



April 6, 2021

Mia Otokiak
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Nunavut Impact Review Board
P.O. Box 1360
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VIA EMAIL

Subject: Response to CIRNAC Information Requests (210319-21UN002)

Dear: Mia Otokiak,

On behalf of Environment and Climate Change Canada (ECCC), please find enclosed our responses to Crown- Indigenous Relations and Northern Affairs Canada (CIRNAC)'s information requests pertaining to ECCC's "Building Demolition and Temporary Camp at Eureka High Arctic Weather Station" (HAWS) Project (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.

ECCC #1: Response

The second proposed project, the non-hazardous disposal facility, was not included in the current application as the project was not far enough along in its planning development in comparison to this Project.



Though complementary in nature, this Project had to be submitted earlier as approval timing on this Project was essential to maintain the HAWS schedule of activities due to the following:

- it is integral to ensure the amendment and extension of the existing Water Licence No. 8B-EUR1621 is completed as soon as possible as the existing permit expires on August 10, 2021; and
- a request to extend Quarrying Permit 2018QP0001 is also included as it is due to expire on June 17, 2021.

Please note, it is expected that the demolition and temporary camp components of the Project may be delayed till summer 2022. The development of the non-hazardous disposal facility is also planned to be built in summer 2022. ECCC can modify the NIRB submission to revise the dates, if directed by NIRB.

The existing waste disposal area at the HAWS does not have the capacity to accept this anticipated additional non-hazardous waste associated with the Project.

To ensure an equitable and fair construction tendering process, design and construction plans cannot be made publicly available at this time.

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.

ECCC #2: Response.

The estimated 12 tonnes of waste identified within Waste Management Table is timber from onsite power poles and existing buildings proposed to be demolished.

Should the timber be found to be hazardous, it would be shipped offsite for disposal.

Any non-hazardous timber could be re-used as building material for the operation of the HAWS and thus recommended to be stored on site until future use is designed.

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.

ECCC #3: Response.

The aforementioned plans will be part of the construction tender process and a requirement for the successful contractor to provide to ensure compliance with regulations and execution of mitigation measures.

ECCC can confirm there is asbestos in the buildings. The guidelines and code of practice listed below will be followed to mitigate potential impact for those buildings which contain asbestos:

Guidelines and Code of Practice

- Environmental Guideline for the General Management of Hazardous Waste, Department of Environment Government of Nunavut, revised October 2010.
- Environmental Guideline for Waste Asbestos, Department of Environment Government of Nunavut, revised January 2011
- Northwest Territories and Nunavut Codes of Practice Asbestos Abatement, Worker's Safety and Compensation Commission, in effect May 30, 2012

Once removed, asbestos will be appropriately containerized and disposed at an approved location.

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 0m³. 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.

ECCC #4: Response.

It is expected that this Project will not exceed the water usage limits that have already been authorized. Therefore, this Project request submission identified water use at 0m³.

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.

ECCC #5: Response

On March 11, 2021 a permit request for archaeological work was submitted to 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.

ECCC #6: Response

On January 19, 2021, Project information was provided to the community of Grise Fiord and the Iviq Hunters and Trappers Organization as recommended by NIRB on September 4, 2020. On March 9, 2021, notification letters describing the proposed archaeological impact assessment work were also sent to the Qikiqtani Inuit Association and the Iviq Hunters and Trappers Organization.

Local Inuit individuals will be hired to provide ongoing wildlife monitoring and support during the archaeological impact assessment, as well as throughout the duration of the project. Furthermore, these groups, as well as other interested organizations, communities and Inuit businesses, will also be further notified prior to any procurement/employment opportunities are made public.

Projects awarded through PSPC are required to follow Article 24 (Government Contracts) of the Nunavut Land Claims Agreement. All procurements where the deliverables of a contract, or even a portion of them, are to be delivered or performed in the Nunavut Settlement Area (NSA), must follow the prescribed procurement measures contained in the [Directive on Government Contracts, including Real Property Leases in the Nunavut Settlement Area](#).

All contractors bidding on the Project will be asked to provide an Inuit Benefits Plan (IBP) with their proposal. The plan should demonstrate how they will provide employment, training and sub-contracting opportunities for Inuit community members and businesses through the course of the project. The IBP will be worth between 30 to 35 percent of the proposal's point rated evaluation. Once the contract is awarded, the winning bidder's plan becomes part of their contract deliverables and will be monitored and reported annually

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 Qaujimagatuqangit into project activities;*
- *Training and employment opportunities for community members; and*
- *Regular updates on the status of project activities.*

ECCC #7: Response

Please refer to ECCC #6 Response.

ECCC will provide annual updates on the status of the Project activities to the community of Grise Fiord, the Iviq Hunters and Trappers Organization and any other communities or groups that have expressed interest in the proposed Project.

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With the exception of personal information, all comments will become part of the public record.

Best Regards,

Jean-Philippe Cloutier-Dussault