

SUMMARY OF ISSUES – New Nain Airport Project

This document provides a high-level summary of issues that were submitted to the Impact Assessment Agency of Canada (the Agency) about the New Nain Airport Project (the Project) during the public comment period on the Summary of the Initial Project Description (IPD), submitted by Nunatsiavut Government (the Proponent). The issues highlight information that will be considered by the Agency in forming its opinion on whether an impact assessment would be required. If the Agency is of the opinion that an impact assessment would be warranted, this information will also be considered, as applicable, in the development of planning phase documents where the Proponent is willing to work collaboratively on the impact assessment. Original submissions from participants can be found online on the Canadian Impact Assessment Registry Internet Site for the Project (Reference Number 87156).

The Agency encourages the Proponent to provide a response to the Summary of Issues that details how it intends to address these issues, as part of its Detailed Project Description. The Detailed Project Description should contain the information from the IPD, with new information integrated throughout the main body of the document as appropriate to respond to the issues raised. This will facilitate understanding by assessment participants, including Indigenous Peoples, the public, federal authorities, provincial departments, and municipalities.

Issues
Project Information, Activities, Scope and Design
Clarify whether the Local Study Area encompasses an area sufficient to address all project components.
Need to clarify the location of all proposed project components, works and activities, such as the siting, construction, and design of sedimentation ponds; the location of rock quarries; details about the construction of the stormwater management infrastructure, potable water systems, and wastewater treatment plant; and siting of the airport radar system.
Need for more information on the proposed construction of the temporary access road from the shoreline, any necessary marine infrastructure and related activities required to bring supplies to land (e.g., temporary wharf structure and/or dredging), and projected marine vessel activity during construction. This information is needed to understand direct and indirect impacts to fish and fish habitat and other marine resources. Where impacts are predicted, describe measures that will be implemented to mitigate potential impacts to fish and fish habitat and the marine environment.
Concerns about the use of light de-icing as opposed to the use of a de-icing/anti-icing facility and the management of waste de-icing fluids.
Comments on the ownership of the data collected by the proponent and consultants for the various studies conducted as part of project planning.
Comments on the results of the feasibility study of a power supply for the terminal, including alternatives to diesel, such as wind and solar. Recommend applying the Northern Responsible Energy Approach for Community Heat and Electricity Program to the feasibility study ¹ .
Need for information on the transportation of diesel to the airport and the capacity of the jet fuel storage tank.
Comments on the importance of using project design engineers who have experience working in northern climates and permafrost.
Comments on using Inuit specific designs for the terminal building (e.g., architectural design).
Importance of considering plans for decommissioning the New Nain Airport, in consultation with the local community.

Fish and Fish Habitat
Need to clarify whether the survey data and information collected is sufficient to identify and locate aquatic invasive species and prevent their introduction into unaffected water bodies.
Need for further characterization of fish and fish habitat for watercourses and bodies of water likely to be affected by the Project to address uncertainties regarding the description of potential impacts on fish and fish habitat.
Need further details on potential impacts to fish and fish habitat (including from accidents and malfunctions), and associated mitigation measures (including avoidance such as strategic siting), from the construction and operation of the potable water supply system, water treatment plant, sedimentation pond(s), stormwater management system, and the access road, including the use of culverts/bridges.
With anticipated harmful alteration, disruption, or destruction of fish and/or fish habitat, the importance of considering suitable offsetting options as early as possible.
Need for information on potential monitoring and reporting requirements during construction and operation for impacted fish and fish habitat.
Clarify the composition of the proposed alternative fluorine-free firefighting foam to better understand any potential residual effects to fish and fish habitat from using this alternative substance.
Migratory Birds
Need for more information on migratory birds and their habitat ^{2,3,4} , including: <ul style="list-style-type: none"> • Baseline information and methodologies for understanding migratory birds that are known or have the potential to occur in the Project Area, including annual variation, distribution and habitat use; • Potential impacts of the Project during all phases of the Project, particularly the impacts of light attraction, on migratory birds (including avian species at risk and species of conservation concern); • Mitigation measures and monitoring programs for potential effects, such as measures to avoid, reduce and monitor potential light attraction; and • A description of any potential residual effects after mitigations have been applied.
Species at Risk, Wildlife, and their Habitat
Need for information on baseline conditions for terrestrial species at risk (birds, caribou, bats), such as species distribution, habitat availability and use, and annual/seasonal variation of species that are known or have the potential to occur in the project area. Also require information on the survey methodologies used to support the description of baseline conditions ^{5,6,7} .
Need for a greater description of potential direct and indirect effects, mitigation measures, and potential residual effects on terrestrial species at risk known to or that have the potential to occur in the project area during all phases of the Project ^{5,6,7} .
Importance of including Species at Risk Act (SARA) permitting to the list of potentially applicable federal legislation.
Concerns about the requirement for a “wildlife control agent” at an airport to hold a firearm permit. Request that wildlife management be done in a humane, cruelty-free no-kill manner, by an animal protection organization rather than a trapper, hunter, or exterminator ⁸ .
Engagement with Indigenous Peoples
Importance of ensuring engagement with Innu First Nation includes identification of potential impacts on culturally important species.

