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Building *Nunavut* Together
Nunavut liuqatigiingniq
Bâtir le *Nunavut* ensemble

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Government of Nunavut
Nunavut Kavamat
Gouvernement du Nunavut

September 5, 2023

Keith Morrison
Manager, Impact Assessment
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Notice of Screening for the “Keewaytinook Okimakanak Bathymetric Marine Fiber Optic Cable” Project Proposal (23YN043)

Dear Mr. Morrison,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Keewaytinook Okimakanak’s Bathymetric Marine Fiber Optic Cable Project proposal. The GN reviewed the proposed project and has prepared three (3) comments for your consideration (see Appendix).

The GN looks forward to further information on this project from NIRB. Should there be any concerns or need for follow-up, please do not hesitate to contact me by phone at (902) 514-8434 or by email at JFBuller@dryasconsulting.ca.

Qujannamiik,

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

Appendix

GN-01: Community Support	
Department	Economic Development and Transportation
Organization	Government of Nunavut
Subject/Topic	Community Support
References	<ul style="list-style-type: none">Keewaytinook Okimakanak (2023). NIRB Application for Screening
CONCERNS	
<p>The NIRB application document mentions that the proponent reached out to Lucassie Arragutainaq from the Sanikiluaq Hunters and Trappers (HTO) in July, 2023. However, the Proponent doesn't specify whether Mr. Arragutainaq supported the project, shared comments on behalf of the HTO, or if there were any concerns registered by either him or the HTO. In the NIRB registry, there are letters of support from Fort Severn and Weenusk First Nations, but no correspondence from Sanikiluaq has been posted to the registry.</p>	
RECOMMENDATIONS	
<p>The Government of Nunavut recommends that the Proponent consult with and obtain written confirmation of support from the Sanikiluaq Hunters and Trappers, and/or Sanikiluaq Hamlet Council, similar to how support was confirmed from neighboring communities in Northern Quebec and Ontario. This alignment would enhance the consistency of the consultative process and further demonstrate confirmation of support for the Proposal.</p>	
ADDITIONAL COMMENTS	

GN-02: Marine Wildlife Observations	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Marine wildlife observations
References	<ul style="list-style-type: none"> Keewaytinook Okimakanak (2023). NIRB Application for Screening
CONCERNS	
<p>In the NIRB Application, the Proponent mentions that they will apply best practices akin to those employed for the Eastern Arctic Undersea Fibre Optic Network (EAUFON) project in Nunavik. This involves monitoring cetaceans through visual observation. The Proponent states, "The [bathymetric] survey will begin only if cetaceans are absent from the survey zone and stop survey if cetaceans are present." No other details are provided about standards of practice for other marine species, such as pinnipeds (seals, walrus), seabirds, or bears, if observed.</p> <p>Additionally, a survey during the fall will encounter roughly 12 hours of daylight to conduct marine wildlife surveys. The proposal does not indicate whether the bathymetric surveys will occur only during daylight (when observers can see wildlife) or whether they will occur on a 24-hour basis. In the case where bathymetric surveys are occurring on a 24-hour basis, what is the proposed mitigation for marine animals at night, when visual observation is not possible?</p>	
RECOMMENDATIONS	
<p>The Government of Nunavut (GN) requests a defined approach for marine wildlife mitigation and monitoring practices for this Proposal, rather than a reference to another project. The GN also requests a description of the proposed mitigation for bathymetric surveys occurring at night, when visual observation is not possible.</p> <p>The GN also recommends that marine wildlife observations during the survey be reported to NIRB following completion of the Project, with special reference to instances where wildlife observations led to delay or pause in bathymetric survey operations.</p>	
ADDITIONAL COMMENTS	

GN-03: Employment Opportunities	
Department	Economic Development and Transportation
Organization	Government of Nunavut
Subject/Topic	Employment Opportunities
References	<ul style="list-style-type: none"> Keewaytinook Okimakanak (2023). NIRB Application for Screening
CONCERNS	
<p>In the NIRB Application, the Proponent mentions that they will apply best practices akin to those employed for the Eastern Arctic Undersea Fibre Optic Network (EAUFON) project in Nunavik. This involves monitoring cetaceans through visual observation, but the document doesn't provide information about how the Proponent intends to fill or train/certify the marine mammal observer positions.</p>	
RECOMMENDATIONS	
<p>The Government of Nunavut requests that at least one marine mammal observer from Sanikiluaq be pursued, particularly for the portion of the survey transect that falls within Nunavut waters around Sanikiluaq.</p>	
ADDITIONAL COMMENTS	