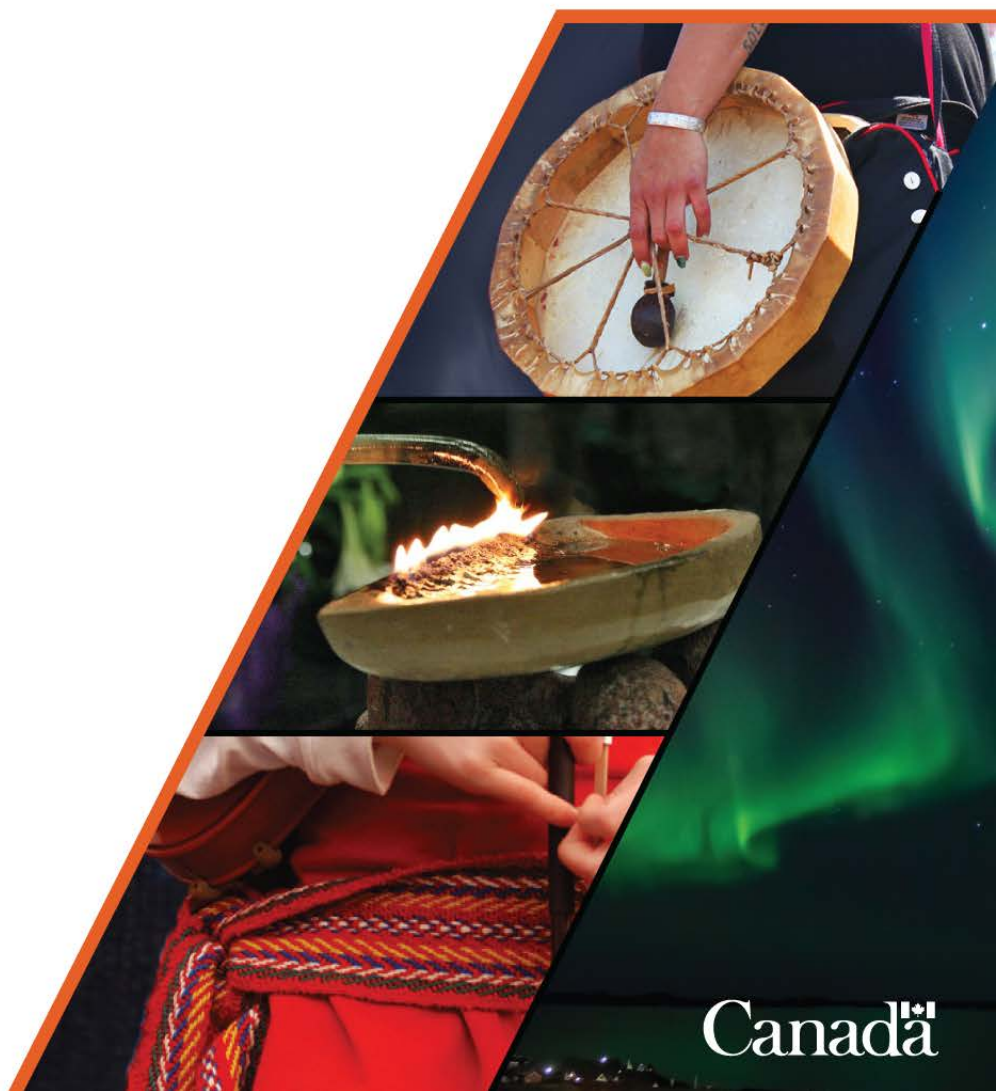




CIRNAC Comments to NIRB Re: Notice of Screening for Arctic Kingdom's "Arctic Kingdom Floe Edge Camp Day Trips - 2020" Project Proposal



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

Your file - Votre référence
15AN029
Our file - Notre référence
1284157

March 17, 2020

Mia Otokiak
Junior Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via NIRB public registry

Re: Notice of Screening for Arctic Kingdom's "Arctic Kingdom Floe Edge Camp Day Trips - 2020" Project Proposal

Dear Mia Otokiak,

On March 6, 2020 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Arctic Kingdom's "Arctic Kingdom Floe Edge Camp Day Trips - 2020" 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 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 with known practices or technology.

Some common practices include:

- Garbage and debris to be kept in bags placed in a covered metal container or equivalent until disposed of at an approved facility. Waste to be kept inaccessible to wildlife at all times;
- Do not erect camps or store materials on the surface ice of lakes or streams;
- Test lake ice thickness to ensure ice is capable of fully supporting the equipment or vehicles;
- Keep the land use area clean and tidy at all times;
- Minimize the environmental footprint of the camp site;



- All fuel and other hazardous materials 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;
- Store incompatible materials separately;
- Re-fuelling of all equipment should occur a minimum of thirty-one (31) metres away from the high water mark of any water body;
- Limit areas where fuel transfers are allowed;
- Drums should be covered to prevent water, snow and ice from filling the containment area;
- All personnel to be properly trained in fuel and hazardous waste handling procedures, as well as spill response procedures;
- Appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) must be readily available during any transfer of fuel or hazardous substances;
- All fuel and chemicals should be stored such that they are inaccessible to wildlife;
- A spill contingency plan should be in place for all phases of camp construction and operation;

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

Community Involvement

The 'Community Involvement & Regional Benefits' section of the Project Application indicates that the Proponent contacted the Mittimatalik Hunters and Trappers Organization (HTO) on Nov. 19, 2019, and the Iviq HTO on Feb. 11, 2019. Additionally, the 'Non-technical Project Proposal Description' states that the Proponent has requested permission for their base of operations from the community of Arctic Bay. No details are provided for engagement with the Mittimatalik HTO, Iviq HTO, or the hamlet of Arctic Bay.

CIRNAC recommends that the Proponent provide a brief written summary of any interactions it has made with community representatives (i.e., HTOs and/or Hamlet officials) regarding the Project proposal. Meeting dates, means of interaction (e.g., telephone calls, email correspondence, in-person discussions), discussion topics, and commitments should be described.

CIRNAC recommends that the Proponent consider how it will involve nearby communities in its project activities. The following points should be explored:

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



Environmental Impacts Table

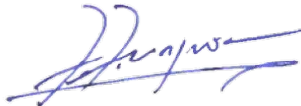
In the Identification of Environmental Impacts table, the Proponent does not indicate any potential effects from Project-related refueling activities. Further, the line for 'Airstrip use or construction' does not indicate potential impacts to the category "Birds, including habitat and migration patterns". Lastly, the Proponent does not indicate any potential effects to the category of "Aquatic species, including habitat and migration/spawning".

CIRNAC recommends that the Proponent:

- Update the table to include refueling activities, with any associated potential impacts related to refueling activities;
- Clarify the Proponents basis for excluding potential impacts on "Birds, including habitat and migration patterns", given that the proposed activities include flights near Bylot Island Migratory Bird Sanctuary and Nirjutiqarvik National Wildlife Area; and,
- Clarify the Proponents basis for excluding potential impacts on "Aquatic species, including habitat and migration/spawning", given that the proposed activities include kayaking and refueling activities in camps which are to be based on ice near the floe edge.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases 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.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

