



CIRNAC Comments to NIRB

Re: Notice of Screening for MPH Consulting
Limited's "Turquetil Esker Drilling Program" Project
Proposal



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

Your file - Votre référence
21EN009
Our file - Notre référence
94650864

May 18, 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 MPH Consulting Limited's
"Turquetil Esker Drilling Program" Project Proposal**

Dear Mia Otokiak,

On April 27, 2021, the Nunavut Impact Review Board (NIRB) invited parties to comment on MPH Consulting Limited's "Turquetil Esker Drilling 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 #1: Secondary Containment for Fuel Caches

In Section 4 of the Environment Management Plan, the Proponent states that, "At least one empty container of equal or greater quantity of the fullest fuel container to be in placed at each cache for secondary containment in case of the necessity of fuel transfer."

It is unclear if the empty containers used will encompass all of the fuel stored at each cache.

CIRNAC recommends that the Proponent ensure that the fuel stored on site is stored in secondary containment that encompasses all fuel stored on site.



CIRNAC #2: Fuel Cache and Drill Sump Locations

There is inconsistency in the Proponent's minimum setback for placement of fuel caches and drill sumps from water bodies.

In the Project Application form, the Proponent indicates that, *"All fuel caches will be located a minimum of 30 meters from the normal high water mark"*, as well as, *"All drill sludges will be collected in a hand dug collection sump or natural depression located no less than 31 metres from the ordinary high water mark of any water body."*

In the Environmental Management Plan, the Proponent states that *"all fuel caches will be located a minimum of 30 meters from the normal high-water mark. Spill kits will be present at all fuel caches and drilling operations"*. The Proponent also states that *"all drill cuttings will be re-deposited back down the hole if possible before freezing, or disposed of and contained in natural depressions or hand dug sumps located at least 30 meters from any high-water mark such that the cuttings do not enter any water"*.

CIRNAC recommends that the Proponent clarify that drill wastes to be stored in sumps or depressions, and any fuel caches will be located a minimum of 31 meters from the high-water mark of any waterbody.

CIRNAC #3: Fuel Contingency Plan and Contaminated Material Removal

CIRNAC notes that the spill contingency plan indicates, in section 6.1 spills on land, that the final step in the remediation process is to *"Transport contaminated material to approved disposal or recovery site. Equipment used will depend on the magnitude and location of the spill."* Similarly, in section 6.2 regarding spills on snow, the proponent plans to *"Transport contaminated material to approved disposal site. Equipment used will depend on the magnitude and location of the spill."*

CIRNAC notes further that the final fate of recovered contaminated ice in section 6.3 and recovered contaminated water in section 6.4 are not specified.

CIRNAC recommends that the Proponent clarify the final fate of the contaminated ice and water.

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

CIRNAC #4: Measures to Prevent the Spread of COVID-19

CIRNAC notes that there are current orders from the Chief Public Health Officer of Nunavut which may impact the ability for the Proponent to conduct their activities in Nunavut. This is especially true with the proposed weekly resupply trips to Arviat.



CIRNAC recommends that the Proponent coordinate any activities with the Government of Nunavut, Department of Health, to ensure that they are compliant with any health orders currently in effect.

CIRNAC #5: Potential for Positive Effects to Inuit Through Employment, Training, and Procurement Opportunities

CIRNAC recommends that the Proponent prioritize the employment and training of local Inuit as well as procurement with Inuit owned business when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. As a result, Arviat community members and businesses should be prioritized in any project-related employment and procurement opportunities that may be made available.

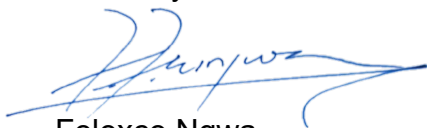
CIRNAC #6: Consultation with Interested Parties

CIRNAC recommends that the Proponent maintain open communication with the Hamlet of Arviat, the local Hunters and Trappers Organization, as well as any community members and organizations which may have an interest in the project's activities. Issues that should be considered as part of any consultation activities include:

- Incorporation of Inuit knowledge or Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities in close proximity to the project area;
- Training and employment opportunities for community members;
- Procurement opportunities for local businesses, 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 by e-mail at Richard.Bingley2@Canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

