



Indian and Northern Affairs Canada Affaires indiennes et du Nord Canada
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Your file - Votre référence
CS-02-005
Our file - Notre référence
IQA-N 5510-5-13 UNC

Aug. 11, 2003

Stephanie Briscoe
Executive Director
Nunavut Impact Review Board (NIRB)
PO Box 2379
Cambridge Bay, NU X0E OCO

Dear Ms. Briscoe,

Re: Federal Re-Scoping of the Revised Bathurst Inlet Port and Road (BIPAR) Proposal

On behalf of Indian and Northern Affairs Canada (INAC), Fisheries and Oceans Canada (DFO), Natural Resources Canada (NRCan), Parks Canada (PC), Environment Canada (EC), Transport Canada (TC), Health Canada (HC), and in co-operation with the Canadian Environmental Assessment Agency (CEA Agency), we would like to submit to you the following comments on the screening of the BIPAR proposal. While INAC and DFO have determined that they will be the federal responsible authorities (RAs), all the departments will be able to provide advice to NIRB on those parts of the project that are relevant to their particular mandate.

In a letter dated May 5, 2002, the aforementioned departments stated to NIRB their belief that there is the potential for this project to cause adverse environmental impacts, and so a review under Part 5 or 6 of the Nunavut Land Claims Agreement (Section 12.4.4(b)) would be appropriate. After reviewing the revised project description, submitted May 20, 2003, the federal authorities continue to be of this opinion. The following are some of the issues the federal authorities considered in making the recommendation:

- marine environment,
- human health,
- impacts on the Bathurst and Queen Maud caribou herds,
- impacts on the ecological reserves and parks adjacent to the Northwest Passage, and
- the need to conduct thorough alternatives assessment.

The federal agencies have found it useful to conduct a scoping exercise of the main issues of a proposal, to provide a framework of discussion. NIRB should note we have not

sought input from non-federal entities. The scoping exercise is meant to encompass, in a brief, comprehensive, and holistic way, the main issues, concerns, linkages, and purposes of BIPAR while providing a framework of discussion. We attach this document for whatever value it may be to NIRB.

We hope this work is of use in making your screening determination, and we look forward to working with you in the near future towards the development of a project acceptable to all stakeholders. If you have any comments or questions, feel free to call myself at 867-975-4549 or Janice Traynor at 867-975-4554.

Sincerely,

original signed by

Glen Stephens
Manager, Environment

cc. John Ramsey, Natural Resources Canada
Debra Myles, Canadian Environmental Assessment Agency
Ed McLean, Parks Canada
Colette Meloche, Environment Canada
Carolyn Dunn, Health Canada
Doug Soloway, Transport Canada
Michelle McChristie, INAC Waters
Stephanie Critch, DFO
Carl McLean, INAC Lands

attnmt. **Government of Canada Submission on the Scope of the Bathurst Port and Road (Bipar) Project and Assessment**

GOVERNMENT OF CANADA SUBMISSION ON THE SCOPE OF THE BATHURST PORT AND ROAD (BIPAR) PROJECT AND ASSESSMENT

SCOPE OF THE PROJECT

This is a description of the physical works, undertakings in relation to those works, and physical activities that constitute the BIPAR project.

1. Construction, operation, modification, decommissioning, abandonment or other undertakings in relation to marine shipping, including:
 - spill response infrastructure
 - new marine transportation routes
 - bathymetric surveys
 - construction of lighthouses or G.P.S. sounding stations
2. Construction, operation, modification, decommissioning, abandonment or other undertakings in relation to the marine shipping terminal, including:
 - airstrip(s) and airstrip facilities
 - landfill and other waste disposal sites, facilities, and activities
 - fuel farm(s), fuel storage, fuel dispensing/uploading and associated distribution lines at camp site(s)
 - all-season roads and access routes
 - explosives storage
 - port laydown area
 - water, waste and sediment management structures such as pipes, ditches, ponds and berms, as well as spill containment
 - water intakes, pumphouse(s), and water supply pipelines
 - wharf and dock
 - waste and water treatment
 - buildings, including maintenance shop(s) and accommodation
 - power station
3. Construction, operation, modification, decommissioning, abandonment or other undertakings in relation to the all-season road from Bathurst Inlet to Contwoyo Lake, including:
 - waterway and/or diversion structures, including dams and outlet structures
 - water crossings (bridges or culverts)
 - quarry areas/borrow pits
 - roads and access routes
 - laydown areas
 - stockpiles of granular material
4. Operation, modification, decommissioning, abandonment or other undertakings in relation to the winter road from Tibbett to Contwoyo, and the winter road from

Contwoyto to Goose Lake, including:

- increased wear on existing infrastructure and the possible need for upgrades or increased maintenance, and
- increased possibility of release of deleterious substances through spills or other events.

