



Environment and Climate Change Canada (ECCC) would like to thank the Government of Nunavut (GN) for their comments and offers the following. Our comments include some clarification on the use of the Federal Contaminated Sites Inventory (FCSI) database and the Federal Contaminated Sites Action Plan (FCSAP) which guides all work to address contamination on Federal Sites. The Isachsen High Arctic Weather Station (HAWS) is, and will continue to be, federal real property that is being remediated following federal guidelines.

The Federal Contaminated Sites Action Plan (FCSAP) is a federal program established in 2005 to reduce environmental and human health risks from known federal contaminated sites in Canada and their associated federal financial liabilities to a level that is consistent with the property's current or intended federal land use (Government of Canada, 2018). The program provides guidance, such as the Decision-Making Framework (DMF) which outlines the framework for remediation on federally managed sites and is considered a roadmap that describes the specific activities and requirements for addressing federal contaminated sites in Canada.

The DMF is based on A Federal Approach to Contaminated Sites (Contaminated Sites Management Working Group (Government of Canada, 1999), which describes a 10-step process used to characterize, classify and prioritize contaminated sites and to ensure remediation occurs in a cost-effective manner. Each step was designed to stand alone and to outline key components for investigating, managing and remediating contaminated sites (Government of Canada, 1999).

The 10 steps for are:

1. Identify Suspect Sites
2. Historical Review
3. Phase 1 and Phase 2 Environmental Site Assessment
4. Classify Contaminated Site Using the Canadian Council of Ministers of the Environment (CCME) National Classification System for Contaminated Sites (NCSCS)
5. Phase 3 Environmental Site Assessment
6. Reclassify the Site Using the CCME NCSCS
7. Develop a Remediation/Risk Management Strategy - Human Health and Ecological Risk Assessment (HHERA), and Develop Remedial Action Plan (RAP)
8. Implement Remediation/Risk Management (R/RM) Strategy
9. Confirmatory Sampling and Final Reporting (if required)
10. Long Term Monitoring (if required)

Steps 1 through 6 of the FCSAP DMF 10-step process involve activities that characterize the environmental conditions of the Site and determine if the risks from identified contamination must be addressed. If risks are identified, the objective of Step 7 is to establish R/RM goals and develop a site management strategy such that the levels of, or potential exposure to, contaminants can be mitigated to meet those goals. Included as part of Step 7 is the requirement to select either a guideline or risk assessment approach for the remedial program.



As part of the site management requirements, custodians are required to update the FCSI which includes information on all known and suspected contaminated sites under the custodianship of federal departments, agencies and consolidated Crown corporations. The database contains general information such as the location of the site, potential or actual contaminated medium, progress in assessment and addressing contamination, and liability and expenditure information. The site does not present the details of the investigations or the severity of contaminants if present.

According to FCSI, the Isachsen HAWS site has completed step 7 and states that “a Remedial Action Plan was completed, and Remediation/Risk Management is underway”. A risk assessment approach was adopted for the site. The findings of the HHERA, indicated that there were no unacceptable risks to Human Health or Ecological receptors from the identified contamination and that soil remediation was not necessary. As such, no soil is planned for removal, and no disposal or containment of contaminated soil is required. A Remedial Action Plan Summary describing the remedial activities to be undertaken at the site was provided as part of our submission (Kuukyoak, 2026) and does not include any activities to address the identified soil impacts. The findings of the assessment work and the RAP were presented to community members from Resolute and Grise Fiord for acceptance.

ECCC is currently at Step 8 of the FCSAP DMF which involves implementation the R/RM strategy selected in Step 7, including completing all actions required to undertake any work at the Site associated with the decommissioning activities described in the RAP (i.e., obtaining permits and approvals, selecting the contractor, conducting operations, maintenance and monitoring during implementation, etc.).

We trust that this information is satisfactory for your requirements.

Thank you,

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