

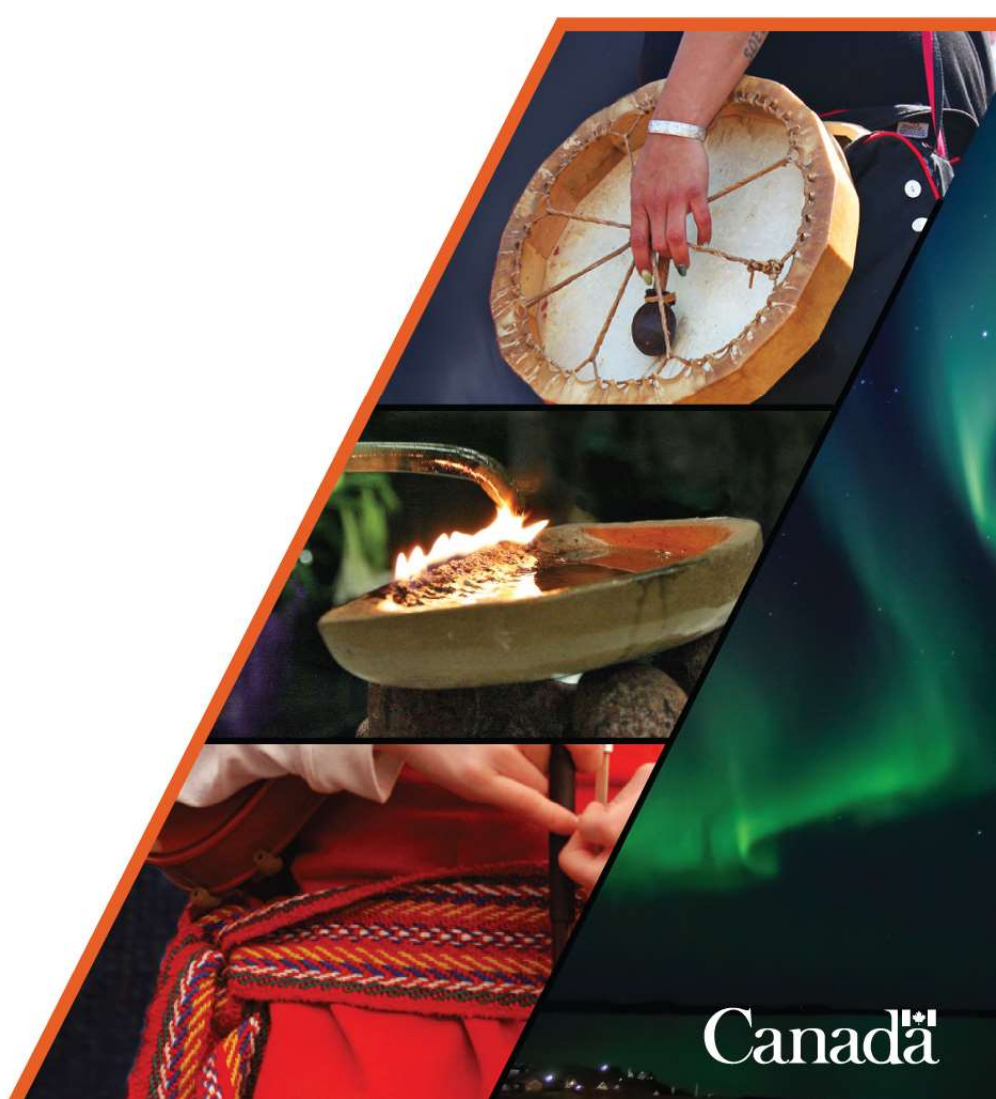


# CIRNAC Comments to NIRB

Re: Notice of Screening for Nunavut Nukkiksautiit Corporation “Anuriqjuak Nukkiksautiit Project” Proposal



GCDOCS # 105956818



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

Your file - Votre référence  
22XN052  
Our file - Notre référence  
GCdocs# 105956818

September 16, 2022

Mia Otokiak  
Technical Advisor I  
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 Nunavut Nukkiksautiit Corporation  
“Anuriquiak Nukkiksautiit Project” Proposal**

Dear Mia Otokiak,

On August 26, 2022 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Kivalliq Alternative Energy's "Coral Harbour Solar and Energy Storage Project" proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the response below as it pertains to NIRB'S request:

**Any matter of importance to the Party related to the project proposal.**

**CIRNAC 1: Environmental Impacts**

The Proponent has identified negative but mitigatable impacts on the biophysical environment within their project application. The identified risks have been assessed through the project application documents, and a monitoring program has been identified.

CIRNAC recommends the Proponent implement a tracking measure into their project to ensure all potential impacts have been identified and addressed prior to fieldwork commencing. This would allow the Proponent to track and mitigate all potential risks within the project area and access road; including but not limited to designated environmental areas, hydrology, permafrost, ground stability, air quality, human health, water quality, sediment and soil quality, acid rock drainage, and wildlife.

**CIRNAC 2: Additional Information**

The Proponent has not provided a discussion of project impacts on permafrost and potential for development of Acid Rock Drainage and Metal Leaching (ARD/ML) associated with the access road construction. CIRNAC recommends the Proponent to assess the project impact on permafrost and ensure mitigation measures are identified and implemented to prevent permafrost degradation. Furthermore, CIRNAC recommends that the Proponent ensures the potential for ARD/ML has been assessed and appropriate mitigation measures incorporated into the design of the project.



### **CIRNAC 3: Combustible Waste Management**

The Proponent mentions in its application that “combustible waste will be disposed of using the communities current waste disposal methods”. CIRNAC notes that the onus is on the proponent to ensure that its waste disposal practices are compliant with applicable regulations. CIRNAC recommends that the Proponent use a compliant waste management facility for disposal of combustible waste.

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

CIRNAC recommends that the Proponent prioritize the employment and training of Inuit located in Sanikiluaq 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 Sanikiluaq 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 continue to consult with the Hamlet of Sanikiluaq who has an interest in the project’s activities. Issues that should be considered as part of any consultation activities include:

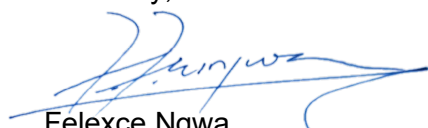
- Incorporation of Inuit knowledge and Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- Use of access roads for project related activities;
- Training and employment opportunities for community members;
- Procurement opportunities for local businesses, and
- Regular updates on the status of project activities.

### **CIRNAC 6: Annual reporting**

If the project is approved to proceed, CIRNAC recommends that the Proponent submit annual reports to the NIRB that include relevant information such as updates on the status of the project, consultation efforts, management plans, and monitoring activities. Information collected under the yet to be provided Wildlife Monitoring Plan and Socio-Economic Monitoring Plan referenced in the proposal should be provided to the NIRB for assessment and information sharing purposes.

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@rcaanc-cirnac.gc.ca](mailto:courtney.white@rcaanc-cirnac.gc.ca) or David Abernethy by email at [david.abernethy@rcaanc-cirnac.gc.ca](mailto:david.abernethy@rcaanc-cirnac.gc.ca).

Sincerely,



Felexce Ngwa  
Manager, Impact Assessment

