

MEMORANDUM

DATE: 18 June 2019

TO: Nunavut Impact Review Board (NIRB)

FROM: Jason Jones, on behalf of The Hamlet of Naujaat

SUBJECT: NIRB File No.: 19PN003 – Naujaat Community Access Trail – Response to Comments

On May 29, 2019, the Hamlet of Naujaat (Hamlet) was informed by Nunavut Impact Review Board (NIRB) that comments had been received regarding our proposed Naujaat Community Access Trail (19PN003). NIRB received comments from the following parties:

- Kivalliq Inuit Association (KivIA)
- Government of Nunavut (GN)
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
- Fisheries and Oceans Canada (DFO)
- Transport Canada (TC)

On June 5, 2019, the Hamlet was informed by NIRB that it had an opportunity to respond to the comments provided, with a deadline for that response of June 18, 2019.

We have provided the Hamlet's response to the submitted comments in the table attached to this memorandum.

Regards,



Jason Jones, Ph.D., R.P.Bio., P.Biol.
On behalf of the Hamlet of Naujaat

Table 1. Hamlet of Naujaat’s responses to comments received by NIRB on proposed Naujaat Community Access Trail (19PN003)

Agency	Comment	Response
KivIA	Air Quality: Dust mitigation and monitoring during and after construction should be completed to ensure safety for all vehicles and to document any adverse effects on local wildlife or water.	The Construction Environmental Management Plan (CEMP) will incorporate dust management and monitoring.
	Wildlife: The road needs to be built to “animal friendly” standards with slopes no less than 4:1 and no large boulders that would create a barrier to animal movement.	The design and construction of the trail will incorporate wildlife movement considerations.
	Heritage Resources: The road route must ensure that the minimum distances from Archaeology sites are being adhered to. The diagram with locations of Archaeology Sites shows several sites in very close proximity to the road.	The Hamlet is currently in the process of engaging a professional archaeologist (Patrick Young) to assist with confirming archaeological sites along the proposed trail alignment and to develop strategies to avoid, minimize, and mitigate potential impacts. Field work is planned for summer 2019.
	Add the number and type of small trucks with portable fuel tanks to the project equipment list.	This information will be updated once the final alignment, design, and construction schedule have been developed.
	The use of a water truck as part of the on-going road maintenance should be given consideration.	Acknowledged.
	Include ARD and ML testing on all road materials.	Once the final alignment has been selected and trail design completed, we will assess the potential for ARD/ML along the route where bedrock may be disturbed.
	Complete a study that documents the potential impacts of wind direction on snow accumulation along the proposed road route.	We are unclear of the intent or purpose behind this request. Can the KivIA please elaborate?
	Involve the Naujaat HTO in monitoring the hunting related traffic on the proposed road.	The Arviq HTO will be integral to the success of the project, at both the construction and use phases. The HTO has already been involved in the early planning stages.

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GN-01	<p>The proponent proposes to develop, operate and maintain a 15 km all-weather community access road with a bridge and multiple culverts following an existing all-terrain vehicle trail near the Hamlet of Naujaat (Repulse Bay). Project activities will also include: use of eight (8) borrow sites and other gravel quarries along the road alignment; construction and use of any access roads as required; potential for blasting of bedrock exposures to make riprap and rock fills; and construction of a clear span bridge.</p> <p>A search of the Nunavut Archaeological Site Database indicates that numerous sites are located along the proposed trail route. This however does not preclude the presence of additional unidentified sites or cultural features.</p> <p>Culture and Heritage also notes that the applicant will be mobilizing vehicles and equipment along the trail route and access roads. This constitutes a concern as the likelihood of vehicles impacting unidentified (unrecognized) protruding cultural features is high (i.e. inuksuit, caches, look-out, dwelling, etc.).</p> <p>The Department of Culture and Heritage recommends that:</p> <ol style="list-style-type: none"> 1) The proponent hires a qualified archaeologist in order to conduct a systematic site inventory and an archaeological assessment prior to any ground disturbance activities (including: the 15 km access road; additional access roads; borrow sites and quarries; blasting areas; clear span bridge; and culverts). 2) No activities be conducted in the vicinity (50 m buffer zone) of any archaeological sites. If archaeological sites or features are encountered during the project, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Department of Culture and Heritage. <p>All archaeological and palaeontological sites in Nunavut are protected by law. The applicant must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site. Moreover, the building of inuksuit is not recommended.</p>	<p>The Hamlet is currently in the process of engaging a professional archaeologist (Patrick Young) to assist with confirming archaeological sites along the proposed trail alignment and to develop strategies to avoid, minimize, and mitigate potential impacts. Field work is planned for summer 2019.</p> <p>Section 5.(2) of the <i>Guidelines for Applicants and Holders of Nunavut Territory Archaeology and Palaeontology Permits</i> states that “No person, other than a person engaged in a search and rescue operation shall approach within 30 m of an archaeological artifact.” and, in section 10(a) of the <i>Territorial Lands Act</i> it states that “No permittee shall, unless expressly authorized in his permit or expressly authorized in writing by an inspector conduct a land use operation within 30 metres of a known monument or a known or suspected archaeological site or burial ground”. The Hamlet recommends the default buffer zone be set at 30 m to match the abovementioned regulations, not the 50 m proposed. The Hamlet proposes that the final determination of appropriate buffer size will be made by a professional archaeologist in consultation with the Department of Culture and Heritage.</p>
GN-02	<p>The Project is located in the southern portion of the Wager Bay Barren-ground caribou herd’s calving ground. Caribou seek out specific calving areas to avoid disturbance and predatory pressure. Development of an all-season road within a</p>	<p>We acknowledge that the proposed route for our community access trail does intersect with the range of the Wager Bay Barren-ground caribou herd. However, in</p>

