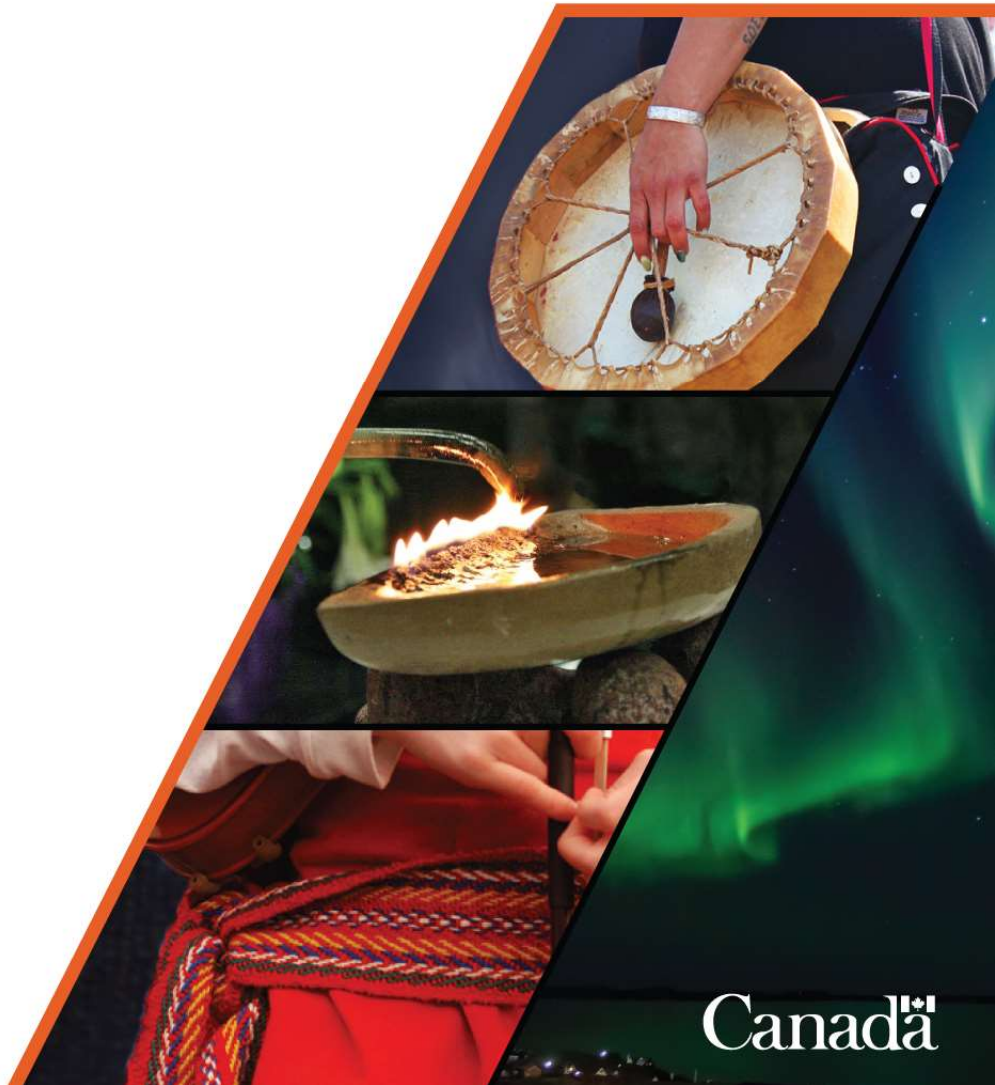




CIRNAC Comments to NIRB

Re: Notice of Screening for Tokyo Sea Life Park's "2025 Tokyo Sea Life Park Public Display Specimen Collection Cambridge Bay, NU" Project Proposal



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

Your file - Votre référence
 25YN059
 Our file - Notre référence
 GCdocs# 147261213

June 1, 2026

Jordan Takkirug
 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 Tokyo Sea Life Park's "2025 Tokyo Sea Life Park Public Display Specimen Collection Cambridge Bay, NU" Project Proposal

Dear Jordan Takkirug,

On May 11, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Tokyo Sea Life Park's "2025 Tokyo Sea Life Park Public Display Specimen Collection Cambridge Bay, NU" 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: Fuel Storage, Handling, and Spill Contingency Planning

The proposed work includes the transportation and storage of 100 liters of gasoline in a single container for a support vehicle to facilitate shore diving and specimen transport within a 7,000-meter radius of Cambridge Bay. However, the application material does not include a spill contingency plan, fuel handling procedures, secondary containment details, or any dedicated on-site spill response equipment. This is an information gap because handling and transporting gasoline in the immediate shoreline zone, where specimen collection occurs at depths of 0 to 30 meters, presents an acute risk of localized hydrocarbon spills. Without a defined shoreline fuel management and mitigation approach, it is not possible to assess whether spill prevention, secondary containment, and emergency response measures are proportionate to the scale of the proposed operation. CIRNAC recommends that the Proponent consider:

- Providing a detailed shoreline fuel handling procedure, including secondary containment methods;
- Confirming the availability of a dedicated spill response kit containing sorbent booms, particulate, and protective equipment at all active dive and fuel transfer locations; and



- Demonstrating that secondary containment systems are scaled to at least 110% of the capacity of the largest single container.

CIRNAC #2: Storage, and Off-site Disposal of Hazardous Waste (Spent Batteries)

The proposed work involves D-cell battery-operated pumps to aerate 135 live marine specimens in camping coolers. However, the application states "no waste production is anticipated" and lists waste data as "not available". The spent batteries contain toxic heavy metals (such as cadmium, lead, and mercury) and corrosive electrolytes requiring hazardous waste management. Without estimated quantities and a defined on-site storage and disposal approach, the environmental liabilities cannot be assessed. CIRNAC recommends that the Proponent consider:

- Quantifying the estimated number of dry-cell batteries to be used and discarded;
- Describing safe on-site storage practices to protect waste batteries from weather, moisture, and physical damage; and
- Confirming that all spent batteries will be segregated and backhauled to an approved southern hazardous waste recycling facility.

CIRNAC #3: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue engaging with the Hamlet of Cambridge Bay, the Ekaluktutiak Hunters & Trappers Organization, and any other relevant organizations and individuals regarding its project proposal. As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit and community knowledge in 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 may participate in traditional harvesting activities within or in close proximity to the 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

