



CIRNAC Comments to NIRB

Re: Notice of Screening for Nunavut Nukkiqsautiit Corporation's "Qikiqtani Marine Renewable Energy Resource Assessment" Project Proposal



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

Your file - Votre référence
21YN028
Our file - Notre référence
GCdocs# 95894629

July 12, 2021

Mia Otokiak
Junior Technical Advisor I
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment request for Nunavut Nukkiksautiit Corporation's "Qikiqtani Marine Renewable Energy Resource Assessment" Project Proposal

Dear Mia Otokiak,

On June 18, 2021 the Nunavut Impact Review Board (NIRB) invited parties to comment on Nunavut Nukkiksautiit Corporation's "Qikiqtani Marine Renewable Energy Resource Assessment" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments 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 #1: Waste Management and Nunavut Communities

The Proponent indicates that information is not available regarding waste management procedures or the method of disposal. It is unclear if the Proponent intends to dispose of



waste within the study communities, and if so, what measures will be implemented to prevent potential transmission of COVID-19 to the communities.

CIRNAC recommends that the Proponent ensure that any combustible wastes are removed and disposed of using a no contact approach, and that proper disposal is arranged with the study community members prior to arriving in the study community(ies).

CIRNAC # 2: Fuel Management

The Proponent indicates that diesel fuel will be used throughout the survey. CIRNAC notes that the Proponent has not indicated if refuelling will occur within the study community(ies).

CIRNAC recommends that the Proponent ensure that any refuelling activities in study community(ies) are conducted using a no contact approach, and that appropriate refuelling strategy is arranged with the study community members prior to arriving. Additionally, all refueling activities should be carried out in designated areas located at least 31m away from the high water mark of any water body.

CIRNAC #3: Fuel and the Identification of Environmental Impacts Matrix

CIRNAC notes that the Proponent has not indicated any mitigation measures for potential spills that may occur during the proposed activities, and that the *Identification of Environmental Impacts* matrix does not indicate any potential negative effects of project activities on water.

Given that there is a potential for fuel spills on the marine environment, CIRNAC recommends that the Proponent provide rationale for not identifying potential negative effects of fuel spills on water in the *Identification of Environmental Impacts* matrix. Alternatively, the Proponent should identify potential mitigation measures for fuel spills that may occur during project activities.

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

CIRNAC #4: Potential for positive effects to Inuit through employment, training, and procurement opportunities.

CIRNAC recommends that the Proponent prioritize the employment and training of local Inuit as well as procurement with Inuit-owned businesses when implementing project activities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. As a result, Inuit and Inuit-owned businesses situated in Qikiqtani communities where project activities will be conducted should be



prioritized in any project-related employment and procurement opportunities that may be made available.

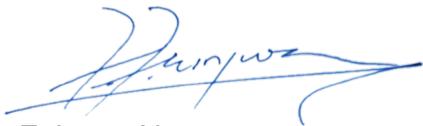
CIRNAC #5: Consultation with interested parties.

CIRNAC recommends that the Proponent consult with Hamlets of the Qikiqtani region, Hunters and Trappers Associations, as well as community members and other organizations which may have an interest in the project's activities. Issues that should be considered as part of any consultation activities include:

- Incorporation of Inuit knowledge and Inuit Qaujimagatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities within or in close proximity to the project area;
- Training and employment opportunities for community members;
- Procurement opportunities for local businesses, and
- Regular updates on the status of project activities.

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 Courtney White by e-mail at courtney.white@canada.ca or David Abernethy at (867) 222-1610 or email at david.abernethy@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

