



# CIRNAC Comments to NIRB

Re: Notice of Screening for Tetra Tech Canada's  
"Proposed Sealift Improvements, Hamlet of Sanikiluaq"  
Project Proposal



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

Your file - Votre référence  
 26XN009  
 Our file - Notre référence  
 GCdocs# 143829933

March 3, 2026

Jordan Takkiruaq  
 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 Tetra Tech Canada's "Proposed Sealift Improvements, Hamlet of Sanikiluaq" Project Proposal**

Dear Jordan Takkiruaq,

On February 10, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Tetra Tech Canada's "Proposed Sealift Improvements, Hamlet of Sanikiluaq" 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: Stability of New Fill Over Soft Coastal Substrate**

The Project proposes expansion of the existing sealift footprint from approximately 0.4 ha to 1.1 ha, requiring placement of fill across roughly 6,725 m<sup>2</sup> of new area. This includes extension of the ramp 20-25 m beyond the current lowest low tide into terrain described by the Proponent as consisting of soft sandy and muddy sediments. Construction and future operations will involve repeated loading from heavy equipment including rock trucks and an excavator, as well as ongoing operational use of the ramp and laydown area. No geotechnical information is provided to demonstrate how the proposed fill will perform when placed over potentially compressible coastal sediments. In Arctic settings, such placement may result in settlement, frost-related ground movement, or slumping over time. CIRNAC recommends that the Proponent consider:

- Explaining subsurface conditions within the proposed fill footprint; and
- Demonstrating how the proposed design will maintain long-term ground stability under construction and operational loading, including potential frost-related movement in coastal permafrost settings.



**CIRNAC #2: Fuel Use**

Construction is expected to occur over approximately 90 days and will require operation of multiple diesel-powered equipment units, including a 50-tonne excavator, three 30–40 tonne rock trucks, a bulldozer, loader, roller, and an on-site crusher and screener. While the Technical Memo states that fuel dispensing, storage, and handling will be managed locally, and that hazardous materials will primarily consist of lubricants and oils for equipment maintenance, this introduces uncertainty regarding the magnitude of potential land-contamination risk associated with temporary fuel and fluid handling within the project area.

CIRNAC recommends that the Proponent consider clarifying the actual volumes of diesel, lubricants, and other maintenance fluids that will be needed to support construction activities.

**CIRNAC #3: Management of Construction-Derived Residual Materials**

Construction of the expanded sealift area will involve aggregate placement supported by on-site processing using a crusher and screener. While inert construction waste will be disposed of at the municipal landfill, it does not identify anticipated waste types or quantities generated during construction. Given the scale of material handling to expand the laydown area and to place riprap along the outer marine perimeter (with ramp works extending into the shallow subtidal), the application does not quantify construction-derived residuals (e.g., crusher/screener fines, over-size rejection, used spill pads) or describe interim containment prior to disposal.

CIRNAC recommends that the Proponent consider:

- Explaining what kinds of residual materials are expected to be produced during aggregate processing and construction, and in what approximate quantities; and
- Describing the procedures that will be used to contain, stage, and move these materials for disposal, in a way that prevents unnecessary disturbance of land or accidental release of fines or contaminants.

**CIRNAC #4: Consultation with Interested Parties**

CIRNAC recommends that the Proponent consult with Nunavut Tunngavik Inc. and the Qikiqtani Inuit Association on its planned 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 Qaujimajatuqangit 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;
- 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](mailto:muhammad.arslan@rcaanc-cirnac.gc.ca) or David Abernethy by email at [david.abernethy@rcaanc-cirnac.gc.ca](mailto:david.abernethy@rcaanc-cirnac.gc.ca).

Sincerely,



Richard Bingley  
Manager, Impact Assessment

