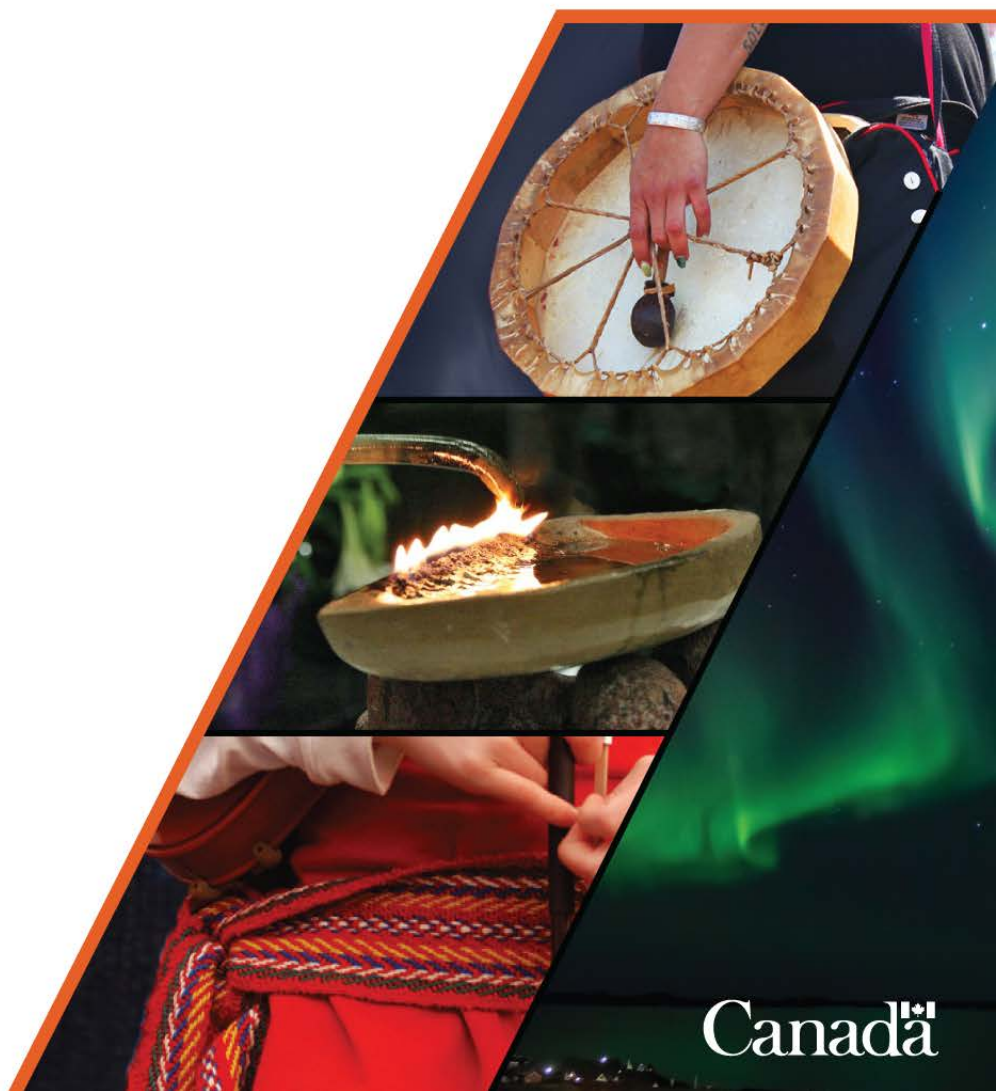




# CIRNAC COMMENTS TO NIRB

## Re: Notice of Screening for Canadian Arctic Holidays' "Clyde River Land Use Permit" Project Proposal



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

Your file - Votre référence  
19TN048  
Our file - Notre référence  
1273222

January 17, 2020

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

**Re: Notice of Screening for Canadian Arctic Holidays Ltd.'s "Clyde River Land Use Permit" Project Proposal;**

Dear Emily Koide,

On January 7, 2020, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Canadian Arctic Holidays Ltd.'s "Clyde River Land Use Permit" 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 arouse significant public concern; and if so, why;**

CIRNAC understands that the Proponent has consulted with the Hamlet of Clyde River and its community members. However, this consultation is not clear in its content of interaction, nor is the application clear on considerations given to Inuit Culture in the proposed activities.

As such, CIRNAC recommends that the Proponent provide a brief written summary of its interaction with Hamlet of Clyde River and community members. This summary should describe meeting dates; types of interaction (e.g., telephone call, email correspondence, in-person visit; etc.); matters discussed; and any agreed upon next steps.

**Whether the project is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);**

CIRNAC is of the view that the potential impacts of the proposed project can be mitigated through following known practices.



The Proponent states in their application that the method of disposal for Sewage (human waste) will be to freeze the waste and dump the frozen wastes several kilometers away from the camp. Human wastes disposal has the potential to contribute to eutrophication if deposited into waterbodies.

CIRNAC recommends that the Proponent ensure that sewage is disposed of in a sump at least 31 meters from the normal high water mark of any water body.

**Any matter of importance to the Party related to the Project proposal:**

CIRNAC requests that the Proponent provides clarification for determining, in the Project Proposal Matrix, that project will have positive impacts on the following environmental components:

- Ground Stability
- Permafrost
- Water Quality
- Climate Conditions
- Air Quality
- Vegetation
- Wildlife, including habitat and migration patterns
- Birds, including habitat and migration patterns
- Wildlife protected areas

Further, CIRNAC recommends that the Proponent consider the following points throughout the implementation of its project:

- Incorporation of Inuit knowledge and Inuit Qaujimajatuqangit in the Project design;
- Briefing community representatives on planned activities; and,
- Training and economic opportunities for community members.

CIRNAC appreciates the opportunity to provide comments and looks forward to working further with the NIRB and the Proponent, as necessary, throughout any further review related to this project. Should you have any questions, please contact Richard Bingley at (867) 975-4556 or by e-mail at [Richard.Bingley2@Canada.ca](mailto:Richard.Bingley2@Canada.ca).

Sincerely,



Felexce Ngwa  
Manager, Impact Assessment

