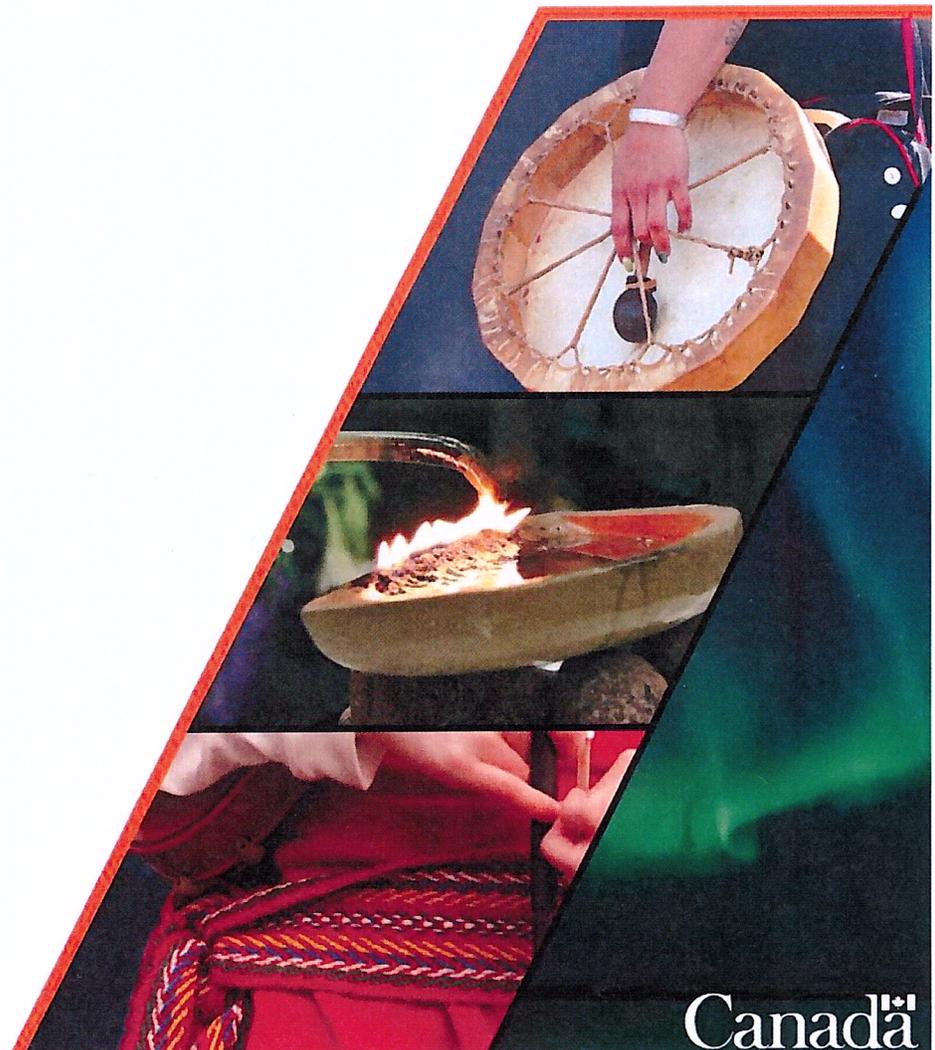




CIRNAC COMMENTS TO NIRB

Re: Notice of Screening for “BBC Perfect Planet –
Ahiak Migratory Bird Sanctuary (Karrak Lake) –
Arctic Foxes



Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
NIRB file #19AN008
Our file - Notre référence
CIDM #1243176

March 8, 2019

Mia Otokiak
Junior Technical Advisor
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU, X0B 0C0
Via electronic mail to: info@nirb.ca

**Re: Notice of Screening for BBC Perfect Planet – Ahiak Migratory Bird Sanctuary
(Karrak Lake) – Arctic Foxes**

Dear Ms. Otokiak,

On February 15, 2019, the Nunavut Impact Review Board (NIRB) invited parties to comment on Silverback Film's "BBC Perfect Planet – Ahiak Migratory Bird Sanctuary (Karrak Lake) – Arctic Foxes" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Whether the project proposal is likely to arouse significant public concern; and if so, why;

