

Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

October 16, 2026

Sent VIA Email: info@nirb.ca

NIRB File #: 26YN054

Re: Notice of Screening and Comment Request for Aurora Energy Solutions’ “Hilamiut: Wind and Solar Resource Assessment Project - Kugaaruk” project proposal

Hello Mia,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to review Aurora Energy Solutions' "Hilamiut: Wind and Solar Resource Assessment Project - Kugaaruk" project proposal, NIRB File #: 26YN054.

The GN has reviewed the proposed project and related documents and has two comments to raise with the Board at this time. These comments relate to how project data will be made available to inform future renewable energy studies, and the need to work with GN staff on archaeological permitting requirements that may apply to certain project activities.

The GN appreciates participating in the screening of this project through the NIRB review process. Should there be any concerns or need for follow-up, please feel free to contact me at jfbuller@gov.nu.ca.

Thank you,

[Handwritten signature]

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN: 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Data Availability to Support Future Renewable Energy Studies and Implementation Planning
References	NIRB 126496/26YN054: Notice of Screening and Comment Request for Aurora Energy Solutions' Hilamiut: Wind and Solar Resource Assessment Project – Kugaaruk
IDENTIFICATION OF ISSUE	
The Government of Nunavut (GN) appreciates that the Project materials describe how the data will inform future renewable energy studies and implementation planning. However, the project materials do not clearly identify how the resulting data and findings will be shared or made available to support these activities.	
IMPORTANCE OF ISSUE TO REVIEW AND SUPPORTING RATIONALE	
Having available and accessible Nunavut-specific data allows the GN and Nunavummiut to better evaluate viability and compare the potential benefits and impacts of future renewable energy implementation, thus informing renewable energy planning in Kugaaruk as well as territory-wide planning.	
REVIEWER'S RECOMMENDATIONS/REQUEST	
The GN requests that the Proponent clarify: 1. Who will retain and manage the resource data and how access may be requested. 2. How findings will be shared with the Hamlet of Kugaaruk, participating Inuit organizations, Qulliq Energy Corporation, and the Nunavut Climate Change Secretariat. 3. Whether a plain-language summary and technical assessment will be made available, and the anticipated timing of these deliverables. 4. Any ownership, confidentiality, or other restrictions affecting access and use of resource data resulting from the Project.	

GN: 02	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeology
References	NIRB 126496/26YN054: Notice of Screening and Comment Request for Aurora Energy Solutions' Hilamiut: Wind and Solar Resource Assessment Project – Kugaaruk
CONCERNS	
<i>Project Summary</i> Aurora Energy Solutions proposes to install and operate a temporary wind and solar resource measurement station approximately 8 km from Kugaaruk, from 2026 to 2028. The proposed monitoring station will be located within municipal boundaries and occupy an area of approximately 45 m × 35 m, and will include a ground-based LiDAR system and supporting platform, two sea containers, six solar panels, four micro wind turbines, temporary anchoring systems, and associated communications and power equipment. Installation will involve site preparation, equipment placement, and the use of a backhoe and loader. Existing access routes will be used for construction, servicing, and eventual decommissioning. The project proposal indicates that the final location of the equipment will be selected within a larger assessment area following an examination of ground conditions. Construction was scheduled for September 2026, with operations continuing until October 2028. A review of Government of Nunavut (GN) records did not identify any previous archaeological assessments having covered the proposed Project site. Prior archaeological assessments completed along the coast and along the Kugajuk River have, however, resulted in the identification of more than 20 archaeological sites within approximately 30 km of the proposed Project area, including inland sites. While no archaeological sites are currently known from within or immediately adjacent to the proposed Project site, this has not been confirmed through archaeological survey. Based on landscape-level considerations, including lakes and waterways, raised beach ridges associated with postglacial isostatic uplift, eskers, and other raised landforms, together with regional patterns of human occupation demonstrated by previously recorded archaeological sites, GN considers that there are reasonable grounds to believe archaeological sites could be present on the lands proposed for Project-related disturbance. CH notes that the Proponent describes the selected location as being outside known archaeological and culturally significant areas. However, the absence of recorded	

archaeological sites within the Project footprint does not establish that archaeological resources are absent. Neither previous disturbance nor community consultation replaces an archaeological assessment conducted by a qualified archaeologist under a CH-issued permit where ground disturbance is proposed.

Project-Specific Concerns

GN notes that the proposed Project includes activities involving ground disturbance, which constitute potential impacts to archaeological resources. These include, but are not limited to:

- Site preparation and equipment installation, including the placement of sea containers, the LiDAR support platform, and associated infrastructure;
- Installation of temporary anchoring systems, including proposed plate anchors or rock anchors;
- Any ground disturbance associated with equipment staging, storage, cabling, conduit supports, and the operation of construction equipment;
- Any ground disturbance associated with access route improvements, off-road vehicle movements, equipment servicing, or snow removal; and
- Equipment removal, site stabilization, restoration, and other decommissioning activities involving ground disturbance.

GN also notes that the final equipment placement and anchoring arrangements have not been confirmed. The Proponent's characterization of the disturbance as minor and temporary does not establish that archaeological sites will be avoided, particularly as the proposed Project site has not previously been subject to archaeological assessment. GN further notes that construction was originally scheduled for September 2026. It is noted that any archaeological field assessment should be completed under snow-free conditions before ground disturbance so that any archaeological sites present can be identified and appropriate protection and conservation measures established.

RECOMMENDATIONS

To ensure compliance with the *Nunavut Act* and the *Nunavut Archaeological and Palaeontological Sites Regulations* (NAPSR), GN recommends that the Proponent consult directly with CH on archaeological requirements for specific project components through CH's archaeological permitting and regulatory review processes prior to any ground

disturbance, including any requirements for archaeological assessment, avoidance, buffering, monitoring, mitigation, and chance-find response.

GN further recommends the following:

- **Site protection:** All heritage sites (archaeological and paleontological) in Nunavut are protected by law. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed during the course of project activities. GN recommends that known or newly recorded archaeological sites are avoided using a minimum 50 metre buffer measured from site boundaries, or greater where directed by CH.
- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the protective buffer area. The site shall be documented (including coordinates, description, and photographs) and reported to CH, and work shall not resume within the buffer area until direction is provided by CH.
- **General protections:** No alteration, disturbance, artifact removal, littering, or defacement of archaeological sites is permitted. No collection or disturbance shall occur unless authorized through the appropriate permitting process. The Proponent shall ensure that all staff and contractors are informed of these legal obligations. The construction of inuksuit is not supported.

ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *NAPSR* provide for the protection, care, and preservation of archaeological and palaeontological resources. CH is the Designated Agency responsible for the administration of the archaeological and palaeontological permitting system, in close coordination with Inuit land claim partners, including the Inuit Heritage Trust (IHT), which serves as the Designated Organization under Article 33 of the Nunavut Agreement. All archaeological and palaeontological sites in Nunavut are protected by law. It is illegal to search for, survey, excavate, alter, or otherwise disturb any archaeological or palaeontological site without a valid permit issued by the Government of Nunavut.