



CIRNAC Comments to NIRB

Re: Notice of Screening for Woods Hole
Oceanographic Institution's "Healy Baffin Bay
Survey" Project Proposal



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

Your file - Votre référence
21YN029
Our file - Notre référence
96662792

July 30, 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 Woods Hole Oceanographic Institution's "Healy Baffin Bay Survey" Project Proposal

Dear Mia Otokiak,

On July 12, 2021, the Nunavut Impact Review Board (NIRB) invited parties to comment on Woods Hole Oceanographic Institution's "Healy Baffin Bay Survey" 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:

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

CIRNAC #1: Pollution Prevention Plan and Potential Mitigation Measures

The Proponent has not indicated any mitigation measures for potential spills that may occur during the proposed activities; both the Identification of Impacts and Proposed Mitigation Measures section and the Identification of Environmental Impacts matrix are not completed.

There is a section on page 4-93, seen on the last page of the document "HAZMAT Plan", listed as '17. Pollution Response Plan'. It is unclear why section 17 is not submitted as a supporting document to the NIRB, and why this section was not used to inform the relevant sections of the NIRB application.

Given that there is a potential for fuel spills on the marine environments, and which have been expanded on in '17. Pollution Response Plan', it is unclear why the NIRB application was left incomplete in the Identification of Impacts and Proposed Mitigation Measures section and the Identification of Environmental Impacts matrix.



CIRNAC recommends that the Proponent:

1. provide rationale for not identifying potential negative effects on the Water Quality, Wildlife, including habitat and Migration Patterns, and Aquatic species, including habitat and migration/spawning fields of the Identification of Environmental Impacts matrix;
2. provide rationale for not entering information in the Identification of Impacts and Proposed Mitigation Measures section; and,
3. submit the pollution management plan to the NIRB registry as a reference document.

CIRNAC #2: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue to consult with the municipalities of Clyde River, Qikiqtarjuaq, Pangnirtung, and Iqaluit, as well as community members and organizations (such as Hunters and Trappers Organizations) which may have an interest in the project's activities. The municipalities of Clyde River and Pangnirtung warrant particular attention due to their proximity to the project area. Issues that should be considered as part of any consultation activities include:

- Incorporation of Inuit knowledge and Inuit Qaujimajatuqangit 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;
- 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 Richard Bingley by e-mail at richard.bingley2@canada.ca, or David Abernethy (867) 222-1610 or email at david.abernethy@canada.ca.

Sincerely,



Amal Roy
A/ Manager, Impact Assessment