Indigenous Peoples’ Physical and Cultural Heritage and Sites of Historical or Archaeological Importance
Importance of implementing plans to protect identified archaeological sites.
Indigenous Peoples’ Current Use of Lands and Resources for Traditional Purposes, and Exercise of Aboriginal and/or Treaty Rights
Need for further information about the location of lands and resources used for traditional purposes (e.g., hunting, trapping, country foods). Include the location of temporary/permanent/seasonal residences potentially impacted by the Project.
Concerns about Arctic char and partridge not being observed during field studies. Importance of using Indigenous knowledge of lands and resources for traditional purposes to determine the appropriate months to collect baseline data for fish and fish habitat, country foods (e.g., berries), and wildlife.
Identification of any harvesting exclusion areas surrounding the airport. Comments on whether there would be potential compensation for two harvesters who use their cabins, in proximity to the airport, on a regular basis.
Importance of considering all drinking water sources in the local project area and near the access road, through community engagement.
Indigenous Peoples’ Health and Well-Being
Need for information on human health risks in areas used for traditional purposes by describing the potential pathways of effects between project activities and humans ⁹ .
Importance of including a discussion on gender-based violence (GBV) risks as it relates to transient workers and potential effects to the local community ^{10,11,12} .
Need for information on airport accessibility from the hospital, especially during inclement weather ¹³ .
Need further details on project activities/sources that may result in the release of dust and potential contaminants ¹⁴ of concern during all phases of the Project and the associated risk of impacts to human health. Include an inventory of those potential project pollutants, a description of potential effects on key valued components (e.g., fish), and measures to mitigate dust and accidental release of pollutants with potential impacts to human health.
Importance of including health and medical practitioners and/or health administrators in the Engagement Plan to better understand the current baseline information on medical emergency flights and primary health care services at the existing airport, and how the Project may positively affect the number of medical emergency flights and access to health care.
Importance of considering the long-term impacts of the Project (both positive and negative) to the health of Indigenous peoples.
Consider expanding on the positive impacts the Project will have on food security (e.g., less cancelled/delayed inbound flights, cold storage and freezer building) within the community and region.
Indigenous Peoples’ Social and Economic Conditions
Importance of considering all users and potential transportation methods in Project design (e.g., space for snowmobile traffic, pull-offs prior to high-risk avalanche zones, parking for snowmobiles and qamutiik/sleds) ¹⁵ .
Importance of including a description of the construction workforce, and employment and procurement opportunities in Nain and Nunatsiavut ¹⁶ .
Importance of applying gender-based analysis plus (GBA+) and consider subpopulations in the local community (i.e., men vs. women, Indigenous vs. non-Indigenous, youth vs. elderly) to better understand how they may be differently impacted by the Project ¹⁷ .

