



CIRNAC Comments to NIRB Re: Notice of Screening for Department of National Defence's "OP NANOOK-NUNALIVUT 2020" Project Proposal



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

Your file - Votre référence
19DN049
Our file - Notre référence
1283880

March 18, 2020

Jaida Ohokannoak
Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

Re: Notice of Screening for Department of National Defence's "OP NANOOK-NUNALIVUT 2020" Project Proposal

Dear Jaida Ohokannoak,

On February 26, 2020 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Department of National Defence's "OP NANOOK-NUNALIVUT 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:

- 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;
- Re-fuelling of all equipment should occur a minimum of thirty-one (31) metres away from the high water mark of any water body;
- Combustible wastes should be incinerated on a daily basis. Ash from incineration activities and non-combustible wastes from the project site should be removed to an approved facility for disposal or disposed by burial beneath no less than one (1) metre of compacted soil;



- Equipment or vehicles should not be moved unless the ground surface is capable of fully supporting the equipment or vehicles without rutting or gouging. If rutting occurs, overland travel of equipment or vehicles must be suspended;
- Avoid disturbance on slopes prone to natural erosion; seek alternate routes for access;
- Use existing trails where possible during project activities on land;
- Do not erect camps or store materials on the surface ice of lakes or streams; and,
- Do not use ammonium nitrate-based explosives in or near water due to the production of by-products that may impact water quality.

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

CIRNAC recommends that the Proponent maintain open communication with land users situated within the Project area to ensure they are aware of planned activities and their interests are respected (e.g., protection of wildlife resources). In addition, to communicating with municipal representatives, the Proponent should consider contacting other relevant organizations such as hunters and trappers' organizations and Regional Inuit Associations.

CIRNAC recommends that the Proponent consider how it will involve local residents in its planned activities (it is recognized that Canadian Rangers will participate in Ranking Inlet based operations). The following points should be explored:

- Incorporation Inuit knowledge and/or Inuit Qaujimajatuqangit in the project design;
- Briefing community members on planned activities; and
- Training and employment opportunities for community members

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

