June 17, 2026

Mr. Mark Cliffe-Phillips
Executive Director
Mackenzie Valley Environmental Impact Review Board
Via email: preliminaryscreening@reviewboard.ca

Dear Mr. Mark Cliffe-Phillips:

Notice of Preliminary Screening Decision for Pesticide Application Permit – Northwest Territories Power Corporation - Fort Resolution diesel plant, the Hay River plant and substation, Deline tank farm, and Tsiigehtchic tank farm

The Department of Environment and Climate Change (ECC) has completed the preliminary screening of the referenced application (Development) in accordance with its responsibilities under subsection 124(1) and subsection 125(1) of the *Mackenzie Valley Resource Management Act* (MVRMA).

ECC has determined that the proposed Development will not be a cause of public concern and will not have a significant adverse impact on the environment. Therefore, ECC has decided not to refer the proposed Development to environmental assessment. ECC's reasons for decision, as required by section 121 of the MVRMA, are attached for your reference.

Unless the Mackenzie Valley Environmental Impact Review Board, or another party with the authority to do so, refers the proposed Development to an environmental assessment, ECC will proceed with the next stages of issuing the Pesticide Application Permit to Nahanni Butte after the ten-day pause period has expired.

If you have any questions, please do not hesitate to contact Lee Ross, Regulatory and Science Advisor at Lee_Ross@gov.nt.ca or (867) 767-9236 Ext. 53138.

Sincerely,

Lee Ross

Digitally signed by Lee Ross
Date: 2026.06.17 15:51:23 -06'00'

Lee Ross
Regulatory and Science Advisor
Environment and Climate Change

.../2

Attachment

c. Rick Walbourne, Director Regulatory and Permitting
Environment and Climate Change

PRELIMINARY SCREENING REPORT FORM

PRELIMINARY SCREENER: Government of the Northwest Territories Environment and Climate Change Regulatory and Permitting Division	**PROPONENT NAME:** **Northwest Territories Power Corporation** **PROJECT NAME:** Pesticide Application Permit

PART 1:

Type of Development:
(*check all that apply*)

- ☐ New Development
- ☐ Amendment
- ☐ Renewal
- ☒ Authorization required
- ☐ Does not require an authorization

Project Summary

The Northwest Territories Power Corporation (NTPC) proposes to have a contractor, with the appropriate training and certifications, yet to be determined, conduct industrial vegetation control for weeds and woody brush around power generation infrastructure (such as fuel tanks, substations, and generators). For the pesticide application, the method of application will be through a sprayer. The equipment would include, but not limited to a tank for water and chemical to be mixed in, a pressure sprayer, PPE(rubber boots, gloves) and a vehicle for equipment movement. NTPC may also make use of handheld spray bottles for application.

NTPC will undertake this work at the Fort Resolution diesel plant, the Hay River NTPC plant and substation, Inuvik diesel tank farm and LNG Facility, Sachs Harbour tank farm, Deline tank farm, Tsiigehtchic tank farm, and Tuktoyaktuk tank farm all located within various regions of the NWT. All work will be performed by trained and certified contractors.

Scope

Perform vegetation control with pesticides to suppress weed and woody brush growth at the Fort Resolution diesel plant, the Hay River NTPC plant and substation, Inuvik diesel tank farm and LNG Facility, Sachs Harbour tank farm, Deline tank farm, Tsiigehtchic tank farm, and Tuktoyaktuk tank farm. All vegetation control measures using pesticides will be in accordance with the *Pesticide Act* and Pesticide Regulations.

Type of ECC Authorization
(*check the authorization that applies*)

- ☐ Forest Management Agreements
- ☐ Timber Cutting Permit (>5000m^3 burned wood or > 1100 m^3 of other timber)
- ☐ Timber Cutting Licence

☐ Mill Licence
☐ Burning Permits (area > $25m^3$)

☒ Pesticide Application Permit
☐ Harvest of Wildlife for a Commercial Purpose
☐ Wildlife Business Licence
☐ Commercial Wildlife Licence
☐ Game Farm Licence
☐ Wildlife Management Permit
☐ General Wildlife Permit
☐ Licence to Capture Wildlife
☐ Licence to Capture Gyrfalcons for Commercial Purposes
☐ Licence to Import Live Wildlife
☐ Licence to Export Live Wildlife
☐ Licence to a Reindeer Owner for Grazing Allotment within a Reserve

☐ Protected Area Land Withdrawal
☐ Territorial Park

☐ Non-Application
☐ Other _____

Principal Activities
(*check all that apply*)

☐ Construction	☐ Exploration	☐ Aerial
☐ Decommissioning	☐ Installation	☐ Industrial
☐ Abandonment	☒ Maintenance	☐ Recreation
☐ Expansion	☐ Harvesting	☐ Solid Waste
☒ Operation	☐ Camp	☐ Sewage
☐ Repair	☐ Scientific/ Research	☐ Water Intake
☐ Linear / Corridor	☐ Municipal	☐ Quarry

☒ Other: apply pesticides for vegetation control

Principal Development Components:

☐ Abandonment/removal	☐ Disposal of hazardous waste
☐ Access Road	☐ Disposal of sewage
☐ Automobile, Aircraft or Vessel Movement	☐ Ditch Construction
☐ Blasting	☐ Drainage Alteration
☐ Borehole core sampling	☐ Drilling other than Geoscientific
☐ Building	☐ Ecological Surveys
☐ Bulk soil sampling	☐ Excavation
☐ gravel	☐ Explosive Storage
☐ hydrological testing	☐ Fuel Storage
☐ site restoration	☐ Geoscientific sampling

