



NIRB File No.: 13UN034
NPC File No.: 148839
NWB File No.: 3AM-IQA1626

January 16, 2019

Matthew Hamp
City of Iqaluit
Box 460
Iqaluit, NU X0A 0H0

Sent via email: m.hamp@city.iqaluit.nu.ca

Re: Opportunity to address comments received regarding City of Iqaluit's "New Landfill and Waste Transfer Station" project proposal

Dear Matthew Hamp:

On December 3, 2018 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen the City of Iqaluit's "New Landfill and Waster Transfer Station" project proposal from the Nunavut Planning Commission (NPC or Commission). On December 20, 2018 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by January 14, 2019.

On or before January 14, 2019 the NIRB received comments from the following interested parties:

- **Government of Nunavut (GN)**
- **Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)**
- **Environment and Climate Change Canada (ECCC)**

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/125346.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

- Lack of a comprehensive geotechnical survey of the proposed landfill site to offer insight into the characteristics of the local groundwater flow regime including completing the drilling of the bore holes as planned;
- Need for Climate Change Predictions including the potential impact to permafrost;

- Insufficient information on the project specifications that detail facility siting (setbacks), design (liner, filtrate management, regular cover), as well as detailed plans for operation and closure;
- Lack of a Wildlife Deterrence and Response Plan that includes:
 - Additional details on the steps the Proponent will take to deter wildlife from interacting with the project;
 - Protocols once an animal is observed, including reporting protocols;
 - What tools will be available to staff; and
 - Education plans for the staff;
- Lack of a Spill Contingency Plan;
- Recommendations for terms and conditions provided with regards to washing, re-fueling, servicing equipment and machinery, and for the storage of fuel and other materials to prevent any harmful substances entering the water;
- Proponent encouraged to use the ECCC planning and technical guidance document to support responsible solid waste management;
- Lack of a Landfill Operation and Maintenance Manual that addresses the management of leachate, and sampling and monitoring requirements;
- Insufficient details on monitoring stations for sampling and analysis for any deposits that could enter fish bearing waters;
- Lack of Monitoring and Management Plans which should include appropriate management of drainage/runoff including monitoring and contingency measures to ensure that any deposits are non-deleterious to fish-bearing waters;
- Lack of information on the potential effects and any mitigation plans for any Species at Risk that could be encountered and affected by the project;
- Need for plans to monitor Species at Risk mitigation, including recording locations and dates of observation of Species at Risk, behaviour or actions taken by the animals, and any actions taken to avoid contact or disturbance of the species and its habitat; and
- Potential impacts to migratory and non-migratory birds from project activities; and
- Appropriate measures to be taken by the Proponent to ensure compliance with legislation and regulations to protect migratory birds, and their nests and eggs.

The NIRB would like to provide the City of Iqaluit with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **January 30, 2019**.

If the City of Iqaluit determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require clarification, please contact the undersigned directly at (867) 983-4609 or johokannoak@nirb.ca.

Sincerely,



Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board

cc: Distribution List
 Erik Marko, Colliers Project Leaders
 Richard Dwyer, Nunavut Water Board
 Joe Adla Kunuk, Qikiqtani Inuit Association
 Sean Joseph, Qikiqtani Inuit Association
 Joel Fortier, Qikiqtani Inuit Association
 Robert Chapple, Government of Nunavut – Community and Government Services