



NIRB File No.: 25YN011
NPC File No.: 150618

April 10, 2025

Max Friesen
University of Toronto
Anthropology – 19 Ursula Franklin St.
Toronto, ON M5S 2S2

Sent via email: max.friesen@utoronto.ca

Re: Notice of Screening for University of Toronto’s “Inuinait Heritage” Project Proposal

Dear Max Friesen:

On March 14, 2025, the Nunavut Impact Review Board (NIRB) received a referral to screen University of Toronto’s “Inuinait Heritage” project proposal from the Nunavut Planning Commission (Commission), which noted that the project proposal is outside the area of an applicable regional land use plan. On March 20, 2025, the NIRB received the complete application from the Proponent.

Pursuant to Article 12, Sections 12.4.1 and 12.4.4 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)* and s. 87 of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*), the NIRB has commenced screening this project proposal and has assigned it file number **25YN011** - please reference this file number in all future related correspondence.

PROJECT OVERVIEW

Project Scope:

All documents received and pertaining to this project proposal can be accessed from the NIRB’s online public registry at www.nirb.ca/126156.

Project:	Inuinait Heritage				
Region:	Kitikmeot Region				
Location:	Ahiak Migratory Bird Sanctuary				
Closest Community:	Cambridge Bay	Distance (approximate)	180 kilometres (km)	Direction	Southwest

Summary of Project Description:	The Proponent intends to conduct record oral histories with several Inuinnait Elders who spent their younger years in the Ahiak Migratory Bird Sanctuary (MBS).
Project Proposed Timeline:	July 2025 to 2027

According to the project proposal, the scope of the project includes the following undertakings, works or activities:

- Transportation of four (4) to five (5) people (pilot, 1-2 Elders, 1-2 researchers) via helicopter to and from Ahiak MBS, near the north end of the Perry River and at Innakhagvik (Perry Island);
 - Fly to three (3) locations within Ahiak MBS each day;
 - Record oral histories from Inuinnait Elders during interviews;
 - Map and photograph archaeological features based on Elder interviews;
- Use of fuel from Canadian Wildlife Services goose banding operation to refuel helicopter; and
- Use of accommodations and facilities in Cambridge Bay.

Inclusion or Exclusion of Scoping List

At this time, the NIRB has identified no additional works or activities in relation to the project proposal. As a result, the NIRB will proceed with screening the project based on the scope as described above.

REQUEST FOR COMMENTS

All documents received can be accessed from the NIRB's online public registry at www.nirb.ca/126156 and include:

- *NPC Referral and Application*
- *NIRB Application in English, Inuktitut and Inuinnaqtun*
- *NIRB Non-Technical Summary in English, Inuktitut and Inuinnaqtun*

The NIRB will copy you on screening process related correspondence and upload related documents to the NIRB's online registry for public access. The NIRB may request additional information at any time during the process.

The NIRB is copying parties and municipalities potentially affected by the University of Toronto's project proposal with this letter, and we invite interested parties to comment directly to the NIRB by **April 21, 2025**.

The NIRB would like parties to provide comments regarding:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;

- Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why;
- Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures); and
- Any matter of importance to the Party related to the project proposal.

Please note that *proposed* project-specific terms and conditions, should the project proceed, have been attached for consideration and comment ([Appendix A](#)).

CONTACT INFORMATION

Please send your comments to the NIRB via email at info@nirb.ca, via fax at (867) 983-2594 or via the individual project dashboard for this assessment on the NIRB's online public registry at www.nirb.ca/126156.

If you have any questions or require clarification, feel free to contact the undersigned at kgillard@nirb.ca.

Sincerely,



Kelli Gillard PAg,
Manager, Impact Assessment
Nunavut Impact Review Board

Attachments: Appendix A: *Proposed* Project Specific Terms and Conditions

Enclosures (4): Public Notice of Screening (English and Inuinnaqtun)
Comment Forms (English and Inuinnaqtun)

cc: Distribution List
Wynter Kuliktana, Kitikmeot Inuit Association
Tannis Bolt, Kitikmeot Inuit Association
Justin Buller, Government of Nunavut
Dianne Lapierre, Government of Nunavut
Sean Joseph, Government of Nunavut
Jonas Azonaha, Government of Nunavut
Mosha Cote, Nunavut Research Institute
Lisa Pirie-Dominix, Canadian Wildlife Service
Environment and Climate Change Canada
Jose Audet-Lecouffe, Fisheries and Oceans Canada

Appendix A: Proposed Project Specific Terms and Conditions

The following is a list of project-specific terms and conditions which, should the project proceed, may be recommended to be attached to any approval.

