



CIRNAC Comments to NIRB

Re: Notice of Screening for Royal Roads University's
“Namminiqurniq Nunavut Ecosystems Field Course”
Project Proposal



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

Your file - Votre référence
26YN048
Our file - Notre référence
GCdocs# 149945011

September 10, 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 Royal Roads University's
"Namminiqsurniq Nunavut Ecosystems Field Course" Project Proposal**

Dear Dustin Sim,

On August 20, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Royal Roads University's "Namminiqsurniq Nunavut Ecosystems Field Course" 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 Handling, Secondary Containment and Remote Refueling

The application identifies field transit using four vessels and up to 20 snowmobiles and the transport of up to 200 litres of spare gasoline in ten 20-litre jerry cans. The Proponent states that fuel containers would be checked for loose caps and condition and that spill-response supplies would be carried; however, the application does not describe how fuel containers would be secured or contained during transport, how releases during fuel transfer or refueling would be prevented and contained, or how contaminated soil, snow, absorbents, or other materials would be managed following a spill. Although the overall fuel volume is limited, accidental releases during transportation, transfer, or use could result in localized contamination of terrestrial, ice, or freshwater environments. CIRNAC recommends that the Proponent consider:

- Clarifying the secondary containment and securing methods for fuel containers during transport aboard vessels and snowmobile sleds;
- Describing fuel-transfer and refuelling procedures, including the use of portable drip trays to avoid leaks or drips onto the land, and procedures for inspecting fuel containers for leaks, damage, and tight seals; and



- Confirming that spill kits would be available wherever fuel is stored or used, and describing procedures for spill containment, reporting and cleanup, including the transfer, storage, and management of spill-related wastes.

CIRNAC #2: Protection of Tundra and Soil During Overland Travel

The application proposes up to 30 temporary 1 m² vegetation quadrats in September 2026 and the use of up to 20 snowmobiles for 3-4 days in March 2027. Activities would occur near Iqaluit and within or near Sylvia Grinnell and Katannilik Territorial Parks. The Proponent indicates that established routes would be used and susceptible soils, banks, and repeated trampling would be avoided; however, the application does not identify operational criteria for determining when snow or ground conditions are adequate for vehicle or pedestrian travel. Where snow cover is insufficient or vegetation and soils are exposed, repeated snowmobile or pedestrian traffic could result in localized vegetation damage, surface disturbance, or erosion. Given the slow recovery of Arctic tundra vegetation, clearer avoidance criteria would help ensure that short-term field activities do not result in persistent terrestrial disturbance. CIRNAC recommends that the Proponent consider:

- Confirming that overland vehicle travel would occur only where the ground is frozen and sufficient snow cover is present to protect the ground surface and vegetation from vehicle tracks;
- Using existing travel routes where practicable and selecting routes based on suitable terrain and environmental conditions to minimize disturbance to the ground surface; and
- Monitoring ground and snow conditions during winter travel and avoiding or discontinuing use of areas where exposed vegetation, thawing ground, rutting, or other surface disturbance is observed.

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.

Sincerely,



Richard Bingley
Manager, Impact Assessment