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	<p>calving ground introduces both of these effects to that area. This can result in range shifts or abandonment, as caribou seek other, disturbance free areas.</p> <p>The Project application contains insufficient information, which impedes the GN's accurate assessment and review of the Projects potential environmental effects. The Project may potentially cause significant adverse impacts on wildlife if the appropriate mitigation is not identified and implemented.</p> <p>The Proponent proposes construction and operation of a 14.76 km long, 6 m wide all-season road with a crowned gravel surface and 50 km/h speed limit. The objective of the Project is to ensure: "...safer access by community members to caribou hunting grounds; access to potential sand, gravel, and carving stone resources; the development of eco-tourism and educational opportunities; and the facilitation of industrial opportunities (e.g., North Arrow Minerals' exploration activities of the Q1-4 kimberlite deposit)." (Environmental and Design Considerations, 2018) The road appears to partially cross the Wager-Bay caribou herd calving area.</p> <p>There may be an indirect adverse effect of this road on caribou abundance caused by increased access to calving grounds, key access corridors, and migratory habitat likely resulting in increased hunting during sensitive times of year, and tourism development, unless there is a proven effective mitigation in place to address the increased harvesting pressure. Potential use of this road to facilitate exploration activities and other industrial opportunities may contribute to adverse cumulative effects on wildlife in the area over the long term.</p> <p>The Project proposal does not reflect potential impacts of the road on Wager-Bay caribou herd calving and post-calving areas, key access corridors, and migratory corridors and does not provide for an assessment of cumulative effects on wildlife.</p> <p>The GN suggests that missing information is necessary for the Board to conduct its screening. Accordingly, the GN asks that the NIRB exercise its power pursuant to <i>NuPPAA s. 144(1)</i>, and direct the Proponent to provide the information described below:</p> <ol style="list-style-type: none"> 1. The Project application should provide for an assessment of impacts including indirect adverse effect of this road on caribou abundance caused by increased access to hunting grounds and tourism development during sensitive times of the year to caribou. 	<p>our experience on the land, this herd does not have a specific calving ground that is used on an annual basis and the currently mapped ranges do not have much actual relevance on the land. Our experience is that the Wager Bay caribou do not form large herds and they do not calve in the same location from year to year.</p> <p>However, even without predictable calving locations, there is still a potential for the construction and use of our proposed access trail to have an adverse effect on caribou. Once the preferred route for the community access trail has been ground-truthed and the design finalized, we are committed to working with our community members, the Arviq HTO, and regulators to develop a sound wildlife management plan that includes mobile mitigation measures and a trail use management plan that will address each of the concerns listed by the GN in this comment.</p>

