



NNC File No. SAN-PMT-RP-020

NIRB File No.: 22XN052

NPC File No.: 149782

Mia Otokiak ,Technical Advisor
Nunavut Impact Review Board
P.O. Box 1360, Cambridge Bay, NU X0B 0C0
Sent via email: info@nirb.ca, motokiak@nirb.ca

October 5, 2022

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

Thank you for your correspondence of September 20, 2022 in which NNC was given the opportunity to address the two sets of comments received to our application prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Ministers.

As noted, the NIRB received comments from the following interested parties:

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

NNC will generally comply with the various requests and recommendations. The attached tables provide specific responses to each of the recommendations received from CIRNAC and ECCC.

NNC would be happy to meet with you or the NIRB if it would be helpful in resolving any remaining concerns.

Sincerely,

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Heather Shilton
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Table 1. Applicant Response to CIRNAC Review Comments on NIRB File 22XN052 Nunavut Nukkiksautiit Corporation (NNC) – Anuriqjuak Nukkiksautiit Project – NIRB Screening

(Note: It is assumed that the para 1 reference to “Coral Harbour Solar and Energy Storage Project” is in error.)

#	Reference	CIRNAC Recommendation	NNC Response
C1	Environmental Impacts	<i>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.</i>	As described in its application, NNC will develop and implement a series of environmental management and monitoring plans. These plans will include procedures to measure effects /changes and, as required, implement additional mitigation measures with corresponding management triggers and response actions. The candidate targets of monitoring and mitigation will include those listed by CIRNAC.
C2a	Additional Information	<i>CIRNAC recommends the Proponent to assess the project impact on permafrost and ensure mitigation measures are identified and implemented to prevent permafrost degradation.</i>	As the purpose of the project is to reduce consumption of fossil fuels and reduce greenhouse gas emissions, it is expected in that way to have a positive effect on permafrost. The NNC assessment did not identify any potential for Project-induced permafrost effects, but did identify that climate change could result in changes to the permafrost level. NNC would consider local participation in or support of any such long-term monitoring program
C2b		<i>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.</i>	The planned Construction and Operation activities pose minimal potential for Acid Rock Drainage or metals leaching (ARD/ML). There will be minimal excavation associated with the Project infrastructure. The main source of excavated rock will be the existing quarry operated by the Hamlet, a location that, to our knowledge does not have any history of producing ARD/ML. Nevertheless, NNC will review the geochemistry of the native rock. Should this indicate any possibility of metals leaching or acid drainage, samples will be collected during construction and analyzed as per laboratory protocols - (see Modified Acid Base Accounting (Lawrence, 1989) and/or EPA Standard Acid Base Accounting (Sobek et al.,1978)

C3	Combustible Waste Management	<i>CIRNAC recommends that the Proponent use a compliant waste management facility for disposal of combustible waste.</i>	NNC will seek assurance that any contracted waste handler employs a compliant facility for disposal of combustible waste.
C4	Potential for positive effects to Inuit through employment, training, and procurement opportunities	<i>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</i>	NNC is itself an Inuit-owned business and has committed to prioritize hiring local contractors and utilizing local businesses. Where direct hire and pre-employment training opportunities arise, NNC will give first preference to Inuit resident in Sanikiluaq.
C5	Consultation with interested parties	<i>CIRNAC recommends that the Proponent continue to consult with the Hamlet of Sanikiluaq who has an interest in the project's activities.</i>	As confirmed in its Application, NNC will continue to consult with Hamlet of Sanikiluaq and residents on various aspects of the project, including <ul style="list-style-type: none"> • 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.
C6a	Annual reporting	<i>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.</i>	NNC will comply with all reporting requirements as issued by NIRB.
C6b		<i>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.</i>	NNC will comply with all reporting requirements as issued by NIRB.

Table 2. Applicant Response to ECCC Review Comments on NIRB File 22XN052 Nunavut Nukkiksautiit Corporation (NNC) – Anuriquak Nukkiksautiit Project – NIRB Screening

