



**NIRB File No.: 22YN035**  
NPC File No.: 149781

June 8, 2022

Katherine Crichton  
University of Exeter  
364 Route de Charavines Bilieu 38850  
Bristol, United Kingdom BS5 9HQ

Sent via email: [k.a.crichton@exeter.ac.uk](mailto:k.a.crichton@exeter.ac.uk) and [a.gallego-sala@exeter.ac.uk](mailto:a.gallego-sala@exeter.ac.uk).

**Re: Notice of Screening for University of Exeter’s “ICAAP Increasing Carbon Accumulation in Arctic Peatlands” Project Proposal**

Dear Katherine Crichton:

On May 26, 2022, the Nunavut Impact Review Board (NIRB) received a referral to screen University of Exeter’s “ICAAP Increasing Carbon Accumulation in Arctic Peatlands” project proposal from the Nunavut Planning Commission (Commission), with an accompanying positive conformity determination with the North Baffin Regional Land Use Plan. Pursuant to Article 12, Sections 12.4.1 and 12.4.4 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and s. 87 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*), the NIRB has commenced screening this project proposal and has assigned it file number **22YN035**.

#### INFORMATION REQUEST

On May 26, 2022, the NIRB requested that the Proponent complete the online application form through the NIRB’s Public Registry system and ensure, pursuant to s. 144(1) of the *NuPPAA*, that sufficient information is provided to determine the scope of the project activities being proposed and commence screening.

On May 30, 2022, the NIRB received the required information and commenced the screening pursuant to Part 3 of the *NuPPAA*.

## PROJECT OVERVIEW

### **Project Scope:**

All documents received and pertaining to this project proposal can be accessed from the NIRB's online Public Registry at [www.nirb.ca/project/125700](http://www.nirb.ca/project/125700).

<b>Project:</b>	ICAAP Increasing Carbon Accumulation in Arctic Peatlands
<b>Region:</b>	Qikiqtani (North Baffin) Region
<b>Location:</b>	Within 25 kilometres (km) of the community of Pond Inlet
<b>Summary of Project Description:</b>	The Proponent intends to conduct research to better understand the carbon dynamics of Arctic peatlands.
<b>Project Proposed Timeline:</b>	July 2022

According to the project proposal, the scope of the project includes the following undertakings, works or activities:

- Use of All-terrain vehicles (ATV) for transportation to terrestrial sample sites;
- May use a boat to access sample site 5 if time permits;
- Use of diesel-powered peat corer to collect soil core, including permanently frozen ground;
- Use of handheld soil sampler to collect samples at research sites;
- Use of a micro drone to survey the topography and plant communities at sample sites;
- Use of accommodations within the community of Pond Inlet; and
- Hiring of local guides and rental of ATV's and boat for transportation.

### **Inclusion or Exclusion of Scoping List**

At this time, the NIRB has identified no additional works or activities in relation to the project proposal. As a result, the NIRB will proceed with screening the project based on the scope as described above.

## REQUEST FOR COMMENTS

All documents received can be accessed from the NIRB's online Public Registry at [www.nirb.ca/project/125700](http://www.nirb.ca/project/125700) and include:

- *Commission Conformity Determination*
- *Commission Application and Questionnaire*
- *NIRB's Online Application*
- *ICAAP Island A Map Proposed Soil Samples Sites*
- *ICAAP Island B Map Proposed Soil Sampled Sites*
- *Non-Technical Project Description*
- *Technical Project Description*

The NIRB will copy you on screening process related correspondence and upload related documents to the NIRB's online Public Registry for public access. The NIRB may request additional information at any time during the process.

The NIRB is copying parties and municipalities potentially affected by University of Exeter's project proposal with this letter, and we invite interested parties to comment directly to the NIRB by **June 20, 2022**.

The NIRB would like parties to provide comments regarding:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;
- Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why;
- Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures); and
- Any matter of importance to the Party related to the project proposal.

Please note that *proposed* project-specific terms and conditions, should the project proceed, have been attached for consideration and comment ([Appendix A](#)).

