Northern Land Use Guidelines: Pits and Quarries. Volume 07.</p>		

Yours sincerely,



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