Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

CIRNAC Comments to NIRB

Re: Notice of Screening for University of Manitoba's "Characterizing Contaminant Levels in Softshell Clams in Frobisher Bay near Iqaluit" Project Proposal

Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
25YN058
Our file - Notre référence
GCdocs# 139284373

July 25, 2025

Robby Qammaniq
Impact Assessment Officer
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 University of Manitoba's "Characterizing Contaminant Levels in Softshell Clams in Frobisher Bay near Iqaluit" Project Proposal

Dear Robby Qammaniq,

On July 17, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on University of Manitoba's "Characterizing Contaminant Levels in Softshell Clams in Frobisher Bay near Iqaluit" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology

CIRNAC #1: Waste (Solid, Biological, and Potentially Contaminated Materials)

The application provides no detail on waste volumes or handling stating "information is not available" for both solid and biological wastes. Given that clam tissues may contain elevated level of contaminants, disposal of unused tissues, shells, and contaminated consumables requires attention to avoid attracting wildlife or creating localized pollution. Absence of a defined plan could lead to improper on-site disposal. CIRNAC is of the view that a brief, but explicit waste management plan is appropriate despite the Project's small scale. Further to mitigation measures, CIRNAC recommends that the Proponent:

- Prepare a concise Waste Management Plan covering solid, biological, and liquid wastes generated in field and lab settings;
- Package and remove all wastes from collection sites and dispose of them through approved municipal or laboratory system; and,
- Store any contaminated materials (e.g., tissues not analyzed) in sealed, labeled containers until proper disposal.

CIRNAC #2: Nunavut Research Institute Licence

The authorization table lists a Fisheries and Oceans Canada scientific-fishing licence and letter of support from Hunters and Trappers Associations (HTA), but it does not include a Nunavut Research Institute (NRI) research licence. Biological field projects that collect wildlife samples may require a NRI research licence in addition to other authorizations. CIRNAC recommends the Proponent contact the NRI to confirm if there is need to apply for a research-licence application prior to field activities.

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

CIRNAC #3: Consultation with interested parties

CIRNAC recommends that the Proponent continue consulting with the City of Iqaluit, the Amarok Hunters & Trappers Association and any other relevant organizations or individuals on its project proposal. As part of these consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujimajatuqangit into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who practice traditional and recreational activities within or in close proximity to project area;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,

Richard Bingley
Manager, Impact Assessment