



NIRB File No.: 22YN0222
NPC File No.: 149723

May 25, 2022

Neil Bose
Memorial University
Office of the Vice President (Research), Memorial University
230 Elizabeth Avenue
St John's Newfoundland and Labrador A1C 5S7

Sent via email: nbose@mun.ca

Re: Notice of Screening for Memorial University's "Investigating Scott Inlet seeps with autonomous underwater vehicles" project proposal

Dear Neil Bose:

On April 14, 2022, the Nunavut Impact Review Board (NIRB) received a referral to screen Memorial University's "Investigating Scott Inlet seeps with autonomous underwater vehicles" project proposal from the Nunavut Planning Commission (Commission), with an accompanying positive conformity determination with the North Baffin Regional Land Use Plan. Pursuant to Article 12, Sections 12.4.1 and 12.4.4 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and s. 87 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*), the NIRB has commenced screening this project proposal and has assigned it file number **22YN022** - please reference this file number in all future related correspondence.

INFORMATION REQUEST

On April 14, 2022, the NIRB requested that the Proponent complete the online application form through the NIRB's public registry system and ensure, pursuant to s. 144(1) of the *NuPPAA*, that sufficient information is provided to determine the scope of the project activities being proposed and commence screening.

Following a preliminary completeness check of the proposal as submitted on May 15, 2022, by the Proponent, the NIRB determined that the proposal did not contain the necessary information for the NIRB to carry out its screening and on May 16, 2022, requested that the Proponent provide the Board with the additional information in order to carry out the screening of the project proposal.

On May 16, 2022, the NIRB received the required information and commenced the screening pursuant to Part 3 of the *NuPPAA*.

PROJECT OVERVIEW

Project Scope:

All documents received and pertaining to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/125689.

Project:	Investigating Scott Inlet seeps with autonomous underwater vehicles				
Region:	Qikiqtani				
Location:	Open water, 50 kilometres (km) offshore from Scott Inlet				
Closest Community:	Clyde River	Distance (approximate)	60 km	Direction	Northwest
Summary of Project Description:	The Proponent intends to conduct research at a naturally occurring oil seep offshore from Scott Inlet to test the use of autonomous underwater vehicle (AUV) technology to improve oil spill response, measure dissolved and undissolved oil concentrations in the water column, and understand how crude oil and gas reacts within the ocean with different depths and water quality parameters.				
Project Proposed Timeline:	Entire Project: August 2022 to December 2024 Field work: Two (2) weeks within August to September of 2023 and 2024				

According to the project proposal, the scope of the project includes the following undertakings, works or activities:

- Use of a ship vessel (either from Nunavut, Greenland, or Newfoundland in which food, water, and waste disposal would occur from where the vessel is from) to carry personnel, equipment, and provide accommodation during field work;
- Potential use of Clyde River's port and community services depending upon vessel selection (If vessel is from Nunavut would request food, water, and waste disposal; planned to be discussed during community consultations August 2022);
- Use of an anchorage location within Scott Inlet if adverse weather occurs;
- Use of a survey class AUV for ten (10) hours a day during field work, and equipped with hydrocarbon sensors selected from a methane sniffer, acoustic scanning sonars and fluorimeters, and a water sampling unit; and
- Use of an underwater glider remaining in the water during field work and equipped with hydrocarbon sensors selected from a methane sniffer, acoustic scanning sonars and fluorimeters.

Inclusion or Exclusion of Scoping List

At this time, the NIRB has identified no additional works or activities in relation to the project proposal. As a result, the NIRB will proceed with screening the project based on the scope as described above.

REQUEST FOR COMMENTS

All documents received can be accessed from the NIRB's online public registry at www.nirb.ca/project/125689 and include:

- *Vehicle Use Description*
- *Non-Technical Summary*
- *Project Description*
- *NPC Conformity Determination*
- *Revised NIRB Application*

The NIRB will copy you on screening process related correspondence and upload related documents to the NIRB's online registry for public access. The NIRB may request additional information at any time during the process.

The NIRB is copying parties and municipalities potentially affected by Memorial University project proposal with this letter, and we invite interested parties to comment directly to the NIRB by **June 3, 2022**.

The NIRB would like parties to provide comments regarding:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;
- Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why;
- Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures); and
- Any matter of importance to the Party related to the project proposal.

Please note that *proposed* project-specific terms and conditions, should the project proceed, have been attached for consideration and comment ([Appendix A](#)).

CONTACT INFORMATION

Please send your comments to the NIRB via email at info@nirb.ca, via fax at (867) 983-2594 or via the individual project dashboard for this assessment on the NIRB's online public registry at www.nirb.ca/project/125689.

If you have any questions or require clarification, feel free to contact the undersigned at (867) 983-4603 or cpelletier@nirb.ca.

Sincerely,



Caitlin Pelletier
Technical Advisor I
Nunavut Impact Review Board

Attachments: Appendix A: *Proposed* Project Specific Terms and Conditions

Enclosures (4) Public Notice of Screening (English, and Inuktitut)
Comment Forms (English, and Inuktitut)

cc: Distribution List
Carson Gillis, Nunavut Tunngavik Inc.
Stephen Williamson Bathory, Qikiqtani Inuit Association
Jared Ottenhof, Qikiqtani Inuit Association
Joel Fortier, Qikiqtani Inuit Association
Chris Spencer, Qikiqtani Inuit Association
Agnes Simonfalvy, Government of Nunavut
Moshia Cote, Nunavut Research Institute
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs
Alasdair Beattie, Fisheries and Oceans Canada

Appendix A: Proposed Project Specific Terms and Conditions

The following is a list of project-specific terms and conditions which, should the project proceed, may be recommended to be attached to any approval.

