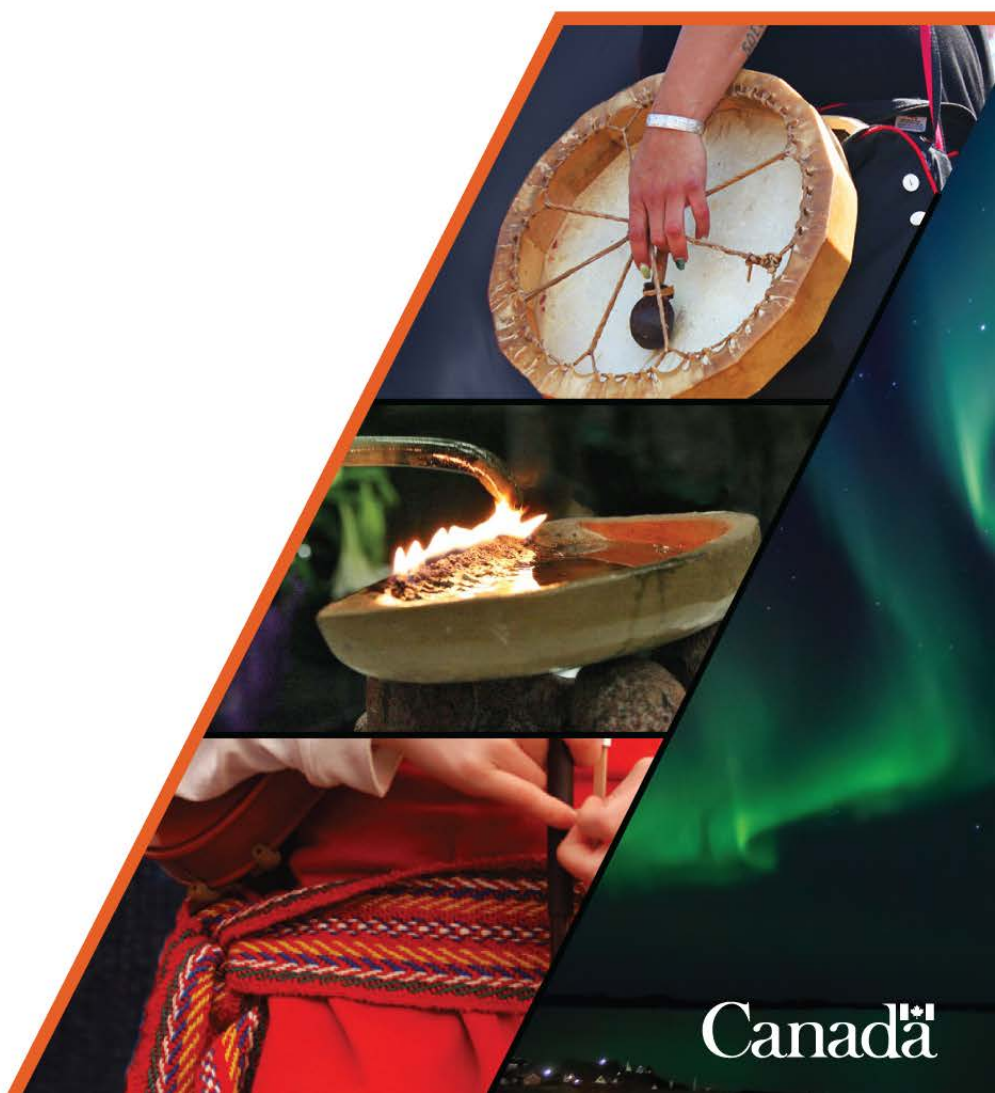




CIRNAC Comments to NIRB

Re: Notice of Screening for Explorer Pictures’ “Arctic Driftwood” Project Proposal



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

Your file - Votre référence
20YN012
Our file - Notre référence
1285429

May 25, 2020

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

Re: Notice of Screening for Explorer Pictures' "Arctic Driftwood" Project Proposal

Dear Keith Morrison,

On May 13, 2020 the Nunavut Impact Review Board (NIRB) invited parties to comment on Explorer Pictures' "Arctic Driftwood" Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) has reviewed the Project Proposal and supporting documents and offers the responses below as it pertains to the NIRB's request:

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

CIRNAC is of the view that the potential impacts of the proposed Project can be mitigated with known practices or technology.

Some common practices include:

- No on-water refueling of boats; and,
- All ships and docks require an approved Oil Pollution Emergency Plan (OPEP) in accordance with Canada Shipping Act regulations. A Shipboard Oil Pollution Emergency Plan (SOPEP), a ship-specific document, must also be certified by Canadian Coast Guard.



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

Detail Fuel and Hazardous Material Use Table

In the NIRB application, the Proponent indicates that the ship, the Balto, has a fuel capacity large enough to last the length of the journey. This fuel capacity is not included in the Detail Fuel and Hazardous Material Use Table. CIRNAC recommends that the Proponent provide rationale for not including the ships fuel estimate in the Detail Fuel and Hazardous Material Use Table.

Current ban on non-essential travel to Nunavut to prevent the spread of Covid-19

CIRNAC advises that the Proponent be reminded of the Government of Nunavut's Chief Medical Officer of Health current ban on all non-essential travel to Nunavut to help prevent the spread of Covid-19. As a result, travel to Nunavut for research purposes is not permitted. This was communicated by the Nunavut Research Institute (NRI) on Mar.19, 2020 through an information notice to researchers (<https://www.nri.nu.ca>).

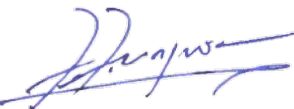
CIRNAC recognizes the Proponent requires an NRI Scientific Research Licence. This is noted in the Nunavut Planning Commission's Mar. 27, 2020 conformity decision and the submitted screening application. The Proponent should not hesitate to contact the NRI for further clarification on implications to project activities associated with the current non-essential travel ban.

Protection of heritage resources

Potential impacts to heritage resources should be carefully considered for the proposed shore excursion and driftwood collection activities. As a result, CIRNAC recommends the Proponent contact the Government of Nunavut's Department of Culture and Heritage to ensure compliance with the Nunavut Archaeological and Paleontological Site Regulations and any other relevant policies.

CIRNAC 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 Richard Bingley at (867) 975-4556 or by e-mail at Richard.Bingley2@Canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