#### CONTACT INFORMATION

Please send your comments to the NIRB via email at [info@nirb.ca](mailto:info@nirb.ca), via fax at (867) 983-2594 or via the individual project dashboard for this assessment on the NIRB's online Public Registry at [www.nirb.ca/project/125700](http://www.nirb.ca/project/125700).

If you have any questions or require clarification, feel free to contact the undersigned at (867) 983-4622 or [motokiak@nirb.ca](mailto:motokiak@nirb.ca).

Sincerely,



Mia Otokiak  
Junior Technical Advisor  
Nunavut Impact Review Board

Attachments: Appendix A: *Proposed* Project Specific Terms and Conditions

Enclosures (4): Public Notice of Screening (English and Inuktitut)  
Comment Forms (English and Inuktitut)

cc: Distribution List  
Carson Gillis, Nunavut Tunngavik Incorporated  
Jorgen Aitaok, Nunavut Tunngavik Incorporated  
Stephen Williamson-Bathory, Qikiqtani Inuit Association  
Joel Fortier, Qikiqtani Inuit Association  
Jared Ottenhof, Qikiqtani Inuit Association  
Agnes Simonfalvy, Government of Nunavut  
Michele LeBlanc-Havard, Government of Nunavut – Department of Environment  
Moshia Cote, Nunavut Research Institute

## Appendix A: Proposed Project Specific Terms and Conditions

The following is a list of project-specific terms and conditions which, should the project proceed, may be recommended to be attached to any approval.

### General

1. University of Exeter (the Proponent) shall always maintain a copy of the Project Terms and Conditions at the site of operation and make it accessible to enforcement officers upon request.
2. The Proponent shall operate in accordance with all commitments stated in correspondence provided to the Nunavut Planning Commission (NPC File No.: 149781) and the NIRB (Online Application Form, May 30, 2022). This information should be accessible to enforcement officers upon request.
3. The Proponent shall operate the site in accordance with all applicable Acts, Regulations and Guidelines.
4. The Proponent shall ensure that it meets the standards and/or limits as set out in the authorizing agencies' permits or licences as required for this project.
5. The Proponent shall ensure that all personnel, staff, and contractors are adequately trained prior to commencement of all project activities, and shall be made aware of all operational plans, management plans, guidelines and Proponent commitments relating to the project.

### Waste Management

6. The Proponent shall manage all hazardous and non-hazardous waste including domestic wastes, debris, and petroleum-based chemicals (e.g., gasoline, diesel) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.

### Fuel and Chemical Storage

7. Unless otherwise authorized, the Proponent shall ensure that re-fuelling of all equipment occurs a minimum distance away from the high-water mark of any water body as required by the appropriate authorizing agencies.
8. The Proponent shall have a Spill Contingency Plan in place at all fuel storage or transfer locations and shall ensure that appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) are readily available.
9. The Proponent shall follow the authorizing agencies' direction for management and removal of hazardous materials and wastes (e.g., contaminated soils, sediment, and waste oil).
10. The Proponent shall ensure that wildlife deterrent systems are utilized at the time of a spill incident in order to avoid wildlife (terrestrial or marine) and migratory birds from being contaminated.
11. The Proponent shall ensure that all spills of fuel or other deleterious materials of 100 litres or more must be reported immediately to the 24-hour Spill Line at (867) 920-8130.

## **Wildlife – General**

12. The Proponent shall not substantially alter or damage or destroy any wildlife habitat in conducting this operation unless otherwise authorized by the appropriate authorizing agencies.
13. The Proponent shall not chase, weary, harass or molest wildlife. This includes persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or disturbing large groups of animals.
14. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.
15. The Proponent shall ensure that all wildlife have the right-of-way on any roads or trails. Vehicles are required to slow down or stop and wait to permit the free and unrestricted movement of wildlife across roads or trails at any location.

