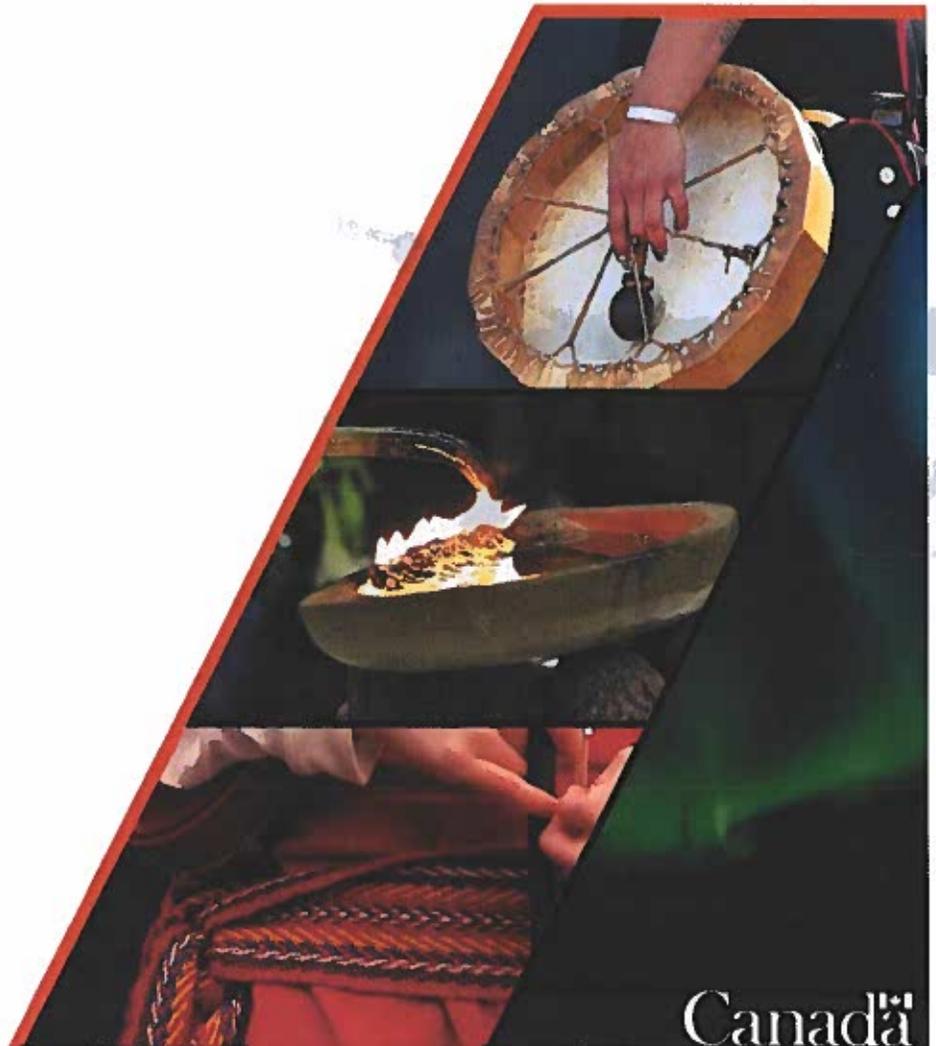




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for the University of Alberta's "Impacts of Melting Tidewater Glaciers on Marine Biogeochemical Cycles" Project Proposal



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

Your file - Votre référence
NIRB file #19YN020
Our file - Notre référence
CIDM #1250842

May 24, 2019

Talia Maksagak
Junior Technical Advisor
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Dear Ms. Maksagak,

Re: Notice of Screening for the University of Alberta's "Impacts of Melting Tidewater Glaciers on Marine Biogeochemical Cycles" Project Proposal

On May 14, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on the University of Alberta's (the proponent) "Impacts of Melting Tidewater Glaciers on Marine Biogeochemical Cycles" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) reviewed the project proposal and related documents and offers the responses below as it pertains to the NIRB's request:

Whether the project proposal is likely to arouse significant public concern; and if so, why:

In the application form submitted it is noted that the proponent was in communication with Mr. Kimmie Qaapik of the Grise Fiord Ranger Patrol Group, on January 3, 2019, but no other information is provided. It is also evident that the proponent was in communication with representatives of the Hamlet because a letter of support was provided by the Hamlet's Mayor Ms. Meeka Kiguktak, dated May 28, 2018.

