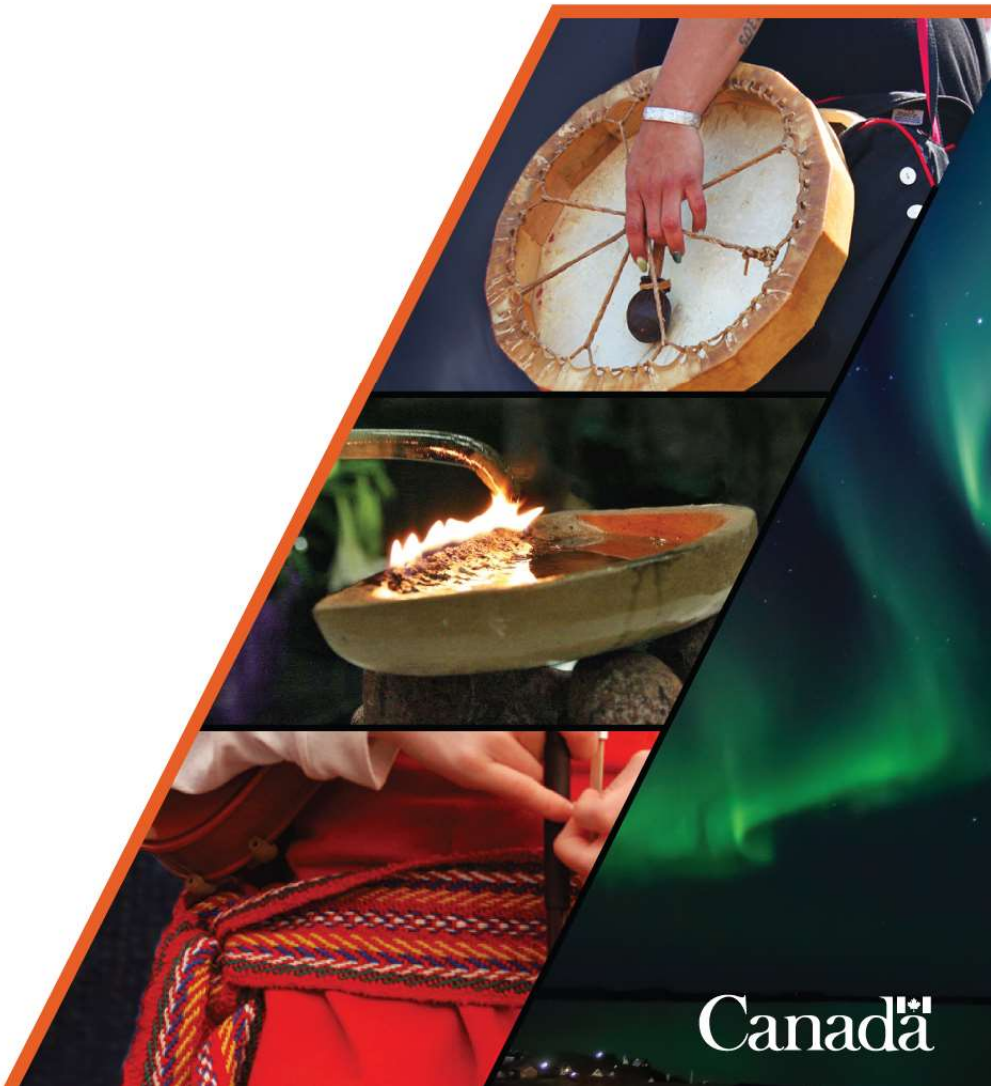
CIRNAC Comments to NIRB

Re: Notice of Screening for the Government of Nunavut's "Arctic Bay Sealift Field Program Project Proposal



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

Your file - Votre référence
26YN033
Our file - Notre référence
GCdocs# 148252118

June 25, 2026

Jordan Takkiruq
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 Government of Nunavut's "Arctic Bay Sealift Field Program" Project Proposal

Dear Jordan Takkiruq,

On June 4, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's "Arctic Bay Sealift Field Program" 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: Potential Disturbance of Permafrost and Thaw-Sensitive Ground

The proposed geotechnical program would use a 30-40 ton excavator during the 2026 open water season to excavate approximately 1 m wide test pits within the sealift laydown and ramp footprints. Test pits would be excavated until refusal, sidewall sloughing, or maximum boom reach, and backfilled the same day using excavated cuttings and bucket compaction. Arctic Bay is located in a continuous permafrost region, where permafrost and ground ice conditions are important considerations for northern infrastructure design and land-management decisions.

While the Environmental Management Plan addresses sediment, water quality, spills, and general reclamation, it does not appear to provide a permafrost-specific assessment of potential effects from heavy equipment travel, test-pit excavation, disturbance of surface materials, or backfilling methods. In particular, the EMP does not describe procedures for identifying ground ice or thaw-sensitive materials, salvaging and reinstating organic surface materials, segregating thaw-sensitive soils, documenting ground ice conditions, or preventing localized settlement where ice-rich permafrost may be encountered. Additional clarification on how permafrost-related risks will be identified, mitigated, and documented during the field program would support effective field planning and adaptive management.

CIRNAC recommends that the Proponent consider:

- Employing non-intrusive geophysical survey methods, such as electrical resistivity tomography (ERT) or ground-penetrating radar (GPR), to map subsurface profiles and minimize the number of physical test pits; and
- Salvaging and properly storing organics, topsoil and overburden disturbed during excavation for use during reclamation, and reinstating these materials during backfilling to restore the ground profile and provide an insulating layer over the active layer/permafrost, where present and practicable.

CIRNAC #2: Surface Water Drainage and Potential Permafrost Degradation

The proposed field program would use an excavator to excavate and backfill test pits within the shoreline study area. The EMP does not appear to provide a site-specific assessment of how heavy equipment travel, rutting, test pit excavation, or backfilling could affect surface drainage, ponding, or thaw-sensitive ground conditions. Ponded water and altered drainage can contribute to localized permafrost degradation, thermal erosion, and ground instability, particularly where fine-grained, saturated, or ice-rich soils are present. Given the shoreline setting and proximity to existing community infrastructure, this a relevant information gap that should be addressed through project-specific drainage, erosion-control, and restoration measures.

CIRNAC recommends that the Proponent consider:

- Identifying existing drainage pathways, swales, culverts, and low-lying areas prior to mobilization and avoiding activities that could block, divert, or concentrate surface runoff;
- Ensuring that equipment or vehicles are not operated where the ground surface cannot fully support the equipment without rutting or gouging, and suspending overland travel if rutting occurs; and
- Backfilling and grading test pits and disturbed areas to restore the ground profile, maintain natural drainage, and prevent ponding that could contribute to permafrost degradation.

CIRNAC #3: Consultation with Interested Parties

CIRNAC recommends that the Proponent consult with the Qikiqtani Inuit Association 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