SCREENING DECISION REPORT
NIRB FILE No.: 25EN084

Related to NIRB File No.: 08EN052
NPC File No.: 150928,148767 and 149691
NWB Water Licence:2BE-ANG2227

March 13, 2026

Following the Nunavut Impact Review Board's (NIRB or Board) assessment of all materials provided, the NIRB **is recommending that a review of ATHA Energy Corp.'s "Angilak Property" is not required** pursuant to Article 12, Section 12.4.4(a) of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (*Nunavut Agreement*) and s. 92(1)(a) of the *Nunavut Planning and Project Assessment Act*, S.C. 2013, c. 14, s. 2 (*NuPPAA*).

Screening Decision and Recommendation

After reviewing the project proposal, comments and replies the NIRB has determined ATHA Energy Corp.'s Angilak Property may proceed without a review, provided the Proponent follows the specific terms and conditions set by the NIRB under s. 92(2)(a) of *NuPPAA*. During the screening, the NIRB notes some community members expressed general concerns about uranium exploration and mining in the region and called for a moratorium on such activities. However, no such moratorium exists in the region that would prevent the proposed exploration activities from occurring, or that would prevent the NIRB's screening of the project proposal on the same basis as any other mineral exploration activities. The NIRB also notes that the scope of this screening applies to early-stage exploration, with any potential advanced exploration or future mining activities requiring further impact assessment.

On this basis, the Board has concluded if the Angilak Property is carried out in compliance with all recommended terms, conditions, and relevant laws, it is unlikely to cause significant adverse environmental or socio-economic impacts. The NIRB therefore recommends that the responsible Minister accept this Screening Decision Report, together with the recommended project-specific terms and conditions as outlined within the Report.

OUTLINE OF SCREENING DECISION REPORT

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REGULATORY FRAMEWORK

The primary objectives of the NIRB are set out in Article 12, Section 12.2.5 of the *Nunavut Agreement* and are confirmed by s. 23 of the *NuPPAA*. The purpose of screening is provided for under Article 12, Section 12.4.1 of the *Nunavut Agreement* and s. 88 of the *NuPPAA*.

As set out under Article 12, Section 12.4.4 of the *Nunavut Agreement* and s. 92(1) of the *NuPPAA*, upon conclusion of the screening process, the Board must provide its written report the Minister indicating one of three options:

(a) a review of the project is not required;

(b) a review of the project is required; or

(c) the project should be modified or abandoned.

PROJECT OVERVIEW & THE NIRB ASSESSMENT PROCESS

On November 17, 2025, the NIRB received a referral to screen ATHA Energy Corp.'s Angilak Property project proposal (NIRB File No: 25EN084) from the Nunavut Planning Commission (Commission), with an accompanying positive conformity determination with the Keewatin Regional Land Use Plan. All documents received and pertaining to this project proposal can be accessed from the NIRB's Public Registry by using any of the following search criteria or www.nirb.ca/project/126266.

- Project Name: Angilak Property
- NIRB File No.: 25EN084
- NIRB Application No.: 126266

Table 1: NIRB's Assessment Process

Date	Stage
November 17, 2025	Receipt of project proposal and positive conformity determination (Keewatin Regional Land Use Plan) from the Commission
November 17, 2025	Pursuant to s. 144(1) of the *NuPPAA* the NIRB requested the Proponent complete an online application to address information required for Screening
December 16, 2025	Receipt of online application from Proponent
December 18, 2025	Request(s) to Proponent for additional information in order to carry out screening pursuant to s. s. 144(1) of the *NuPPAA*
December 18, 2025	Proponent responded to information request(s) and provided additional information
December 18, 2025	Scoping pursuant to s. 86(1) of the *NuPPAA*
December 18, 2025	NIRB conducted an inclusion or exclusion of scope
January 08, 2026	Public engagement and comment request (which included draft terms and conditions) was issued in English with translations provided once available
February 09, 2026	Receipt of public comments (later extended to February 06, 2026)
February 16, 2026	Proponent provided with an opportunity to address comments/concerns raised by public
February 26, 2026	Proponent responded to comments/concerns raised by public
February 02, 2026	Pursuant to Article 12, s 12.4.5 of the *Nunavut Agreement* and s. 92(3) of the *NuPPAA*, an extension to the 45-day timeline for the provision of the Board's Report was requested from Minister(s) of Northern and Arctic Affairs and Minister Responsible for the Canadian Northern Economic Development Agency
March 13, 2026	Issuance of Screening Decision Report

