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September 20, 2013

BY-ELECTRONIC MAIL: info@nirb.ca

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Serving the
communities of

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Arctic Bay

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Cape Dorset

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Qikiqtarjuaq

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Resolute Bay

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Sanikiluaq

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Re: Notice of Part 4 Screening for Department of National Defence's Clarification and Resubmission of its "Nanisivik Naval Facility" project proposal

NIRB File # 09DN018

On August 30th 2013, the Nunavut Impact Review Board (NIRB) requested comments on the Part 4 Screening for the Department of National Defence's Clarification and Resubmission of its "Nanisivik Naval Facility" Project Proposal. The Qikiqtani Inuit Association (QIA) Department of Lands and Resources would like to thank the Nunavut Impact Review Board for providing the opportunity to comment on the proposal.

On June 28, 2013 the Department of National Defence (the DND or the Proponent) provided clarification to the NIRB regarding their "Nanisivik Naval Facility" project proposal and the deficiencies identified by the NIRB in the original project proposal. As you are aware, QIA had submitted comments on October 13th 2011 identifying a long list of concerns with the project plans at that time.

Based on our review of documents provided to NIRB and our own consultation with the residents of Arctic Bay, certain elements of the project proposal were requested to be modified to in order to greatly reduce impacts and ease public concern. The concerns revolved around the following topics:

- The use of the Arctic Bay airport and All-Weather Road
- Emergency Services and Plans for an Unmanned Facility
- Local Harvesting
- Wildlife Monitoring and Mitigation
- Use of local Aggregate and Carving Stone Deposits
- Potential Introduction of Invasive Species

Appendix 1

Comments from Defense Construction Canada
Regarding QIA Concerns

Sanikiluaq

- In summary, DND has visited the community of Arctic Bay many times since the project was announced in 2007, to advise of the concept and plans for the site. Most of the meetings were held with the Mayor and Council of the Hamlet of Arctic Bay. At a meeting in October 2008, representatives of various community organizations were present. In February 2011, an 'Open House' was held at the Community Centre, which provided an opportunity for residents to learn more of the project, to ask questions and provide comments. DND has been active in maintaining an open line of communication with the Mayor and Council, as well as with the local Member of the Legislative Assembly. DND has listened carefully to stakeholder comments and concerns, which have been taken into account for the design of the site – for example, the community's capacity to provide services to the site; the skill sets available in the community for construction and for the operation phase. It is critical to understand that plans will change when undertaking a project of this magnitude. DND has only recently received approval to fund the implementation of this project. Like all projects, the final plan and associated budget allocation to implement the plan are based on available funding, which is always a challenge to secure. DND will continue to ensure that the community of Arctic Bay and other stakeholders are consulted and kept informed of any further changes which may come to pass.

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Resolute Bay

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DND integrated these concerns into the design of the facility and will incorporate the following strategies to address the security of the site:

- Secure building with appropriate panels over windows; and
- Routine ranger security patrols

This level of security is similar to that used for other isolated DND sites.

3. *Updates are required to the Emergency Response Plan to include the description of additional emergency resources to be provided in Arctic Bay.*

DND does not expect residents of Arctic Bay to respond to a fire or other emergency at the NNF. A copy of the current Emergency Response Plan can be found in Appendix F of the PSIR – Nov 2012.

4. *Questions were raised on the use of emergency equipment located in Arctic Bay and issues related to providing support during adverse weather conditions, fire suppression systems in place at site and limited emergency resources currently available at Arctic Bay.* DND does not expect residents of Arctic Bay to respond to a fire or other emergency at the NNF. In the event of a fire or other emergency, no additional crew or machinery is required from the Arctic Bay community.

5. *Noted that hunting conditions have changed since the mine has ceased operations and residents are concerned that increased activity due to the operation of the Nanisivik Naval Facility will scare away wildlife from the area again.*
Identified concerns regarding the potential for increased naval traffic to interfere with Inuit harvesting in and around Nanisivik.

Work at the site will occur over three (3) seasons, and only during the time of suitable weather. The work shall be contained to the immediate area only. Local persons from the community will not be prevented from crossing the area as they require. During the construction season, 2-3 supply ships are expected. Coast Guard activity at the NNF site will continue unchanged from the present annual operation. From the AOPS ship operations perspective, which is a separate activity to the construction of the NNF facility, Navy ships will utilize NNF during the navigable season, late July through to very early in October. This is when the Canadian Coast Guard is operating at the NNF site as well. Other than day long fuelling operations at NNF, which are currently estimated to be a minimum of 4 to a maximum of 10 refuelling events, Navy ships will not be at the site for more than a couple of days at a time at most. It is possible that a short, 2 to 3 day goodwill visit to the hamlet of Arctic Bay might be conducted each summer, subject to the approval of the local community. All planned Navy ship movement and activities will be provided to the NIRB

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The Arctic Offshore Patrol Ships will be conducting patrols during navigable water season only, approximately late July through to early October. While the ships will be capable of breaking ice, they will not be icebreakers and will not be employed as such. Impacts to Inuit hunters regarding boat paths on the sea ice will be discussed as part of the annual deployment plan for the ship, discussions which will be conducted by JTFN with stakeholder prior to and during ship deployments to the North.

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- Washing down equipment will not be performed at the Nanisivik Naval Facility. The Royal Canadian Navy strictly adheres to all Canadian and International maritime laws and regulations; for example the Arctic Waters Pollution Prevention Act (AWPPA) which aims to prevent pollution in Canadian Arctic waters. The AWPPA is a 'zero discharge' act, which states, "no person or ship shall deposit or permit the deposit of waste of any type in the Arctic waters." The AWPPR applies to the deposit of waste in Arctic waters; or in any location on the mainland or islands of the Canadian Arctic; and the liability for such deposits. The AWPPR regulates the deposit of domestic and industrial waste in Arctic waters and on land in the Arctic, and the deposit of waste by ships in Arctic water. These regulations fall under the control of Transport Canada. The International Convention for the Prevention of Pollution from Ships, 1973 as Modified by the Protocol of 1978 Relating Thereto (MARPOL 73/78) establishes international standards for pollutant discharges from ships.

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