- ☐ fertilization
- ☐ grubbing
- ☐ planting/seeding
- ☐ reforestation
- ☐ scarify
- ☒ spraying
- ☐ recontouring

☐ Burning
☐ Burying
☐ Channeling
☐ Construction
☐ Cut and Fill
☐ Cutting of Trees or Removal of Vegetation
☐ Construction
- ☐ Abandonment/Removal
- ☐ Modification

☐ Modification e.g., widening, straightening
☐ Sewage
☐ Slashing and removal of vegetation
☐ Soil Testing
☐ Stream Crossing/Bridging
☐ Waste management
☐ Waste generation
☐ Topsoil, Overburden or Soil
- ☐ disposal
- ☐ fill
- ☐ removal
- ☐ storage

☐ Trenching
☐ Tunneling/Underground
☐ Other (describe):

PART 2:

NTS Topographic Map Sheet Numbers (*List all that apply*)
Fort Resolution – 085H
Hay River – 085B
Inuvik – 107B07
Sachs Harbour – 097G09
Deline – 096G11
Tsiigehtchic – 107B03
Tuktoyaktuk – 107C01

NTS Map Sheet #s:

Latitude / Longitude and UTM System:

Location	Latitude / Longitude and UTM System:
Fort Resolution Diesel Plant	61° 10' 14.7" N, 113° 39' 37.0" W
Hay River Yard, Plant and Substation	60° 48' 23.1" N, 115° 47' 50.9" W
Inuvik Diesel Tank Farm and LNG Facility	68° 21′ 19.08″ N, 133° 43′ 35.54″ W
Sachs Harbour Tank Farm	71° 59' 10.1" N, 125° 15' 13.3" W
Deline Tank Farm	65° 11′ 12.26″ N, 123° 25′ 14.45″ W
Tsiigehtchic Site and Tank Farm	67° 26' 31.9" N 133° 44' 22.0" W
Tuktoyaktuk Site and Tank Farm	69° 25′ 12.18″ N, 132° 59′ 59.46″ W

Nearest Community and Water Body:
The nearest communities are:

Location	Nearest Community	Nearest Water Body
Fort Resolution Diesel Plant	>1 km from Fort Resolution	600 m from the Great Slave Lake
Hay River Yard, Plant and Substation	>1 km from Hay River 4 km from Kátł'odeeche First Nation Community	7 km from the Great Slave Lake >1 km from the Hay River
Inuvik Diesel Tank Farm and LNG Facility	Within Inuvik	200 m from the Mackenzie River East Channel 200 m from Duct Lake 200 m from Twin Lakes 300 m from Boot Lake 700 m from Hidden Lake
Sachs Harbour Tank Farm	Within Sachs Harbour	200 m from Arctic Ocean
Deline Tank Farm	Within Deline	220 m from Great Bear Lake
Tsiigehtchic Site and Tank Farm	Within Tsiigehtchic	350 m from Arctic Red River 550 m from Mackenzie River
Tuktoyaktuk Site and Tank Farm	>1 km from Tuktoyaktuk	50 m from Arctic Ocean

Land Status

☐ Free Hold / Private
☐ Federal Crown Land
☒ Commissioners Land
☐ Municipal Land

Transboundary Implications

☐ British Columbia
☐ Alberta
☐ Saskatchewan
☐ Manitoba
☐ Nunavut
☐ Yukon
☐ Wood Buffalo National Park
☐ Inuvialuit Settlement Region

Type of Transboundary Implication:

☐ Impact / Effect
☐ Development
☐ Public Concern:

Describe: ___N/A_____

PART 3:

PHYSICAL - CHEMICAL EFFECTS

IMPACT	MITIGATION	CONDITION
1. Ground Water		
☐ water table alteration		
☐ water quality changes		
☐ infiltration changes		
☐ other		
☒ N/A	No impacts are expected based on the proposed pesticide application or associated activities.	

IMPACT	MITIGATION	CONDITION
2. Surface Water		
☐ flow or level changes		
☐ water quality changes		
☐ water quantity changes		
☐ drainage pattern changes		
☐ temperature		
☐ wetland changes /loss		
☒ other:	There is potential for surface water impacts, however risks are mitigated by using proper spray techniques, only applying pesticides approved by Health Canada, and establishing and working within buffer zones. Additionally spraying will only occur in suitable weather conditions.	
☐ N/A		

IMPACT	MITIGATION	CONDITION
3. Noise		
☐ noise in/near water		
☐ other: noise increase		
☒ N/A		

IMPACT	MITIGATION	CONDITION
4. Land		
☐ geologic structure changes		
☐ soil contamination		
☐ buffer zone loss		
☐ soil compaction & settling		
☐ Destabilization/erosion		
☐ permafrost regime alteration		
☐ other:		
☒ N/A	No impacts are expected based on the proposed pesticide application or associated activities.	

IMPACT	MITIGATION	CONDITION
5. Non-Renewable Resources		
☐ resource depletion		
☐ other:		
☒ N/A	No impacts are expected based on the proposed pesticide application or associated activities.	

IMPACT	MITIGATION	CONDITION
6. Air/Climate/Atmosphere		
☐ other		
☒ N/A	No impacts are expected based on the proposed pesticide application or associated activities.	

