



CIRNAC Comments to NIRB

Re: Notice of Screening for Institut National de Recherche Scientifique's "Water Quality and Fish Health near Kugluktuk" Project Proposal



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

Your file - Votre référence
26YN036
Our file - Notre référence
GCdocs# 148588270

July 15, 2026

Dustin Sim
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 Kugluktuk Angoniatit Association's "Water Quality and Fish Health near Kugluktuk" Project Proposal

Dear Dustin Sim,

On June 23, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Kugluktuk Angoniatit Association's "Water Quality and Fish Health near Kugluktuk" 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 Management, Secondary Containment, and Spill Contingency Planning

The Proponent proposes to transport up to 50 gallons of gasoline and 6 gallons of white gas to support mobile field operations by boat, ATV, and/or snow machine, including brief overnight trips. While the application states that fuel will not be cached and will be stored securely upright, out of direct sunlight, and away from sources of combustion, it does not appear to describe secondary containment, impermeable liners, fuel setback distances, spill response equipment, or a project-specific Spill Contingency Plan. In the absence of these measures, temporary storage or handling of un-bermed fuel containers on sensitive tundra surfaces could increase the risk of leakage, or fuel migration to adjacent surface waters. Without a formal Spill Contingency Plan, field crews may also lack clearly designated response roles, communication procedures, and confirmed spill response inventories. CIRNAC recommends that the Proponent consider:

- Using portable secondary containment, impermeable liners, drip trays, or equivalent protective measures during temporary fuel storage, staging, and refueling;
- Maintaining appropriate setback distances from the ordinary high water mark of adjacent waterbodies for all fuel storage and refueling activities; and



- Creating project-specific Spill Contingency Plans that details spill response roles, communication flowcharts, and emergency contact numbers.

CIRNAC #2: Bedrock Drilling, Anchor Materials, and Potential Water Quality Risks

The Proponent proposes to install metal housings for water level and temperature loggers along the lower Coppermine River by drilling 5/8-inch pilot boreholes into bedrock and securing the assemblies with mechanical anchor bolts. The application states that this will have footprints of less than 0.5 m² and will be removed at the end of the project; however, it does not appear to describe bedrock conditions, anchoring materials, corrosion resistance, or measures to avoid mineralized or sulfide-bearing rock. Where drilling occurs in or near water, exposed mineralized bedrock could create localized acid rock drainage/metal leaching (ARD/ML) concerns if sulfide-bearing material is encountered. CIRNAC recommends that the Proponent consider using non-toxic, water-compatible anchoring materials and corrosion-resistant hardware to minimize chemical leaching, equipment failure, and loss of monitoring equipment.

CIRNAC #3: Terrain Degradation and Permafrost Protection

The Proponent proposes to use 2 ATVs during the open-water season, up to 3 snow machines during the ice-covered season, and a helicopter to access remote sampling locations. The application states that ATV travel will occur on durable surfaces and pre-existing trails, and that helicopter travel will maintain a minimum altitude of 500 m, except during take-off and landing. However, the application does not appear to describe measures to avoid off-trail travel on wet or sensitive tundra, helicopter landings on vegetated or ice-rich terrain, or potential disturbance to permafrost terrain near sampling locations. Disturbance to vegetation and the insulating organic layer could increase the risk of localized rutting, thermokarst, erosion, and sediment transport to nearby waterbodies. CIRNAC recommends that the Proponent consider:

- Avoiding wet or sensitive tundra;
- Avoiding vehicle use and aircraft landings on ice-rich, thaw-sensitive, ponded, rutted, slumping, or actively eroding terrain; and
- Limiting helicopter landings to durable, non-vegetated areas set back from waterbodies, where practicable.

CIRNAC #4: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue engaging with the Hamlet of Kugluktuk, the Kitikmeot Inuit Association, 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 Qaujimajatuqangit 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 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

