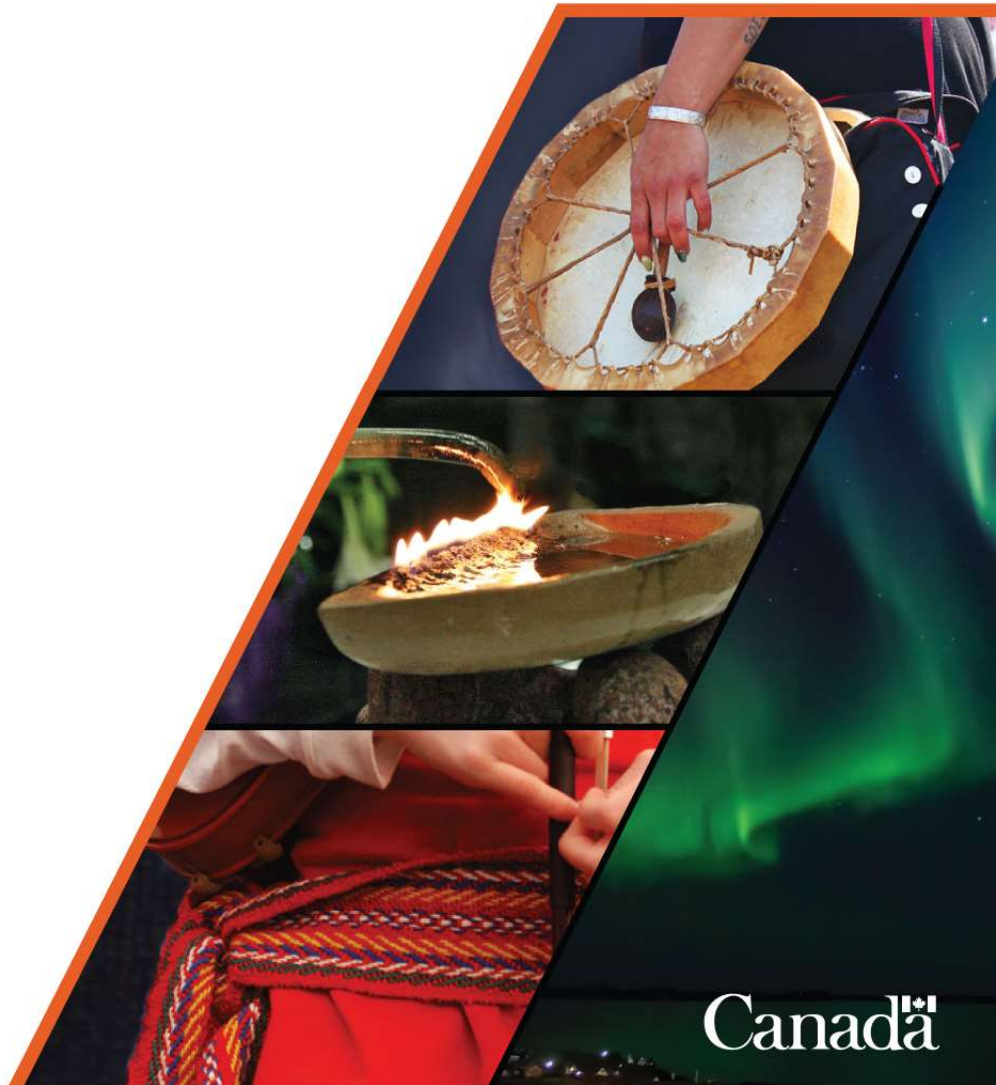




CIRNAC Comments to NIRB

Re: Notice of Screening for Institut National de Recherche Scientifique's "Evaluation of the Deep Geothermal Potential of Iqaluit" Project Proposal



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

Your file - Votre référence
 26YN032
 Our file - Notre référence
 GCdocs# 146753576

May 29, 2026

Dustin Sim
 Screening 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 Institut Nation de Recherche Scientifique's "Evaluation of the Deep Geothermal Potential of Iqaluit" Project Proposal

Dear Dustin Sim,

On May 8, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Institut Nation de Recherche Scientifique's "Evaluation of the Deep Geothermal Potential of Iqaluit" 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 Secondary Containment

The application materials indicate that "information is not available" regarding fuel types and storage capacities for the proposed summer field program. Fuel storage and handling areas are typically located with adequate setbacks from the high-water mark of nearby waterbodies to reduce potential spill pathways to surface water and shallow soils, including the active layer. Where stationary or bulk fuel storage is proposed, secondary containment is generally required and should be appropriately sized (e.g., able to hold approximately 110% of the largest container's volume). In the absence of quantitative information on anticipated fuel volumes for vehicles and field equipment, it is not possible to define a defensible maximum spill scenario or assess whether proposed spill prevention and response measures are proportionate to the scale of use and handling conditions. In Arctic environments, even small releases of petroleum products can spread and persist if not quickly contained and recovered, particularly near water. CIRNAC recommends that the Proponent consider:

- Providing a fuel and hazardous-materials inventory for the field program, including types, containerization, and total volumes;



- Clarifying whether any fuel will be stored or transferred in the field, including anticipated transfer frequency and how setbacks from waterbodies will be maintained;
- Demonstrating secondary containment design for the proposed storage approach, ($\geq 110\%$ of the largest container) and management of precipitation or snowmelt; and
- Describing fuel-handling and spill response readiness, including personnel training and spill kit availability during all fuel transfers.

CIRNAC #2: Waste Management

The application materials list the projected amounts and types of waste for the field campaign as “Information is not available”. Waste streams should be identified, classified, and segregated to protect human health and the environment. Specifically, non-combustible waste is typically organized for back-hauling. In remote Arctic locations, the absence of a defined waste management plan increases the risk of wildlife attraction and the unquantified burdening of local municipal infrastructure. CIRNAC recommends that the Proponent consider submitting a Waste Management Plan that itemizes and quantifies all anticipated waste streams, including greywater and domestic refuse.

CIRNAC #3: Consultation with the City of Iqaluit and the Qikiqtani Inuit Association

CIRNAC recommends that the Proponent engage with the City of Iqaluit and 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 may 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