1. Project Scope

Location	Kivalliq region, Angikuni Basin, approximately 225 km southwest of Baker Lake
Objective	The Proponent intends to advance mineral exploration activities within the project area in Nunavut by collecting geological and drilling data necessary to refine the understanding of mineralization and resource potential. The project includes the continued use and expansion of existing exploration infrastructure, such as an established camp, extension of an existing airstrip, and construction of limited exploration trails to support safe and efficient field operations.
Timeline	March 01, 2026, to October 26, 2027(Construction) October 28, 2027, to February 28, 2031(Operation)

As required under s. 86(1) of the *NuPPAA*, the Board accepted the scope of the project as set out by ATHA Energy Corp in the proposal. The scope of the project proposal includes the following undertakings, works, or activities:

- **Transportation and access**
  - Use of fixed-wing aircraft, helicopters, ATVs/side-by-sides, and construction vehicles for personnel, equipment, fuel, and supplies.
  - Extension of the primary airstrip adjacent to Nutaaq Camp by approximately 250 m x 30 m.
- **Exploration trails**
  - Construction and operation of low-profile exploration trails totaling approximately 17.5 km in length and 1.5 m in width (~2.65 ha), including short spur trails.
  - Trail construction using brush cutters, ATVs/side-by-sides with trailers, skid steer, and small backhoe.
  - Use of existing eskers along the route and near camp as construction material sources.
- **Camp infrastructure**
  - Continued operation of the existing 40-person Nutaaq Camp and expansion of camp capacity to 60 persons through the addition of Weatherhavens and internal camp structures, with no material increase to the camp footprint, acknowledging that the addition of Weatherhavens may alter the camp layout.
- **Exploration and drilling**
  - Advanced mineral exploration activities, including geological mapping, sampling, and exploration drilling using up to 4 diamond drill rigs and 1 reverse circulation drill.
  - Drill site preparation and access using the proposed exploration trails.
- **Fuel storage and use**
  - Storage and use of diesel and aviation fuel within the existing camp footprint.
  - Transition from drum storage to CSA-approved fuel bladders with secondary containment.
- **Waste and water management**
  - Domestic and drilling water use in accordance with existing NWB licence limits.
  - Incineration of combustible waste and sewage using approved systems.
  - Removal of hazardous and non-combustible waste from site to approved facilities.

2. Inclusion or Exclusion to Scoping List

The NIRB has identified the previously assessed activities listed above will be considered in the current assessment, especially for potential of cumulative impacts where previous approvals may still be in force.

3. Public Comments and Concerns

As outlined in Table 1 above, notices regarding the NIRB's screening of this project proposal were distributed to community organizations as well as to relevant federal and territorial government

agencies, Inuit and Indigenous organizations and other parties with a request for interested parties to provide the Board with any comments or concerns 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.

