

MUNICIPALITY OF CLYDE RIVER
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June 27, 2022

Nunavut Impact Review Board

RE: Comments and Questions for NIRB

NIRB #: 22YN022

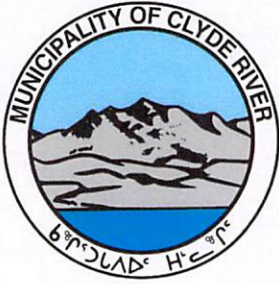
Project proposal title: Investigating Scott Inlet seeps with autonomous underwater vehicles
Memorial University

The Nammautaq HTO, Hamlet of Clyde River, and Ittaq Heritage and Research Centre request additional information before this application can be properly reviewed and commented on.

We request that this application be resubmitted after the following points are addressed in order to provide more complete information to the community. We believe this is a reasonable request as the proposed activities are not scheduled to start until August 2023:

Specifically:

- The project has not yet identified a ship for use. It is important to know which ship is being used as it has an impact on noise, operations, and other factors. For example, a smaller fishing vessel would be different than an icebreaker.
- The proponent has explained that depending on what ship is used, there would be other activities that happen on board at the same time, specifically the Students on Ice (SOI) program. If this UAV project is happening at the same time/same ship as SOI, there will be zodiacs in daily use (with landings) and other activities. We need to understand what other activities are happening from the ship during this time period, and where, in order to properly assess the application. The application should be submitted **after** the equipment/vessel is confirmed and the full plan is known.
- The proponent has indicated that they will visit the community August 22-24, 2022. This is an opportunity for the public to be informed about the project through public presentations and radio shows. These informative presentations and community consultation should happen **before** the submission of a NIRB application and/or other permit applications. This is so the community receives the information **beforehand** and has an opportunity to ask questions and provide input after, and before permits are received. Information sharing and consultation should be done prior to permitting.



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Request:

Given the timing and location of the proposed activities, there may be concern around the project potentially causing disturbances to wildlife and hunting activities. Full information is critical for consideration. Therefore, we request that this application be resubmitted after there is full information and project plans in place, so that the community has complete information to consider and base feedback on.

Since the project is not planned to take place until August 2023, we think this is a reasonable request as there is enough time.

In addition to the above, we also request information on the following questions:

- The project will be collecting information about oil deposits in the area and this information will be part of project results and publications (for example, information showing the location and characteristics of the oil). What are the risks of this information being accessed and used by oil or other companies who might use it for oil exploitation purposes (even if the purpose of this particular project is not related to this use of the data)? What if other companies with other intentions use the information? How can this be mitigated?
- The project includes operation of underwater UAVs. What plans are in place in the event that a UAV is lost in the water due to damage, malfunction, etc.?

We appreciate this opportunity given to us to comment and we hope that we can work together to solve these concerns and be able to work together for a successful project.

Regards,

Alan Cormack
Mayor of the Municipality of Clyde River

cc. Apiusie Apak,
Chairman of the Nammataq HTO
Clyde River, NU

Shari Gearheard
Ittaq Heritage & Research Center
Clyde River, NU