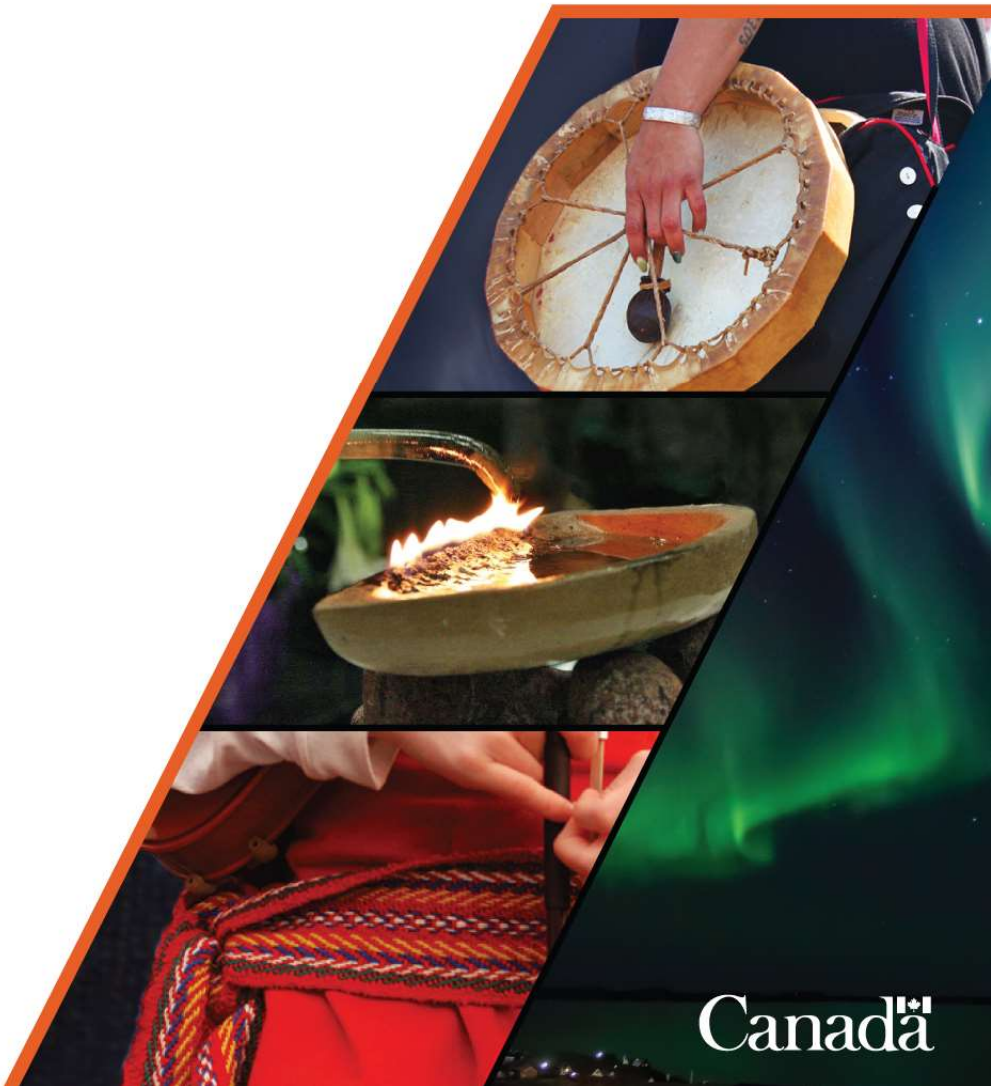
Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

CIRNAC Comments to NIRB

Re: Notice of Screening for Department of Transportation and Infrastructure Nunavut's "Kimmirut Sealift Field Program" Project Proposal



Canada

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

Your file - Votre référence
25YN087
Our file - Notre référence
GCdocs# 143589796

February 13, 2026

Viren Nasit
Senior 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 Department of Transportation and Infrastructure Nunavut's "Kimmirut Sealift Field Program" Project Proposal

Dear Viren Nasit,

On January 22, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Department of Transportation and Infrastructure Nunavut's "Kimmirut Sealift Field Program" 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:

