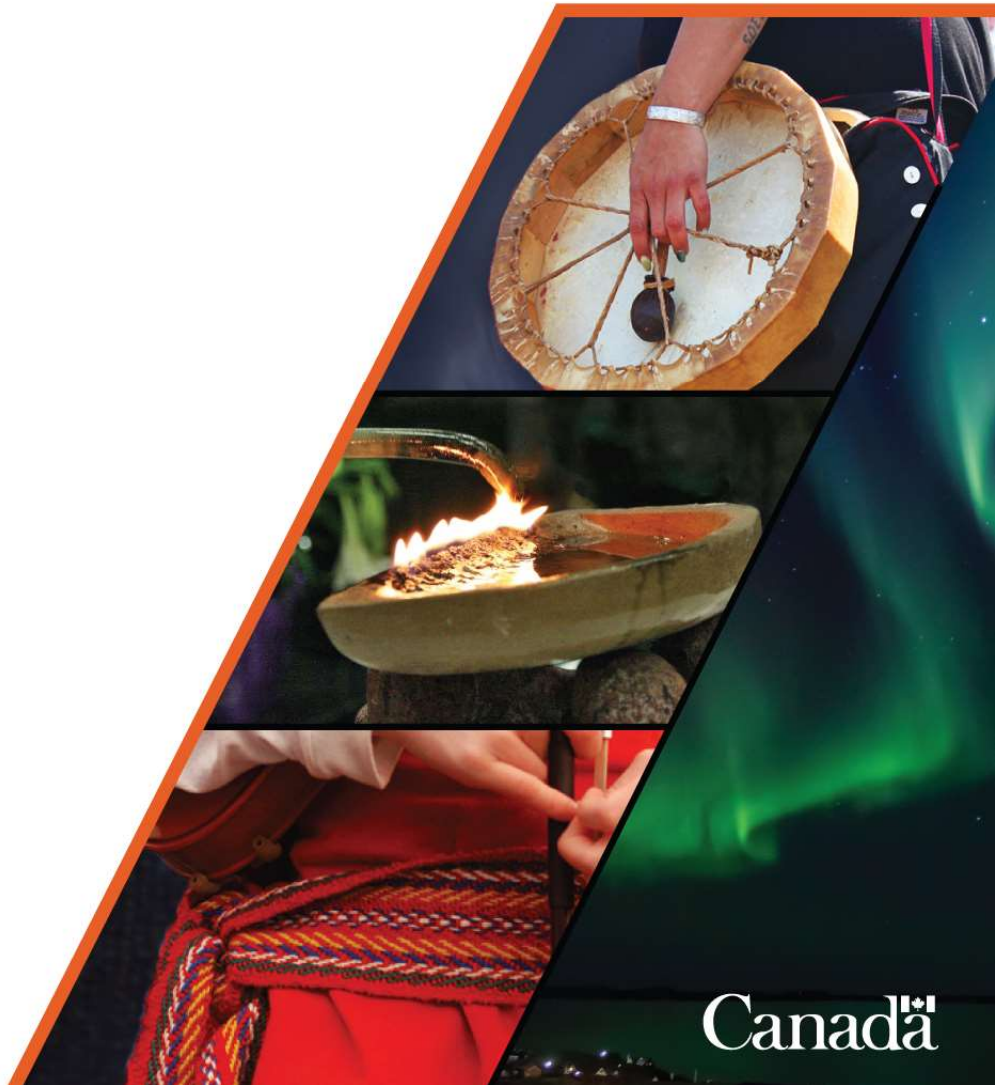




CIRNAC Comments to NIRB

Re: Notice of Screening for McGill University's
"Adaptation to an Ice-free Summer by Arctic Seabirds"
Project Proposal



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

Your file - Votre référence
 26YN019
 Our file - Notre référence
 GCdocs# 147025409

May 26, 2026

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 McGill University's "Adaptation to an Ice-free Summer by Arctic Seabirds" Project Proposal

Dear Francis Emingak,

On May 8, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on McGill University's "Adaptation to an Ice-free Summer by Arctic Seabirds" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

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

CIRNAC #1: Nunavut Research Institute Licence

While the authorizations table lists several pending and active permits from federal and territorial entities, the application lacks a registered Nunavut Research Institute (NRI) scientific research licence. Centralized scientific licensing is essential for all biological and land-based research projects to ensure appropriate regional oversight, cross-disciplinary coordination, and community-level awareness of active field studies. Proceeding with summer field programs without this core scientific authorization creates an operational gap and risks operating without proper regional clearance. CIRNAC recommends the Proponent contact the NRI to confirm if there is need to apply for a research-licence application prior to field activities.

CIRNAC #2: Fuel Storage and Secondary Containment

The application materials identify a proposed fuel cache consisting of gasoline and propane (100 L each) stored on a flat cliffside location near the base camp above the ocean high-water line, using a small hand-built berm for spill containment. However, the proposal lacks specific setback distances from the ordinary high-water mark of adjacent waterbodies, and lacks information on engineered secondary containment systems or fuel-impermeable liners. In continuous permafrost and low Arctic environments, non-engineered earthen or gravel barriers are highly



susceptible to freeze-thaw cracking and high material permeability, failing to provide an effective barrier against liquid hydrocarbons. Storing fuel on an elevated cliff edge presents a severe gravity-assisted physical hazard, where a containment breach would result in rapid downslope fuel migration, bypassing active cleanup efforts and directly contaminating the coastal active layer and marine waters below. CIRNAC recommends that the Proponent consider:

- Relocating all fuel storage containers away from the cliff edge to a level, low-gradient site situated at an appropriate setback distance from the ordinary high-water mark of adjacent waterbodies;
- Utilizing secondary containment systems with fuel-impermeable liners, scaled to at least 110% of the capacity of the largest single container stored; and
- Covering fuel storage areas to prevent water, snow, and ice from filling the containment area, and regularly checking any accumulated meltwater for hydrocarbon contamination prior to disposal.

CIRNAC #3: Off-Road ATV Operations and Tundra Protection

The application materials identify a plan to mobilize and resupply the camp using approximately five Twin Otter flights landing directly on the tundra using specialized tires, followed by using a Honda ATV after each flight to haul heavy gear and supplies from the landing area to the cabins. However, the proposal lacks specific operational protocols, weight limits, or progressive ground-protection strategies to prevent vegetative shearing, soil compaction, and rutting during the early summer thaw. In continuous permafrost regions, the thin vegetative cover of mosses and lichens serves as a critical thermal insulating barrier that maintains the ground's temperature balance. Operating motorized vehicles over unprepared, saturated tundra can tear this delicate organic layer and destroy the underlying soil structure. This disruption accelerates active-layer thawing, which triggers terrain subsidence, trail braiding, and channelized erosion along sloped pathways. CIRNAC recommends that the Proponent consider:

- Suspending all overland vehicle travel immediately if ground thawing results in visible soil rutting, gouging, or surface pooling; and
- Restoring and stabilizing any physically disturbed ground surfaces or ruts to a stable, natural contour prior to the end of each field season.

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.

Sincerely,



Richard Bingley
Manager, Impact Assessment

