



CIRNAC Comments to NIRB

Re: Notice of Screening for Fisheries and Oceans
Canada – Small Craft Harbours’ “Clyde River
Small Craft Harbour – Clyde River Geotechnical
and Sampling Program” Project Proposal



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

Your file - Votre référence
21UN003
Our file - Notre référence
91619319

March 10, 2021

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 and Comment request for Fisheries and Oceans Canada – Small Craft Harbours’ “Clyde River Small Craft Harbour – Clyde River Geotechnical and Sampling Program” Project Proposal

Dear Mia Otokiak,

On February 18, 2021 the Nunavut Impact Review Board (NIRB) invited parties to comment on Fisheries and Oceans Canada - Small Craft Harbours’ “Clyde River Small Craft Harbour – Clyde River Geotechnical and Sampling Program” 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 may be related to management of fuel and hazardous materials and waste and can be mitigated with known practices or technology.

In section 7.2.6 Fueling and Hazardous Material Storage, Handling, and Spill Prevention of the Regulatory Compliance and Environmental Management Plan, the Proponent indicates several bullets of mitigation measures they will deploy, two of which are:

- A limited amount of fuel will be stored onsite at the drill and will be contained in a new double-walled storage tank.
- A second new double-walled storage tank will be installed in the bed of a pickup truck and used to ferry fuel from the Hamlet’s fueling station to the storage tank at the drill rig.

From these bullets, it is not clear if the Proponent will move the drill away from the shoreline to be refuelled, or if fuel, and any other hazardous material used on site, will be stored away from the shoreline when not in use. Two common practices which the Proponent could implement to mitigate risk 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 waterbody; and,

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

Potential for positive effects to Inuit beneficiaries through employment and training opportunities.

CIRNAC recommends that the Proponent prioritize the employment and training of local Inuit beneficiaries throughout the implementation of project activities. Such efforts will allow for positive effects to be realized by Clyde River community members and the local Inuit population.

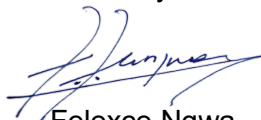
Consultation with interested parties.

CIRNAC recommends that the Proponent, and any consultants or joint venture partners acting on the Proponent's behalf, maintain open communication with the Hamlet of Clyde River, community members, and local organizations that have an interest in project activities (e.g., the Nangmautaq Hunters and Trappers Organization of Clyde River). Issues that should be considered in consultation activities include:

- Safety precautions associated with project activities, including shared use of the shoreline area and any other locations;
- Incorporation of Inuit knowledge or Inuit Qaujimajatuqangit into project activities;
- Training and employment opportunities for community members; and
- Regular updates on the status of project activities throughout its lifecycle (i.e., construction and operation).

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