BIOLOGICAL ENVIRONMENT

IMPACT	MITIGATION	CONDITION
7. Vegetation		
☐ species composition		
☐ species introduction		
☐ toxic/heavy accumulation		
☐ other:		
☒ N/A	Chemical and mechanical control of undesirable and noxious vegetation is limited to the locations listed in the Scope of this document. Risk of run-off and spray drift is mitigated by using proper spray techniques, low-risk herbicides, establishing and working within buffer zones, and only spraying in suitable weather conditions.	

IMPACT	MITIGATION	CONDITION
8. Wildlife & Fish		
☐ effects on rare, threatened or endangered species		
☐ fish population changes		
☐ waterfowl population changes		
☐ breeding disturbance		
☐ population reduction		
☐ species diversity change		
☐ health changes		
☐ behavioral changes		
☐ habitat changes / effects		
☐ game species effects		
☐ toxins / heavy metals		
☐ forestry changes		
☐ agricultural changes		
☐ other:		
☒ N/A	No impacts are expected based on the proposed pesticide application or associated activities.	

INTERACTING ENVIRONMENT

IMPACT	MITIGATION	CONDITION
9. Habitat &Communities		
☐ predator-prey		
☐ wildlife habitat/ecosystem		
☐ composition changes		
☐ keystone/endangered species		
☐ wildlife corridor/buffer zone		
☐ other:		
☒ N/A	No impacts are expected based on the proposed pesticide application or	

associated activities.

IMPACT	MITIGATION	CONDITION
10. Social and Economic		
☐ planning / zoning changes or conflicts		
☐ increase in urban facilities or services use		
☐ rental house		
☐ airport operations / capacity changes		
☐ human health hazard		
☐ impair the recreational use of water or aesthetic quality		
☐ affect water use for other purposes		
☐ affect other land use operations		
☐ quality of life changes		
☐ public concern		
☐ other:		
☒ N/A	No impacts are expected based on the proposed pesticide application or associated activities. The permit holder will be required to post signs warning workers and the public that pesticide spraying is taking place in the area. Public access will also be restricted during and for a period after the spraying.	

IMPACT	MITIGATION	CONDITION
11. Cultural and Heritage		
☐ affects to historic property		
☐ increased economic pressure on historic properties		
☐ change to or loss of historic resources		
☐ change to or loss of archaeological resources		

☐ increased pressure on archaeological sites

☐ change to or loss of aesthetically important site

☐ affects to aboriginal lifestyle

☐ other:

☒ N/A — No impacts are expected based on the proposed pesticide application or associated activities.

PART 4:

PRELIMINARY SCREENER / Distribution List

Please refer to the distribution list on the Online Review System for a complete list of recipients.

Part 5:

PRELIMINARY SCREENING COMMENTS

Table 1. Preliminary Screening comments for the proposed Pesticide Application Permit

Organization	Impact/Concern	Mitigation
See Appendix A		

REASONS FOR DECISION

(LIST REASONS AND SUPPORTING RATIONALE FOR PRELIMINARY SCREENING DECISION)

DECISION:

The Department of Environment and Climate Change (ECC) is satisfied that the preliminary screening of the application for a Pesticide Application Permit by Northwest Territories Power Corporation (NTPC) for industrial vegetation control at the Fort Resolution diesel plant, the Hay River plant and substation, Deline tank farm, and Tsiigehtchic tank farm has been completed in accordance with Section 125 of the *Mackenzie Valley Resource Management Act (MVRMA)*.

ECC is satisfied that a reasonable notice period (21 days) was given to Communities and Indigenous Governments affected by the application, as required by Subsection 63(2) of the *MVRMA* for comments to be provided to ECC.

ECC notes that the originally distributed screening package inadvertently included the Inuvik diesel tank farm and LNG facility, Sachs Harbour tank farm, and Tuktoyaktuk site and tank farm. ECC recognizes that these locations are within the Inuvialuit Settlement Region (ISR) and therefore require application to the Environmental Impact Screening Committee (EISC) for preliminary screening. NTPC has been in contact with the EISC for those locations within the ISR and ECC understands that the screening under the EISC will occur in the near future for those sites. NTPC shall not apply pesticides at the locations within the ISR until the EISC has made a determination on their preliminary screening application.

In regard to the locations in the Mackenzie Valley, for which the GNWT is responsible for conducting a preliminary screening, ECC having reviewed all relevant information in the application regarding locations, including the submissions of the Applicant, and the written comments provided through the Online Review System (ORS) and responses provided by NTPC, ECC has decided in its opinion that:

- there is no likelihood that the proposed development might have a significant adverse impact on the environment; and
- there is no likelihood that the proposed development might be a cause of public concern.

ECC is also of the opinion that the application can proceed through the regulatory process and that any impact on the environment from the development can be mitigated through the imposition of the terms and conditions in the Pesticide Application Permit.

As a result, ECC, having due regard to the facts and circumstances, the merits of the submissions made to it, and to the purpose, scope and intent of the *MVRMA* and the Mackenzie Valley Land Use Regulations has decided that this Pesticide Application Permit be issued subject to the terms and conditions contained therein.

