



Environmental Protection Operations Directorate
Prairie & Northern Region
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ECCC File: 6300 000 041/001
NIRB File: 18UN050

January 16, 2019

Via email at: info@nirb.ca

Keith Morrison Technical Advisor II
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Keith Morrison:

RE: 18UN050 – Government of Nunavut, Department of Community and Government Services – Undersea Fibre Optic Cable Installation – NIRB Screening

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned screening and is submitting comments via email. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Species at Risk Act* and the *Migratory Birds Convention Act*.

The following comments are provided:

1. Potential Disposal at Sea

Reference

- NIRB Application for Screening #1254525. Undersea Fibre Optic Cable Installation. December 3, 2018.

Comment

ECCC notes the installation methods will be determined based on the results of the marine survey (Page 2, NIRB Application), however, it does not appear from the Project Description that any disposal at sea for unused materials will be required.

If disposal at sea is required, the Proponent will need to provide the necessary information for a Disposal at Sea permit application (see <https://www.canada.ca/en/environment-climate-change/services/disposal-at-sea/permit-applicant-guide.html> for more details).

ECCC Recommendation

No recommendation, information provided for the Proponent's benefit.

2. Schedule and Location of Activities in The Belcher Islands

References

- NIRB Application for Screening #1254525. Undersea Fibre Optic Cable Installation. December 3, 2018.
- Government of Nunavut. Undersea Fibre Optic Cable Installation Linking Greenland, Nunavut and Quebec – Project Description. December 2018.
- Gilchrist, H. G. and G. J. Robertson. 2000. Observations of Marine Birds and Mammals Wintering at Polynyas and Ice Edges in the Belcher Islands, Nunavut, Canada. *Arctic* 53 (1): 61-68.
- Mallory, M.L and A.J. Fontaine. 2004. Key marine habitat sites for migratory birds in Nunavut and the Northwest Territories (refer to site #33). *Canadian Wildlife Service Occasional Paper No. 109*. Available on-line at: <http://publications.gc.ca/site/eng/392824/publication.html>
- Environment and Climate Change Canada. 2016. ECCC's input to the Nunavut Planning Commission regarding Key Habitat Sites for Migratory Birds in the Nunavut Settlement Area. Revised May 2016. Available on-line at: <http://www.nunavut.ca/files/2016-05-31%20ECCC%20Key%20habitat%20sites%20for%20migratory%20birds%20in%20the%20NSA.pdf>

Comment

The Project Application states that the Project proposes to install fibre optic cable from Sanikiluaq (on the Belcher Islands) to a similar fibre optic cable project to be installed by the Kativik Regional Government in Nunavik, Quebec (Page 2, NIRB Application). The Belcher Islands provide important breeding, molting and wintering habitat to migratory birds, especially Common Eider and other sea ducks. ECCC has identified the area as a key habitat site (Mallory and Fontaine 2010; ECCC 2016).

The Project Description states that the Project is planned to begin July 2019 and end in December 2021 (GN Project Description). Details in the Project Application further explain that the Project will begin construction in the summer of 2019 for some of the terrestrial components and install marine cable infrastructure during the open water

season of 2020 and that the cable will be installed during the open water during the August-September 2020 installation window (Page 2, NIRB Application).

ECCC notes that open water areas persist during the winter period at the floe edge and polynyas are present in the project area (Gilchrist and Robertson, 2000). These open water areas around the Belcher Islands support thousands of marine birds and >10% of the Canadian population of the *sedentaria* subspecies of Common Eider during the winter. These large congregations of wintering sea ducks are very susceptible to disturbance and potential oil spills.

ECCC is aware of accounts of important concentrations of molting sea ducks, particularly scoters (or “black ducks”) in the general area surrounding the Belcher Islands during the fall period. The molting or “flightless” period is another period when sea ducks are particularly sensitive to disturbance. ECCC has not conducted specific surveys to document the timing and numbers of molting sea ducks in this area. However, Inuit Qaujimagatuqangit may be available to help assess and minimize potential effects.

ECCC Recommendations

- ECCC recommends that the Proponent clarify or provide more detail on when work will commence.
- ECCC recommends that polynyas and other open water areas be avoided. Gilchrist and Robertson (2000) details these locations.
- ECCC recommends that, at a minimum, the Proponent follow ECCC’s recommended setback distances that were provided to the Nunavut Planning Commission to minimize disturbance to eiders and other sea ducks (ECCC 2016).

Should you require further information, please do not hesitate to contact me at (867) 669-4732 or Emily.Nichol@canada.ca.

Sincerely,

[original signed by]

Emily Nichol
Environmental Assessment Coordinator

cc: Bradley Summerfield, A/Head, Environmental Assessment North (NT and NU)