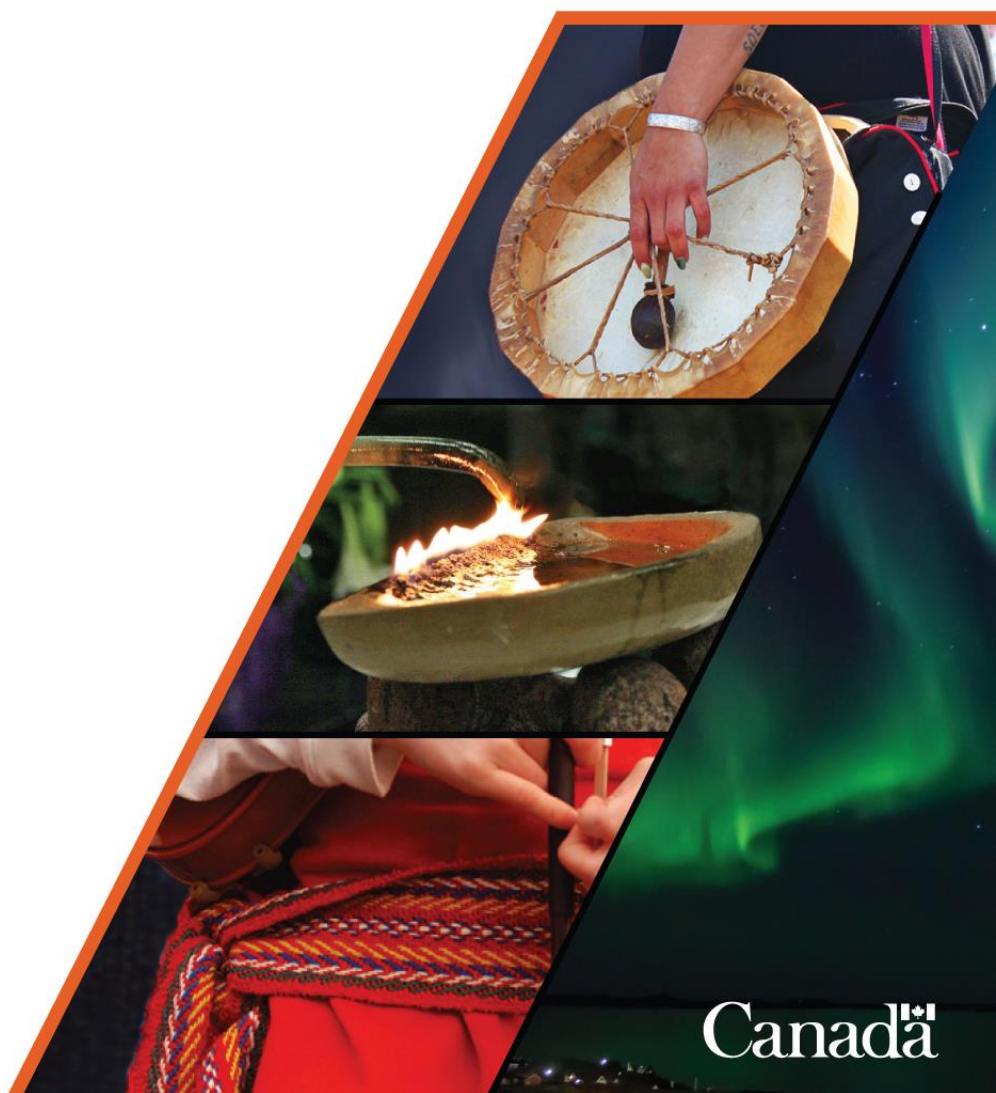




CIRNAC Comments to NIRB

Re: Notice of Screening for Keewaytinook
Okimakanak's "Keewaytinook Okimakanak Bathymetric
Marine Fiber Optic Cable Survey" Project Proposal



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

Your file - Votre référence
23YN043
Our file - Notre référence
GCdocs#116819063

September 5, 2023

Keith Morrison
Manager, Impact Assessment
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 Keewaytinook Okimakanak's "Keewaytinook Okimakanak Bathymetric Marine Fiber Optic Cable Survey" Project Proposal

Dear Keith Morrison,

On August 23, 2023, the Nunavut Impact Review Board (NIRB) invited parties to comment on Keewaytinook Okimakanak's "Keewaytinook Okimakanak Bathymetric Marine Fiber Optic Cable Survey" 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: Fuel and Hazardous Materials Classification

The Proponent indicated that it has contracted Arctic Research Foundation's vessel, *William Kennedy*, to complete a bathymetric survey, and provided a document outlining emergency procedures for the vessel. In this document, there are descriptions related to oil spill response and lithium-ion battery disposal procedures, the use of a hydraulic crane, and the presence of a laboratory and kitchen. In describing procedures for instances when lithium-ion batteries (or devices containing them) catch fire, the Proponent indicated that, if possible, the batteries should be disposed of overboard, to prevent the fire from spreading.

CIRNAC notes that it appears the Proponent did not identify all fuel and hazardous materials in its application to the NIRB that may be associated with its vessel (e.g., oil, batteries, hydraulic fluids, chemicals used in the laboratory, propane for cooking), or whether the Proponent intends to recover batteries (or devices) that are disposed of in the ocean, following a fire.

CIRNAC recommends that the Proponent:



- Identifies the type and estimated quantity of all fuel and hazardous materials onboard its vessel;
- Clarifies whether it intends to recover batteries (or devices) that are disposed of in the ocean, following a fire; and
- Describes how it intends to manage potential contamination resulting from battery disposal in the ocean, following a fire.

CIRNAC #2: Waste Classification and Disposal Procedures

CIRNAC notes that the Proponent did not identify waste products that are reasonably expected from activities onboard its vessel in its application to the NIRB, or procedures related to the handling and disposal of all its waste products. CIRNAC recommends the Proponent provides:

- Descriptions of the anticipated waste resulting from project activities (e.g., combustible, non-combustible, and hazardous waste, sewage, greywater);
- Procedures for handling and disposing of waste products; and
- Measures that it will implement to prevent potential negative environmental impacts resulting from waste disposal activities.

CIRNAC #3: Consultation with Interested Parties

CIRNAC appreciates the effort the Proponent has made in contacting the Sanikiluaq Hunters and Trappers Association, and acknowledges that:

- The project is supported by Weenusk and Fort Severn First Nations;
- The Proponent is willing to share results of its survey with surrounding First Nations and organizations; and
- The Proponent intends to consider traditional knowledge describing the seasonal migration patterns and locations of the beluga in southern Hudson Bay in the marine survey.

CIRNAC recommends that the Proponent continues consulting with the Sanikiluaq Hunters and Trappers Association, and considers consulting with relevant interested Inuit, community members, and community organizations in Sanikiluaq, as well as affected, adjacent, transboundary Indigenous groups and community members who may have an interest in the project.

As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities within or in close proximity to the project area;
- Mitigation measures designed to prevent disturbance to sites with cultural, archaeological, and/or environmental significance;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.



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,



Vincent Okonkwo
A/Manager, Impact Assessment