Concerns identified through review of the application and the written comments and responses provided through the ORS (Appendix A) can be summarized into three main categories and are discussed below. Please note that as the EISC is conducting the preliminary screening for the ISR locations, comments and responses specific to the ISR locations from the Inuvialuit Water Board and the Nihtat Gwich'in Council

(NGC) are not addressed in this Reasons for Decision, although NTPC has provided responses to those concerns via the ORS.

Summary of Concerns and Mitigations

Concerns Related to Pesticide/Herbicide disposal in Sewage Treatment Lagoons and impacts to Water

NTPC stated in its application package that, in some locations, excess pesticides/herbicides would be disposed of within community lagoons. In response to reviewer comments NTPC revised its position stating that there will be no disposal to lagoons and that a contractor will remove excess pesticide product and store in a locked cabinet. Both the Gwich'in Renewable Resources Board (GRRB) and the Gwich'in Land and Water Board expressed their concern via the ORS with the original proposal in the application package from NTPC. West Point First Nation (WPFN) also expressed their concern about the potential impacts of pesticides on surrounding water and the broader aquatic environment.

NTPC stated in their response to WPFN-1 that 'it should be clarified that there is no use of pesticides expected for this project'. ECC would like to clarify that herbicides are a type of pesticide. While pesticides cover a wide range of products (including those used for pests such as insects and rodents), herbicides specifically target unwanted plants and weeds. While NTPC was likely referring to the project not using pesticides that target pest control, the statement that this project is not using pesticides is incorrect. Beyond this statement, NTPC has provided a valid rationale and proposed mitigation measures to minimize the risk of pesticides entering water. The mitigation measures proposed include the use of a spray dye to identify where pesticides are applied and to track any migration, as well as the use of a pressure sprayer to limit spray drift. The GNWT notes that disposal of pesticides into sewage lagoons is not an approved disposal method under a Pesticide Application Permit. The standard conditions included in issued permits are designed to further address identified concerns from parties. The following are of standard conditions of a Pesticide Application Permit (non-exhaustive list):

- The permit holder shall not permit pesticides to enter any waters.
- The permit holder shall not apply pesticides within a horizontal distance of thirty (30) metres from the ordinary high-water mark of any surface waters.
- The permit holder shall not spray pesticides during wet weather conditions.
- The permit holder shall triple rinse plastic pesticide containers with fresh water, with the rinse water added to the spray tank.

Given the above standard conditions, and in consideration of NTPC's proposed mitigations in their responses to comments which state that there will be no disposal to lagoons, that a contractor will remove excess pesticide product and store in a locked cabinet, and that a permit does not authorize NTPC to dispose of pesticides into a sewage lagoon, ECC finds that appropriate mitigation measures are in place to address these concerns.

Concerns Related to Spill Contingency Plans for Sites

The GRRB, in their letter of concern, expressed concern with what appeared to be a lack of a spill response or spill contingency plan for the proposed project. In response, NTPC explained that each facility has a site-specific spill contingency plan, which covers hazardous substances as well as fuel spills, etc. NTPC also clarified that each employee and contractor at each location is required to review and understand the appropriate plan for each location. ECC finds this concern is appropriately addressed and mitigated.

Concerns Related to Pesticide Use Prior Attempted Mechanical Removal of Vegetation

WPFN expressed concerns with NTPC pursuing the use of pesticides prior to the attempted mechanical removal of vegetation with mowers, trimmers, etc. NTPC has clarified that mechanical removal has been attempted in the past and is determined to be unsatisfactory due to the layout of electrical equipment and the safety risks of using mechanical trimmers and mower equipment in close proximity to electrical generation equipment.

Rationale for mechanical removal provided by WPFN focused on the protection of wildlife and vegetation. NTPC responded that pesticides will not be sprayed in inclement weather (wet or windy) and that a dye will be used to ensure sprayed product is only applied in the intended location. Additionally, NTPC clarified that the Hay River property (which is identified as a concern to WPFN) is fenced to prevent wildlife from interacting with the spray area. ECC finds that, given NTPC has attempted mechanical vegetation removal and considering the proposed mitigation measures, these concerns have been acceptably addressed.

?	PRELIMINARY SCREENING DECISION
☐	**Outside Local Government Boundaries**
☐	The development proposal might have a significant adverse impact on the environment, *refer it to the Mackenzie Valley Environmental Impact Review Board (Review Board)*.
☒	*Proceed with regulatory process and/or implementation.*
☐	The development proposal might have public concern, *refer it to the Review Board*.
☒	*Proceed with regulatory process and/or implementation.*
☐	**Wholly within Local Government Boundaries**
☐	The development proposal is likely to have a significant adverse impact on air, water or renewable resources, *refer it to the Review Board*.
☒	*Proceed with regulatory process and/or implementation*.
☐	The development proposal might have public concern, *refer it to the Review Board*.
☒	*Proceed with regulatory process and/or implementation*.

