

March 8, 2019

Mia Otokiak Junior Technical Advisor Nunavut Impact Review Board P.O Box 1360 Cambridge Bay, NU X0B 0C0

Sent VIA Email: info@nirb.ca

RE: Notice of Screening for Silverback Films Ltd.'s "BBC Perfect Planet – Ahiak Migratory Bird Sanctuary (Karrak Lake) – Arctic Foxes" Project Proposal (19AN008)

Dear Mia Otokiak,

On behalf of the Government of Nunavut (GN), I would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on Silverback Films Ltd.'s "BBC Perfect Planet – Ahiak Migratory Bird Sanctuary (Karrak Lake) – Arctic Foxes" proposal. The GN reviewed the proposed project and has prepared several comments for your consideration (see Appendix).

Should you have any concerns with our comments, please contact me by phone at 867-975-7808 or by email at cspencer@gov.nu.ca.

Qujannamiik,

[Original Signed By]

Chris Spencer Avatiliriniq Coordinator Government of Nunavut

Appendix

GN-01: Archaeological Sites	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	BBC Perfect Planet – Ahiak Migratory Bird Sanctuary (Karrak Lake) – Arctic Foxes
References	NIRB Notice of Screening

CONCERNS

A search of the Nunavut Archaeological Site Database indicates that there are five (5) recorded archaeological sites located within the proposed filming locations, with an additional twenty five (25) recorded archaeological sites in the vicinity of the project footprint. This however does not preclude the presence of unrecorded sites or cultural features as the area has not been the object of systematic archaeological surveys.

SUGGESTIONS AND RECOMMENDATIONS

- (1) The Department of Culture and Heritage recommends that the applicant avoids conducting activities in the vicinity (50 m buffer zone) of archaeological/historical sites. If archaeological sites or features are encountered, activities should immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to our office.
- (2) All archaeological and palaeontological sites in Nunavut are protected under the Nunavut Act. The applicant must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site without the proper authorizations. Moreover, the building of inuksuit is not recommended.

GN-02: Disturbance to Caribou Activity	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Disturbance to caribou during migration, calving, and post-calving
References	 NIRB Notice of Screening 125436 / 19AN008: Screening for "Ahiak Migratory Bird Sanctuary (Karrak Lake) - Arctic Foxes" NIRB Application for Screening # 125436 as of February 8, 2019 NIRB Application for Screening # 125436 as of February 11, 2019

CONCERNS

The Project activities have the potential to disturb caribou during sensitive periods. The proposed Project area and schedule may overlap with caribou migration, calving, and post-calving.

The Project activities will not likely lead to the destruction of wildlife habitat, will not include fuel storage, and will only use existing infrastructure. Therefore, the Project does not present any fundamental issues related to environmental impacts. The potential adverse effects related to wildlife disturbance are predictable and can be mitigated using the standard best practices.

SUGGESTIONS AND RECOMMENDATIONS

- 1. Ensure that wildlife will not be harassed or disturbed.
- 2. Cease Project activities during periods of caribou migration, calving, and post-calving.
- 3. Maintain a minimum aircraft flight altitude of 610m above ground level and 600m horizontal distance from caribou.
- 4. Apply for a Wildlife Observation Licence following Project approval (application attached).