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	<p>2. The Proponent should revise the Environmental and Design Considerations to include a detailed description of the proposed and proven mitigation measures and a monitoring program proven effective to ensure proposed mitigation is followed.</p> <p>The GN further recommends that the Proponent co-ordinate the development of the environmental information with the GN regional biologist and local wildlife conservation officers in dealing with their proposed mitigation measures and response measures.</p> <p>If the all-season road is approved to be constructed, the Proponent should develop a roads management plan to identify, monitor, and mitigate impacts related to road construction and use. The roads management plan should include developing mitigation strategies and collecting data for:</p> <ul style="list-style-type: none"> • Traffic volume (quantity), type, speed, and seasonality; • Dust emissions and appropriate triggers for mitigation (e.g. speed limits, dust suppressants); • Changes in vegetation health, abundance, and species assemblages; • Noise; • Permeability to wildlife (see GN-02). <p>A roads management plan would include steps taken to identify, monitor, and mitigate impacts and provide organizations and individuals in constructing, using, and maintaining the road with the knowledge and tools to reduce or eliminate the impacts of road development on wildlife, which are clearly valued by the community.</p>	
GN-03	<p>The adverse impacts to wildlife from road construction and use are not fully addressed or mitigated within the Proponent’s Project proposal. Use of the road as a source of impact to wildlife is not considered. The Proponent states: “... the magnitude and duration of [adverse effects on wildlife] are unlikely to be long-lasting or have population-level consequences.” (Environmental and Design Considerations, 2018) The GN does not agree with this assessment, primarily for the three main reasons identified by the Proponent in the Project proposal: mortality, sensory disturbance, and disruption of movement.</p> <ul style="list-style-type: none"> • Mortality: This includes both direct mortality on the road and the indirect mortality associated with increased hunting pressure, and 	<p>Once the preferred route for the community access trail has been ground-truthed and the design finalized, we are committed to working with our community members, the Arviq HTO, and regulators to develop a sound wildlife management plan that includes mobile mitigation measures, and a trail use management plan that will address each of the concerns listed by the GN in this comment.</p>

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	<p>though both are not likely to be substantial during the construction phase of the Project, they are expected to be throughout the life (use phase) of the road.</p> <ul style="list-style-type: none"> • Sensory Disturbance: Wildlife may avoid roads and the human activity roads support. The Proponent describes the Project as a community access trail but includes mixed industrial use (quarries, mining development) as a stated intent for developing the Project. These uses serve to magnify the intensity of disturbance and it can be expected that any avoidance response by wildlife would also be magnified. Sensory disturbance is an issue for both the construction and use of the road. • Disruption of Movement: As with sensory disturbance, this effect can be linked to a variety of factors, including traffic type and volume. Based on the Proponent’s stated interests for the road, the type and volume of traffic on the road is expected to increase over its life and continued use. <p>Construction and use of the road should be expected to have potentially adverse effects on wildlife, and the Project proposal does not include a plan to identify, monitor, reduce or eliminate these effects.</p> <p>The GN recommends that the Proponent develop a wildlife monitoring and mitigation plan (WMMP) to identify and evaluate adverse effects from the Project on wildlife. This plan should include elements such as proven methods and analysis approach for wildlife monitoring, assessment of infrastructure permeability for wildlife, changes in hunting pressure, occurrence and distribution of wildlife, etc. also, the Role of Environmental Monitors (see GN-09).</p>	
<p>GN-04</p>	<p>The use of helicopters is suggested as necessary for initial environmental surveys, engineering, etc. (NIRB Application for Screening #125448). Use of helicopters can have negative impacts on wildlife, especially during critical stages of their lifecycle (e.g. calving). The Nunavut Wildlife Act prohibits harassment of wildlife, as an individual (s.74.1) and through the use of a vehicle or other conveyance (s.87.1.d)</p> <ol style="list-style-type: none"> 1. Ensure that wildlife will not be harassed or disturbed. 	<p>Based on the current project schedule, helicopter use for trail design and engineering is no longer thought to be necessary. A helicopter may be required to facilitate the requested archaeological survey. If required, we will develop a wildlife management plan associated with the helicopter use.</p>

