



INUVIALUIT GAME COUNCIL

May 2, 2018

Kelli Gillard
A/Director, Technical Services
Nunavut Impact Review Board
PO Box 1360
Cambridge, NU

Submitted to info@nirb.ca

**Re: Draft Scope and Environmental Impact Statement Guidelines for
“Gray’s Bay Road and Port” Project Proposal**

Dear Ms. Gillard,

Thank you for the opportunity to provide comment on the Draft Scope and Environmental Impact Statement Guidelines for the “Gray’s Bay Road and Port” Project Proposal. The Inuvialuit Game Council, as per the *Inuvialuit Final Agreement*, represents the collective Inuvialuit interest in wildlife. The Council would like to submit the following comments regarding the draft scope list:

Under 2) Anticipated ecosystemic and socio-economic impacts of the Project:

- Under Terrestrial wildlife and wildlife habitat, the scoping should include of impacts on sea ice crossings and sea ice habitat for polar bears and Dolphin and Union Caribou.
- Under Marine environment, the scoping should include all fish, not only Commercial, Recreational and Aboriginal (CRA) fisheries as defined in the *Fisheries Act*. The changes in the *Fisheries Act* in 2012 that limits protection to only CRA fisheries was made without consultation with the Inuvialuit Game Council.
- Should specifically refer to impact to sea ice habitat for ringed seals, bearded seals and walrus.

- Should specifically refer to impacts to migratory routes, habitat use and impacts to beluga, bowhead, arctic char and arctic cod.
- Impacts and potential risks to Marine Protected Areas, namely Tarium Niryutait Marine Protected Area and Anguniaqvia Niqiqyuam Marine Protected Area should also be taken into consideration.
- Terrestrial and marine Species at Risk should include all species listed under the *Species at Risk Act*, not only those listed as “at risk” by COSEWIC
- Impacts to traditional activity and knowledge and community knowledge should also include impacts to travel routes on the sea ice.
- Cumulative effects should also include impacts of increased noise pollution to the marine environment as a result of the increased ship traffic.

Under 3) Measures proposed by the Proponent to avoid and mitigate adverse ecosystemic and socio-economic impacts, including contingency plans:

- Inclusion of transboundary coordination and communication plans for emergency or spill response.
- Avoidance, Mitigation and Offsetting Measures specifically related to fisheries offsetting should encompass all fisheries, not only commercial, recreational and Aboriginal fisheries.

Thank you for taking these comments into consideration.

Regards,



John Lucas Jr.
Chair

CC:
Wildlife Management Advisory Council (NWT)
Fisheries Joint Management Committee

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