Importance of including a cost estimate for the construction and operation of the project, including the source of funds and consideration of any potential increases in future costs.
Social and Economic Conditions (Non-Indigenous)
Importance of considering GBA+ and equality, diversity, and inclusion (EDI) proactively as a part of early workforce planning and mitigation measure development ¹⁷ .
Comments on how the self-sufficient working conditions during the construction phase will be implemented and the plans for dealing with workplace accidents in a remote setting.
Importance of outlining a human resources plan to operate the airport (and facilities) once the Project is completed.
Need for information on the availability of the local workforce for construction in the short-, medium-, and long-term and how labour/skills shortages will be addressed.
Atmospheric Environment (e.g., air quality, light, etc.)
Need for information on plans for air quality monitoring at the New Nain Airport to monitor ambient air pollution (e.g., aircraft emissions during taxiing, takeoff and climb, fugitive dust and particulate matter emissions) ¹⁸ .
Need for information on the amount of light pollution expected during all phases of the Project and for all Project infrastructure. Where feasible, consider alternative lighting options to mitigate light emissions from the Project.
Request to use new 1991-2020 climate normals for Nain which are currently available (except for rainfall or snowfall), to complement the 1981-2010 climate normals for Nain ¹⁹ .
Importance of using the Nunatsiavut Government's climate change projection models for the community of Nain.
Comments on whether the Nain weather station would remain in Nain or be moved to the new airport location.
Water (Surface and Ground)
Request for information on potential groundwater-surface water interactions and expected impacts where groundwater may interact with surface water (e.g., at Kauk Brook and Blow Hole Creek). Concern that groundwater use for potable water supply and construction activities may impact other groundwater users, and/or aquatic/wetland habitat ²⁰ .
Need for more information on the characterization of the marine environment that was collected for other initiatives to determine its adequacy for baseline. Include how the baseline data was gathered, including but not limited to, sampling locations, methods and effort; media sampled (e.g., water, sediment, fish); guidelines to which sampling was compared (e.g., water quality guidelines, sediment quality guidelines, fish toxicity); sample timing (e.g., seasonal and/or yearly) and duration (e.g., multi-year sampling plan).
Need for more information on the proposed methodology to assess potential impacts on water quality at stream crossings along the airport access road.
Need for additional details on the proposed de-icing activities and potential impacts to the surrounding freshwater environment. Provide more information on mitigation measures that will be utilized to manage potential impacts to surface water quality.
Soils and Geology
Need for information on field methodologies and data for determining potential (or known) permafrost areas, with a map of said areas, which will help assess where permafrost bodies could impact the Project activities. Areas of ice-rich permafrost should also be considered in the mapping ²¹ .

Need for information on baseline permafrost characteristics (active layer and permafrost thicknesses) and ground thermal regime which are essential to assess the climate change impacts on infrastructure and projected changes to permafrost conditions.
Need to include proposed alternative mitigation measures and techniques for embankment and pavement approaches over permafrost in cases where it would not be possible to avoid permafrost areas ²² .
Wetlands
Need for a description of any potential direct or indirect effects of the Project activities on wetlands and wetland functions during all Project phases as it relates to migratory birds, species at risk, and species of conservation concern. Include information regarding the amount of wetland loss, and any measures that will be implemented to avoid, mitigate or offset potential effects ⁷ .
Accidents and Malfunctions
Need more information on the development and implementation of spill prevention, preparedness, and response measures and systems to minimize the risk of accidents and malfunctions arising from construction and operation activities ^{23,24} .
Importance of including other topics in the Emergency Response Plan (e.g., fire, extreme weather events, emergency evacuation, power failure, injury and illness, workplace violence).
Importance of developing a Communication Plan to communicate information on driving and road conditions for the access road.
Need a description of the potential impacts of accidents and malfunctions on migratory birds ⁴ and species at risk, and mitigations and response plans to address these potential impacts, including information related to the development of a Wildlife Response Plan.
Climate Change and Greenhouse Gas Emissions
Need for further information on how it was determined that GHG emissions from decommissioning would be half of the construction emissions.
Need to clarify annual GHG emissions estimates, in addition to total emission estimates from each phase of the Project. Include any new information on GHG estimates, such as emissions related to the temporary construction camp.
Effects of the Environment on the Project
Importance of including a discussion on the potential impacts of climate change projections on groundwater availability as it relates to the supply of potable water ²⁰ .
Concerns about how the location and design of the new airport will account for increased visibility and fog challenges in the future, due to a changing climate.
Importance of including a terrain stability assessment to help understand landslide and avalanche hazards and the potential impacts to the Project ²⁵ .

