

GN # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Aircraft Flight Altitudes
References	<ul style="list-style-type: none"> Canadian North Resources, Inc. (2024). NIRB Application for Screening #126014 – The Ferguson Lake, Nunavut, Environmental Baseline Studies. https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=352445&applicationid=126014&sessionid=p5f4e3vvf6a5268g792km0csu3 Canadian North Resources, Inc. (2025). NIRB File No.: 24YN037. Response to February 12, 2025 email “Opportunity to Address Comments Regarding CNRIs “Ferguson Lake, Nunavut Environmental Baseline Studies” Project Proposal. https://www.nirb.ca/portal/dms/script/dms_download.php?fileid=353417&applicationid=126014&sessionid=p5f4e3vvf6a5268g792km0csu3
CONCERN(S)	
<p>As detailed in Canadian North Resources, Inc’s (CNRI, the Proponent’s) ‘<i>NIRB Application for Screening #126014 – The Ferguson Lake, Nunavut, Environmental Baseline Studies</i>’, helicopters are a critical component of the Ferguson Lake, Nunavut, Environmental Baseline Studies Project (the Project).</p> <p>Within this document, CNRI acknowledges that helicopters are a known source of sensory disturbance (visual and sound) to wildlife, stating:</p> <p style="padding-left: 40px;">“Helicopter overflights will be conducted at high altitudes, except in areas of takeoff and landing, where low-level flights are necessary for baseline work or safety reasons. Helicopter flights will follow guidelines designed to minimize effects on wildlife.” (Page 12).</p> <p>In the Proponent’s February 2025 ‘<i>Opportunity to Address Comments Regarding CNRI’s “Ferguson Lake, Nunavut Environmental Baseline Studies” Project Proposal</i>’, CNRI summarized and then responded to the following Crown-Indigenous Relations and Northern Affairs Canada’s (CIRNAC) comment concerning aircraft and wildlife disturbance:</p>	

“CIRNAC3: Management Practices Designed to Prevent Disturbance to Wildlife:

CIRNAC recommends that the Proponent adhere to applicable regulatory requirements and accepted practices to prevent and/or mitigate any potential disturbances to wildlife that may result [from] project active activities. Meaningful efforts should be made to work with interested stakeholders, including the Kivalliq Inuit Association, Government of Nunavut’s Department of Environment, the Kivalliq Wildlife Board, and the Hunters and Trappers Associations of Baker Lake and Arviat to ensure acceptable management practices are applied. In particular, efforts should be made to develop an acceptable approach for the operation of a helicopter to prevent any negative impacts to caribou and muskoxen from sensory disturbances (visual and sound).

CNRI Response – Thank you for providing your comments. We will work with interested and relevant stakeholders to collect data and inform acceptable approaches to prevent negative impacts to caribou and muskoxen.” (Pages 2 and 3).

The Government of Nunavut (GN) wishes to provide the recommendations below concerning this topic.

REQUEST(S)/RECOMMENDATION(S)

1. The GN generally recommends that aircraft flights occur at or above 610 m above ground level (AGL). This flight altitude helps reduce sensory disturbance to wildlife and does not require pilots to visually locate animals on the ground.

Exceptions to this general recommendation may include low ceilings, takeoffs and landings, or for hauling external loads (e.g., drill relocation) due to safety reasons.

2. The GN understands from the Proponent’s application, they are not seeking to undertake low altitude flights for their Project. Should the Proponent seek to undertake low altitude flights for a future amendment to this Project, the GN requests that the Proponent provide clear information in their application regarding the frequency and timing of flight operations below 610 m.

ADDITIONAL COMMENT(S)

The Government of Nunavut’s Department of Environment is open to engaging with the Proponent on this topic. Any further questions can be directed to the Department of Environment’s one-window inbox for impact assessment: envassessment@gov.nu.ca