



NIRB Response:

Keewaytinook Okimakanak Bathymetric Marine Fibre Optic Cable Survey

NIRB File No.: 23YN043 & 150134

September 14, 2023

1. CIRNAC	<p>1.1 Fuel and Hazardous Materials Classification</p> <p>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.</p> <p>CIRNAC recommends that the Proponent:</p> <ul style="list-style-type: none">• 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. <p>1.2 Waste Classification and Disposal Procedures</p> <p>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:</p> <ul style="list-style-type: none">• 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.
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	<p>1.3 Consultation with Interested Parties 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.</p>
Response	
	<p>1.1 Additional fuel and hazardous materials usage and disposal protocols are included in Appendix A (oil, batteries, hydraulic fluids, chemicals used in the laboratory, propane for cooking). In the event that a battery has potential to cause a fire and/or risk to life, it will be wrapped in a fire blanket, removed from an enclosed space, then an ABC fire extinguisher would be used to extinguish any remaining fire. The battery would then be returned for disposal in port when it is safe to do so.</p> <p>1.2 Waste and disposal procedures from the project activities (combustible, non-combustible, and hazardous waste, sewage, greywater) are in Appendix A based on the NIRB submission, however more information can be provided upon request.</p> <p>1.3 Keewaytinook Okimakanak has been in contact with the Sanikiluaq HTA to ask if the project team can visit the community following the survey to share the mapping results and continue engagement. We have also reached out to the Arctic Eider Society, Qikiqtani Inuit Association and other interested stakeholders in order to share project updates, and will continue to reach out. We will share the mapping and survey information with stakeholders and offer to provide project updates and gather input from the above-mentioned stakeholders.</p>
2. Government of Nunavut	<p>2.1 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>2.2 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>

	<p>2.3 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> <p>2.4 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>
Response	
	<p>2.1 The Arctic Research Foundation will follow the guidance from the Department of Fisheries for this project regarding marine wildlife mitigation and monitoring including adding the following guidance:</p> <ul style="list-style-type: none"> - Observation to include cetaceans and other marine species, such as pinnipeds (seals, walrus), seabirds and bears. - Nighttime observations to be completed by infrared lights and night vision goggles. If the weather does not permit adequate nighttime observations, the survey will be halted until daylight observation can be completed. - The marine monitor post includes images with marine species identification table and experienced monitors, along with orientation to properly identify, alert the crew and document the species. <p>2.2 The Government of Nunavut will be provided with the marine wildlife observations report through the Nunavut Department of Environment contact, NIRB, and other contacts that are provided at the Government of Nunavut. The marine wildlife observations report will include reference to instances where wildlife observations led to delay or pause in bathymetric survey operations.</p>

	<p>2.3 Keewaytinook Okimakanak has been in contact with the Manager of the Sanikiluaq HTA to request further comments, feedback and support. As a result, a route revision (Appendix B) has been made and the Manager of the Sanikiluaq HTA has indicated that the route is acceptable.</p> <p>2.4 An invitation has been provided to the Sanikiluaq HTA to identify a marine observer to join the survey. Keewaytinook Okimakanak is in discussions with the Manager of the Sanikiluaq HTA to coordinate logistics for this opportunity.</p>
3. Sanikiluaq HTA	<p>3.1 Proponent Summary of Sanikiluaq HTA Board Guidance:</p> <ul style="list-style-type: none"> • The survey route is too close to the south Belcher Islands • The survey route needs to be moved south away from Milliit Island • There are beluga stocks that migrate in the Hudson and James Bay (Western Hudson Bay, Eastern Hudson Bay, and James Bay beluga stocks)
Response	
	<p>3.1 Keewaytinook Okimakanak has further discussed the project with the Manager of the Sanikiluaq HTA and the route has been requested to be moved 10km south. This route revision has been made (Appendix B) and the Manager of the Sanikiluaq HTA has indicated that the route is acceptable.</p> <p>Keewaytinook Okimakanak has requested to visit Sanikiluaq following the survey to share the mapping results and continue engagement to incorporate local Indigenous knowledge in the project.</p>

Appendix A - Waste Usage and Disposal Procedures

All waste will be stored on board and unloaded at the port of Churchill, Manitoba or Nain, Newfoundland upon completion of survey at approved facilities.

Solid Waste is held on board and disposed of at an approved facility in port. Estimated 600Kg

Waste Oil is stored onboard and delivered to approved disposal facility in port. Estimated 360L

Grey Water is stored in a tank prior to discharge. Estimated 8,000L

Black Water (sewage) is treated via the vessel's two (2) Managem sewage treatment systems. Managem systems meet USCG Certified Type II Marine Sanitation Device and are also and is compliant with IMO Resolution MEPC2(VI). Estimated 4,200L

Propane is used in the operation of cooking. Propane containers are refilled at an approved facility in port. Estimated 40Lbs

Batteries are kept on board for operations and kept charged. If batteries are found to be no longer functioning, they are disposed of at an approved disposal facility in port. N/A

Hydraulic Fluids are used in the operation of cranes which are kept in good working order. If additional hydraulic fluids are added, this is completed at port. All hydraulic fluids used on the vessel are a biodegradable type and are kept on board and disposed of an approved facility in port if needed. N/A

Laboratory Chemicals are used in the operation of laboratory testing for certain projects. Laboratory chemicals are disposed at an approved disposal facility in port. Laboratory chemicals will not be used during the survey. N/A

Appendix B – Survey Route Update