Community Engagement

The Proponent has identified the Ekaluktutiak Hunters and Trappers Organization (HTO), the Gjoa Haven HTO, and the Umingmaktok HTO as community groups with an interest in the project proposal. These organizations were contacted on January 15, 2019. It is not known what the means of communication was and the results of any discussions. The submitted non-technical summary states,

Due to time constraints it would be very difficult to hold any local talks or events however we will send each community a copy of the final program once the series is shown on television around the globe. We will be staying in Cambridge Bay using local hotels, restaurants and taxis for crew when they pass through...



It would be preferable for the Proponent to continue engaging with the identified HTO's as well as the Hamlets of Cambridge Bay and Gjoa Haven to discuss the project proposal and any concerns raised by community members. CIRNAC recommends:

- the Proponent provide a written summary of how they are addressing any concerns raised by the Ekaluktutiak HTO, Gjoa Haven HTO, and Umingmaktok HTO as a result of the communications that took place on January 15, 2019. This summary should reference what information was shared to these organizations and the means of communication (e.g., teleconference, email, etc.).
- the Proponent endeavor to continue engaging with the identified HTO's as well as the Hamlets of Cambridge Bay and Gjoa Haven to discuss the project proposal and any concerns raised by community members. The Proponent should also consider arranging in-person meetings with community members when project personnel pass through Cambridge Bay.

Local hires

The submitted application makes no reference to hiring members of the communities of Cambridge Bay or Gjoa Haven (e.g., field assistant, camp support staff, etc.). This may be useful for the Proponent because members of these communities are familiar with the terrain and wildlife behavior. Additionally, this would benefit community members (e.g., training, summer employment, etc.). The Proponent should consider hiring members from the communities of Cambridge Bay and Gjoa Haven to assist with their project activities.

Any matter of importance to the Party related to the project proposal.

Although the Proponent references "Task Hazard Analyses (THA), and Safe Work Procedures (SWP)" documents regarding the use, maintenance and disposal of fuel and hazardous material, these documents have not been submitted for review.

Should the project be approved, CIRNAC recommends that all personnel should be properly trained in fuel and hazardous waste handling procedures, as well as spill response procedures. Additionally, CIRNAC recommends NIRB to include the following terms and conditions for the Proponent to follow:

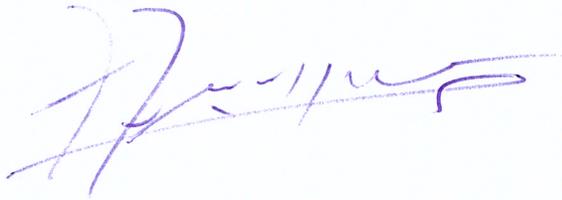
1. Fuel and other hazardous material should not be stored on the surface ice of lakes or streams (unless otherwise approved).
2. All fuel and other hazardous materials should be stored a minimum of thirty-one (31) metres away from the high water mark of any water body and in such a manner as to prevent their release into the environment.
3. Re-fueling of all equipment should occur a minimum of thirty-one (31) metres away from the high water mark of any water body. Furthermore, all fuel transfers should be carried out at designated re-fueling stations.



4. Secondary containment or a surface liner should be used when storing barreled fuel and chemicals at all locations.
5. Drip pans or other equivalent devices should be used when refueling equipment on-site.
6. Food and waste should be stored in such a manner as to prevent access by wildlife.
7. The storage of waste should be located a minimum of thirty-one (31) meters away from the high water mark of any waterbody.
8. If ash is generated from burning human waste, the pit contents must be removed from the camp.

CIRNAC appreciates the opportunity to provide comments and looks forward to working further with the NIRB and the Proponent, as necessary, throughout any further review related to this project. Should you have any questions, please contact Krista Pooley at (867) 975-4587 or by e-mail at krista.pooley@canada.ca.

Sincerely,



Felexce Ngwa
Manager, Impact Assessment