## **Migratory Birds and Raptors Disturbance**

16. The Proponent shall carry out all phases of the project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's *Avoidance Guidelines*. The Proponent's actions in applying the *Avoidance Guidelines* shall be in compliance with the *Migratory Birds Convention Act, 1994* and with the *Species at Risk Act*.
17. The Proponent shall not disturb or destroy the nests or eggs of any birds. If active nests of any birds are discovered or located (i.e., with eggs or young), the Proponent shall avoid these areas until nesting is complete and the young have naturally left the vicinity of the nest by establishing a protection buffer zone<sup>1</sup> appropriate for the species and the surrounding habitat.
18. The Proponent shall avoid the seaward site of seabird colonies and areas used by flocks of migrating waterfowl, a minimum distance away on the recommendation of the appropriate authorizing agencies.
19. The Proponent shall not pursue seabirds or waterbirds swimming on the water surface and shall avoid concentrations of these birds if encountered on the water

## **Marine Activities**

20. The Proponent shall not visit cliffs used by nesting and breeding birds during the late afternoon or early evening hours during the months of August and September.
21. The Proponent shall not attempt to intersect or interfere with the movements of marine mammals. This includes ensuring that there are no wake zones within 250 metres and a minimum of 100 metre no go zone around marine mammals. Strategic positioning of vessels ahead of the path being traveled by mobile mammals and waiting for the mammals to pass is also prohibited.

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<sup>1</sup> Recommended setback distances to define buffer zones have been established by Environment and Climate Change Canada for different bird groups nesting in tundra habitat and can be found at [www.ec.gc.ca/paom-itmb](http://www.ec.gc.ca/paom-itmb).

22. When marine mammals appear to be trapped or disturbed by vessel movements, the Proponent shall implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife have moved away from the immediate area.
23. The Proponent shall maintain a distance of 100 metres if a Polar Bear is encountered on land or ice while conducting activities from a zodiac or other small craft; all interaction with Polar Bears should be avoided if possible.

### **Drone Flight Restrictions**

24. The Proponent shall not alter flight paths to approach wildlife and avoid flying directly over animals.
25. The Proponent shall plan flight paths that minimize flights over known habitat likely to have birds or concentrations of wildlife. Drones should avoid critical and sensitive wildlife areas at all times by choosing alternate flight path.
26. The Proponent shall avoid known concentrations of birds (e.g., bird colonies, moulting areas) by a lateral distance of 1.5 kilometre.

### **Road and Ground Disturbance**

27. The Proponent shall not move any equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging. Overland travel of equipment or vehicles must be suspended if rutting occurs.

### **Land Use and Restoration of Disturbed Areas**

28. The Proponent shall use existing trails where possible during project activities on the land.
29. The Proponent shall ensure that the land use area is kept clean and tidy at all times.
30. The Proponent shall remove all garbage, fuel and equipment upon completion of work.
31. The Proponent shall ensure that all disturbed areas are restored to a stable or pre-disturbed state using Best Available Technology Economically Achievable (BATEA) upon completion of work.

### **Heritage Sites**

32. The Proponent shall ensure that archaeological and paleontological sites are not purposely or inadvertently disturbed by clients or staff as a result of project activities.
33. The Proponent shall ensure that all clients and staff are aware of the Proponent's responsibilities and requirements regarding archaeological or palaeontological sites that are encountered during land-based activities. This should include briefings explaining the prohibitions regarding removal of artifacts, and defacing or writing on rocks and infrastructure.
34. No activities shall be conducted in the vicinity (50 metres buffer zone) of any archaeological/historical sites. If archaeological sites or features are encountered, activities shall immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Government of Nunavut-Department of Culture and Heritage.

## Other

35. The Proponent should engage with local residents regarding planned activities in the area and should solicit available Inuit Qaujimaningit and information regarding current recreational and traditional usage of the project area which may inform project activities. Posting of translated public notices and direct engagement with potentially interested groups and individuals prior to undertaking project activities is strongly encouraged.
36. The Proponent shall ensure that project activities do not interfere with Inuit wildlife harvesting or traditional land use activities.
37. The Proponent should, to the extent possible, hire local people and access local services where possible.