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Nunavut Impact Review Board  
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**Re: Follow up to the Board's Final Report and Recommendations for the Strategic Environmental Assessment in Baffin Bay and Davis Strait**

We are pleased to submit follow-up comments to the Nunavut Impact Review Board (NIRB) on the Board's Final Report and Recommendations for the Strategic Environmental Assessment in Baffin Bay and Davis Strait. WWF-Canada actively supported and engaged with the SEA process as we believe it is an important component in ensuring that offshore oil and gas activities in Canada's Eastern Arctic are conducted safely with the lowest possible risk to human health and the environment, if such activities are to be carried out at all. We commend the NIRB for its detailed and comprehensive final report and we concur with the Board's central conclusion:

*"Given the importance of the marine environment to the well-being of Nunavummiut, significant gaps in knowledge of the environment necessary to support impact assessment, and an overall lack of regulatory, industry and infrastructure readiness in Nunavut, the 2016 moratorium on oil and gas development in the Canadian Arctic should remain in place for Baffin Bay and Davis Strait until such time as the key issues set out in this Report can be addressed. The Board expects that it will take at least a decade to complete the research, planning, and consultation identified as necessary prior to undertaking a re-assessment by the Minister to determine if the moratorium should be lifted."*

WWF-Canada agrees that "at least a decade" will be required before offshore oil and gas activities should even be considered in Baffin Bay and Davis Strait. There is too much uncertainty and insufficient information at this time to make an informed decision about the future of offshore oil and gas activities, which can carry considerable risks to the marine environment and the livelihoods of Nunavummiut.

In addition, even if all of the Board's 79 recommendations were to be met, offshore oil and gas may still not be the best development option for the people of Nunavut, from the perspective of both economic and environmental sustainability, in comparison with other, less risky alternatives. We feel strongly that another Strategic Environmental Assessment process would be required to compare the viability of other development options before any oil and gas activities take place in the region. As noted in Volume 3 of the NIRB's final SEA report, WWF-Canada believes such an SEA must consider "overall sustainability objectives" and establish "clear development and sustainability goals for Nunavut" (pages 241-242).



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This submission is in response to the NIRB's request for feedback from interested parties on how the Board's 79 recommendations are or have been addressed to date and plans for their implementation moving forward. Many of the recommendations in the final SEA report highlighted the need for more research and better information. WWF-Canada is engaged in a wide variety of research and projects in the Canadian Arctic and table below highlights how WWF is contributing to fulfilling some of these recommendations.

World Wildlife Fund (WWF) is one of the largest independent conservation organizations in the world, with projects in more than 100 countries. WWF-Canada creates solutions to the environmental challenges that matter most for Canadians. We work in places that are unique and ecologically important, so that wildlife, nature and people thrive together.

With respect to our Arctic oil and gas and marine conservation work, WWF-Canada believes healthy coastal communities depend on healthy oceans. We are working in partnership with coastal communities, Indigenous peoples and other groups to advocate for marine protected areas and sustainable oceans management, and to ensure the rules governing offshore oil and gas activities are consistent with international best practices for safety, accountability and environmental protection.

Sincerely,

Mark Brooks  
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Report Section	NIRB Recommendation	WWF-Canada Response
Human Environment	4. The Government of Nunavut, Nunavut Tunngavik Incorporated, the Qikiqtani Inuit Association, marine users (including commercial and traditional harvesters), and the communities in the Area of Focus should be included as active participants in all marine planning with the potential to affect the Canadian offshore waters of Baffin Bay and Davis Strait.	WWF-Canada is exploring how to help initiate more integrated marine planning in Nunavut.
Accidents and Malfunctions	5. All parties with responsibilities for emergency response in the Area of Focus, including the communities in the region, should establish relationships with other circumpolar nations and transboundary groups to support active and timely coordination with these groups to enhance transboundary emergency preparedness and response capabilities.	WWF-Canada is not responsible for emergency response in the Area of Focus, however, WWF-Canada has supported the development of a <i>Community Marine Oil Spill Response Action Plan</i> with the community of Resolute. This plan focuses on ensuring a swift and coordinated localized initial response to a marine oil spill and does not include transboundary emergency preparedness.
Climate Change	19. Collect baseline information and undertake assessments of the current and predicted effects of climate change in the Arctic, including direct and indirect impacts:	WWF-Canada is supporting research by scientists at the University of Windsor to track and understand the movement of Greenland halibut between inshore environments and the offshore areas of Baffin Bay and Davis Strait, as well as the North-South movement of Greenland halibut in Baffin Bay and Davis Strait.
Biological Environment	25. Collect additional baseline data and undertake research in Baffin Bay and Davis Strait on: <ul style="list-style-type: none"> <li>fish and fish habitat (including spawning grounds, nursery, rearing, food supply, and migration areas on which fish depend directly or indirectly to carry out their life processes)</li> </ul>	WWF-Canada is supporting research by scientists at the University of Windsor to track and understand the movement of Greenland halibut between inshore environments and the offshore areas of Baffin Bay and Davis Strait, as well as the North-South movement of Greenland halibut in Baffin Bay and Davis Strait. This could potentially provide additional insight into the spawning grounds of this important species.
Human Environment	27. Collect baseline fisheries and ecosystem data to assess the commercial and ecosystemic viability of existing and potential expansions to the commercial fisheries in Baffin Bay and Davis Strait, including consideration of:	WWF-Canada is supporting research by scientists at the University of Windsor to track and understand the movement of Greenland halibut between inshore environments and the offshore areas of Baffin Bay and Davis Strait, as well as the North-South movement of Greenland halibut in Baffin Bay and Davis Strait. This could



