



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
918 Nunavut Drive
Iqaluit, NU, X0A 3H0

Your file - Votre référence
8AC-EUR2331
Our file - Notre référence
GCDocs#131384892

December 02, 2024

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

Re: Crown-Indigenous Relations and Northern Affairs Canada's reply to Environment and Climate Change Canada's response on the Licence Amendment Application of the Remedial Action Plan and Risk Assessment for Eureka High Arctic Weather Station, Type A Water Licence No. 8AC-EUR2331

Dear Mr. Hunter,

Thank you for your invitation on November 18, 2024, to review the responses to the review comments on the Licence Amendment Application of the Remedial Action Plan and Risk Assessment for Eureka High Arctic Weather Station, Type A Water Licence No. 8AC-EUR2331.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the responses per its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*.

CIRNAC does not broadly support the adoption of site-specific target levels (SSTLs) for the remediation of the Eureka High Arctic Weather Station (HAWS), emphasizing the sensitivity of the Arctic environment, the precautionary principle, and the risks of deviating from established CCME Tier 1 guidelines. The Arctic's fragile ecosystem is uniquely vulnerable to contamination due to its extreme conditions, slow degradation processes, and specialized flora and fauna. Introducing soils exceeding Tier 1 criteria into an uncontaminated site like Johnny's Hole risks irreversible ecological harm, which is unacceptable in such a pristine environment. Cold temperatures and limited microbial activity slow the degradation of Petroleum Hydrocarbon (PHC), meaning contaminants can persist for decades, compounding their impact on the environment and indigenous rights.

While ECCC argues that Tier 1 guidelines are overly conservative and irrelevant to the HAWS site, CIRNAC contends that these guidelines are critically important for the Arctic's



heightened ecological sensitivity. The broader application of SSTLs beyond PHC F2, the primary contaminant of concern, lacks strong justification and undermines the robustness of CCME standards. Adopting SSTLs risks environmental damage and sets a dangerous precedent that could weaken regulatory consistency and stakeholder confidence in future remediation projects.

Adhering to CCME Tier 1 guidelines ensures comprehensive environmental protection and aligns with federal and territorial policies designed to preserve Arctic ecosystems. Deviation from Tier 1 guidelines must be limited to scenarios with unequivocal evidence of irrelevance or inapplicability, neither of which has been sufficiently demonstrated for HAWS. Therefore, CIRNAC recommends rejecting the proposed SSTLs and urges ECCC to explore alternative remediation strategies that meet Tier 1 standards, thereby upholding the highest level of environmental stewardship for this sensitive and invaluable region.

If you have any questions or concerns, please contact me at andrew.keim@rcaanc-cirnac.gc.ca or (867)-975-4550

Sincerely,

Andrew Keim

Andrew Keim,
Manager, Water Resources