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	<p>2. Cease Project activities when caribou and other terrestrial wildlife are observed to be approaching the Project area.</p> <p>3. Maintain a minimum aircraft flight altitude of 610m above ground level and 600m horizontal distance from wildlife habitat.</p>	
GN-05	<p>A stated purpose for this road development is to access granular materials, via quarry and/or borrow sources (at least 8 identified so far) (Environmental and Design Considerations, 2018). The GN is concerned that there is no information related to the location, number, development, use/exploitation, and closure/reclamation of these sites. Furthermore, no description of the adverse effects related to quarry use or the monitoring and mitigation of these effects on local wildlife, is included in the Project's application materials.</p> <p>It appears that the application is deficient in this area. If blasting or development of access roads are required to access these quarry/borrow sites, the adverse effects of these activities are similarly lacking from the application (see GN-06 and GN-07).</p> <p>The GN recommends that development of quarry/borrow management plans should be developed for each site if new quarry and borrow sources are developed and utilized for any portion of the construction or use of the proposed all-season road.</p> <p>Quarry/borrow management plans should include elements such as:</p> <ul style="list-style-type: none"> • Location and description of each site; • Geotechnical assessment to evaluate the stability of the site and acid generating potential; • Type of materials present and approximate volumes to be removed; Permafrost assessment to reduce permafrost degradation, erosion (via melting permafrost); • Water management (drainage, dewatering, freshet, alteration of water courses, etc.); • Soil/sediment erosion prevention and control; • Public safety access restrictions; • Monitoring for wildlife use/impact (carnivore denning [sand/gravel] and raptor nesting [quarry] prior to or during quarry/borrow development); 	<p>It is important to differentiate between a potential end use of the trail (i.e., the development of aggregate sources or quarry activities by the Hamlet) and the potential that local surficial materials could be used to facilitate trail construction. In the former case, the Hamlet will pursue appropriate permits and regulatory guidance.</p> <p>In the latter case, it is currently not known whether local borrow sources will be required. If so, the Hamlet will develop borrow management plans that will be incorporated into the overall Construction Environmental Management Plan.</p>

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	<ul style="list-style-type: none"> • Ancillary activities required for each site (blasting, access roads); • Reclamation and closure plans. 	
GN-06	<p>Additional road access may be required to reach quarry or borrow sources. The location, length, and construction requirements (e.g. water crossings) of these access roads are not described in the Proponent's application.</p> <p>A stated purpose of the all-season road is to concentrate local traffic, preventing trail braiding and degradation of adjacent terrestrial and aquatic habitat (Environmental and Design Considerations, 2018). The GN is concerned, however, that the established road will provide more efficient access to areas which were previously more difficult to get to and serve to enable more side trails and junctions into undisturbed areas.</p> <p>The GN recommends that the Proponent:</p> <ul style="list-style-type: none"> • Identify potential access roads that will connect to the main road as proposed. Additional details are required; • Establish guidelines for local use of the road and work with local user groups to reduce the impact and damage resulting from side-trails, offshoots, and other branching trails. This could include identification of side trails. 	<p>The Hamlet does not foresee a need to construct additional access trails to access local borrow sources, should they be required.</p> <p>The Hamlet will work with local groups (e.g., the HTO), guide outfitters, and community members to develop guidelines for trail use.</p>
GN-07	<p>Blasting can have a negative effect on wildlife and wildlife habitat through vibration, noise, dust, toxic fumes, pollution from explosives and residues, and habitat loss and alteration.</p> <p>The Project proposal did not include information on blasting and only stated that should blasting be necessary, the Hamlet of Naujaat will work with its contractors and regulators to develop wildlife management plans specific to blasting (Environmental and Design Considerations, 2018). The GN views this approach as inadequate; blasting should either form a part of this application or not.</p> <p>Blasting management plans containing a wildlife impact monitoring and mitigation component should be developed for any blasting associated with the Project. This includes blasting to create or improve the road right of way itself, access roads, or any blasting required to source road construction materials.</p>	<p>As stated in the application, it is currently unknown if blasting is required to construct the proposed community access trail. It is difficult to develop a management plan for an unknown. If blasting is deemed necessary, the Hamlet will work with NIRB (and other regulators and stakeholders as appropriate) to develop the necessary management plans.</p>

