



# CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's  
"Re-estimating the abundance of the Lancaster Sound  
(LS) Polar Bear subpopulation via genetic mark-  
recapture sampling" Project Proposal



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

Your file - Votre référence  
20YN008  
Our file - Notre référence  
CIDMS # 1284884

May 7, 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 the Government of Nunavut's "Re-estimating the abundance of the Lancaster Sound (LS) Polar Bear subpopulation via genetic mark-recapture sampling" Project Proposal**

Dear Mia Otokiak,

On April 16, 2020 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's "Re-estimating the abundance of the Lancaster Sound (LS) Polar Bear Subpopulation via Genetic Mark-recapture Sampling" Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the Project Proposal and supporting documents 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:

- Do not erect camps or store materials on the surface ice of lakes or streams;
- All fuel and chemicals should be stored so as to be inaccessible to wildlife;
- Secondary containment or a surface liner should be used when storing fuel and chemicals at all locations;



- 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 waterbody; and,
- Spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) should be readily available during any transfer of fuel or hazardous substances, at all fuel storage sites and maintenance areas.

**Any matter of importance to the Party related to the project proposal;**

**Identification of Environmental Impacts Table**

In the “Identification of Environmental Impacts” table, the Proponent has not indicated any potential impacts on Water quality, Hydrology/Limnology and Sediment and soil quality sections. Given the potential for fuel spills from the fuel caches onto the land, CIRNAC recommends that the Proponent clarify the rationale for concluding that there would be no impacts to water quality, hydrology/limnology and sediment and soil quality.

**Use of Heavy-duty Tarps**

In Section 9. Existing preventative measures of the Spill Contingency Plan, the Proponent states that “all Jet A fuel drums will be placed on a heavy-duty tarp in case of leakage”. CIRNAC notes that use of woven polyethylene tarpaulins is not acceptable industry best practice for secondary containment system design, and recommends that the Proponent clarify what other mitigation measures will be used in the storage of Jet A fuel drums.

**Communications with Land Users**

CIRNAC recommends that the Proponent maintain open communication with the Ikajutit Hunters and Trappers Organization (HTO), the Iviq HTO, and the Resolute Bay HTO regarding project activities. This will allow for their familiarization with the project and opportunities to ensure their interests are respected (e.g., protection of wildlife resources and contribution toward the project). In particular, the following considerations should be explored to promote the participation of local Inuit from the communities of Arctic Bay, Grise Fiord, and Resolute Bay, which are situated within the proposed study area:

- Incorporation Inuit knowledge or Inuit Qaujimajatuqangit in the project design;
- Briefing community members on planned activities;
- Briefing community members on project results; 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](mailto:Richard.Bingley2@Canada.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Felexce Ngwa', with a long horizontal flourish extending to the right.

Felexce Ngwa  
Manager, Impact Assessment