FACTORS FOR THE ASSESSMENT

Project Rationale

5. Purpose, objectives, and goals to be achieved by the project. Clear evidence of the ability of the proposal to meet its objectives.
6. Alternative means of carrying out the project that are technically and economically feasible and the potential environmental effects of any such alternative means (alternatives to basic components of the project, such as siting of facilities, different scales of project components, fuel and supply delivery via road from the south with no marine shipping, etc.).
7. Alternatives to the project, including the no-go option, and a discussion of decision-making criteria. This would include a detailed alternatives assessment.
8. Socio-economic impacts on communities in the N.W.T. and Nunavut.

Concerns of the Public

9. A review of comments received from the public, and a discussion of their concerns.

Effects of the Project

For all effects, there should be a description and a discussion of their significance. Significance determinations should be made based on the logical and transparent application of a set of appropriate criteria (these may include, for instance, magnitude, statistical significance, geographic extent, duration, frequency, reversibility, and ecological context). Appropriate measures that are technically and economically feasible to mitigate any significant adverse effects should be provided.

10. A review of the effects of BIPAR on Valued Ecosystem Components (VECs) Environmental including (this federal list is not exclusive and may be made longer through further consultation):
 - Air quality;
 - Water quantity of surface water, groundwater, including alterations to water

- courses, and loss or disturbance to streams, lakes or wetlands;
- Water quality of surface water, ground water, as well as receiving waterbodies (marine and freshwater), including the Coppermine River;
- Worst-case scenarios of marine spills and mitigative measures;
- Land surface disturbance, including loss of vegetative cover;
- Terrain stability, including effects on permafrost;
- Ambient noise levels, including noise from aircraft;
- Current use of land and resources for traditional purposes by Aboriginal persons;
- Wildlife (including wildlife impacts), migratory birds and their habitats, marine mammals, and fish and their habitats;
- Country foods;
- Vegetation;
- Human health and safety;
- Species at risk and their habitat;
- Capacity of the renewable resources that are likely to be significantly affected by the project to meet the needs of the present and those of the future; and
- Potential effects from the road or related shipping to National Parks on the corridors proposed, preferably including the western corridor.

11. A review of the effects of BIPAR on Valued Socioeconomic Components (VSECs) including (this federal list is not exclusive and may be made longer through further consultation):

- Archaeological sites and other heritage resources;
- Underwater archaeological resources;
- Human health and safety, with “health” defined as “a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity”,
- Cultural and economic health of communities including those in both N.W.T. and Nunavut, including a discussion of interjurisdictional effects;
- Objects and places of recreational, scenic, spiritual and ecological value;
- Use of land and resources for traditional purposes by Aboriginal persons; and
- Tourism.

12. For better contextual understanding by the decision makers, existing baseline socioeconomic conditions (for comparative purposes) should be provided for both the VEC and VSEC discussions.

13. A review of the potential environmental effects of malfunctions or accidents will be needed. For instance, the equipment and resources adequate to react to a spill or accident need to be planned for and in place when operations begin.

14. A variety of static and kinetic ARD tests on samples of sulphidic-bearing rock that will be disturbed by construction. The overall quantity that will be disturbed should be noted. Additional information on acidic drainage prediction and methods of prevention and control would be very helpful.

15. Regarding the health and safety of BIPAR workers:

- The noise and air quality of the work site; and
- Access to clean water for workers and the source of this water.

16. Human health effects, including bioaccumulation in the country food chain, air quality, and drinking water quality. Scenarios should include both standard operations and accidents involving deleterious substances on all components of the project.

17. Discussion of monitoring methods for human health during and before the project. This must include a detailed discussion of what the post-construction public health monitoring programs will entail.

18. The need for and requirements of a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of measures taken to mitigate adverse environmental effects will have to be devised.

Cumulative Effects

19. The cumulative effects of the project in combination with other past, existing, and reasonably probable future projects and activities, focusing on VECs and VSECs, including:

- The potential mines along the BIPAR corridor, as well as the access to those mines. This would include, but is not limited to Jericho.
- Any former mines along or near the BIPAR corridor.
- Existing mines along the BIPAR corridor, whether or not they have agreed to use the facilities of BIPAR. These would include Lupin, Diavik, and EkatiTM.
- Marine access shipping.
- Current use of winter roads (Tibbett to Contwoyto Lake, Contwoyto Lake to Ulu via Lupin, and Contwoyto Lake to Goose Lake via George Lake).
- Existing shipping traffic, primarily in the form of the barge supply runs to Bathurst Inlet, Umingmaktok, and nearby wilderness lodges.
- Current tourism activities.
- Current traditional activities.
- Possible increase in prospecting activities along the corridor.
- Existing prospecting activities along the corridor.
- Possible changes in shipping along the whole of the Northwest Passage.
- Other activities.

Adaptability of Project

20. Changes to the project that may be caused by the following environmental factors:

- Climate change;
- Permafrost patterns;
- Severe weather events;
- Seismicity;

- Other environmental factors that may effect the project (e.g. floods, sea ice); and
- Terrain stability.