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	<p>The GN recommends that the Proponent identify the location and intensity of any Project-related blasting activity, and provide blasting management plans, including impact monitoring and mitigation plans to reduce or eliminate adverse effects on wildlife.</p> <p>Any future blasting activity should be described and reviewed under separate application to the NIRB.</p>	
GN-08	<p>Controls identified by the Proponent for preventing the introduction of invasive species and erosion prevention may be inadequate. The Nunavut Wildlife Act states: “No person shall release a member of a species into a habitat in which that species does not belong or never naturally occurred.” (Government of Nunavut, 2003; Section 91.2)</p> <p>The GN recommends the following mitigation regarding invasive species prevention:</p> <p>Earthmoving equipment: All equipment not already located in the community should be thoroughly cleaned of dirt and debris and inspected prior to deployment to prevent introduction of invasive plant species (including and especially as seeds).</p> <p>Erosion Prevention: The Proponent identifies a number of ways to reduce possible erosion which may not be appropriate for application at the Project area.</p> <ul style="list-style-type: none"> • Mulches (typically wood): Could potentially introduce atypical plant material to the Project area and may contain invasive species. • Top-soil reapplication and seeding: Seed mixes that are Arctic-specific and match the species assemblages found in the Project area may not be commercially available, and non-native species should not be introduced. • Hydro-seeding: Seed mixes that are Arctic-specific and match the species assemblages found in the Project area may not be commercially available, and non-native species should not be introduced. <p>The GN recommends that the Proponent avoid utilizing erosion control methods which have the potential to introduce invasive species. Stockpiled topsoil should be handled in such a way that wind and water erosion does not become a problem.</p>	<p>The Hamlet commits to incorporating both erosion and sedimentation control (ESC) and invasive species management protocols into the CEMP, with carryover into operations and maintenance of the community access trail. One of the Hamlet’s partners in the project, EcoLogic Consultants, has specialists in both areas that will work with the Hamlet and local knowledge holders to develop plans that are site- and biome-appropriate.</p>

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	<p>Care should be taken during all stages of the Project (planning, construction, operation, and reclamation) to avoid introduction of invasive species. This effort should include periodic monitoring, via botanical surveys, to identify and control species that have been introduced through Project activities.</p>	
GN-09	<p>The Project proposal lacks information about the roles and responsibilities of the Environmental Monitors and it appears that their role exists only for construction, not use or ongoing maintenance of the road.</p> <p>The description of training provided to the Environmental Monitors does not explain what they will be learning or what the extent of their role is. The application notes that the Environmental Monitors will collect observation data but does not include information on how these data will be collected, analyzed, reported, used, or distributed.</p> <p>Direct wildlife mortality (vehicle collisions) are to be reported to the Environmental Monitors; these must also be reported to the GN via the Naujaat Conservation Officer.</p> <p>The GN recommends that the Proponent provide a description of the roles and responsibilities of the Environmental Monitors and their training plan.</p> <p>The GN recommends that the Proponent develop a wildlife data management plan that describes what data will be collected, proven methods of collection and analysis, and how and to whom the data or findings will be distributed. This should also include how the observations of the monitors will be incorporated into adaptive management to address ongoing impacts from Project activity.</p>	<p>The roles and responsibilities of the Environmental Monitors (including their training) will be fully described, as requested, in the CEMP that will be developed following the finalization of the route alignment and design. Part of the EM responsibilities will be the reporting of all compliance issues with respect to the CEMP (and other permit requirements), including interactions with wildlife.</p> <p>The Hamlet will work with trail users and the HTO to develop a wildlife data reporting and management plan to be implemented once the trail is useable. The Hamlet will use these data adaptively to address potential ongoing impacts from the use of the trail, as suggested in the comment.</p>
GN-10	<p>The GN is concerned that the proposed community access trail will become increasingly utilized by industrial activities. Two stated intents for the proposed roads are access to granular and quarry materials for the Hamlet of Naujaat and access to mineral resources and support for bulk sampling by North Arrow Minerals at the Qilalugaq Project.</p> <p>In addition to increased industrial use having the potential to displace or impede local use of the proposed road, the type and volume of traffic associated with these uses may have an increased impact on caribou use of adjacent habitat.</p> <p>The GN recommends that:</p>	<p>Any use of the trail for industrial purposes either by the Hamlet (e.g. potential development of aggregate source) or a third party (e.g. bulk sample transport by North Arrow) will go through the appropriate permitting channels prior to the initiation of that use.</p>