Preliminary Screening Organization

Department of Environment and Climate Change

Signatures

Lee Ross

Digitally signed by Lee Ross
Date: 2026.06.17 15:52:54 -06'00'

APPENDIX A

Reviewer Comments and Proponent Responses

Project: Preliminary Screening - Pesticide Application Permit - NTPC
Board: GNWT - ECC
Proponent: NTPC

File Number: P4-260X
Review Comments Due: June 3, 2026
Proponent Responses Due: June 12, 2026

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Inuvialuit Water Board - Dr. Bijaya Adhikari				
1	Preliminary Screening - Pesticide Application Permit - NTPC	Given the sensitivity of Arctic environments and the proximity of both the Sachs Harbour Tank Farm and the Tuktoyaktuk Site and Tank Farm to surface water, the key concern is the potential off-site movement of pollutants into surface water body via surface runoff (especially during snowmelt and rain events) and accidental spills.	Therefore, it is recommended to implement appropriate measures to prevent and mitigate potential impacts on surface water.	Response provided by NTPC: The application of the herbicide will be confined to the tank farms and inside of the berm. However there will be no spraying within 30m of a waterbody regardless of being within a berm or not. The permit holder will not let any herbicide enter any open water. A mitigation measure is prior to application the amount of herbicide required will be precalculated to the spray area so the minimal amount of herbicides will be applied. The application of the herbicide will only occur during favourable weather terms (not during snow melt or rain events) Additionally, the water/ herbicide mixture has a dye applied to it so it is very clear to where the mixture has been applied.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Nihtat Gwich'in Council - DGO - Ellen Torng				
1		Attached		Response provided by NTPC: spoke with Ellen Torng and the issue has been resolved. Nihtat has no issues.
2		I have spoken with the proponent through their representative, Richard Johnstone, and have no objection to the scope of work as proposed.		

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
West Point First Nation - John Sexsmith				
1		Please see attached letter outlineing West Point FIrst Nations respons to the consultation notificaiton for the Preliminary Screening - Pesticide Application Permit - NTPC	West Point First Nation is strongly opposed to NTPC planned use of pesticides spraying in the Hay River area. The spraying of the above listed pesticides can land outside the spray zone carried by the winds into other areas where moose and other animal will consume plants and these chemical will enter their bodies. If a community member were to consume meat from a moose for example that has consumed plants with these pesticides that now is in their system as well. Of concern to West Point First Nation is the lack of alternative vegetation management and control listed in the application. There ar	Response provided by NTPC, additonally NTPC provided a letter to WPFN (attached): it should be clarified that there is no use of pesticides expected for the this project. The Hay River substation is located within the property of the Hay River diesel back up facility. The herbicides will be used to remove vegetation from the Hay River Substation. There will be little to no affects of the herbicides on local wildlife and near by water bodies. The entire facility is fenced off and then the substation has its own fencing around the area. The herbicide will be mixed with water and applied

			e no mechanical vegetation management options listed; this includes but not limited to: · Cutting down of trees, and tree branch from powerlines and using chippers to chip the trees and branches before harmful pesticide chemicals are used as an option. · Mechanical mowing of underbrush and chipping the materials before use of harmful chemical options are used. · Regular ongoing mechanical maintenance of trees trimming, tree branches being trimmed back, and mowing of underbrush so pesticide use is not required. The Government of the Northwest Territories (GNWT) Department of Environment and Climate Change (ECC) as a designated regulatory agency under the Mackenzie Valley Resource Management Act (MVRMA), needs to consider and should have considered the above mentioned mechanical vegetation removal management and controls prior to summitting a preliminary screening of a Pesticide Application Permit from Northwest Territories Power Corporation (NTPC) to the Machenzie Valley Land and Water Board.	with water onto the ground using a pressurized sprayer (similar to a pressure washer) making the travel of the herbicide via wind very difficult. If there is some migration of the herbicide then it will be contained to the NTPC diesel back up property which encompasses the substation area. There is already the use of mechanical means for vegetation control. However using mechanical means for vegetation removal inside of a substation I not advised. The risks of coming into contact with power lines and potential causing damage to equipment is very high and could lead to power outages, or human injury. But with using a sprayer only the operator, spraying wand and hose are in the substation and are able to maneuver around equipment without causing damages.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
GLWB - AlecSandra Macdonald				
1		NTPC proposes the disposal of surplus and waste herbicides into community sewage lagoons, however most municipal water licences prohibit the deposit of hazardous waste into sewage waste disposal facilities.	• Provide the Safety Data Sheet for each of the listed products, and confirm the hazard classification and recommended disposal method for each chemical. • If the herbicides are determined to be hazardous, provide an alternative method of disposal for waste and surplus products.	Response provided by NTPC: Prior to application, the treatment area is measured, and the square footage is calculated. Based on this calculation, only the minimum amount of herbicide required for effective vegetation control is mixed and applied. This approach ensures that herbicide is used at an effective dosage while minimizing waste and reducing the potential for environmental impacts. The herbicide is mixed with water and a dye, then applied using a hose and pressurized sprayer. The use of a pressurized sprayer allows the operator to control the spray pattern and application distance, significantly reducing the potential for drift caused by wind. In the unlikely event that minor migration occurs, the dye allows the treated area to be readily identified and assessed. Once the application is complete the tank where the water/herbicide/dye will be rinsed and it is this grey water that will need to be disposed.
2		When considering alternative disposal methods, note that while some communities may accept household hazardous waste at their solid waste disposal facilities, many are prohibited from accepting hazardous waste from commercial and industrial operations.	• Consult the Water Licence for each community to determine if commercial/industrial hazardous wastes can be accepted at the solid waste disposal facility. • Seek advice from each Community or ECC Water Resources Officer prior to the disposal of any hazardous wastes.	Response provided by NTPC: Thank you for the information. NTPC will consult if the need to dispose of hazardous waste arises. Prior to the application of the herbicide the total area will be calculated. Once the application area is known the herbicide will be mix

				ed with water and a dye, ensuring the minimal needed amount of herbicide is mixed. After the application the container may have to be rinsed diluting the residual herbicides to a level where they are ineffective.
3		The preliminary screening report does not consider the impacts to surface water or aquatic vegetation that could result from the disposal of surplus herbicide into community lagoons.	If the wastes are deemed non-hazardous and disposal to lagoons proceeds, the impacts of the herbicides to surface water and aquatic vegetation should be considered in the screening.	Response provided by NTPC: The affects to the surface water and aquatic vegetation will be minimal. The residual amounts of herbicide will be diluted to a point that would render the chemicals ineffective. Any empty herbicide containers will be taken by the contractor.

