



CIRNAC Comments to NIRB

Re: Notice of Screening for Aurora Energy Solutions'
“Hilamiut: Wind and Solar Resource Assessment Project
- Kugaaruk” Project Proposal



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

Your file - Votre référence
26YN054
Our file - Notre référence
GCdocs# 150795651

October 15, 2026

Mia Beattie
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 Aurora Energy Solutions' "Hilamiut: Wind and Solar Resource Assessment Project - Kugaaruk" Project Proposal

Dear Mia Beattie,

On September 25, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Aurora Energy Solutions' "Hilamiut: Wind and Solar Resource Assessment Project - Kugaaruk" 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 Storage, Secondary Containment and Spill Response

The application identifies the proposed use of 600 litres of methanol in ten 60-litre cartridges to operate the fuel-cell system, along with 60 litres of gasoline for project vehicles. The Proponent indicates that methanol would be stored in a sea container equipped with secondary containment and references a Spill Prevention and Response Plan. However, the application does not clearly describe the design or capacity of the secondary containment, whether gasoline would be stored onsite, or measures to prevent releases during fuel transportation, handling and cartridge replacement. Given the two-year operating period and periodic fuel deliveries, accidental releases could result in localized soil contamination and potentially affect freshwater through surface runoff. Further information would assist in determining whether adequate prevention and response measures are in place. CIRNAC recommends that the Proponent consider:

- Clarifying the design, capacity and suitability of secondary containment for methanol and gasoline storage;
- Describing spill-prevention measures during fuel transportation, handling and cartridge replacement; and



- Confirming spill-response procedures, including the availability of cleanup equipment and arrangements for managing contaminated soil, snow and absorbent materials.

CIRNAC #2: Management and Disposal of Spent Fuel Cartridges and Batteries

The Proponent proposes to operate a methanol fuel-cell system supported by valve-regulated lead-acid batteries for approximately two years, with fuel replacement occurring about every two months. However, the application identifies only ten empty fuel cartridges as waste and proposes disposing of them as regular plastic, without clarifying whether this represents the total number expected over the project or whether spent cartridges may contain residual methanol. The application also does not describe how the lead-acid batteries would be managed and ultimately recycled or disposed of. Improper management of these materials could release residual fuel or battery constituents and affect soil or water quality. Further information would help confirm that these materials will be appropriately managed throughout operations and decommissioning. CIRNAC recommends that the Proponent consider:

- Reconciling the estimated number of spent methanol cartridges with the proposed operating period and replacement frequency;
- Clarifying whether spent cartridges may retain residual methanol and identifying appropriate storage, transportation and disposal or recycling arrangements; and
- Describing the proposed management and disposal or recycling of lead-acid batteries, including during project decommissioning.

CIRNAC #3: Protection of Soils and Permafrost During Installation and Decommissioning

The application identifies a project footprint of approximately 45 metres by 35 metres (1,575 m²), involving two sea containers, a LiDAR platform, renewable energy equipment and associated supports. The Proponent describes the site as relatively flat and rocky and proposes using existing access routes and temporary anchoring methods selected according to ground conditions. However, the application does not clearly identify the extent of ground disturbance associated with equipment access, anchoring and infrastructure removal, or whether frost-sensitive soils or permafrost could be affected. Although the installation is temporary, disturbance of susceptible ground surfaces could result in localized rutting, erosion, settlement or changes to drainage that persist beyond project closure. Additional information on ground-disturbance avoidance and restoration would assist in assessing the potential for lasting impacts. CIRNAC recommends that the Proponent consider:

- Clarifying the anticipated extent of ground disturbance associated with equipment access, anchoring and infrastructure installation;
- Confirming whether frost-sensitive soils or permafrost are present and, if so, describing measures to avoid or minimize disturbance during construction, operation and decommissioning; and
- Confirming how temporary supports, anchors and other infrastructure would be removed and how disturbed areas would be stabilized or restored following decommissioning.



CIRNAC #4: Consultation with the Interested Parties

CIRNAC recommends that the Proponent continue to engage with the Hamlet of Kugaaruk, the Kurtairujuark Hunters & Trappers Association, the Kitikmeot Inuit Association, and other interested parties and individuals 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;
- 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

