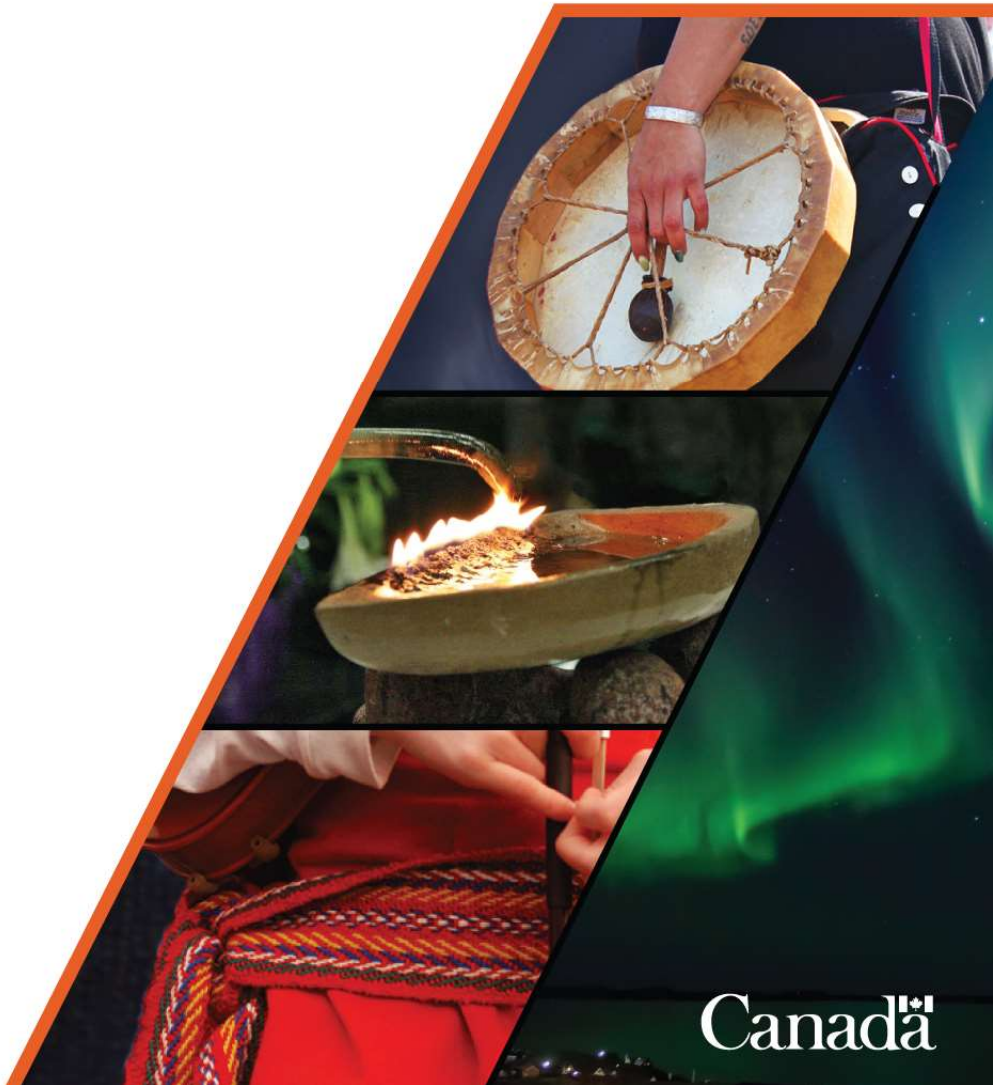




CIRNAC Comments to NIRB

Re: Notice of Screening for Memorial University of
Newfoundland's "ArcSolution: Emerging Pollutants and
Health in the Arctic" Project Proposal



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

Your file - Votre référence
25YN073
Our file - Notre référence
GCdocs# 141556112

November 17, 2025

Jordan Takkirug
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 Memorial University of Newfoundland's "ArcSolution: Emerging Pollutants and Health in the Arctic" Project Proposal

Dear Jordan Takkirug,

On November 7, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on Memorial University of Newfoundland's "ArcSolution: Emerging Pollutants and Health in the Arctic" 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: Sampling Near Municipal Infrastructure

The Project includes sampling near Cambridge Bay's drinking water intake, wastewater lagoon, and landfill, with shoreline and lagoon sites adjacent to Old Town. These areas are hydrologically sensitive and support essential community infrastructure. The use of a manual soil auger may introduce a potential ground disturbance, especially if deployed near drainage paths or thaw-sensitive soils. During thaw and freeze-up, sediment disruption from such coring or anchoring could mobilize contaminants into surface water used for drinking or subsistence. Runoff from disturbed ground near landfill or lagoon drainage paths could alter flow regimes or increase turbidity. Without defined seasonal access controls or buffer zones, there is a credible pathway for short-term contaminant mobilization into aquatic systems. CIRNAC recommends that the Proponent consider:

- Maintaining buffer zones from water intakes, lagoon outfalls, and landfill drainage paths;
- Avoiding intrusive sampling within thirty-one (31 m) of the high water mark;
- Implementing site-specific drainage controls to minimize runoff into nearby waterbodies during thaw and rainfall events; and,



- Reclaiming disturbed areas by backfilling, recontouring, and stabilizing soils prior to the end of each field season to prevent erosion and sediment transport.

CIRNAC #2: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with the Municipality of Cambridge Bay, the Ekaluktutiak Hunters & Trappers Organization, the Kitikmeot Inuit Association, the Pitquhirnikkut Ilihautiniq (Kitikmeot Heritage Society), and any other relevant organizations and individuals who may have an interest in 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;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- 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

