



CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's "Baker Lake Landfarm" Project Proposal



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

Your file - Votre référence
22XN014
Our file - Notre référence
GCdocs# 103257268

May 19, 2022

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 "Baker Lake Landfarm" Project Proposal

Dear Francis Emingak,

On April 28, 2022, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "Baker Lake Landfarm" 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: Landfarm Equipment Operations

The Proponent indicates in the Operations Plan that "When equipment leaves the landfarm care should be taken not to track excess material out of the berm." It is not clear what measures will be taken to remove any material which may gather on equipment used in the landfarm treatment area.

CIRNAC recommends that the Proponent clarify what measures will be taken to ensure that equipment used in the landfarm remediation area is cleaned prior to removal from the landfarm.

CIRNAC #2: Landfarm Dust Suppression

The Proponent indicates in the NIRB application that the run-off water will accumulate in a retention pond, which will be recycled over the landfarm materials to maintain moisture content. However, it is unclear if there will be sufficient water in the annual precipitation over the landfarm footprint to allow for adequate dust suppression of the landfarm facility.

CIRNAC recommends that the Proponent clarify if the annual precipitation falling over the footprint of the facility is expected to be adequate for dust suppression efforts of the facility, and if not, provide quantities of water to be sourced from surrounding water bodies to meet the project's dust mitigation needs.



CIRNAC #3: Projected Water Consumption

The Proponent indicates in the NIRB application that there is an expected daily consumption of 200 cubic meters of water. However, under Water Retrieval Location, the Proponent states “All water will be discharge after meeting all discharge criteria as per Environment Canada and Nunavut Water Act before discharge after treatment.” It is unclear if the proponent intends to consume 200 cubic metres of water or plans to return the entire amount into water bodies after treatment.

CIRNAC recommends the Proponent clarify what water consumption is expected.

CIRNAC #4: Potential for Positive Effects to Inuit Through Employment, Training, and Procurement Opportunities

CIRNAC recommends that wherever possible, the Proponent prioritize 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 Baker Lake should be prioritized in any project-related employment, training, and procurement opportunities that may be made available.

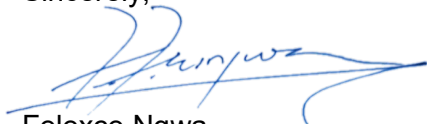
CIRNAC #5: Consultation with Interested Parties

CIRNAC recommends that the Proponent consult with the Hamlet of Baker Lake and the Baker Lake Hunters and Trappers Organization. Issues that should be considered as part of any consultation activities should include:

- Incorporation of Inuit knowledge and 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 within or 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 phases related to this project. Should you have any questions, please contact Richard Bingley by e-mail at richard.bingley2@rcaanc-cirnac.gc.ca or Jalen Tagoona at (867) 975-4663 or email at Jalen.tagoona@rcaanc-cirnac.gc.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