No.	Topic	Reviewer Comment	Reviewer Recommendation	Proponent Response
Gwich'in Renewable Resources Board - Staff Gwich'in Renewable Resources Board				
1		Letter of Concern	Please see the attached Letter of Concern submitted on behalf of the GRRB	Response provided by NTPC, additonally NTPC provided a letter to GRRB (attached): a response letter was submitted and sent to the proponent.

Gwich'in Renewable Resources Board

P.O. Box 2240, Inuvik, NT X0E 0T0
Phone: (867) 777-6600 Fax: (867) 777-6601
http://www.grrb.nt.ca

June 3rd, 2026

Government of the Northwest Territories
Environment and Climate Change
Regulatory and Permitting Division

RE: NTPC Pesticide Application Permit

To Whom It May Concern,

The Gwich'in Renewable Resources Board (GRRB) was established under the guidance of the *Gwich'in Comprehensive Land Claim Agreement* (GCLCA) to be the main instrument of wildlife, fish and forest management in the Gwich'in Settlement Area (GSA).

The GRRB appreciates the opportunity to review the Northwest Territories Power Corporation's application to use herbicides for vegetation control around several of their facilities in the Gwich'in Settlement Area and throughout the NWT. Given the nature of the activity being proposed, GRRB has the following concerns:

1) The proponent's plans to dispose of excess herbicides by diluting them and dumping the diluted mixture(s) into municipal sewage lagoons is of great concern to the GRRB. The material safety data sheets for several of the listed herbicides describe them as hazardous to aquatic environments and explicitly warn against the dumping of the herbicides down drains or into waterways. The proponent appears to be disregarding the manufacturers' directives for safe disposal of these products, and GRRB has concerns that these actions could pollute natural water bodies and risk toxic exposure to aquatic organisms. GRRB is of the opinion that dilution does not reduce pollution, especially given that most community lagoons are near, if not indirectly connected to, natural waterbodies, that many communities rely on fish and aquatic species for subsistence, and that dilution as a disposal method goes against best management practices and possibly territorial regulations – i.e. Sections 4 and 5 of the NWT Pesticide Act clearly prohibits any interactions between pesticide product(s) and open waterbodies; and

2) GRRB noted the lack of identified spill response plan as part of this permit application and emphasized the need for the proponent to consider impacts and plan for mitigation measures in the case of chemical spills. Spills of any hazardous substances, including chemicals, should immediately be reported to the NWT Department of Environment and Climate Change: www.gov.nt.ca/ecc/en/services/report-spill.

Gwich'in Renewable Resources Board

P.O. Box 2240, Inuvik, NT X0E 0T0
Phone: (867) 777-6600 Fax: (867) 777-6601
http://www.grrb.nt.ca

Given the current plans for herbicide disposal, and the lack of a spill response plan in place, the GRRB cannot support the Northwest Territories Power Corporation's Pesticide Application Permit in its current form.

If you have any questions, please contact myself, Leigh-Ann Williams-Jones by phone at 867-777-6600 x 2 or by email at lwilliamsjones@grrb.nt.ca.

Sincerely,

Leigh-Ann Williams-Jones
Executive Director
Gwich'in Renewable Resources Board

West Point First Nation
Lands Department
1-47031 Mackenzie Highway
Hay River, NT X0E 0R0
Phone: (867) 874-6677 | Fax: (867) 874-2486

Tuesday May 19, 2026

Mackenzie Valley Land and Waterboard
P.O Box 2130
4922 – 48 Street
7th Floor YK Centre Mall
Yellowknife, NT X1A 2P6
RE: Preliminary Screening - Pesticide Application Permit - NTPC

Dear Review Committee,

I am writing on behalf of West Point First Nation Chief and Council regarding the Government of the Northwest Territories (GNWT) Department of Environment and Climate Change (ECC) as a designated regulatory agency under the *Mackenzie Valley Resource Management Act* (MVRMA), is undertaking a preliminary screening of a Pesticide Application Permit from Northwest Territories Power Corporation (NTPC). Using the contractor Ace Vegetation Control Service Ltd. Located in NIsku Alberta.

West Point First Nation Lands Department understand that the Pesticide Application Permit is for the Hay River plant and substation, that is located the corner of Industrial Drive and Spruce Road in Hay River, Northwest Territories -60.80642. -11579748. And is within 1 km from the Hay River, and 7 km from the Great Slave Lake, and approximately 500m away from the Hay River Animal Shelter.

As requested, West Point First Nation is providing its comments, concerns and recommendations on the Mackenzie Valley Land and Water Board Online Review System for the consideration of the Mackenzie Valley Land and Water Board for review regarding this pesticide applications.

