



CIRNAC Comments to NIRB

Re: Notice of Screening for Vermont State University's “Vermont State University” Project Proposal



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

Your file - Votre référence
26YN015
Our file - Notre référence
GCdocs# 145484250

April 15, 2026

Mia Beattie
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 Vermont State University's "Vermont State University" Project Proposal

Dear Mia Beattie,

On March 25, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Vermont State University's "Vermont State University" 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 and Hazardous Materials

The application identifies 50 L of gasoline to support two coring drills, six ATVs, one truck, and Twin Otter aircraft transport between Resolute and Eureka. This quantity appears insufficient for operating six ATVs and drilling activities over an 18-day program with multi-site travel, creating uncertainty as to whether the hazardous materials inventory is complete. In addition, the application does not describe fuel storage or secondary containment, refueling practices, or spill prevention and response capacity suitable for remote permafrost and ice environments, where small spills may be difficult to recover and can persist. These omissions reduce confidence that potential contamination pathways are fully understood and managed. CIRNAC recommends that the Proponent clarify the complete fuel and hazardous materials profile associated with ATV, drilling, and logistical activities (including storage and handling locations), and provide a brief description of spill prevention and response measures appropriate to remote field operations.

CIRNAC #2: Waste Management and Site Restoration

The application states that all cores will be shipped back to Vermont at sub-eutectic temperatures for later imaging, and the Project also includes use of accommodations and local facilities in Resolute and Eureka. However, the submitted material does not clearly describe how



drill cuttings, packaging, single-use consumables, damaged equipment, or any site debris will be managed in the field, nor does it specify whether coring holes, disturbed snow/ice surfaces, or access tracks will be left to natural recovery or otherwise treated. For a project moving between 3–5 sites in each area and collecting multiple cores, the absence of a concise waste and restoration plan creates uncertainty about whether the project will leave any residual physical footprint beyond the intended sample removal. CIRNAC recommends that the Proponent clarify field waste handling, sample-packaging disposal, equipment decontamination, and the expected condition of each site following completion of coring activities.

CIRNAC #3: Consultation with Interested Parties

CIRNAC recommends that the Proponent engage with the Qikiqtani Inuit Association regarding its project proposal. 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;
- 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 #4: Heritage Resource Protection

CIRNAC recommends that the Proponent consult the Government of Nunavut's Nunavut Archaeology Program within the Department of Culture and Heritage, which oversees archaeology and paleontology permitting and conducts related research. Given the High Arctic's significant paleontological and cultural sites, the Proponent should seek guidance to ensure project activities do not disturb Nunavut's heritage resources.

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

