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17XN030  
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CIDMS # 1166942

August 8, 2017

Sophia Granchinho  
Manager, Impact Assessment  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU, X0B 0C0  
*Via electronic mail to: info@nirb.ca*

**Re: Notice of Screening for Government of Nunavut's "Pond Inlet Marine Infrastructure" Project Proposal**

Dear Ms. Granchinho,

On July 18, 2017 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut's "Pond Inlet Marine Infrastructure" project proposal. Indigenous and Northern Affairs Canada (INAC) appreciates the opportunity to provide comments and offers the response below as it pertains to the NIRB's request:

- ***Whether the project proposal is likely to arouse significant public concern; and if so, why;***

**Project Specific Information Requirements (PSIR) Section 1.1.1 – Project Overview, Page 1, paragraph 4.**

Issue: The project overview states that "As the objective of the Project is to improve access for existing marine use and overall safety of marine activities in the community, an increase in shipping or any future potential commercial development using the SCH is not included in the Project scope."

The proposed harbour development will provide opportunity for increased vessel traffic in Eclipse Sound (tourism, pleasure craft, etc.) which may increase the potential for adverse effects such as vessel - vessel collisions, vessel - marine mammal collisions, and increased potential for the introduction of contaminants (bilge water, spills, etc.).



Despite the intended goals of the project to serve existing users, there is a potential for increased use of the local marine environment as a result of the harbour development. It is difficult to determine if the project will have residual adverse effects on the marine environment and members of the community without quantifying the potential increase in vessel traffic and identifying appropriate mitigation measures to address the additional risks this may pose for Eclipse Sound.

INAC recommends that the proponent provide a discussion on the estimated increase in marine traffic and associated mitigation measures as this is required to assess the potential for residual significant adverse effects resulting from the project.

**PSIR Section 6 – Potential Cumulative Effects, Page 108-109:**

Issue: Climate change effects are not fully considered.

Climate change effects in the Canadian Arctic have been the focus of considerable attention, including effects on fishery migration, sea ice changes, and an increased open water access period which can influence future fisheries operation and cruise ship arrivals.

The effects of climate change on local use of the port and adjacent waters should be considered for both construction and operations of the Small Craft Harbour (SCH).

INAC recommends that the Proponent provide some evaluation of the cumulative effects of climate change on the design and operation of the SCH.

- ***Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;***

**CEMP Section 3.2.2 Emergency Response, Page 15:**

Issue: There is insufficient detail related to the types of emergency situations anticipated during construction and operation of the SCH.

The CEMP states that an emergency response plan will be developed during construction but there is no indication of what types of emergencies the proponent anticipates could occur as well as no discussion on emergency response during operation.

It is uncertain if the proponent has considered all potential emergency situations that may result in significant adverse effects to the environment and members of the community, should they occur.

INAC recommends that the proponent provide an overview of what types of emergencies may arise from the project and the types of mitigation measures that may be employed with the understanding that more detail will be provided in the Project Emergency Response Plans.



INAC also requests clarification that the emergency response plan will cover both construction and operation of the SCH.

**CEMP Section 3.6 Marine Construction, Table 3-7 MC01, Page 21-23:**

Issue: Insufficient detail provided regarding the marine construction monitoring program.

The CEMP commits to monitoring TSS/turbidity and marine mammals during marine construction activities but does not provide sufficient detail to determine if monitoring is adequate to be able to detect adverse effects to the marine environment resulting from project activities.

Details regarding marine construction monitoring activities are not provided. In order to determine if proposed monitoring activities will be effective in detecting/preventing adverse effects to the marine environment, details related to location, frequency, timing, methods, etc. are required.

INAC recommends that the proponent provide more details regarding marine construction monitoring. It is understood that the detailed monitoring plan will be developed by the contractor. However, a discussion on the minimum requirements of a monitoring program is required to determine if this would be adequate in ensuring adverse effects to the marine environment are minimized or avoided.

**CEMP Section 4, Monitoring and Reporting, Page 30:**

Issue: It is unclear what data will be included in the Environmental Monitoring Reports and if these will be submitted to applicable regulatory agencies.

This section does not reference how data collected during compliance monitoring and/or environmental effects monitoring will be made available to regulatory agencies as well as at what frequency and what types of data would be included.

INAC recommends that the proponent provide more detail related to how the data collected during compliance monitoring and environmental effects monitoring will be reported to applicable regulatory agencies.

- ***Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures);***

**PSIR Section 1.7 – Fuel, Page 16:**

Issue: Section 1.7 states that “Refueling of mobile equipment will take place in a designated fueling area in the Contractor’s laydown area or at the mobile equipment’s location at the SCH or in the quarry.”

The reason for the establishment of designated fueling areas is to mitigate the risk of spills during refueling as these areas would typically be constructed in a manner that would contain a potential fuel spill and/or allow for a rapid response to a spill should one



occur. Designated refueling areas are also typically situated in areas away from environmentally sensitive areas and as such act to further reduce the potential for accidental spills of fuel into areas such as streams and wetlands.

Refueling mobile equipment outside of designated refueling areas increases the risk of introducing fuels and other deleterious substances into the environment.

INAC recommends that the Proponent ensure that refueling of mobile equipment occurs only at least thirty one (31) metres away from the normal high water mark.

- **Closing**

INAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Julia Prokopick at (867) 975-4567 or by e-mail at [julia.prokopick@aandc-aadnc.gc.ca](mailto:julia.prokopick@aandc-aadnc.gc.ca).

Sincerely,

[Original Signed by]

Felexce Ngwa  
A/Manager, Impact Assessment