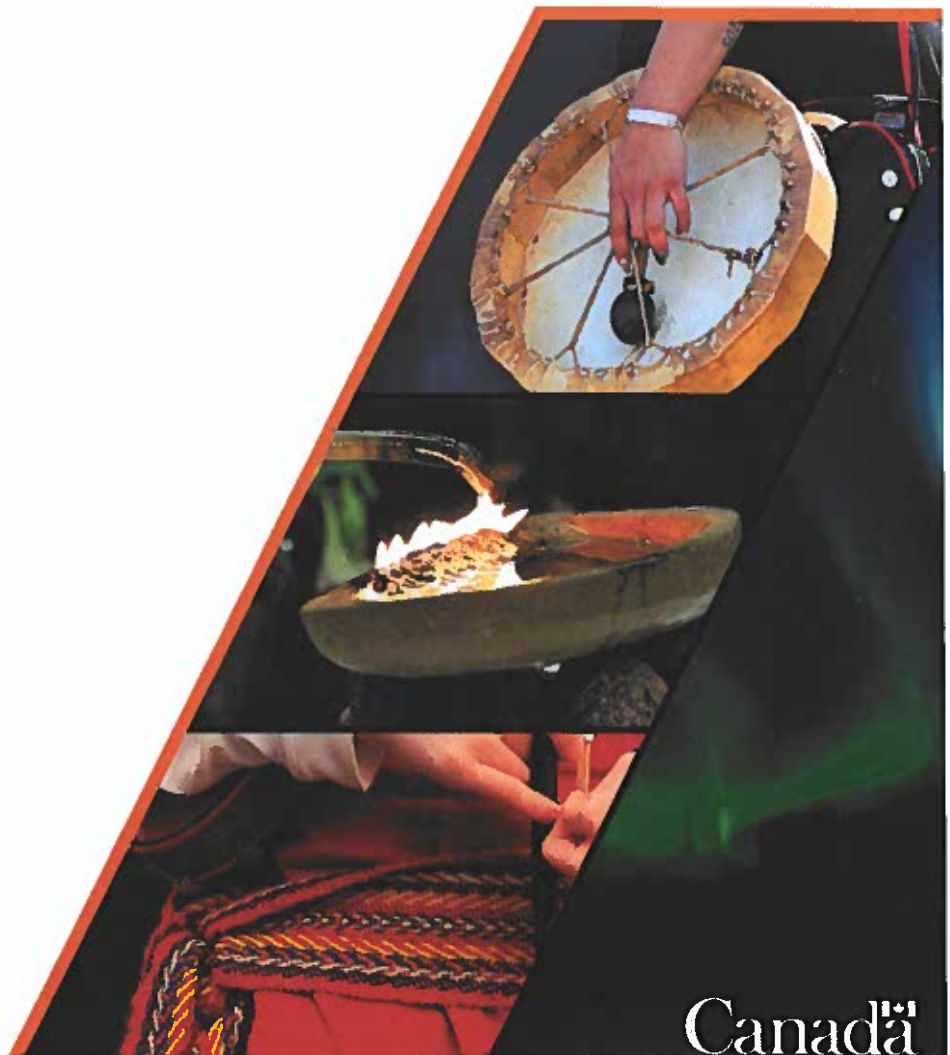




CIRNAC Comments to NIRB

Re: Notice of Screening for Government of
Nunavut's "3AM-ARV1016 Municipal Water
Licence Amendment" Project Proposal



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

Your file - Votre référence
21UN019
Our file - Notre référence
GCdocs #96404337

July 28, 2021

Francis Emingak
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 Government of Nunavut's "3 AM-ARV1016 Municipal Water Licence Amendment" Project Proposal

Dear Francis Emingak,

On July 7, 2021, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "3 AM-ARV1016 Municipal Water Licence Amendment" 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: Decommissioning of the existing wastewater lagoon

One of Stantec's recommendations within the Business Case Report is that *"a study on the existing lagoon cells should be conducted to study the permeability of the existing berms and cell bottom. The study will confirm if the existing berms and bottom should be retrofit or removed in new cell construction."* CIRNAC recommends the Proponent



conducts such study and informs the NIRB about the selected option for the new cell construction.

The project application does not provide any details about environmental impact of the decommissioning of the existing wastewater lagoon.

CIRNAC recommends the Proponent provides some clarification on its plan to conduct site cleanup and remediation works with regards to lagoon decommissioning and to determine if human health or ecological risks are anticipated and mitigated.

CIRNAC #2: Permafrost

The proposed project has the potential to cause permafrost degradation. CIRNAC notes that in the “Geotechnical Report” of the project application, the Proponent states *“Developing the future SWMF and WWTF at the selected locations therefore requires specific design and operation procedures so that permafrost remains frozen to the greatest extent practical”*. It is not clear from the project application how the construction work and operation of the facility will follow these recommendations. CIRNAC recommends the Proponent provides some clarification on its plan to incorporate permafrost protection measures during construction and operation.

CIRNAC #3: Fuel and the Identification of Environmental Impacts Matrix

CIRNAC notes that, though the expanded facility is not expected to use fuel in operations, the construction of the facility expansion will require fuel. The Proponent does not indicate any spill mitigation measure for potential spills from the construction phase of the project.

Additionally, CIRNAC notes that the *Detail Fuel and Hazardous Material Use* table (located in the Proponent’s NIRB application) does not indicate the use of fuel and potential of negative effects that may occur on the environment. Given that there is a potential for fuel spill during the construction phase, CIRNAC recommends that the Proponent provides rationale for not identifying potential environmental impacts in the Identification of Environmental Impacts Matrix, and expands on measures that will be used to mitigate any fuel spills that may occur during project activities.

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

CIRNAC # 4: Potential for positive effects to Inuit through employment, training, and procurement opportunities.

CIRNAC recommends that the Proponent prioritizes the employment and training of local Inuit as well as procurement with Inuit-owned businesses 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, Inuit and Inuit-owned businesses situated in Arviat should be prioritized in any project-related employment, training and procurement opportunities that may be made available.

CIRNAC #5: Consultation with interested parties.

CIRNAC recommends that the Proponent and the Hamlet of Arviat consult with community members and organizations which may have an interest in the project's activities (e.g., the Arviat Hunters and Trappers Organization). Issues that should be considered as part of any consultation activities include:

- Safety precautions associated with sewage treatment facility construction and operation;
- Incorporation of Inuit knowledge and Inuit Qaujimajatuqangit into project activities;
- 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 Courtney White by e-mail at courtney.white@canada.ca or David Abernethy at (867) 222-1610 or email at david.abernethy@canada.ca.

Sincerely,



Amal Roy
A/Manager, Impact Assessment

