



CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's "Qikiqtarjuaq Marine Infrastructure Project" Proposal



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

Your file - Votre référence
25XN030
Our file - Notre référence
GCdocs# 139202579

July 25, 2025

Francis Emingak
Screening 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 Government of Nunavut's "Qikiqtarjuaq Marine Infrastructure Project" Proposal

Dear Francis Emingak,

On July 3, 2025, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's (the Proponent) "Qikiqtarjuaq Marine Infrastructure Project" proposal (the Project). Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as they pertain 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 is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

CIRNAC #1: Fuel and Hazardous Material Spill Prevention

The Proponent forecasts total use of 5700 m³ of diesel and 140 m³ of gasoline, plus propane cylinders and lubricants for camp utilities and equipment. Handling millions of liters over four construction seasons will involve hundreds of fuel truck trips, hose couplings and refueling events. All transfers will occur outdoors in a coastal setting underlain by permafrost. These volumes can cause long-lived contamination if spilled. CIRNAC recommends that the Proponent:

- Provide information during the water licence application process regarding their proposed emergency response plans for the construction and operation of the facility, including details on where onshore equipment is to be refueled and serviced, proposed schedules for training for spill cleanup, and approach to spill response on land and in water;



- Employ spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) during any transfer of fuel or hazardous substances; and,
- Provide operational procedures, equipment maintenance, and operator training at the start of each field season.

CIRNAC #2: Water Quality and Sediment Control

The Proponent anticipates dredging of approximately 25000 m³ of seabed. Quarry operations and lay-down area runoff may introduce fines to Broughton Channel. The digging, hoisting, and dewatering cycle agitates fine sediments, creating plumes that raise turbidity and TSS, can depress dissolved oxygen by increasing oxygen demand, and may mobilize trace metals or nutrients. If unmanaged, these effects could impair water clarity. CIRNAC recommends that the Proponent consider:

- Monitoring water quality during in-water works, including real-time turbidity tracking (thresholds as an adaptive trigger) and periodic checks of TSS, dissolved oxygen, and hydrocarbon sheen, with proposed management and/or mitigation measures prepared if effects are greater than expected;
- Implementing erosion and sediment control measures (e.g., silt fences, rip-rap) on disturbed areas to minimize sediments entering waterbodies; and,
- Actively reclaiming completed sections by stabilizing disturbed shorelines to minimize erosion and sedimentation, and then removing non-biodegradable erosion and sediment control materials once the site is stabilized.

CIRNAC #3: Waste Management

The Proponent proposes to send ~1500 m³ of sewage and ~800 m³ of greywater to the municipal lagoon, with hazardous waste shipped south. Improper handling of these wastes could contaminate land/water and attract wildlife into the work areas. CIRNAC recommends that the Proponent consider:

- Providing additional detail during the water licence process on waste management practices during construction and operation of the Project;
- Separating, organizing and storing wastes set for southern disposal at least thirty-one (31) m away from a waterbody, for eventual removal and disposal off-site; and,
- Training personnel on the waste management procedures.

CIRNAC #4: Acid Rock Drainage and Metal Leaching (ARD/ML)

CIRNAC notes that the Project Proposal does not provide information on the ARD/ML potential of rock cuts, quarries, embankment, armouring, or any other materials with acid-generating potential. CIRNAC recommends that the Proponent conduct an assessment of the ARD/ML potential of materials, and clarify what contingencies would be used if ARD rock is identified.

The assessment could be provided as part of the Annual Report or as a standalone memo within a timeframe that NIRB determines to be appropriate.



CIRNAC #5: Permafrost and Groundwater

CIRNAC notes that the proposed analysis for permafrost degradation and hydrogeology focuses on quarries and lacks detail on other relevant infrastructure associated with the Project. The Project Proposal states that “... *potential for differential earth settlement due to permafrost melting under future climate change scenarios will be integrated into the engineering and design of the wharf, buildings, and access road.*” CIRNAC is of the view that refining the Project areas associated with the permafrost melting would improve the analysis for the prediction and assessment of permafrost degradation and impact on hydrogeology. CIRNAC recommends that the Proponent consider how it will:

- Assess Project impacts on groundwater quantity and quality before receiving the water licence for the Project; and,
- Manage any artesian groundwater flows using appropriate control measures to prevent uncontrolled discharge.

CIRNAC #6: Terrestrial Habitat Disturbance and Progressive Reclamation

The Project’s construction will permanently alter some terrestrial habitat. A new quarry and access road (200 m) will disturb tundra terrain and remove surface materials. CIRNAC notes that the long-term loss of upland and shoreline habitat, characterized as minor by the Proponent, is important as the recovery of high-arctic vegetation is extremely low. Therefore, CIRNAC recommends adopting best management practices to minimize the impacts, including:

- Strict footprint fencing and signage to confine disturbance;
- Salvaging organic soils for later site contouring and natural revegetation;
- Carrying out progressive reclamation to minimize time and extent of disturbance; and
- At the end of operations, remove all materials and debris from the site and, to the extent possible, return the disturbed area to a stable, useable condition.

CIRNAC also seeks clarification on whether the pit will be closed at the end of the mining schedule, or if interim stabilization measures are planned in the event the Municipality chooses to operate it as a community quarry.

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

CIRNAC #7: Environmental Monitoring

There is a lack of clarity regarding what data will be collected and submitted in the Environmental Monitoring Report. CIRNAC recommends more detail be provided on environmental data collection and reporting.

CIRNAC #8: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to consult with the Municipality of Qikiqtarjuak, the Qikiqtarjuak Hunters and Trappers Association, local Qikiqtani Inuit Association



representatives, 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 #9: Management of Potential Construction Camp

CIRNAC recommends that the Proponent work closely with its contractors, the Municipality of Qikiqtarjuak, and other interested parties to ensure that any potential construction camp is managed in a way that reflects local needs and expectations. This includes selecting an appropriate location and promoting respectful behaviour among Project personnel, particularly with regard to community customs and socio-economic well-being.

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

