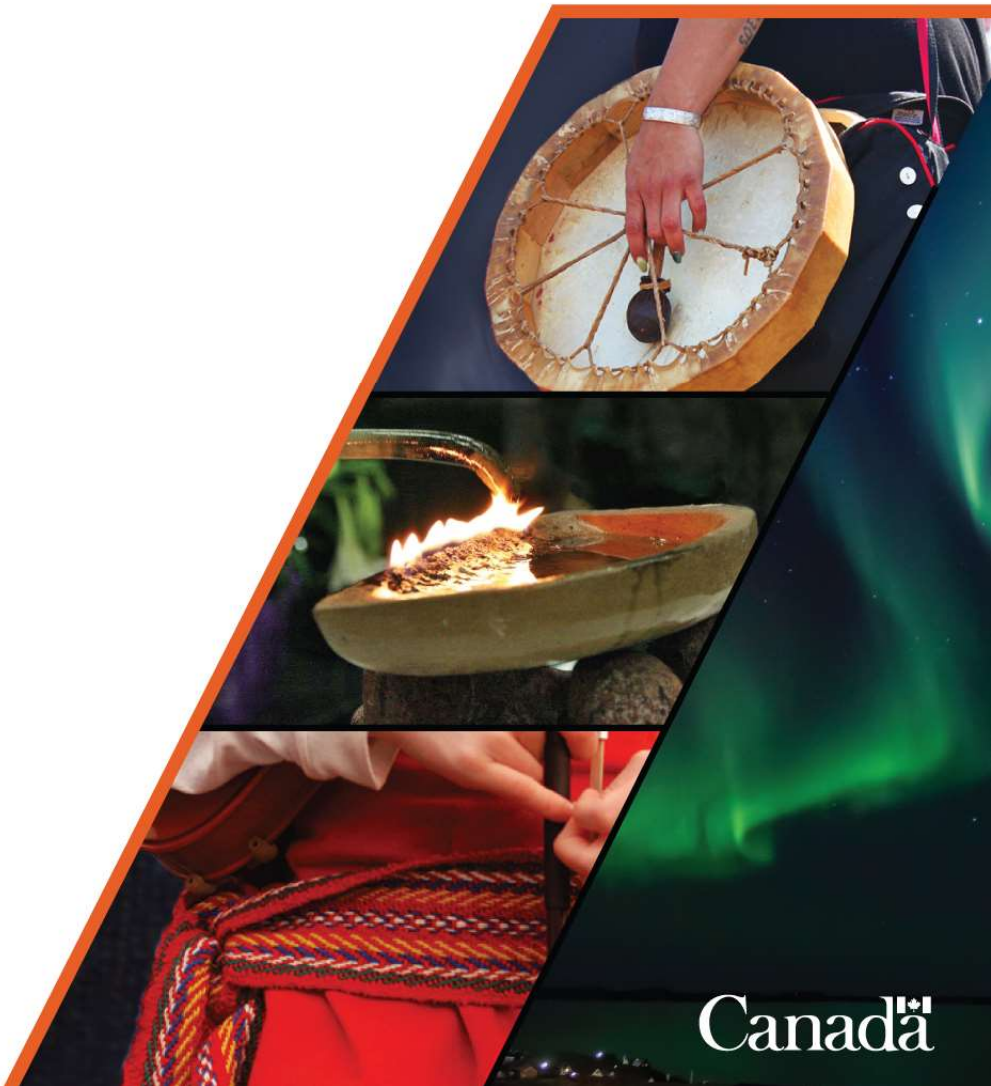
Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

CIRNAC Comments to NIRB

Re: Notice of Screening for Aston Bay Holdings' "Aston Bay Property or Storm Project" Proposal



Canada

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

Your file - Votre référence
25EN077
Our file - Notre référence
GCdocs# 143302862

February 3, 2026

Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: <u>Notice of Screening and Comment Request for Aston Bay Holdings' "Aston Bay Property or Storm Project" Proposal</u>

Dear Mia Beattie,

On January 13, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Aston Bay Holdings' "Aston Bay Property or Storm Project" proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

<u>Any matter of importance to the Party related to the project proposal</u>

CIRNAC #1: Fuel and Hazardous Material Storage and Risks

Storage and handling of $CaCl_2$ brine (200,000 lbs) lack any site-specific spill pathway or soil-salinity mitigation analysis; $CaCl_2$ is highly saline and corrosive, and spills could create persistent soil salt traps that kill vegetation and alter soil chemistry. CIRNAC recommends that the Proponent considers identifying specific spill response measures for saline drilling additives (e.g., $CaCl_2$), given their potential to alter soil chemistry.

CIRNAC #2: Soil & Permafrost Disturbance

Drilling pads, camp foundations, and new trails will disturb tundra soils and vegetation. The Environmental Management Plan acknowledges that disturbance and heat from buildings can thaw permafrost, and commits to avoiding sensitive patterned ground/clay soils and elevating heated structures. However, expanding the camp and marine landing can also compact organic layers and remove insulating cover, increasing risk of ground subsidence and erosion. Even confined clearing (within existing boundaries) can alter local drainage. Although general measures are identified, the plans lack details on site-specific soil and permafrost sensitivity. There is no documented baseline of ground conditions (active-layer thickness, ground temperature, ice content) at camp or drill sites. CIRNAC recommends that the Proponent

considers completing terrain sensitivity and ground-ice assessments at all permanent and semi-permanent infrastructure locations to validate the closure and reclamation documentation in the regulatory phases.

CIRNAC #3: Waste Handling and Disposal

Combustible wastes and sewage are incinerated on-site (batch-controlled incinerator), while camp greywater (~10 m^3/day) and drilling fluids are placed in earthen sumps. This avoids discharging effluent into the environment, but raises concerns about filtration and residual pollutants. Greywater sumps are shallow (2'×2'×3') with cobble walls, meaning contaminants (soaps, food particles) could leach if sumps overflow. Drill muds (often containing diesel or $CaCl_2$) are also deposited in depressions; while additives are mostly biodegradable, any uncontained fluids could alter soil chemistry. Incineration may release ashes containing metals and organics; the plan calls for returning ash and recyclables off-site, but that must be verified. Improperly segregated trash or spills (oil-contaminated rags, batteries) could cause localized soil contamination. CIRNAC recommends that the Proponent considers:

- Estimating expected annual waste volumes of each waste stream (e.g., ash, sump sludge, and hazardous solids) over the project life;
- Confirming how incinerator residues and ash will be managed and documented prior to removal from site; and
- Verifying waste disposal areas prior to closure to confirm that no residual contamination remains.

CIRNAC #4: Closure & Abandonment Risks

While the Abandonment and Restoration Plan commits to the removal of infrastructure and materials prior to land use permit or claim termination, it does not define measurable closure success criteria. Further, it remains unclear how successful site closure will be evaluated, particularly in permafrost terrain where residual contamination or ground instability associated with sumps or fuel storage areas may only become apparent after thaw cycles. CIRNAC recommends that the Proponent considers defining measurable closure success criteria (e.g., absence of hydrocarbon odour, stable ground surface conditions, no visible waste or infrastructure) to support closure plans in the regulatory phases.

CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the Hamlet of Resolute Bay, the Resolute Bay Hunters' & Trappers' Association, the Hamlet of Taloyoak, the Taloyoak Hunters' & Trappers' Organization, the Hamlet of Grise Fiord, the Grise Fiord Hunters' & Trappers' Association, the Qikiqtani Inuit Association, the Kitikmeot Inuit Association, and any other relevant organizations or individuals.

As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit, Indigenous knowledge, 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