#	Reference	ECCC Recommendation	NNC Response
E1	Air Emissions Mitigations	<i>ECCC recommends that the Proponent confirm the intention that construction and truck vehicles will be equipped with Tier 3 or 4 engines where possible.</i>	It is the intent of the Applicant (NNC) that construction and truck vehicles will be equipped with Tier 3 or 4 engines where possible. Note, in order to utilize locally available construction equipment, some compromise may be appropriate. In all cases however, all Project vehicles are to be properly maintained and muffled to control emissions
E2	Incorporating Mitigation Measures into Management Plans	<i>ECCC 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. Topics to be addressed by management plans include but are not limited to: construction, operation and maintenance, erosion and sedimentation control, waste management, fuel and chemical storage and management, spill prevention and response, monitoring, QA/QC, and closure</i>	As indicated in the NIRB Application, NNC will develop a suite of monitoring and management plans including – <ul style="list-style-type: none"> • Emergency Response Plan • Environmental Protection Plan • Comprehensive Spill Prevention Plan • Waste Management Plan. The topics to be addressed by these management plans include but are not limited to: construction, operation and maintenance, erosion and sedimentation control, waste management, fuel and chemical storage and management, spill prevention and response, monitoring, QA/QC, and closure.
E3	Water Quality Monitoring	<i>ECCC 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.</i>	The NNC management and monitoring plans will include <ul style="list-style-type: none"> • 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 with corresponding management triggers and response actions.

E4.	Aquatic Environment	<i>ECCC recommends that the Proponent clarify how the aquatic environment will be protected during each stage of the project. All relevant components (for example, access road, watercourse crossings) should be addressed. Such information should be incorporated into relevant management, monitoring and contingency plans.</i>	The NNC Project management and monitoring plans will include details on measures for protection of the aquatic environment by Project Stage and Site Location. The collected information will be incorporated into management, monitoring and contingency plans as appropriate.
E5	Wildlife Management Plan	<i>ECCC requests that the Proponent consult with the Department, along with all other interested parties, in the review of the forthcoming Wildlife Management Plan.</i>	NNC will consult with ECCC, along with all other interested parties, in the review of the forthcoming Wildlife Management Plan.
E6a	Biological Environment – Bird Baseline Information	<i>ECCC recommends that the Proponent provide additional details on survey effort and individual survey counts for the winter and migration bird surveys</i>	NNC will consult with ECCC for specifics on the type and level of detail required on winter and migration bird surveys.
E6b		<i>ECCC recommends that the Proponent conduct additional winter resident surveys to allow a better assessment of risks to the resident common eider population.</i>	NNC notes that the avian survey program was planned in consultation with Canadian Wildlife Services and the Arctic Eider Society. NNC will consult with ECCC on the need for and scope/timing of any additional winter resident surveys.
E6c		<i>ECCC requests that the Proponent consult with the Department, along with all other interested parties, in the review of the forthcoming supplementary report containing the breeding bird point count results and findings from the acoustic monitoring</i>	The supplementary report has been completed and uploaded to the NIRB portal. NNC will cooperate with ECCC, as well as with any other interested parties, in the review of the report, including the breeding bird point count results and findings from the acoustic monitoring
E7a	Vegetation Clearing	<i>ECCC recommends the Proponent avoid vegetation clearing (i.e., grubbing) during the general nesting period of May 1 to August 15.</i>	NNC will endeavour to avoid vegetation clearing during the general nesting period.
E7b	Impacts to Birds	<i>If avoidance during the general nesting period is not possible, ECCC recommends the Proponent confirm there are no nesting migratory birds in the area prior to clearing in accordance with ECCC's Guidelines to Avoid Harm to Migratory Birds.</i>	Should avoidance not be possible, NNC will confirm the absence of migratory birds in the affected area using procedures laid out in the <i>ECCC Guidelines to Avoid Harm to Migratory Birds</i> .
E7c		<i>Specifically, ECCC recommends that the Proponents use non-intrusive search methods, conducted by a trained and experienced observer, to increase the effectiveness of surveys and also to prevent disturbance of migratory birds while they are nesting.</i>	NNC commits to the use of non-intrusive search methods, conducted by a trained and experienced observer,

E7d		<i>ECCC recommends the Proponent contact the Department at cwsnorth-scfnord@ec.gc.ca.</i>	NNC will engage ECCC in the development and implementation of avoidance protocols for nesting migratory birds.
E8a	Transmission Lines	<i>ECCC recommends the Proponent further assess areas along the transmission line span that might require site-specific mitigation measures.</i>	As detailed design proceeds, NNC commits to further assessing transmission spans that might call for specific mitigation measures.
E8b		<i>ECCC also recommends the Proponent review and consider APLIC guidance to minimize the potential for bird collisions along the transmission line.</i>	<p>NNC will review and, as appropriate, apply the guidance contained in the cited reference</p> <p><i>Avian Power Line Interaction Committee (APLIC). 2012. Reducing Avian Collisions with Power Lines: The State of the Art in 2012. Edison Electric Institute. Washington, D.C.</i></p>