



NIRB File No.: 22XN052
NPC File No.: 149782

September 20, 2022

Heather Shilton
Nunavut Nukkiksautiit Corporation
P.O Box 1228
Iqaluit, NU X0A 0H0

Sent via email: hshilton@qcorp.com

Re: Opportunity To Address Comments Received Regarding Nunavut Nukkiksautiit Corporation's "Anuriquak Nukkiksautiit Project" Proposal

Dear Heather Shilton:

On July 22, 2022, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Nunavut Nukkiksautiit Corporation's "Anuriquak Nukkiksautiit Project" proposal from the Nunavut Planning Commission (NPC or Commission). On August 26, 2022, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by September 16, 2022.

On or before September 16, 2022, the NIRB received comments from the following interested parties:

- *Crown – Indigenous Relations and Northern Affairs Canada (CIRNAC)*
- *Environment and Climate Change Canada (ECCC)*

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/125590.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

CIRNAC

- Recommends that 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;
- 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;

- Recommends that the Proponent use a compliant waste management facility for disposal of combustible waste;
- Recommends that the Proponent prioritize the employment and training of local Inuit located in Sanikiluaq as well as procurement with Inuit-owned businesses when implementing project activities;
- Recommends that the Proponent consult with the Hamlet of Sanikiluaq, as well as any other community members or organizations which may have an interest in the project activities; and
- Recommends that the Proponent submit annual reports to the NIRB that include relevant information.

ECCC

- Recommends that the Proponent confirm the intention that construction and truck vehicles will be equipped with Tier 3 or 4 engines where possible;
- Recommends that the mitigation measures listed in Table 6.1 and Table 6.2 of the Biophysical Impact Assessment document be incorporated into relevant management plans, with a greater level of mitigation detail provided in the plans;
- Recommends that the following information be provided in relevant management and monitoring plans:
 - Water quality monitoring details;
 - Procedures to monitor the effectiveness of mitigation measures (for example, monitoring effectiveness of erosion and sedimentation controls), with corresponding management triggers and response actions; and
 - Procedures to monitor the effectiveness of spill prevention measures (for example, monitoring effectiveness of containment of fuels, chemical and wastes), with corresponding management triggers and response actions.
- Recommends that the Proponent clarify how the aquatic environment will be protected at each stage of the project;
- Recommend that the Proponent consult with the Department, along with all other interested parties, in the review of the forthcoming Wildlife Management Plan and supplementary report containing the breeding bird point count results and findings from the acoustic monitoring;
- Recommend that the Proponent provide additional details on survey efforts and individual survey counts for the winter and migration bird surveys;
- Recommends that the Proponent conduct additional winter resident surveys to allow better assessment of risks to the resident common eider population;
- Recommends the Proponent avoid vegetation clearing during the general nesting period of May 1 to August 15. If avoidance during the general nesting period is not possible, ECCC recommends the Proponent confirm there are no nesting migratory birds in the area; and
- Recommends that the Proponent use non-intrusive search methods, conducted by a trained experienced observer, to increase the effectiveness of surveys and also to prevent disturbance of migratory birds while they are nesting.

- Recommends the Proponent further assess areas along the transmission line span that might require site-specific mitigation measures.
- Recommends the Proponent review and consider Avian Power Line Interaction Committee (APLIC) guidance to minimize the potential for bird collisions along the transmission line.

The NIRB would like to provide Nunavut Nukkiqsautiit Corporation with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Ministers. The NIRB respectfully requests that a response be provided directly to the NIRB by **October 4, 2022**.

If Nunavut Nukkiqsautiit Corporation determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at (867) 982-4622 or motokiak@nirb.ca

Sincerely,



Mia Otokiak
Technical Advisor I
Nunavut Impact Review Board

cc: Distribution List
Richard Dwyer, Nunavut Water Board
Jared Ottenhof, Qikiqtani Inuit Association
Joel Fortier, Qikiqtani Inuit Association
Stephen Williamson Bathory, Qikiqtani Inuit Association
William Patch, Government of Nunavut – Community and Government Services
Alexander Stubbing, Government of Nunavut – Department of Culture and Heritage
Michele LeBlanc-Havard, Government of Nunavut – Department of Environment
Lisa Pirie-Dominix, Canadian Wildlife Service