

Environmental Protection Operations Directorate  
Prairie & Northern Region  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 2310  
Yellowknife, NT X1A 2P7

ECCC File: 6200 000 020/004  
NIRB File: 24YN008



April 12, 2024

via email at: info@nirb.ca

Stephanie Autut  
Executive Director  
Nunavut Impact Review Board  
29 Mitik Street  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

Dear Stephanie Autut:

**RE: 24YN008 – Government of Nunavut – Baseline Study – Qikiqtarjuaq Marine Infrastructure**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned baseline study.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

**1. Project Activities Within Migratory Bird Habitat and During Nesting Season**

Reference(s)

- Baseline Studies Report
- Section 2.2 Project Schedule

Comment

The Migratory Birds Regulations (MBR) prohibit the disturbance or destruction of migratory birds and their nests or eggs.



The project occurs during the nesting season for migratory birds, which extends from late May until mid-August for this region. Marine and Terrestrial Surveys are planned for July 15 to August 30, which may include electrofishing, gill netting, angling, minnow trapping, fyke netting and/or beach seining.

Migratory birds, their nests and their eggs can be inadvertently harmed, killed, disturbed or destroyed because of many activities including, but not limited to, using fishing gear. Harming of individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different incidences.

#### ECCC Recommendation(s)

ECCC recommends the Proponent carry out all phases of the project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests and eggs.

Proponents should not conduct potentially destructive or disruptive activities at key locations or during key periods to avoid negative impacts to migratory birds. In this regard, the Proponent should take into account ECCC's [Guidelines to Avoid Harm to Migratory Birds](#) and visit [Fact Sheet Nest Protection Under the Migratory Birds Regulations, 2022](#) and [Frequently Asked Question, Migratory Birds Regulations, 2022](#) for more information on the amended Migratory Bird Regulations and updates to nest protections.

## **2. Water Quality**

#### Reference(s)

- Baseline Studies Report

#### Comment

The project identifies that borehole drilling has the potential to increase suspended sediment in the water column, causing temporary impacts to water quality. Although the potential issue is identified, there is no discussion of monitoring to confirm that impacts are negligible, or of management/mitigation measures to be implemented in the event that sediment re-suspension is greater than predicted.

In addition, based on the figure (no figure number) provided in the baseline study project proposal, the project will also include borehole drilling on land near the shoreline. ECCC notes that there is no discussion in the application or project proposal related to the potential for erosion/sedimentation and any associated management or mitigation to prevent impacts to water quality.

### Recommendation

ECCC recommends the Proponent provide additional information on:

- Monitoring of water quality during in-water drilling to confirm negligible impacts, including proposed management and/or mitigation measures if effects are greater than expected.
- Management actions and/or mitigation measures to prevent erosion and sedimentation when working on-shore near waters.

If you need more information, please contact Jennifer Sabourin at [Jennifer.Sabourin@ec.gc.ca](mailto:Jennifer.Sabourin@ec.gc.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Sabourin', is positioned above the printed name.

Jennifer Sabourin  
Acting Senior Environmental Assessment Officer

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)