West Point First Nation understand that the intended pesticide usage is to perform vegetation control to suppress weed and woody brush growth at the Hay River plant and substation. It is noted in the contractor Ace Vegetation Control Service Ltd. will be spraying the following pesticides listed in the application:

- MCPA
- VisionMax

- Overdrive
- Esplanade
- Navius Flex

West Point First Nation Lands Department understands that the listed pesticides are glyphosate-based pesticides. It has been reported in media that these types of pesticides can have toxic effects on wildlife, aquatic species, and also can have human health effects specifically the above listed pesticides can have carcinogenic effects to humans as well as wildlife and aquatic species.

West Point First Nation is strongly opposed to NTPC planned use of pesticides spraying in the Hay River area. The spraying of the above listed pesticides can land outside the spray zone carried by the winds into other areas where moose and other animal will consume plants and these chemical will enter their bodies. If a community member were to consume meat from a moose for example that has consumed plants with these pesticides that now is in their system as well.

It is noted in the application that the sprayed pesticides have the potential to make surface contact with water and can have impacts to the water. It is not noted that the same sprayed pesticide chemical can contact plants and vegetation outside the proposed spray areas, and buffer zones. Despite plans for the spraying to be conducted duding "suitable weather conditions" sudden gusts of strong wind can spread the listed pesticides far away from the treatment areas and buffer zones.

The Hay River plant and substation is also located in the Industrial area of the Town of Hay River next to the Home Hardwar Store, where the sprayed chemicals can impact this area and approximately 500m from the Hay River Animal Shelter, where the animals could also breath int these harmful chemicals from the chemical pesticides being deposited by wind and other means and make contact with plants and vegetation at the shelter and anything the animals may come into contact with. **There is cumulative impacts concerns with how the spraying will proceed and remail in soils and leach into water tables and the Hay River via water run off into sewer drainages.**

Of concern to West Point First Nation is the lack of alternative vegetation management and control listed in the application. There are no mechanical vegetation management options listed; this includes but not limited to:

- **Cutting down of trees, and tree branch from powerlines and using chippers to chip the trees and branches before harmful pesticide chemicals are used as an option.**
- **Mechanical mowing of underbrush and chipping the materials before use of harmful chemical options are used.**
- **Regular ongoing mechanical maintenance of trees trimming, tree branches being trimmed back, and mowing of underbrush so pesticide use is not required.**

The Hay River Yard, Plant and Substation is an open area in the industrial areas of the Town of Hay River where the above listed mechanical option for vegetation removal management and control is a better option over spraying pesticides.

The Government of the Northwest Territories (GNWT) Department of Environment and Climate Change (ECC) **as a designated regulatory agency under the *Mackenzie Valley Resource Management Act* (MVRMA)**, needs to consider and should have considered the above mentioned mechanical vegetation removal management and controls prior to summitting a preliminary screening of a Pesticide Application Permit from Northwest Territories Power Corporation (NTPC) to the Machenzie Valley Land and Water Board.

Please contact West Point First Nation Lands Department land@wpfn.ca for any questions, further comments, question or if the proponent wants to arrange a meeting to discuss this matter and written response.

Sincerely,

John Sexsmith
Lands Manager
West Point First Nation

Cc:
Deveon Felker
Chief
West Point First Nation

Wendy Domes
Band Manager
West Point First Nation

Nihtat Technical Lead

May 20, 2026
Gwich'in Land and Water Board
P.O. Box 2018
Inuvik, NT X0E 0T0

Re: NTPC Pesticide Application Permit Package – Inuvik Diesel Tank Farm and LNG Facility

Nihtat Gwich'in Council responds to the Northwest Territories Power Corporation pesticide application permit package as it relates to the Inuvik diesel tank farm and LNG facility within Nihtat's homeland of Inuvik.

The Inuvik application area is located close to significant water systems, including the Mackenzie River. Despite this proximity, the screening relies on general statements that risks will be mitigated through spray techniques, weather conditions, and buffer zones. The documentation provides limited detail regarding actual buffer distances, weather restrictions, runoff prevention measures, spill response protocols, drainage considerations, or monitoring measures.

The proponent proposes the use of multiple herbicides, including glyphosate-based products, which carry potential impacts to harvesting, berry picking, wildlife exposure pathways, and runoff into waterways.

Nihtat also notes the proposed disposal methods identified in the application package, including references to surplus pesticide solutions being diluted and placed into sewage lagoons. The documentation does not indicate whether this disposal pathway has been separately assessed from a water licensing or environmental discharge perspective, nor whether potential implications to receiving environments have been evaluated or whether such disposal is authorized under the Town of Inuvik lagoon permit. Additionally, a second application is currently before the GLWB for lagoon modifications, and the documentation does not clarify whether the timelines for this pesticide application overlap with the lagoon modification work. Nihtat requests that the proponent provide clarification on these points.

Nihtat respectfully requests that the Board consider whether:

- the engagement associated with this application has been procedurally adequate, given that the response period is less than 15 working days;
- the current Town of Inuvik sewage disposal/lagoons permit allows for the dumping of pesticide waste;
- the proposed work in Inuvik is scheduled before, after, or during the lagoon modification project;
- whether DFO has been notified, given the proximity of the work to fish-bearing waterways.

Nihtat would appreciate a direct discussion with the proponent to have those concerns addressed.

