



CIRNAC Comments to NIRB

Re: Notice of Screening for Parks Canada's "Establishment of Tallurutiup Imanga National Marine Conservation Area" Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
23UN047
Our file - Notre référence
GCdocs#116355181

August 24, 2023

Kelli Gillard
Manager, Project Monitoring
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 Parks Canada's "Establishment of Tallurutiup Imanga National Marine Conservation Area" Project Proposal

Dear Kelli Gillard,

On August 3, 2023, the Nunavut Impact Review Board (NIRB) invited parties to comment on Parks Canada's "Establishment of Tallurutiup Imanga National Marine Conservation Area" 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: Cumulative Effects Assessment

The Proponent indicated in its application to the NIRB that the anticipated long-term environmental and socio-economic outcomes resulting from the establishment of the Tallurutiup Imanga National Marine Conservation Area (TINMCA) will provide a net benefit. Legislative and regulatory frameworks, policy and management tools, and governance structure are expected to provide an effective, multi-layered approach for achieving ecosystem and socio-economic benefits and mitigating potential impacts. The Proponent also indicated in its Strategic Environmental Assessment that increased tourism may result from the establishment of the TINMCA, and noted in its Feasibility Assessment Report that there is emerging interest in nominating the site as a potential World Heritage Site.

CIRNAC recognizes that the Proponent will consider positive, negative, and cumulative impacts of proposed policies, programs, and plans, pursuant to subsections 8.3.7 and 8.9.3 in the Directive on the Management of National Marine Conservation Areas (NMCAs), but notes that the Proponent did not identify potential adverse cumulative effects that may result from increased tourism in this region, if the area is designated as a NMCA and World Heritage Site in the future.



CIRNAC recommends that the Proponent identifies potential cumulative impacts that may result from the designation of the TINMCA and whether current mitigation strategies consider potential paradigm shifts related to Arctic tourism in the future (e.g., reduced development barriers from investments in tourism infrastructure, simplified government permitting, reduced travel costs to the region).

CIRNAC #2: Consultation with Interested Parties

CIRNAC appreciates the effort the Proponent has made in consulting with relevant interested Inuit, hamlets, and community organizations in Clyde River, Pond Inlet, Arctic Bay, Resolute Bay, and Grise Fiord, as well as community members, government departments, and non-government organizations in Iqaluit. CIRNAC recommends that the Proponent:

- Continues consulting with relevant interested Inuit, hamlets, and community organizations, prioritizing those in Clyde River, Pond Inlet, Arctic Bay, Resolute Bay, and Grise Fiord;
- Provides regular updates on the status of project activities to relevant interested Inuit, hamlets, and community organizations; and
- Considers engaging with affected, adjacent, transboundary Indigenous groups who may have an interest in the project.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further phases related to this project. Should you have any questions, please contact John MacInnis by e-mail at john.macinnis@rcaanc-cirnac.gc.ca.

Sincerely,



Amal Roy
A/Manager, Impact Assessment

