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Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU XoB oCo
Via Email: info@nirb.ca

Parks Canada comments on 22YN034 proposal “Far North Fiber Marine Route Survey”

Good afternoon

Thank you for the opportunity to review Far North Digital’s proposal “Far North Fiber Marine Route Survey”. As a portion of the survey route runs through the area that will become part of Tallurutiup Imanga National Marine Conservation Area, the Parks Canada comments include some consideration points for a future proposal that will address cable deployment and maintenance. It is anticipated that Parks Canada will become a regulatory authority for the fiber optic cable project as per section 12(b)¹ of the *Canada National Marine Conservation Areas Act*.

Recommendations for survey activities:

- The schedule for survey activities is broad: 3 summer seasons and conditions in a given shipping season may vary significantly. It is recommended the Proponent annually contact communities in the project area early in the season to discuss the planned survey activities and schedule and address community concerns and recommendations for mitigating survey impacts.
- There is no mention of the frequency of cone penetrometer testing. This is assumed to be more necessary in shallower areas and may be occurring near the communities, such as Resolute and Grise Fiord, where offshoot cables are planned. The minimum distance between testing sites should be discussed to address potential disturbance of marine wildlife and Inuit activities.
- Plan the survey route to avoid the marine components of Migratory Bird Sanctuaries (Prince Leopold MBS and Bylot Island MBS) and Nirjuqutiqavvik National Wildlife Area.

¹ S 12: “Except as permitted by this Act or the regulations, (b) no person shall use or occupy public lands in a marine conservation area.” The submerged lands are included in a national marine conservation area.

- Following the marine setbacks identified in the draft Nunavut Land Use Plan for migratory birds, including seabirds, is recommended.
- To avoid disturbance of marine mammals, monitor survey area for marine mammals and modify activities appropriately. Setback distances are identified in Section 5 of the Marine Mammal Regulations. The communities may recommend use of local wildlife monitors.

While the current proposal is a survey, the intention, if feasible, is to install a fiber optic cable through the Northwest Passage. For operational consideration, the Proponent will need to address cable maintenance during the ice season. This is particularly important for the offshoot cables, currently projected for the communities of Resolute Bay and Grise Fiord. Certain areas of sea ice have been as Critical Habitat in the Recovery Strategy for Peary Caribou. The final version of the Strategy, with critical habitat maps, was posted in September 2022, and is located on the Species at Risk registry:

https://www.registrelep-sararegistry.gc.ca/document/default_e.cfm?documentID=3657.

If you have any questions regarding this submission, please do not hesitate to contact me at nunavut-impactassessment@pc.gc.ca or 873-353-4849

Sincerely,

Jane Chisholm
Program / Policy Advisor