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	<ul style="list-style-type: none"> <li>turbot migratory patterns, spawning grounds, and stock connectivity with inshore waters in Nunavut and Greenlandic waters</li> </ul>	potentially provide additional insight into the spawning grounds of this important species.
Accidents and Malfunctions	29. Assemble available information on emergency preparedness and response	WWF-Canada has researched and identified significant spill response gaps in the Canadian Arctic and we have detailed equipment and emergency response planning requirements. To this end WWF-Canada has convened government partners and worked directly with the community of Resolute to develop a spill response emergency preparedness plan for the community. A best practices guide was developed as part of this work and the plan was passed by the Hamlet Council and officially embedded in the Emergency Response Plan for the community.
Human Environment	40. Conduct a comparative analysis of oil and gas developments and alternative forms of economic development in the Area of Focus (e.g., commercial fishing, shipping, mining, and tourism)	WWF-Canada will produce a report on economic alternatives to oil and gas development in the Canadian Arctic, which will highlight opportunities for development that are more sustainable and less risky than offshore oil and gas.
Physical Environment	41. Conduct baseline research to: <ul style="list-style-type: none"> <li>establish baseline atmospheric and underwater sound levels in Baffin Bay and Davis Strait;</li> <li>improve understanding of the potential effects of underwater noise and seismic activities on plankton, benthic organisms and invertebrates (including shellfish and arthropods), fish, waterbirds, and marine mammals; and</li> <li>apply research to develop threshold criteria for assessing injury and behavioural disturbance.</li> </ul>	WWF-Canada and the WWF Arctic Programme (global in focus) are co-sponsoring a project at the Arctic Council's Protection of the Arctic Marine Environment (PAME) working group to develop shipping acoustic underwater noise maps for Canada and the entire pan-Arctic. Once this mapping is complete, measures to reduce noise impacts will be contemplated. PAME, with WWF's input and funding, conducted a state of knowledge report on shipping underwater noise pollution for the global Arctic.
Effects to Physical Environment	46. Conduct research to: <ul style="list-style-type: none"> <li>assess upstream and downstream greenhouse gas emissions at various scales of offshore oil and gas development in Baffin Bay and Davis Strait; and</li> </ul>	WWF-Canada is not conducting this research ourselves but our analyses of upstream and downstream climate impacts indicated that it is highly unlikely that Arctic oil development would be consistent with global emissions targets under the Paris Agreement.



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	<ul style="list-style-type: none"> <li>determine if, and to what extent, oil and gas resources can be developed in the Area of Focus within the limits imposed under national and international carbon reduction targets.</li> </ul>	
Additional Factors	51. Incorporating all relevant updated baseline data (including Inuit Qaujimajatuqangit and Inuit Qaujimaningit) and in collaboration with the Nunavut government, Inuit organizations, and local communities, initiate marine-based regional planning throughout the Area of Focus, including the development of regional priorities	WWF-Canada's soon to be released report entitled <i>CanPAC: Canadian Arctic Marine Priority Areas for Conservation</i> identifies a network of priority areas for conservation to best protect the present — and the future — of the species and habitats in this climate-threatened ecosystem.
Additional Factors	52. Reflecting updated baseline information and regional priorities, conduct an analysis of the risks and benefits of: <ul style="list-style-type: none"> <li>alternative economic development options (e.g., commercial fishing, renewable energy, and tourism) for the Area of Focus; and</li> <li>development of alternative energy sources which could support domestic energy consumption in Nunavut.</li> </ul>	Since 2016, WWF-Canada has worked to demonstrate that low-impact renewable energy from wind and solar is possible and can contribute to the sustainable development of Nunavut. Previous studies supported by WWF-Canada have predicted what the use of renewable energy for Nunavut's communities might look like and assessed how financing and fossil fuel subsidies impact the feasibility of renewable energy generation in the territory. WWF-Canada continues to support a transition to habitat-friendly renewable energy in Nunavut by working in partnership with communities to develop energy co-operatives, offer training and educational opportunities, and provide renewable energy expertise. WWF-Canada is researching the issue of economic alternatives to oil and gas development in the Canadian Arctic and will be producing a report on our findings, which is likely to be released in 2021.
Additional Factors	60. Any future SEAs or project-specific assessments should include consideration of alternative technologies, particularly for marine seismic surveys.	WWF-Canada's has conducted research suggesting that marine vibroseis is a viable alternative to seismic testing that is far less harmful to marine wildlife while producing similar data results.



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Effects to Physical Environment	61. Identify standard impact mitigation measures associated with offshore oil and gas development	WWF-Canada has been actively involved with the ongoing Frontier and Offshore Regulatory Renewal Initiative (FORRI), which is a joint federal-provincial initiative. We have made several submissions to FORRI detailing the regulatory reforms required (including risk mitigation measures) before any offshore oil and gas in the Canadian Arctic takes place in the Canadian Arctic.
Biological Environment	69. Reflecting up to date information, produce up-to-date online maps of sensitive habitats for the Area of Focus with layers of information for relevant species and factors considered to identify sensitive habitats.	Our CanPAC report (described above, not yet released) will include maps that could be used for this purpose to some extent.
Biological Environment	71. Identify sensitive/critical habitat for Species at Risk where oil and gas activities should be limited, restricted, or prevented from occurring and/or where establishment of Marine Protected Areas may be appropriate.	Our CanPAC results/reports will include information on where establishment of Marine Protected Areas may be appropriate – including but not specifically focused on Species at Risk.
Physical Environment	74. Shipping emissions associated with proposed oil and gas development should be modelled to understand the potential direct, indirect, and cumulative effects on air quality and contributions of greenhouse gas emissions	WWF-Canada conducts research on greenhouse gas emissions from shipping, which indicates that the industry is an important contributor to Canadian and global emissions. We do not have data on shipping emissions associated with oil and gas development specifically.