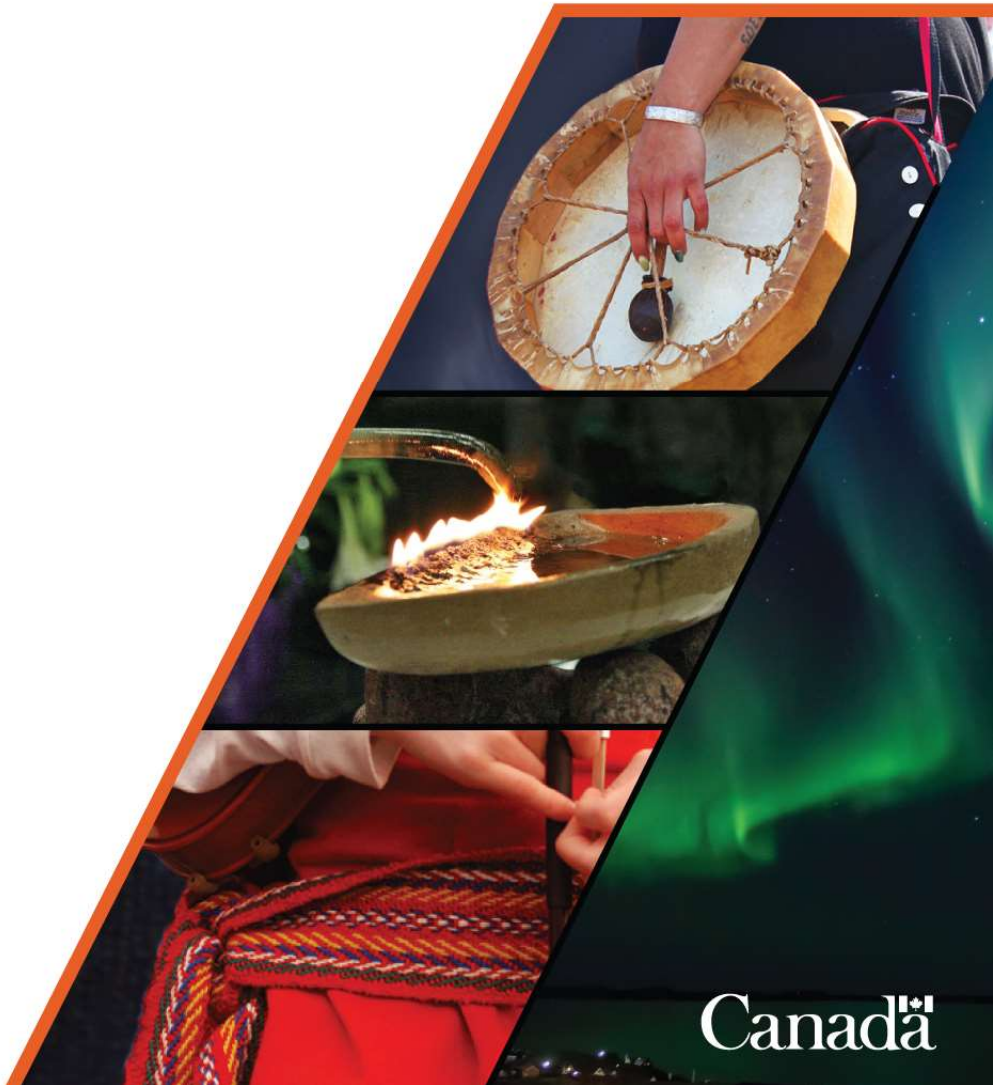




# CIRNAC Comments to NIRB

Re: Notice of Screening for Laval University (LU)  
"Temporal Monitoring of Arctic Kelp Forests and  
Associated Biodiversity in the Qikiqtarjuaq Region"  
Project Proposal



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

Your file - Votre référence  
 26YN039  
 Our file - Notre référence  
 GCdocs# 147733801

June 12, 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 Laval University (LU) "Temporal Monitoring of Arctic Kelp Forests and Associated Biodiversity in the Qikiqtarjuaq Region" Project Proposal**

Dear Francis Emingak,

On May 20, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Laval University (LU) "Temporal Monitoring of Arctic Kelp Forests and Associated Biodiversity in the Qikiqtarjuaq Region" 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: Shoreline Refueling and Hydrocarbon Storage Risks**

The application materials identify 6,000 Liters of gasoline to be stored and transported in 300 plastic jerry cans over the four-year lifespan of the monitoring program. However, the application material does not describe fuel staging locations, transfer procedures, spill response measures, or secondary containment requirements. Shoreline manual transfer of gasoline without containment presents a severe risk of accidental release.

Fuel storage facilities must be sited at appropriate setbacks from the high-water mark of any waterbody to mitigate the risk of hydrocarbon contamination of the active layer. Furthermore, secondary containment is required for any stationary fuel container, designed to hold 110% of the largest container's volume. In Arctic settings, even minor releases of petroleum, oils, or lubricants can migrate rapidly through thaw-sensitive gravel shoreline soils, saturate the active layer, and enter the shallow permafrost table, leading to long-term persistence in the terrestrial and intertidal environments. CIRNAC recommends that the Proponent consider:



- Submitting a site-specific spill contingency plan that outlines shoreline fuel transfer protocols and identifies the staging and storage locations for all fuel containers on land and/or at shore access points;
- Ensuring that all fuel caches and refueling locations are sited at appropriate setbacks from the high-water mark of any waterbody; and
- Demonstrating that secondary containment systems are scaled to at least 110% of the capacity of the largest single container.

## **CIRNAC #2: Solid Waste Management**

The application materials does not identify any solid waste, packaging waste, or scientific consumables generated over the life of the monitoring program. This is inconsistent with a multi-year seasonal research program involving 4 to 6 personnel. In Arctic settings, unmanaged solid waste represents a major wildlife attractant and is prone to windborne escape across the tundra, permafrost, and sea ice. Without quantitative disclosure of solid waste volumes, it is not possible to evaluate the adequacy of local disposal capabilities. CIRNAC recommends that the Proponent consider:

- Identifying and quantifying all anticipated domestic and project-related solid waste streams, including packaging, disposable field supplies, and scientific consumables;
- Confirming how all waste streams will be handled, stored, and managed on-site prior to disposal or removal; and
- Coordinating with the Hamlet of Qikiqtarjuaq to confirm that the municipal landfill has capacity to accept waste generated during this project, and if not, implementing a waste-segregation and "pack-in, pack-out" protocol to ensure all non-biodegradable, plastic, and packaging wastes are backhauled to a licensed facility.

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](mailto:muhammad.arslan@rcaanc-cirnac.gc.ca).

Sincerely,



Richard Bingley  
Manager, Impact Assessment

