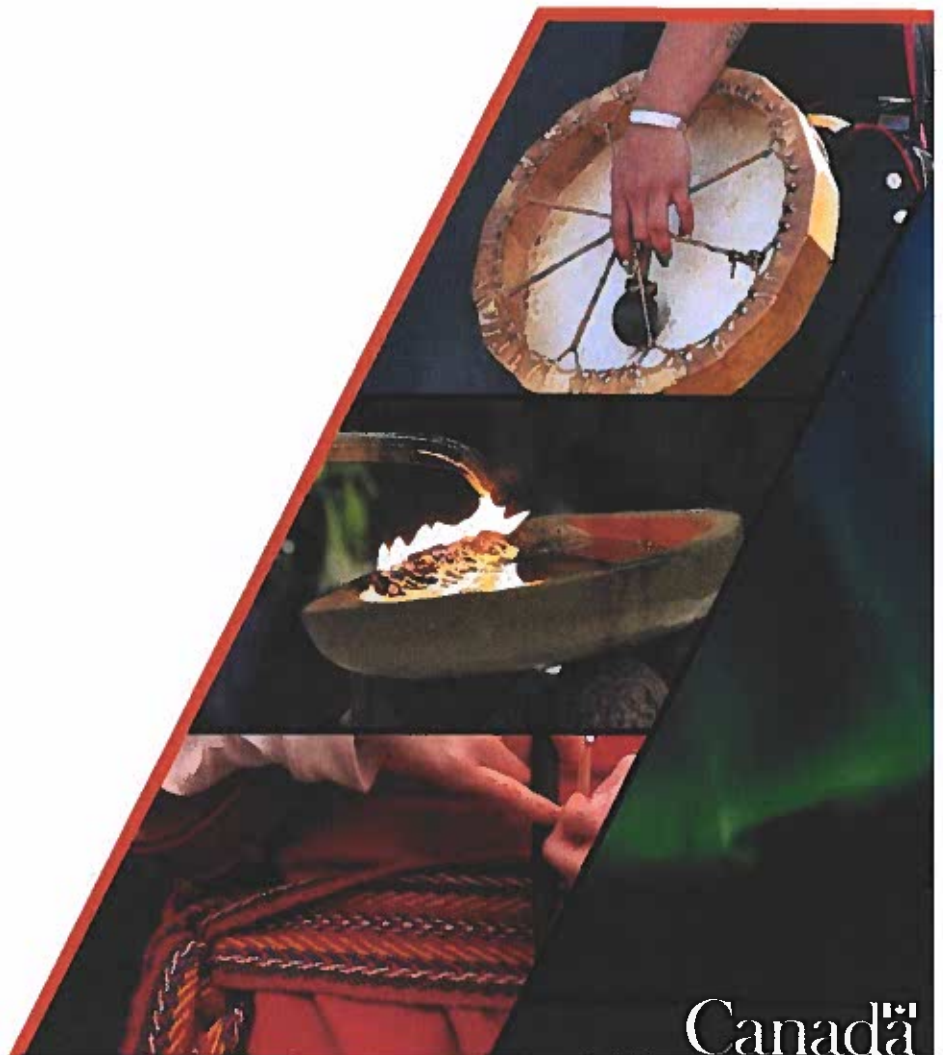




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for “Qulliq Energy Corporation’s “Kugluktuk Power Plant and Solar” Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
19XN011
Our file - Notre référence
CIDMS # 1244735

March 20, 2019

Keith Morrison
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for Qulliq Energy Corporation's "Kugluktuk Power Plant and Solar" Project Proposal

Dear Mr. Morrison,

On February 20, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Qulliq Energy Corporation's (the proponent) "Kugluktuk Power Plant and Solar" project (the 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.

Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why:

Opportunities for local labour:

The non-technical project description states that the project's construction phase will span two years and will provide good employment opportunities for local labour. No further details are provided about this socio-economic benefit. It is not known what types of employment opportunities will be made available, what efforts will be made to hire and train Inuit from Kugluktuk and nearby communities, or whether any coordination will be done with other regional employers to support continued employment for local workers once project's construction phase is complete.

CIRNAC recommends the proponent provide additional details about employment opportunities that will result from the project proposal. In particular, the proponent should describe:

- the types of employment opportunities that will be made available,



- the effort that will be made to hire and train Inuit from Kugluktuk and other nearby communities, and
- any coordination that may occur with regional employers such as: hamlets, mining operators, construction company operators, or other employers who commit to supporting continued employment for workers once the projects construction phase is complete.

Community engagement:

The "Community Involvement & Regional Benefits" section included in the project application indicates that the proponent communicated with the Government of Nunavut's Department of Community Government and Services on May 1, 2018, and with the Hamlet of Kugluktuk (the Hamlet) on November 22, 2016. These communication dates are documented in the application however, the proponent does not mention what type of communication occurred (phone calls, emails, in-person meetings), or if the community members provided any feedback about the planned activities included in the proposed project.

The application also indicates that a Motion of Council was issued by the Hamlet on November 22, 2016, allowing construction of a new power plant. Due to the proposed location of the proposed project, it would be important for the proponent to communicate its planned activities with the community of Kugluktuk. Residents may appreciate the opportunity to become familiar with the proposed projects activities specifically: plant design, location, closure plans for the existing power plant, and opportunities for local labour.

CIRNAC recommends the proponent describe the efforts being made to inform the community of Kugluktuk about the project proposal, address any concerns brought forward from members of the community, and provide an update documenting these efforts and any outcomes that arise from the engagement process.

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

Environmental Impacts Matrix:

In the project application form under the title "Environmental Impacts", the Proponent mentioned:

Building the structures will change the makeup of the ground and could alter the permafrost under them. QEC has committed to an engineered design which will eliminate this risk by constructing a foundation which will not affect the permafrost. A pile foundation will mitigate this risk.

However, in the Proponent's impact identification matrix, under "Construction" and "Operation" it is stated that impacts of the Municipal and Industrial Development on Ground stability and Permafrost would be "Negative and non-mitigatable", which apparently contradicts what was stated under "Environmental Impacts" section. CIRNAC recommends that the Proponent clarifies this inconsistency.

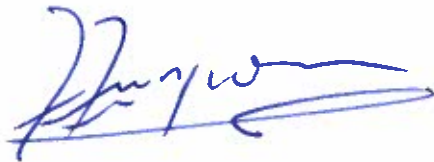
Spill Contingency Plans:

The proponent has submitted two Spill Contingency Plans: one dated September 2016 and another dated January 2019. It may be useful to combine, or provide an explanation as to how the two documents work together to represent the overall Spill Contingency Plan for the proposed project. CIRNAC recommends the plan(s) include:

- Details about extending fuel and hazardous waste handling and spill response procedure training to include casual employees,
- Lists of the items contained in each spill kit and the location of the kits. The kits should include: shovels, pumps, barrels, and absorbents at a minimum, and be located at fuel transfer locations and bulk fuel storage areas, and
- Discussion and plans for follow-up soil and groundwater monitoring in response to large spills in the proposed project area in order to document any new impacts and compare the analysis with the results of the Phase II Environmental Study.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Krista Pooley at (867) 975-4587 or by e-mail at krista.pooley@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

