



NIRB File No.: 19TN048

Talia Maksagak
Manager, Technical Administration
Nunavut Impact Review Board

Via email: info@nirb.ca

RE: NIRB 125495/19TN048: Notice of Screening and Comment Request for CAH's "Clyde River Land Use Permit" Project Proposal

Thank you for providing the Qikiqtani Inuit Association (QIA) with the opportunity to comment on Canadian Arctic Holidays' (CAH) "Clyde River Land Use Permit" project proposal.

QIA wishes to convey concerns about the proposal to build a temporary camp on Ayr Lake, located near Clyde River. Primarily, QIA wishes to relay the concern that community members from Clyde River have related regarding potential environmental and socio-economic impacts associated with this proposal. Furthermore, QIA wishes to highlight inaccuracies related to how the physical environment has been described by the applicant. Finally, QIA wishes to gain some clarity on some project components.

In the NIRB application, Description of Existing Environment, Biological Environment, the applicant suggests, “The only wildlife we have seen, is a couple foxes and polar bear tracks. No birds have been sighted. We do not fish or pour contaminants into the lake. The ground is rock and ice where we operate.” QIA would like to clarify that Ayr Lake and the river downstream is a known fishing area for the Community of Clyde River. QIA would suggest that the applicant review the impact that their proposal may have on Polar Bears, the fish and waters downstream. Importantly, Inuit Owned Land surrounds the river that flows from Ayr Lake to the ocean. As per the Nunavut Agreement, section 20.2.4, QIA shall have the right to have water flow through IOL substantially unaffected in quality, quantity and flow.

In the NIRB application, Description of Existing Environment, Socio-economic Environment, the applicant suggests, “The community of Clyde River does not hunt in the area, as there is no caribou. Land and resource use in the area is zero, we operate in the high mountains and glaciers. We do not interfere with subsistence harvesting or local trapping.” QIA would like to again reiterate that Ayr Lake and the river downstream is a known fishing area for the Community of Clyde River. The applicant has suggested that Polar Bears are known to frequent this area as well. Impacts to local hunters is something that QIA takes very

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Qikiqtani Inuit Association

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seriously. QIA suggests that the applicant review how their project may impact community members who depend on the land for subsistence.

In the NIRB application, Description of Existing Environment, Physical Environment, the applicant suggests, “the potential camp is not in the proximity of any protected areas, heritage sites, archaeological sites or sensitive wildlife areas or wildlife migration trails. The camp is located on a glacial moraine.” QIA wishes to notify reviewers that although the proposed location of the camp is currently located on Crown Land, that location also falls within the *proposed* Government of Nunavut Territorial Park – **“Agguttinni Territorial Park”**. The Government of Nunavut has received funding from the Nature Challenge Fund to advance the establishment of Agguttinni Territorial Park, and to date they have developed the Master Plan and Management Plan drafts. They have also started discussions with QIA about the negotiation of the Inuit Impact and Benefit Agreement amendments for Territorial Parks in the form of a Park Specific Appendix.

Beyond the concerns listed above, QIA seeks clarity regarding the length of time the applicant wishes to lease land for their camp as this is unclear from the project documents found on the NIRB portal. Ideally, QIA would like the applicant to provide more information about the size, footprint and length of time they wish to lease land in this area. QIA would like clarity on whether the camp would be demobilized in its entirety at the end of this field season. Finally, QIA requests that the applicant provide a complete Abandonment and Reclamation plan and we would like the opportunity to review those plans with the Community of Clyde River. Consequently, QIA asks that the NIRB ensure the applicant provides the suggested information and documentation prior to finalizing the review of this Proposal.

With these concerns in mind and the fact that the community of Clyde River has already expressed concerns with the camp being built, we would like to suggest that a decision be delayed until we have a better understanding of potential impacts and benefits regarding this type of activity. This is of particular significance due to the fact that this location may soon become part of a Territorial Park.

Should you have any concerns or questions, do not hesitate to contact Joel Fortier, Environmental Assessment Coordinator, directly at jfortier@gia.ca.

Regards,

Rosanne D'Orazio
Director, Lands and Resources
Qikigtani Inuit Association.