



# CIRNAC Comments to NIRB

Re: Notice of Screening for Environment and  
Climate Change Canada’s “Building Demolition  
and Temporary Camp at Eureka High Arctic  
Weather Station” Project Proposal



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

Your file - Votre référence  
21UN002  
Our file - Notre référence  
91993015

March 19, 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 Environment and Climate Change Canada's "Building Demolition and Temporary Camp at Eureka High Arctic Weather Station" Project Proposal**

Dear Mia Otokiak,

On February 26, 2021 the Nunavut Impact Review Board (NIRB) invited parties to comment on Environment and Climate Change Canada's "Building Demolition and Temporary Camp at Eureka High Arctic Weather Station" 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:

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

**CIRNAC #1: Non-Hazardous Disposal Facility**

Under the Site Cleanup section of the Project Application for NIRB file 21UN002, the Proponent indicates that "the non-hazardous disposal facility is currently in the design stage with details to be submitted in early 2021 as part of a separate application". It is unclear why the second proposed project is not included in the current application, due to their related and complementary nature.

Further, it is unclear if this new facility is required for the disposal of non-hazardous waste generated from the proposed project activities, or if there is a non-hazardous waste facility on site which can accommodate some or all of the wastes related to the proposed activities. If the new facility is required, providing the design and construction plans of the facility for the NIRB to canvas comments from interested parties could lower risks associated with the proposed project.



CIRNAC recommends that the Proponent provide rationale for the second proposed project, related to the construction of a new non-hazardous disposal facility, and this Project being applied for separately. Also, if the new non-hazardous waste facility is required for the proposed project activities, CIRNAC recommends that the Proponent submit the design and construction plans to the NIRB to collect comments from interested parties prior to the start of the proposed project activities.

### **CIRNAC #2: Hazardous Waste Management Table**

In the Waste Management Table of the Project application, the Proponent indicates that 12 tonnes of hazardous waste will be generated and stored on site for future use. It is unclear what the hazardous waste will be used for, and when the waste will be removed from site.

CIRNAC recommends that the Proponent clarify what the 12 tonnes of Hazardous waste will be used for, how long it is expected to remain on site, and how the Proponent intends to process the waste.

### **CIRNAC #3: Proposed Plans to be Provided**

In the Project application, the Proponent indicates that the plans listed below will be prepared prior to the start of construction:

- Environmental Protection Plan;
- Health and Safety Plan;
- Emergency Response Plan;
- Erosion, Sediment and Drainage Control Plan;
- Spill Contingency Plan;
- Fire Safety Plan;
- Worker Orientation Seminar;
- Building Deconstruction/Decontamination Plan; and
- Waste Management Plan.

CIRNAC notes that risk associated with the project activities could be lowered by provision of these plans for comments from parties, through the NIRB screening processes.

Further, the Eureka High Arctic Weather Station has been in commission since 1947 (see Nunavut Water Board Public Registry, 1999 application under 8BC-EUR1621). Given this construction date, it is unclear if asbestos used as an insulation is a concern in the buildings being demolished.

CIRNAC recommends that the plans listed above be submitted to the NIRB to collect comments from interested parties prior to the start of the proposed project activities. CIRNAC also recommends that the Proponent clarify if there is asbestos in the buildings



targeted to be demolished, and if so, whether the Building Deconstruction/Decontamination Plan will encompass specific measures for mitigating potential impact that may result from demolition of any buildings that may contain asbestos.

#### **CIRNAC #4: Water Consumption Table**

CIRNAC notes that the water consumption table indicates that the Proponent intends to retrieve water for use in the proposed activities from Station Creek, but has the intended water use listed as 0m<sup>3</sup>. It is unclear how much water is expected when the Identification of Impacts and Proposed Mitigation Measures section of the Project application indicates that one dust mitigation measure includes application of water for road dust emissions.

CIRNAC recommends that the Proponent indicate the expected volume of water to be drawn for the proposed activities.

#### **CIRNAC #5: Permit for Archaeological Assessment**

In the Project Proposal, the Proponent indicates that, “A permit to conduct the archaeological assessment will be requested from Crown-Indigenous Relations and Northern Affairs Canada prior to March 31st...”. CIRNAC notes that permits for archaeological assessments are not regulated by CIRNAC.

CIRNAC recommends that the Proponent request permit information from the Government of Nunavut’s Department of Culture and Heritage.

#### **CIRNAC #6: 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 its implementation of project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. It is noted that the community of Grise Fiord is in closest proximity to the project location. As a result, members of this community should be prioritized in any project related employment and training opportunities.

#### **CIRNAC #7: Consultation with interested parties.**

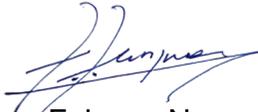
CIRNAC recommends that the Proponent maintain open communication with the Hamlet of Grise Fiord, the Iviq Hunters and Trappers Organization, community members, and local organizations that have an interest in project activities. Issues that should be considered in consultation activities include:

- 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.



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,



Felexce Ngwa  
Manager, Impact Assessment

