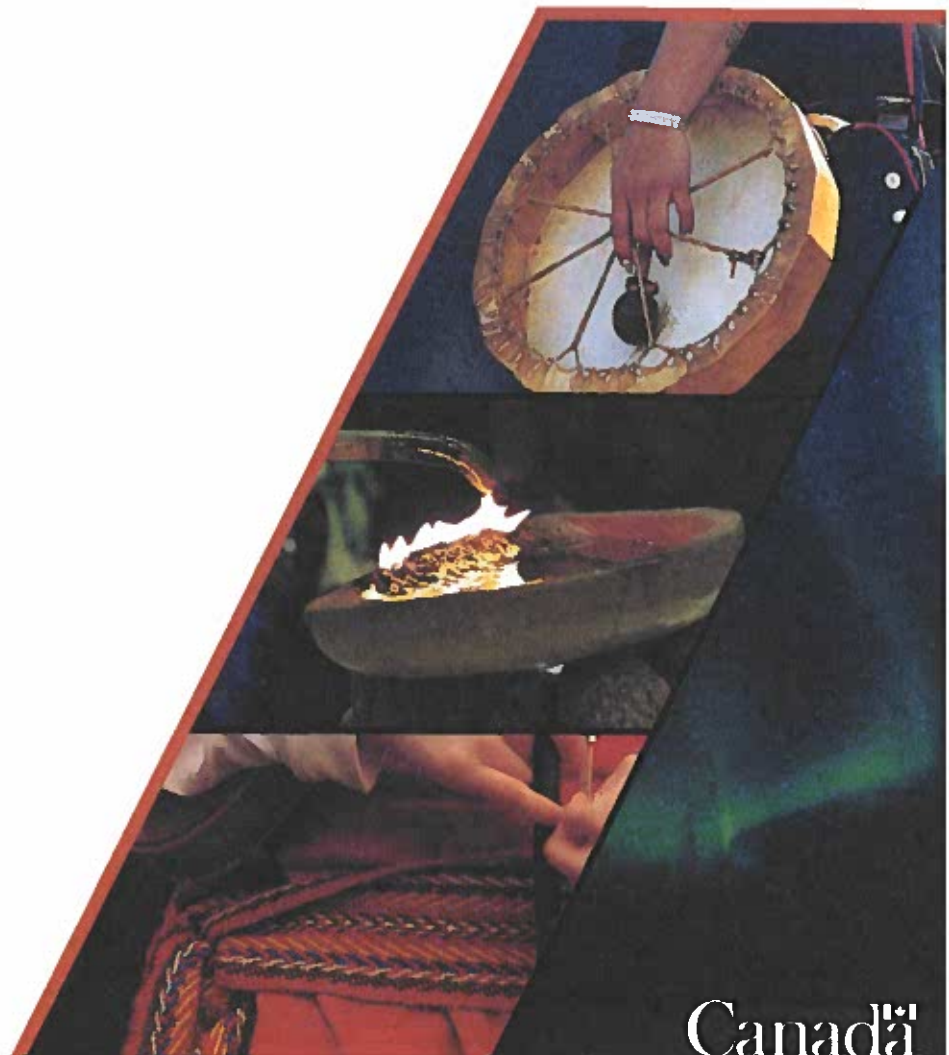




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for “GN’s Undersea Fibre
Optic Cable Installation” Project Proposal



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
18UN050
Our file - Notre référence
CIDMS # 1239009

January 16, 2019

Keith Morrison
Technical Advisor II
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 GN's "Undersea Fibre Optic Cable Installation" Project Proposal

Dear Mr. Morrison,

On December 20, 2018, the Nunavut Impact Review Board (NIRB) invited parties to comment on the Government of Nunavut (GN)'s "Undersea Fibre Optic Cable Installation" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) 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 cause significant adverse eco-systemic or socio-economic effects; and if so, why;

1. Impact Identification

The Proponent mentioned in the project proposal that different classes of vessels and heavy equipment will be used during the marine and land operations - the installation of the cable in the marine environment, at the landing sites and the cable station. The use of various kinds of vessels and equipment during the construction and operation of the project might negatively impact the marine and terrestrial environments. However, the Proponent did not provide a description of the potential impacts of those activities on the marine and terrestrial environment or propose mitigation measures.

Although, the Proponent stated in the "Identification of Environmental Impacts" matrix that the installation of equipment during the project construction phase will cause negative and "non-mitigatable" impacts on water quality, they did not identify the specific negative impacts that the project might cause and also did not give an explanation as to



why these impacts were considered to be “non-mitigatable”. It is also unclear how the proponent intends to monitor these impacts to ensure they remain “non-significant”. CIRNAC suggests that the proponent clearly identifies all project impacts, alongside their appropriate mitigation measures and monitoring plans.

2. Emergency and Spill Contingency Planning

The project involves use of many vessels and equipment and presumably substantial amount of fuel but the proponent did not provide any information on fuel usage, emergency management and spill contingency planning. CIRNAC recommends that the Proponent develops and submits for review an Emergency and Spill Contingency Plan. Should the project be approved, CIRNAC recommends the NIRB to include the following terms and conditions:

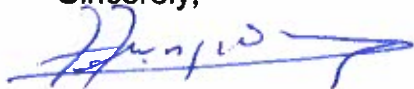
- The Proponent should wash, refuel and service machinery and store fuel and other materials so as to prevent any harmful substances entering the water;
- Drip pans or other equivalent device should be used when refueling equipment. Secondary containment or a surface liner (e.g., self-supporting Insta-Berms and fold-a-tanks) to be used at all refueling stations;
- Spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) should be readily available during any transfer of fuel or hazardous substances, at all fuel storage sites and maintenance areas;
- All fuel and other hazardous materials should be stored a minimum of 31 metres away from the high water mark of any water body and in such a manner as to prevent their release into the environment;
- Re-fueling of all equipment should occur a minimum of 31 metres away from the high water mark of any waterbody;
- Secondary containment or a surface liner should be used when storing fuel and chemicals at all locations; and
- All personnel are to be properly trained in fuel and hazardous waste handling procedures, as well as spill response procedures.

Any matter of importance to the Party related to the project proposal;

The Proponent will require land authorizations from CIRNAC Land Administration.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Amal Roy at (867) 975-4554 or by e-mail at amal.roy@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