On or before February 06, 2026, the NIRB received comments from the following interested parties:

Table 2: Comments Received

Commenting Party	**NIRB Doc ID No.**
Kivalliq Inuit Association (KIA)	359401
Government of Nunavut (GN)	359333
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	359253
Environment and Climate Change Canada (ECCC)	359272
Transport Canada (TC)	359270
Athabasca Denesųłiné NéNé Land Corporation (ADNLC)	359408
Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	359386
Ghotelnene K'odtineh Dene (GKD)	359363
P. Hughson (Public Comment)	359385

a. Summary of Comments and Concerns Received

The following provides a summary of the comments and concerns received by the NIRB in relation to the Angilak Property project proposal:

Kivalliq Inuit Association (KIA):

- As long as the KIA Mobile Caribou Protection Measures are followed and all required permits and licences are obtained and maintained, KIA has no issue with the Project.
- KIA notes the project area may be used for hunting between winter and spring.
- The project area includes both Crown land and Inuit Owned Land (IOL).
- KIA expects the Proponent to contract Inuit wildlife monitors for the Project.

Government of Nunavut (GN)

The Government of Nunavut's review (Department of Environment and related divisions) focused on wildlife protection, water management, and waste handling.

Key Concerns

- Potential impacts on the Qamanirjuaq caribou herd and seasonal migration routes.
- Disturbance from aircraft, drilling, and increased ground access.

- Camp expansion and associated increase in water use and waste generation.
- Waste incineration practices and emissions management.
- Proper management of drilling fluids and mineralized (radioactive) drill cuttings.

Requested Clarifications / Expectations

- Confirmation that domestic and drilling water use remains within existing Nunavut Water Board licence limits.
- Compliance with wildlife protection measures and seasonal timing considerations.
- Proper hazardous waste storage, manifesting, and backhaul procedures.
- Detailed spill response and emergency preparedness measures.
- Monitoring and reporting commitments for wildlife interactions.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

CIRNAC's review focused on land use compliance, fuel management, and environmental protection measures associated with exploration trail construction, airstrip extension, and camp expansion.

Key Concerns

- Potential impacts of the 250 m × 30 m airstrip extension on terrain stability and nearby waterbodies.
- Environmental risks associated with construction of approximately 17.5 km of low-profile exploration trails.
- Use of eskers as material sources and potential long-term geomorphological disturbance.
- Fuel storage transition from drums to large-capacity fuel bladders.
- Adequacy of secondary containment systems and inspection protocols.
- Spill prevention, reporting, and emergency response preparedness.
- Progressive reclamation and site closure commitments.

Requested Clarifications / Expectations

- Confirmation all fuel storage systems meet CSA standards and provide 110% secondary containment capacity.
- Detailed inspection and monitoring protocols for fuel bladders and berms.
- Clear spill reporting procedures consistent with NT/NU 24-Hour Spill Line requirements.
- Commitment to progressive reclamation of trails and disturbed areas.
- Confirmation hazardous waste would be removed to approved facilities.

Environment and Climate Change Canada (ECCC)

ECCC's comments focused on potential impacts to migratory birds, wildlife habitat, and water quality.

Key Concerns

- Potential disturbance to migratory birds and species at risk during construction and drilling.
- Risk of sedimentation or contamination of surface water from trail construction and drilling.
- Proper storage and handling of hazardous materials and drilling additives.
- Protection of aquatic habitat during fuel storage and transfer.
- Adequacy of spill prevention and containment measures near waterbodies.

Requested Clarifications / Expectations

- Confirmation of buffer distances from waterbodies during construction and fuel storage.
- Description of erosion and sediment control measures.

- Wildlife monitoring commitments during sensitive seasons.
- Assurance drilling additives are non-toxic and biodegradable where feasible.
- Compliance with the Migratory Birds Convention Act and Species at Risk Act, where applicable.

Transport Canada (TC)

Transport Canada's review centered on aviation safety and airstrip modifications.

Key Concerns

- Safety implications of extending the primary airstrip by approximately 250 m.
- Increased fixed-wing and helicopter traffic associated with expanded exploration activities.
- Safe handling and storage of aviation fuel.
- Compliance with federal aviation safety regulations for remote airstrip operations.

Requested Clarifications / Expectations

- Confirmation airstrip design and construction meet aviation safety standards.
- Operational procedures for safe aircraft movement and refueling.
- Fire suppression and emergency response preparedness at fuel storage and refueling areas.
- Ongoing inspection and maintenance of the airstrip.