End Notes

- ¹ Crown-Indigenous Relations and Northern Affairs Canada. 2023. Northern REACHE Program. <https://www.rcaanc-cirnac.gc.ca/eng/1481305379258/1594737453888>.
- ² Environment and Climate Change Canada. 2022. New Migratory Birds Regulations, 2022. <https://www.canada.ca/en/environment-climate-change/services/migratory-game-bird-hunting/status-update-modernization-regulations.html>.
- ³ Environment and Climate Change Canada. 2023. Guidelines to avoid harm to migratory birds. <https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds.html>.
- ⁴ Environment and Climate Change Canada. 1994. Migratory Birds Convention Act, 1994. <https://laws.justice.gc.ca/eng/acts/M-7.01/>.
- ⁵ Government of Canada. 2023. Protection statement for the habitat to which Migratory Birds Convention Act, 1994 applies for migratory birds listed under the Species at Risk Act. <https://species-registry.canada.ca/index-en.html#/documents/1638>.
- ⁶ Environment and Climate Change Canada. 2024. Species at risk public registry. <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry.html>.
- ⁷ Environment and Climate Change Canada. 2012. Operational framework for use of conservation allowances. <https://www.canada.ca/en/environment-climate-change/services/sustainable-development/publications/operational-framework-use-conservation-allowances.html>.
- ⁸ Impact Assessment Agency of Canada. 2024. Canadian impact assessment registry, reference numbers 8, 11, 12, 13 and 18. <https://iaac-aeic.gc.ca/050/evaluations/proj/87156/contributions/id/61647>; <https://iaac-aeic.gc.ca/050/evaluations/proj/87156/contributions/id/61666>; <https://iaac-aeic.gc.ca/050/evaluations/proj/87156/contributions/id/61667>; <https://iaac-aeic.gc.ca/050/evaluations/proj/87156/contributions/id/61693>; <https://iaac-aeic.gc.ca/050/evaluations/proj/87156/contributions/id/61711>.
- ⁹ Health Canada. 2019. Guidance for evaluating human health impacts in environmental assessment: human health risk assessment. <https://publications.gc.ca/site/eng/9.870475/publication.html>.
- ¹⁰ Women and Gender Equality Canada. 2023. What is gender-based violence? <https://women-gender-equality.canada.ca/en/gender-based-violence/about-gender-based-violence.html>.
- ¹¹ Forrest, B. Skies Magazine. 2016. Putting women in the pilot's seat. <https://wwfc.ca/putting-women-in-the-pilots-seat/#:~:text=According%20to%20the%20Brampton%20Flight,airline%20transport%20pilot%20licence%20holders>.
- ¹² MMIWG. 2019. Reclaiming power and place. https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/Final_Report_Vol_1a-1.pdf.
- ¹³ Bridges, A. Zacharuk, B. & Tuglavina, J. 2023. Shared responsibilities: Indigenous lens GBA+ in impact assessments. Keepers of the Circle & AnânuKatiget Tuningit Regional Inuit Women's Association of Canada. IAAC invitation to voices project. <https://keepersofthecircle.com/assets-system/resources/Shared-Responsibilities.pdf>.

- ¹⁴ Health Canada. 2018. Guidance for the environmental public health management of crude oil incidents. Available at https://publications.gc.ca/collections/collection_2018/sc-hc/H129-82-2018-eng.pdf.
- ¹⁵ Newfoundland and Labrador, Labrador Affairs. 2024. Labrador transportation grooming subsidy. <https://www.gov.nl.ca/exec/las/grantsprograms-we-offer/labrador-transportation-grooming-subsidy/>.
- ¹⁶ Hettinga, J and Dean. A. 2023. Mapping danger: Canadian resource-based projects associated with violence against indigenous women. <https://spectrumjournal.ca/index.php/spectrum/article/view/181/96>.
- ¹⁷ Impact Assessment Agency of Canada. 2021. Guidance: gender-based analysis plus in impact assessment. <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html>.
- ¹⁸ Government of Northwest Territories, Environment and Climate Change. 2023. NWT small air quality sensors - community based air monitoring project. <https://www.gov.nt.ca/ecc/en/services/air-quality/nwt-small-air-quality-sensors-community-based-air-monitoring-project#:~:text=The%20GNWT%20is%20now%20providing,industrial%20activities%20throughout%20the%20year>.
- ¹⁹ Environment and Climate Change Canada. 2024. Canadian climate normals. https://climate.weather.gc.ca/climate_normals/index_e.html.
- ²⁰ Canada1Water. n.d. <https://www.canada1water.ca/>.
- ²¹ Way G.R and Lewkowicz, A.G. 2015. Investigations of discontinuous permafrost in coastal Labrador with DC electrical resistivity tomography. In proceedings of GeoQuebec 2015. DOI: 10.13140/RG.2.1.1647.8803 Standard CAN/BNQ 2501-500. 2017. Geotechnical site investigation for building foundations in permafrost zones. <https://www.bnq.qc.ca/en/standardization/civil-engineering-and-urban-infrastructure/geotechnical-site-investigation-for-building-foundations-in-permafrost-zones.html>.
- ²² Transportation Association of Canada. 2010. Guidelines for development and management of transportation infrastructure in permafrost regions. <https://www.tac-atc.ca/en/publications/ptm-permafrost>.
- ²³ Environment and Climate Change Canada. 1999. Canadian Environmental Protection Act, 1999. <https://laws-lois.justice.gc.ca/eng/acts/c-15.31/>.
- ²⁴ Environment and Climate Change Canada. 2019. Environmental Emergency Regulations, 1999. <https://laws.justice.gc.ca/eng/regulations/SOR-2019-51/>.
- ²⁵ British Columbia Ministry of Forests. 1999. Mapping and assessing terrain stability guidebook, 2nd ed., forest practices code of British Columbia, Victoria, BC. https://www.for.gov.bc.ca/hfd/library/ffip/BCMof1999_C.pdf.

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