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	<ul style="list-style-type: none"> Any proposal by the Hamlet to use the road for access granular or quarried materials outside of municipal boundaries should be described and reviewed under a separate application to the NIRB; Any proposal by North Arrow to use the road for access to its mineral holdings should be described and reviewed under a separate application to the NIRB. 	
CIRNAC	<p>In the project application document: “Environmental and Design Considerations Naujaat Community Access Trail”, the proponent discusses “Hazardous Materials Handling Procedures” (which includes fuel) and “Spill Prevention and Emergency Response Procedures”. The procedures indicate that fuel will be used for refueling, but it is unclear how the fuel will be managed routinely (outside of emergency spills) to prevent impacts.</p> <p>CIRNAC recommends the following project specific terms and conditions pertaining to the spill prevention plan and fuel management procedures be included in the Screening Decision Reports, should the project proceed:</p> <ul style="list-style-type: none"> The spill prevention plan should be more specific about what items the spill kits will contain. At a minimum the kits should include: shovels, pumps, barrels, drip pans and absorbants. The spill prevention plan should indicate the intended locations of spill kits which includes having spill kits readily available at fuel storage/handling areas and during any transfer of fuel. The spill prevention plan should be updated to indicate that any spills of fuel or other deleterious materials of any amount must be reported immediately to the 24-hr spill line 867-920-8130 (if applicable). Refuelling and fuel storage should be 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 release into the environment. Secondary containment or a surface liner should be used when refueling equipment on-site, Drip pans or other equivalent devices should be used when refueling equipment on-site, and All fuel and chemicals should be stored such to prevent access to wildlife. 	<p>Upon completion of the route alignment and trail design, the Hamlet will develop a comprehensive CEMP that will include spill prevention and response measures, including those listed in the comment.</p>

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TC	<p>The watercourses currently identified are not on the List of Schedule Waters under the <i>Navigation Protection Act</i>, therefore no approvals will likely be issued under the Navigation Protection Program (NPP). If the proponent chooses to “opt-in” for works in non-scheduled navigable waters, they can submit a request to the NPP to have their project assessed and reviewed for navigability.</p> <p>If equipment is required to be barged to the community, the proponent must adhere to the <i>Canada Shipping Act, 2001</i> (CSA). The CSA provides an overall regime to protect the safety and the environment for vessels operating in waters under Canadian jurisdiction. Its regulations include requirements for a vessel’s construction, management of ballast water, pollution control, arrangements for emergency response, and crew qualifications. Pollution response and prevention measures apply in respects of vessels in Canadian waters or waters in the exclusive economic zone of Canada.</p>	<p>Thank you for the response. If the project is approved, the Hamlet and its partners will ensure that all vendors and contractors will abide by federal statutes and regulations.</p>
DFO	<p>As directed by the NIRB in their email dated May 7, 2019, DFO-FPP is providing the following comments with respect to the Project’s screening. DFO-FPP understands that the NIRB would like interested parties to provide comments regarding:</p> <ol style="list-style-type: none"> 1) Whether the project proposal is likely to arouse significant public concern; and if so, why; <p style="margin-left: 40px;">DFO-FPP is not aware of any significant public concern at this stage of review.</p> 2) Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why; <p style="margin-left: 40px;">DFO-FPP has reviewed the Proponent’s application pursuant to its mandate to maintain the on-going productivity of commercial, recreational, and Aboriginal fisheries. DFO-FPP is not aware of any significant adverse eco-systemic or socio-economic effects at this stage of review.</p> 3) Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; if so, why; <p style="margin-left: 40px;">DFO-FPP has reviewed the Proponent’s application pursuant to its mandate to determine whether it is likely to result in serious harm to fish which is prohibited under subsection 35(1) of the Fisheries Act unless authorized. Based on the information provided, the Program has</p> 	<p>The Hamlet is planning to submit a Request for Review upon completion of route selection and engineering design.</p> <p>We will explicitly incorporate the Duty to Report into the project CEMP.</p>

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	<p>insufficient information to determine if your proposal could result in serious harm to fish.</p> <p>In order for us to complete the review of your proposal, we ask that the Hamlet of Naujaat complete a request for review form (www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/index-eng.html). The completed form can be submitted by email to FisheriesProtection@dfo-mpo.gc.ca. Information provided for each culvert should include an assessment of whether the watercourse is fish bearing, and the size and design specifications for the proposed culvert.</p> <p>4) Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);</p> <p>If watercourses are determined to be fish habitat, culverts should be installed to allow fish passage. As discussed above, in order for us to complete the review of your proposal, we ask that the Hamlet of Naujaat complete a request for review form (www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/index-eng.html).</p> <p>5) Any matter of importance to the Party related to the project proposal.</p> <p>It is your Duty to Notify DFO-FPP if you have caused, or are about to cause, serious harm to fish that are part of or support a commercial, recreational or Aboriginal fishery. Such notifications should be directed to http://www.dfo-mpo.gc.ca/pnw-ppe/violation-infraction/index-eng.html.</p>	