CIRNAC recommends that the proponent provide a brief written summary of its interaction with interested parties from the Hamlet of Grise Fiord (the Hamlet) to date. This summary should describe: the date of the meeting, the nature of interaction (telephone call, email correspondence, or in-person), matters discussed, and any agreed upon next steps.



CIRNAC also recommends that the proponent develop a plan for how it will involve the community members of the Hamlet in its project. This plan should consider the following points:

- Incorporation of Inuit knowledge, or Inuit Qaujimagatunqangit in the project design,
- Briefing community members on planned activities,
- Briefing community members on monitoring results, and
- Training and employment opportunities for community members.

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

Fuel Management:

In the project application, the proponent indicates that fuel will be: transported by sailboat, cached in some areas for the duration of the field season, or “on the northern margin of the ice cap” from year-to-year for the duration of the project (June 2019 to July 2024), and used for refueling. It is unclear how the fuel will be managed to prevent impacts.

CIRNAC recommends the following project specific terms and conditions be included in the Screening Decision Report, should the project proceed:

- A spill contingency plan should be in place which outlines the planned procedures, and training of personnel for: reporting, containing, removing, and cleaning up a spill or leak on land, or at sea. The plan should include a list of appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) that will be readily available at fuel storage/handling areas and during any transfer of fuel,
- All spills of fuel or other deleterious materials of any amount must be reported immediately to the 24-hour spill line 867-920-8130,
- Fuel should not be stored on the surface ice of lakes or streams (unless otherwise approved),
- All fuel should be stored a minimum of thirty-one (31) metres away from the high water mark of any water body and in such a manner as to prevent their release into the environment,
- Refuelling of all equipment should occur a minimum of thirty-one (31) metres away from the high water mark of any water body,
- Secondary containment or a surface liner should be used when storing barreled fuel at all locations,
- Drip pans or other equivalent device should be used when refueling equipment on-site, and
- All fuel and chemicals should be stored such to prevent access to wildlife.



Temporary Camp:

In the project application it is noted that several temporary camp sites will be used for the project. The temporary camp site locations should be selected and operated in such a way to minimize the potential for damage to the land/tundra.

CIRNAC recommends the following terms and conditions be included in the Screening Decision Report, should the project proceed:

- Land use area should be clean and tidy at all times,
- The environmental footprint of the project should be minimized, and
- Upon abandonment and at the end of each field season all waste, supplies, and equipment should be cleaned-up, removed and all lands restored.

Waste:

In the project application the proponent does not discuss how food and garbage wastes generated during project activities will be stored before transferring for disposal offsite.

CIRNAC recommends the following terms and conditions be included in the Screening Decision Report, should the project be approved:

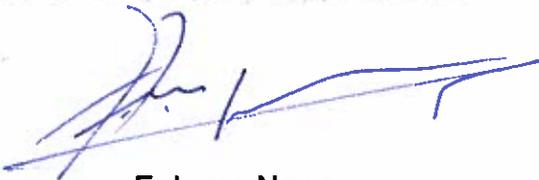
- Waste and food should be stored in such a manner as to prevent access to wildlife, and
- Waste should be stored a minimum of thirty-one (31) meters away from the normal high water mark of any waterbody.

CIRNAC recommends the proponent adheres to the following "best practice" should the project proceed:

- Food particles that may attract wildlife should be removed from greywater.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the proponent, as necessary, throughout any further review of this project. If you have any questions, please contact Krista Pooley at (867) 975-4741, or by e-mail at krista.pooley@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