General

1. University of Toronto (the Proponent) shall maintain a copy of the Project Terms and Conditions at the site of operation at all times and make it accessible to enforcement officers upon request.
2. The Proponent shall operate in accordance with all commitments stated in correspondence provided to the Nunavut Planning Commission (NPC File No.: 150618), and the NIRB (Online Application Form, March 20, 2025; Project Summary, and March 20, 2025). This information should be accessible to enforcement officers upon request.
3. The Proponent shall operate the site in accordance with all applicable Acts, Regulations and Guidelines.
4. The Proponent shall ensure that it meets the standards and/or limits as set out in the authorizing agencies' permits or licences as required for this project.
5. The Proponent shall ensure that all personnel, staff and contractors are adequately trained prior to commencement of all project activities, and shall be made aware of all operational plans, management plans, guidelines and Proponent commitments relating to the project.

Waste Management

6. The Proponent shall manage all hazardous and non-hazardous waste including food, domestic wastes, debris and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.

Wildlife – General

7. The Proponent shall not substantially alter or damage or destroy any wildlife habitat in conducting this operation unless otherwise authorized by the appropriate authorizing agencies.
8. The Proponent shall not chase, weary, harass or molest wildlife. This includes persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or disturbing large groups of animals.
9. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.

Migratory Birds and Raptors Disturbance

10. The Proponent shall carry out all phases of the project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's *Avoidance Guidelines*. The Proponent's actions in applying the *Avoidance Guidelines* shall be in compliance with the *Migratory Birds Convention Act, 1994* and with the *Species at Risk Act*.

11. The Proponent shall not disturb or destroy the nests or eggs of any birds. If active nests of any birds are discovered or located (i.e., with eggs or young), the Proponent shall avoid these areas until nesting is complete and the young have naturally left the vicinity of the nest by establishing a protection buffer zone¹ appropriate for the species and the surrounding habitat.

Aircraft Flight Restrictions

12. The Proponent shall not alter flight paths to approach wildlife and avoid flying directly over animals.
13. The Proponent shall plan flight paths that minimize flights over known habitat likely to have birds or concentrations of wildlife. Aircraft should avoid critical and sensitive wildlife areas at all times by choosing alternate flight corridors.
14. The Proponent shall restrict aircraft/helicopter activity related to the project to a minimum flight altitude of 610 metres (2,100 ft) above ground level except during landing, take-off or if there is a specific requirement for low-level flying, which does not disturb wildlife or migratory birds.
15. The Proponent shall avoid known concentrations of birds (e.g., bird colonies, moulting areas) by a lateral distance of 1.5 kilometre. If avoidance is not possible maintain a minimum flight altitude of 1,100 metres (3,500 feet) over these areas.
16. The Proponent shall ensure that aircraft/helicopter do not, unless for emergency, touch-down in areas where wildlife are present.
17. The Proponent shall advise all pilots of relevant flight restrictions and enforce their application over the project area, including flight paths to/from the project area.

Caribou and Muskoxen Disturbance

18. The Proponent shall avoid interfering with any paths or crossings known to be frequented by caribou during periods of migration as identified by current land use plans in place and/or by Inuit Qaujimaningit.
19. The Proponent shall not locate any operation or undertake activities that could block or cause any diversion to migration of caribou or muskoxen.
20. The Proponent shall immediately cease activities likely to interfere with the migration or calving of caribou or muskoxen until such time as the caribou or muskox have passed.

Land Use and Restoration of Disturbed Areas

21. The Proponent shall ensure that the land use area is kept clean and tidy at all times.
22. The Proponent shall remove all garbage, fuel and equipment at the end of each field season and/or upon completion of work and/or upon abandonment.

Heritage Sites

23. The Proponent shall ensure that all personnel are aware of the Proponent's responsibilities and requirements regarding archaeological or palaeontological sites that are encountered during

¹ Recommended setback distances to define buffer zones have been established by Environment and Climate Change Canada for different bird groups nesting in tundra habitat and can be found at www.ec.gc.ca/paom-itmb.

land-based activities. This should include briefings explaining the prohibitions regarding removal of artifacts, and defacing or writing on rocks and infrastructure.

Other

24. The Proponent should consult with local residents regarding their activities in the area and solicit available Inuit Qaujimaningit and information that can inform project activities.
25. The Proponent shall ensure that project activities do not interfere with Inuit wildlife harvesting or traditional land use activities.
26. The Proponent should, to the extent possible, hire local people and access local services where possible.