



Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0
Via email: info@nirb.ca

9 August, 2017

Re: Parks Canada Agency's comments for the NIRB's screening of the "Pond Inlet Infrastructure" project proposal (NIRB File No.:17XN030)

Parks Canada (PC) is pleased to provide the Nunavut Impact Review Board (NIRB) with our comments for the screening of the "Pond Inlet Marine Infrastructure" project proposal (NIRB File No.: 17XN030).

Parks Canada reviewed this proposal as it is located within the proposed national marine conservation area (NMCA) in Lancaster Sound. This is an active NMCA proposal with ongoing discussions between Parks Canada, the Government of Nunavut (GN) and the Qikiqtani Inuit Association (QIA). A final boundary is expected to be announced by the government of Canada, the GN and QIA shortly. Further steps toward NMCA establishment will include the negotiation of an Inuit Impact and Benefit Agreement (IIBA) as per the Nunavut Land Claims Agreement and the development of an interim management plan, including an interim zoning plan. Once the IIBA is signed, formal establishment under the *Canada National Marine Conservation Areas Act (CNMCA Act)* would follow shortly thereafter. We will inform NIRB of any further developments as they occur.

NMCAs are established and managed under the *CNMCA Act* which states that these areas "are established ... for the purpose of protecting and conserving representative marine areas for the benefit, education, and enjoyment of the people of Canada and the world". NMCAs are multiple use areas with zones of varying protection where sustainable uses, such as fishing and shipping, are permitted. They are managed in cooperation with other responsible departments, notably the Department of Fisheries and Oceans (DFO) and Transport Canada. The purpose of an NMCA is to balance protection and sustainable use.

The area of the Lancaster Sound NMCA is of critical importance to a number of marine mammal species at various times of the year, including most of the world's narwhal, 20% of Canada's beluga, as well as bowhead whales, walrus, and ringed and bearded seals. Many of these species are also harvested by Inuit, and thus are of great relevance to the objective of managing marine resources for ecological sustainability. This area is also critically important to millions of breeding, summering and staging seabirds, such as Thick-billed murres, Black-legged kittiwakes, Northern Fulmars, Dovekies, Black guillemots, and seabirds such as eiders and long-tailed ducks.

Within this broad mandate Parks Canada's key areas of interest related to the Pond Inlet Infrastructure Project proposal include:

1. marine ecosystem
2. marine shipping
3. visitor experience

Parks Canada and DFO would share responsibility for the management of the marine mammal component of an NMCA in Lancaster Sound. For this common area of interest, PC will rely on the outcomes of the technical analysis by DFO for potential effects on the marine ecosystem, and the effectiveness of proposed mitigation measures.

PC and Environment and Climate Change Canada (ECCC) also have overlapping mandates in terms of impacts on seabirds and water quality. PC will rely on the outcomes of the technical analysis by ECCC for potential effects and the effectiveness of proposed mitigation measures.

With regards to visitor experience, Parks Canada recommends that government departments and agencies who regulate the cruise ship industry in the area of the proposed project be made aware of the timing of construction. This information should be communicated to the cruise ship industry at least a year in advance so that trips can be planned accordingly and visitors are well aware of the potential for construction noise.

We look forward to continuing to work with NIRB and the regulators throughout the remainder of the planning and regulatory process. Please feel free to contact Allison Stoddart at (819) 420-9188 or Allison.stoddart@pc.gc.ca if you should have any questions.

Sincerely,



Kevin McNamee
Director, Protected Areas Establishment

c.c. Jenna Boon, Nunavut Field Unit Superintendent