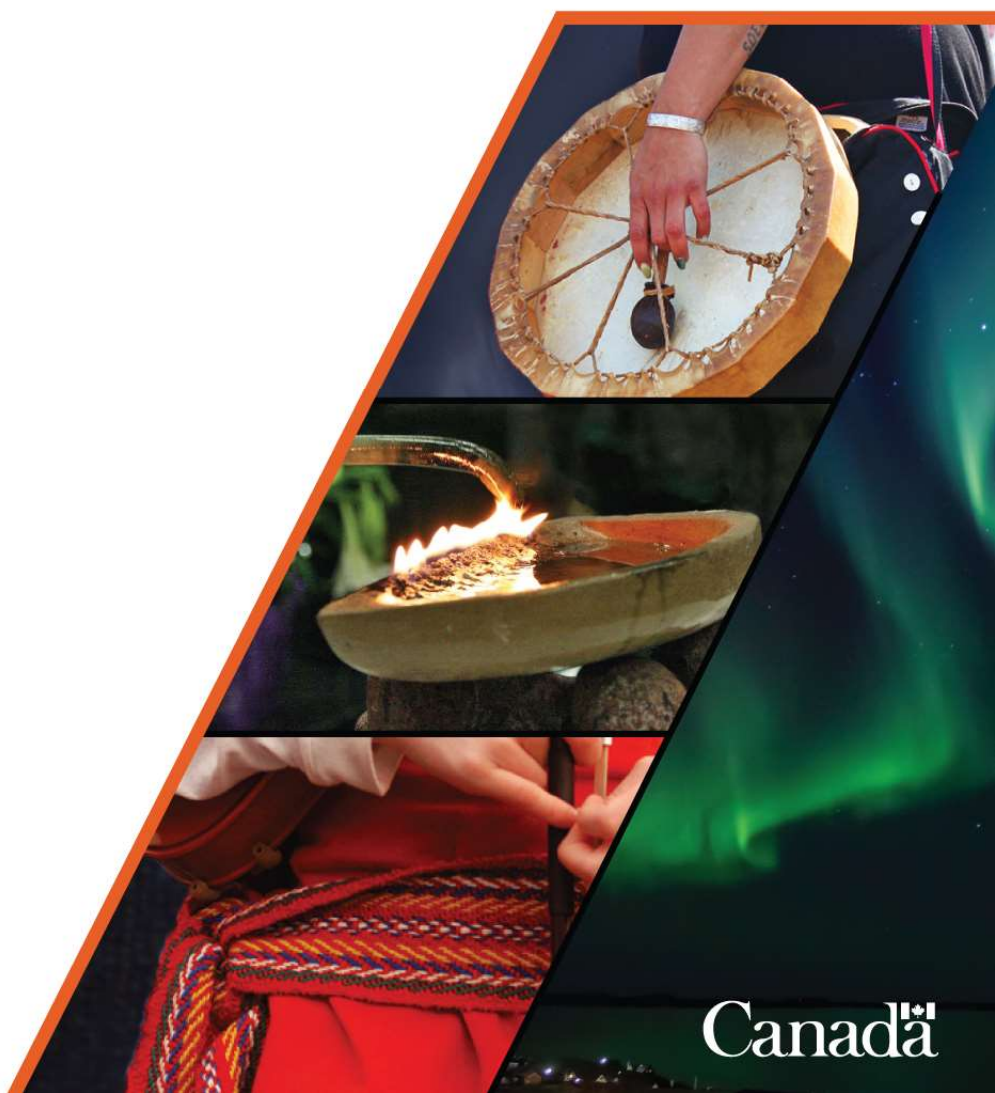




CIRNAC Comments to NIRB

Re: Notice of Screening for 994458 Nunavut Ltd.'s
“Arctic Haven Runway Overlay” Project Proposal



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

Your file - Votre référence
15TN012
Our file - Notre référence
CIDM # 1287280

August 26, 2020

Emily Koide
Technical Advisor I
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
Via e-mail: info@nirb.ca

Dear Emily Koide,

Re: Notice of Screening and Comment request for 994458 Nunavut Ltd.'s "Arctic Haven Runway Overlay" Project Proposal

On August 5, 2020, the Nunavut Impact Review Board (NIRB) invited parties to comment on 994458 Nunavut Ltd.'s "Arctic Haven Runway Overlay" 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.

CIRNAC recommends that the Proponent adopt the following additional common practices to mitigate potential adverse effects from project activities:

- 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 order to prevent their release into the environment;
- Re-fueling of all equipment should occur a minimum of thirty-one (31) meters away from the high water of any water body;



- Spill response equipment and clean-up kits (e.g. shovels, barrels, drip trays, pumps and absorbents) should be readily available during any transfer of fuel or hazardous substances, at all fuel storage sites and maintenance areas;
- Drip trays should be used when refueling equipment and be put under the engine/fuel compartment when parked;
- Limit the number of designated areas for fuel transfers;
- Any hydrocarbon contaminated soils should be treated and disposed on-site or transported to an approved off-site disposal site for treatment;
- Site personnel should be designated to routinely inspect storage containers, containment areas, drip trays, valves and conveyance lines for leaks and punctures;
- All personnel are to be properly trained in fuel handling and spill response procedures;
- All manner of fuel spill should be reported immediately for appropriate investigation and documentation;
- All fuel and chemicals should be stored so as to be inaccessible to wildlife;
- Implement suitable erosion and sediment suppression measures on all areas before, during and after conducting activities in order to prevent sediment from entering any waterbody;
- Inspect and maintain erosion and sediment control measures and structures on a regular basis during the course of construction;
- Appropriate dust suppression measures should be carried out as required;
- 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;
- Restrict construction activities to the foot print to reduce land disturbance and use existing trails where possible during project activities on land;
- All garbage, fuel and equipment shall be removed from site upon project completion; and
- All construction and road vehicles must be fitted with standard and well-maintained noise suppression devices and engine idling is to be minimized.

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

Potential Environmental Impact

The Proponent is proposing to store up to 5000 liters of fuel on site for equipment operation and use. Although, the fuel is stored in a containment cells surrounded by berms, there is still potential for release into the environment, which is not captured under the *Identification of Potential Environment Impact matrix* of the NIRB application.

CIRNAC recommends that the Proponent update the *Identification of Potential Environmental Impact matrix* to reflect the potential impacts from stored fuel and equipment use.



Community Involvement

CIRNAC recommends the Proponent maintain open communication with the Municipality of Arviat, the Arviat Hunters and Trappers Organization, and interested community members. This will allow for their familiarization with the project and provide opportunities to address any concerns or interests (e.g., wildlife protection measures, employment and contracting opportunities, etc.). In particular, the following considerations should be explored to promote the participation of local Inuit beneficiaries:

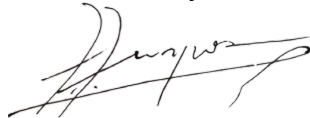
- Incorporation of Inuit knowledge or Inuit Qaujimajatuqangit in the project design;
- Briefing community members on planned activities;
- Briefing community members on project results; and
- Training and employment opportunities for community members.

Travel restrictions to prevent the spread of COVID-19 in Nunavut

CIRNAC recommends the Proponent be reminded that to help prevent the spread of COVID-19 in Nunavut, the Government of Nunavut's Minister of Health has declared a Public Health Emergency pursuant to the Public Health Act and imposed travel restrictions. The Proponent must comply with orders from the Chief Public Health Officer of Nunavut when planning project activities.

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 Vincent Okonkwo by e-mail at Vincent.okonkwo@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