Ellen Torng
Senior Technical Lead
On behalf of Nihtat Gwich'in Council
Email: partnerships@nihtatgwichin.ca

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Lands Department
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Hay River, NT X0E 0R0
Phone: (867) 874-6677
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Attention: John Sexsmith

Good Day,

This letter is provided in response to concerns raised during the screening process regarding the proposed application of herbicides at the Hay River Diesel Generating Facility (the "Facility") and the Hay River Substation.

The Hay River Substation is located within the Facility property. Herbicides will primarily be used to control vegetation within the substation and in selected areas of the Facility. The proposed application poses negligible risk to wildlife when applied according to label requirements and regulatory guidelines, or nearby water bodies. The entire Facility is fenced, and the substation is enclosed within its own fenced area. Due to the level of human activity at the site, wildlife presence is minimal. In addition, the site does not contain suitable habitat that would attract or support wildlife.

There are no water bodies or direct hydrological connections (e.g., creeks, streams, or drainage channels) adjacent to the Facility. Once applied, the herbicide remains on the ground surface and is unlikely to reach the groundwater table. Great Slave Lake is located approximately 5.6 to 6 km from the Facility, and the Hay River is more than 600 m away. Both distances are well beyond the 30 m buffer zone required under Government of the Northwest Territories (GNWT) regulations governing herbicide application.

Prior to application, the treatment area is measured, and the square footage is calculated. Based on this calculation, only the minimum amount of herbicide required for effective vegetation control is mixed and applied. This approach ensures that herbicide is used at an effective dosage while minimizing waste and reducing the potential for environmental impacts. Any unused herbicide concentrate is retained in its original labelled container and secured in a lock storage cabinet within the application vehicle until it is required for future use. The herbicide is mixed with water and a dye, then applied using a hose and pressurized sprayer. The use of a pressurized sprayer allows the operator to control the spray pattern and application distance, significantly reducing the potential for drift caused by wind. In the unlikely event that minor migration occurs, the dye allows the treated area

to be readily identified and assessed. Once applied, the herbicide begins acting immediately and achieves its intended effectiveness within the first few days.
Mechanical vegetation control methods are already used at both the substation and the Facility. However, relying solely on mechanical methods within an energized substation is not recommended. The risk of contact with electrical equipment and conductors is significant and could result in equipment damage, power outages, or personal injury. In contrast, herbicide application requires only the operator, hose, and spray wand to enter the substation, allowing vegetation to be managed safely and effectively while minimizing the risk of damage to critical infrastructure.
Should you require any additional information regarding the proposed herbicide application, please do not hesitate to contact us.

Sincerely,

Richard Johnstone

Richard Johnstone (BSc. Hon)
Environmental Analyst
Northwest Territories Power Corporation
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Hay River, NT X0E 1G2
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P.O. Box 2240, Inuvik, NT
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Fax: (867) 777-6601
http://www.grrb.nt.ca

Attention Leigh-Ann Williams-Jones

This letter is provided in response to concerns raised during the screening process regarding the proposed application of herbicides at Northwest Territories Power Corporation (NTPC) facilities in the Gwich'in Region.

Each NTPC facility has a site-specific spill contingency plan that outlines procedures for responding to environmental incidents and identifies the agencies that must be notified. These plans are tailored to the unique characteristics of each site and are readily available on site. Workers, including NTPC employees and contractors, review the applicable spill contingency plan prior to commencing work involving hazardous materials. Additionally, any contractor retained to perform herbicide application services would be required to maintain their own spill response plan and ensure that personnel are properly trained to respond to a potential incident.

Prior to herbicide application, the treatment area is mapped and measured where sensitive receptors are identified and the square footage is calculated. Based on this calculation, only the minimum amount of herbicide required for effective vegetation control is mixed and applied. This approach ensures that herbicide is used at an effective dosage while minimizing waste and reducing the potential for environmental impacts. Any unused herbicide concentrate is retained in its original labelled container and secured within a locked storage cabinet on the contractor's service vehicle until it is required for future use.

The herbicide is mixed with water and a dye and then applied using a hose and pressurized sprayer. The use of a pressurized sprayer allows the operator to control the spray pattern and application distance, significantly reducing the potential for spray drift. In the unlikely event that minor migration occurs, the dye allows the treated area to be readily identified and assessed. Once applied, the herbicide begins acting immediately and achieves its

intended effectiveness within the first few days.

Herbicides will primarily be used to control vegetation within substations and in selected areas of NTPC facilities. When applied in accordance with product label requirements and applicable regulatory requirements, the proposed application is not expected to adversely affect wildlife or nearby water bodies. Areas located within 30 metres of a water body will not be treated with herbicides. Government of the Northwest Territories (GNWT) regulations prohibit the application of herbicides and pesticides within this buffer zone.

Once applied, the herbicide remains on the ground surface and is unlikely to reach the groundwater table. Following application, only residual amounts of herbicide remain within the application equipment. The equipment is subsequently rinsed with water, resulting in only trace amounts of herbicide remaining within the container.

Mechanical vegetation control methods are already used at NTPC facilities. However, relying solely on mechanical methods within an energized substation is not recommended. The risk of contact with electrical equipment and conductors is significant and could result in equipment damage, power outages, or personal injury. In contrast, herbicide application requires only the operator, hose, and spray wand to enter the substation, allowing vegetation to be managed safely and effectively while minimizing the risk of damage to critical infrastructure.

Should you require any additional information regarding the proposed herbicide application, please do not hesitate to contact us.

Sincerely,

Richard Johnstone

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Environmental Analyst
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