



CIRNAC Comments to NIRB

Re: Notice of Screening for Far North Digital's "Far North Fiber Marine Route Survey" Project Proposal



GCDOCS # 106725198

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

Your file - Votre référence
22YN034
Our file - Notre référence
GCDOCS # 106725198

October 31, 2022

Robby Qammaniq
Technical Advisor II
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 Far North Digital's "Far North Fiber Marine Route Survey" Project Proposal

Dear Robby Qammaniq,

On October 19, 2022 the Nunavut Impact Review Board (NIRB) invited parties to comment on the Far North Digital's "Far North Fiber Marine Route Survey" Project Proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the response below as it pertains to NIRB'S request:

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

CIRNAC 1: Environmental Impacts

CIRNAC notes that the Proponent has identified some potential environmental impacts associated with the Project, but has not included commentary or information regarding any planned measures to mitigate any potential adverse impacts identified.

CIRNAC recommends that the Proponent develop an impact tracker in order to track and mitigate all potential adverse environmental impacts associated with this project. The impact tracker should include aspects related, but not be limited, to:

- Fuel management (spills and leaks)
- Underwater exploration and surveying activities
- Water Quality
- Noise Levels
- Birds, including habitat and migration patterns
- Aquatic species
- Wildlife protected areas



CIRNAC 2: Project Scope and Public Engagement

CIRNAC notes that the project proposal includes the following activities; Profiling of underwater topography using side scans and depth measurement sonars, sailing through the Northwest Passage to survey for the best potential fiber cable route through the Perry Channel, and Burial Assessment Survey using cone penetrometer. Cable installation is identified as a future activity, which is outside the scope of the current application.

The Community Involvement and Regional Benefits section of the project application states that “information is not available”. It is unclear if any public engagement, or consideration of project impacts on marine wildlife, archaeological areas, and traditional use areas has been incorporated into the assessment.

Given the nature, scale, and scope of the proposed project, CIRNAC recommends that the Proponent engages with the potentially affected communities to ensure their input is appropriately incorporated into project design and assessment.

CIRNAC 3: Potential for positive effects to Inuit through employment, training, and procurement opportunities

CIRNAC recommends that wherever possible, the Proponent prioritize the employment and training of local Inuit as well as procurement with Inuit-owned businesses when implementing project activities within Nunavut waters. Such efforts will allow for positive effects to be realized by community members and the local Inuit population.

CIRNAC 4: Consultation with Interested Parties

CIRNAC recommends that the Proponent work with the hamlets and Hunters and Trappers Organizations and Associations of Pond Inlet (Mittimatalik), Clyde River, Arctic Bay (Ikpiarjuk), Grise Fiord, and Resolute Bay (Qausuittuq), who may have an interest in the project’s activities. Issues that should be considered as part of any consultation activities include, but are not limited to:

- Incorporation of Inuit knowledge and Inuit Qaujimaqatunqangit 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 phases related to this project.



Should you have any questions, please contact Richard Bingley by e-mail at richard.bingley@rcaanc-cirnac.gc.ca .

Sincerely,

A handwritten signature in blue ink, appearing to read 'Felexce Ngwa', with a long horizontal flourish extending to the right.

Felexce Ngwa
Manager, Impact Assessment