Any matter of importance to the Party related to the project proposal

CIRNAC #1: Fuel Storage and Refueling

The Project proposes the use of up to 10,000 L of diesel, 200 L of gasoline, and approximately 944 L of lubricants, hydraulic oils, methanol, antifreeze, and related drilling fluids to support seasonal field operations between 2026 and 2031. Fuel storage is to occur at least 31 m above the high-water mark; however, refuelling activities are anticipated to occur nearshore and in proximity to intertidal areas. In Arctic, even moderate releases can migrate rapidly across saturated or thaw-softened ground into intertidal areas. Furthermore, while secondary containment and spill response measures are described, the materials do not demonstrate that containment systems and response capacity are proportionate to the maximum single-container volume (10,000 L diesel), nor do they specify boom lengths, sorbent capacity, or equipment inventories to confirm that "worst-case" spill planning is scaled to this volume. As a result, the distinction between storage protection and transfer-related risk remains insufficiently articulated, particularly regarding spill pathways under thaw-sensitive conditions. CIRNAC recommends that the Proponent consider:

- Demonstrating that secondary containment and spill response capacity are scaled to the largest credible single-container release;

- Clarifying procedures and controls for nearshore refueling to prevent migration into intertidal environments; and
- Describing how fuel handling practices account for thaw-sensitive ground conditions and seasonal runoff pathways.

CIRNAC #2: Drill Cuttings and Deposition

The Project includes geotechnical drilling within nearshore and terrestrial study areas, with drill cuttings proposed to be discharged or placed within the drilling footprint. Drilling across multiple locations and seasons may result in repeated localized deposition of cuttings, which in tundra and coastal settings can be mobilized by rainfall or snowmelt where surface disturbance occurs. Cuttings derived from mineralized formations are not inherently inert and may contain elevated metals or exhibit acid-rock-drainage/metal-leaching (ARD/ML) potential depending on lithology.

The Proponent did not quantify anticipated cuttings volumes or describe how geochemical characteristics (including ARD/ML risk) will inform placement decisions; sediment quality testing described in the materials applies only to marine/intertidal sediments and not to drill cuttings. As such, the assumption that cuttings will remain stable within the footprint is not fully demonstrated, particularly under multi-season disturbance. CIRNAC recommends that the Proponent consider:

- Quantifying anticipated drill cuttings volumes per borehole and cumulatively across field seasons;
- Clarifying how placement locations are selected to prevent runoff-driven migration; and
- Demonstrating that material characteristics are evaluated where mineralized or potentially reactive formations are encountered, including screening for ARD/ML potential.

CIRNAC #3: Quarry Material Suitability and Drainage Stability

The Project includes confirmation of quarry rock conditions to support future sealift infrastructure development. Test pits and drilling will be conducted at up to four quarry sites using heavy equipment (30-40 ton excavator and mounted drill rig) to extract and sample rock for “strength and durability testing”. In Arctic environments, such investigations can disturb overburden and alter surface drainage patterns, particularly in thaw-sensitive terrain.

Long-term material suitability must consider freeze-thaw durability, mechanical stability, and geochemical characteristics under prolonged moisture exposure; however, while laboratory testing is referenced, the Proponent does not specify the engineering or geochemical parameters to be used (e.g., freeze–thaw loss, leachability). Likewise, no quarry-specific drainage or erosion controls are described, despite multi-season ground disturbance at four quarry sites between 2026 and 2031.

Without defined acceptance criteria and surface water management measures, uncertainty remains regarding long-term material stability and sediment transport risk during rainfall or snowmelt. CIRNAC recommends that the Proponent consider:

- Clarifying the engineering and geochemical parameters used to determine quarry material suitability;
- Demonstrating that extracted materials will remain stable under freeze–thaw and moisture exposure conditions; and
- Describing erosion and surface drainage control measures associated with quarry investigations.

CIRNAC #4: Reclamation

The field program is proposed from 2026 to 2031 and includes repeated seasonal disturbance within terrestrial, intertidal, and nearshore study areas. While drill holes will be plugged and areas cleaned following completion of activities, the Environmental Management Plan states that "reclamation is not required" and provides no objective restoration criteria or post-activity verification measures.

In Arctic terrestrial environments, vegetation recovery is slow due to short growing seasons and freeze-thaw cycling. Disturbances to tundra surfaces or temporary laydown areas can persist for multiple years without active restoration. The conclusion that reclamation is not required does not clearly reflect a cumulative multi-season disturbance assessment and does not define measurable criteria for restoration success or seasonal verification. CIRNAC recommends that the Proponent consider:

- Clarifying how terrestrial disturbance over multiple seasons will be minimized and progressively restored;
- Defining objective criteria for determining when disturbed areas are considered restored; and
- Describing whether post-activity verification will be undertaken to confirm ground stability and vegetation recovery.

CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent consult with Nunavut Tunngavik Inc. and the Qikiqtani Inuit Association on project activities. Both organizations represent Inuit interests in the project area. As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit and Community Knowledge in 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