General

1. Memorial University (the Proponent) shall maintain a copy of the Project Terms and Conditions at the site of operation at all times and make it accessible to enforcement officers upon request.
2. The Proponent shall operate in accordance with all commitments stated in correspondence provided to the Nunavut Planning Commission (NPC File No.: 149723), to the Department of Fisheries and Oceans, and the NIRB (Online Application Form, May 16, 2022; NIRB Application Attachments, May 16, 2022). This information should be accessible to enforcement officers upon request.
3. The Proponent shall operate the site in accordance with all applicable Acts, Regulations and Guidelines.
4. The Proponent shall ensure that it meets the standards and/or limits as set out in the authorizing agencies' permits or licences as required for this project.
5. The Proponent shall ensure that all personnel, staff, and contractors are adequately trained prior to commencement of all project activities, and shall be made aware of all operational plans, management plans, guidelines and Proponent commitments relating to the project.

Water courses/Water bodies (including fresh and marine waters)

6. The Proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes (including wastewater) or sediment into any water body. The Proponent should have in place an Emergency Spill Response Plan that is approved by the appropriate authorizing agency(ies).

Waste Management

7. The Proponent shall manage all hazardous and non-hazardous waste including food, domestic wastes, debris, and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.
8. The Proponent shall incinerate all combustible wastes as needed and dispose of as required by the appropriate authorizing agencies. All non-combustible wastes from the project site shall be removed to an approved facility for disposal.
9. The Proponent shall follow the authorizing agencies' direction for management and removal of hazardous materials and wastes.

Fuel and Chemical Storage

10. All fuel and chemical storage containers must be clearly marked with the Proponent's name for ease of identification.

11. The Proponent shall have a Spill Contingency Plan in place at all fuel storage or transfer locations and shall ensure that appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) are readily available.
12. The Proponent shall ensure that wildlife deterrent systems are utilized at the time of a spill incident in order to avoid wildlife (terrestrial or marine) and migratory birds from being contaminated.
13. The Proponent shall ensure that all spills of fuel or other deleterious materials of 100 litres or more must be reported immediately to the 24-hour Spill Line at (867) 920-8130.

Wildlife – General

14. The Proponent shall not substantially alter or damage or destroy any wildlife habitat in conducting this operation unless otherwise authorized by the appropriate authorizing agencies.
15. The Proponent shall not chase, weary, harass or molest wildlife. This includes persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or disturbing large groups of animals.
16. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.

Migratory Birds and Raptors Disturbance

17. The Proponent shall carry out all phases of the project in a manner that protects migratory birds and avoids harming, killing, or disturbing migratory birds or destroying, disturbing, or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's *Avoidance Guidelines*. The Proponent's actions in applying the *Avoidance Guidelines* shall be in compliance with the *Migratory Birds Convention Act, 1994* and with the *Species at Risk Act*.
18. The Proponent shall avoid the seaward site of seabird colonies and areas used by flocks of migrating waterfowl, a minimum distance away on the recommendation of the appropriate authorizing agencies.
19. The Proponent shall not pursue seabirds or waterbirds swimming on the water surface and shall avoid concentrations of these birds if encountered on the water.

Marine-Based Activities

20. The Proponent shall, where practicable, coordinate with other vessels to minimize simultaneous vessel traffic in critical wildlife habitat areas allowing the wildlife to continue to use the habitat undisturbed.
21. The Proponent shall ensure that noise be kept to a minimum and shall refrain from making sharp or loud noises, blowing horns or whistles and shall maintain constant engine noise levels.
22. The Proponent shall not visit cliffs used by nesting and breeding birds during the late afternoon or early evening hours during the months of August and September.
23. The Proponent shall anchor large vessels, such as cruise ships at least 500 metres away from seabird and sea duck breeding colonies except Ivory gull breeding sites which requires a setback distance of 2,000 metres. Further, the Proponent shall ensure small launch vessels (e.g., zodiacs, kayaks) maintain a distance of 100 metres from the seabird colonies.

24. The Proponent shall not attempt to intersect or interfere with the movements of marine mammals. This includes ensuring that there are no wake zones within 250 metres and a minimum of 100 metre no go zone around marine mammals. Strategic positioning of vessels ahead of the path being traveled by mobile mammals and waiting for the mammals to pass is also prohibited.
25. When marine mammals appear to be trapped or disturbed by vessel movements, the Proponent shall implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife have moved away from the immediate area.
26. The Proponent shall maintain a distance of 100 metres if a Polar Bear is encountered on land or ice while conducting activities from a zodiac or other small craft; all interaction with Polar Bears should be avoided if possible.
27. The Proponent shall maintain a distance of 500 metres of a walrus haul out while conducting activities from a zodiac or other small craft.
28. The Proponent shall suspend all project activities should any dead fish or wildlife (both marine and terrestrial), or any injured wildlife be observed during any works or activities in and around the marine waters. Activities may only be resumed on the recommendation of the authorizing agencies.
29. The Proponent shall report all incidents, injuries, or sightings of marine mammals to the appropriate authorizing agencies.
30. The Proponent shall implement measures designed to minimize disturbance to seabed sediments and benthic communities and marine wildlife when carrying out project activities within the marine environment.

Other

31. The Proponent should engage with local residents regarding planned activities in the area and should solicit available Inuit Qaujimaningit and information regarding current recreational and traditional usage of the project area which may inform project activities. Posting of translated public notices and direct engagement with potentially interested groups and individuals prior to undertaking project activities is strongly encouraged.
32. The Proponent shall ensure that project activities do not interfere with Inuit wildlife harvesting or traditional land use activities.
33. The Proponent should, to the extent possible, hire local people and access local services where possible.