Athabasca Denesųłiné NéNé Land Corporation (ADNLC)

ADNLC does not support the Project at this time due to insufficient information to assess potential impacts on the Qamanirjuaq caribou herd and associated habitat, as well as potential impacts to Athabasca Denesųłiné (AD) land use areas adjacent to the Project.

Key Concerns

- Insufficient information to assess impacts on caribou habitat and migration.
- Lack of detailed avoidance, mitigation, monitoring, and reporting measures for caribou and other wildlife.
- Limited clarity regarding proposed trails/linear features, camps, and associated infrastructure.
- Potential impacts to AD land use areas.
- Potential disturbance to archaeological artifacts.
- Inadequate consideration of cumulative effects across the Qamanirjuaq caribou range.
- Screening timelines considered too short for comprehensive cumulative effects assessment.

Requested Clarifications / Conditions

- Provide detailed descriptions of proposed trails, including type, length, permanence, traffic levels, reclamation methods, and expected reclamation success.
- Provide clear mapping of trail systems and camp infrastructure.
- Clarify whether trail construction would reduce helicopter use.
- Provide evidence supporting the statement that no important caribou sites or freshwater crossings exist within the Project area.
- Provide detailed caribou avoidance and mitigation measures, including:
    - Timing restrictions
    - Monitoring protocols
    - Clear stop-work triggers
- Include ADNLC in ongoing wildlife interaction communications.
- Consider hiring wildlife monitors from AD and GKD communities/HTOs.
- Provide end-of-season reporting on wildlife interactions and mitigation effectiveness.

- Develop a communications protocol for archaeological discoveries and include ADNLC in all related communications.
- Meet with Athabasca Denesųłiné representatives prior to issuance of approvals/permits.
- Include ADNLC in spill or environmental event notifications that may affect AD territories.
- Provide more meaningful consideration of cumulative effects in the assessment.

Beverly and Qamanirjuaq Caribou Management Board (BQCMB)

- The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) provided comments based on longstanding concerns previously submitted in 2008, which remain applicable. BQCMB emphasizes that caribou utilize the region across multiple seasons, with heightened sensitivity during calving and post-calving periods.

Key Concerns

- The proposed "trail" may function as a road, creating repeated ground-traffic disturbance and displacement or avoidance.
- The linear feature may persist longer than intended.
- If the trail functions as a road, it should be assessed and conditioned accordingly.
- BQCMB questions the conclusion that no cumulative effects are predicted.
- Authorizing a new ground-access corridor may increase long-term cumulative risk and enable incremental expansion of access.

Requested Clarifications and Conditions

- Confirm a maximum trail width of 1.5 m.
- Prohibit widening, ditching, upgrading, or conversion to a higher-standard road.
- Restrict access to authorized project activities only.
- Implement access controls and reporting of any unauthorized use.
- Commit to progressive reclamation of trail segments no longer required, with clear methods and timelines.
- Convert EMP (Environment management plan) commitments into enforceable requirements.
- Establish clear buffers and stop-work distances.
- Add seasonal restrictions during calving and post-calving periods.
- Require trained Inuit wildlife monitors during trail construction and high-traffic periods.
- Provide standardized wildlife interaction reporting (numbers observed, behaviour, distance, direction of movement, and mitigation actions taken).
- Implement adaptive management measures, including escalation if interaction thresholds are exceeded.
- Submit a detailed trail abandonment and restoration plan.
- Include drainage restoration, stabilization, and revegetation measures.
- Commit to post-closure monitoring to confirm habitat recovery of trail segments.
- BQCMB appended its 2008 submission for context and requests continued engagement as the screening process proceeds.

Ghotelnene K'odtineh Dene (GKD)

Ghotelnene K'odtineh Dene (GKD) provided comments expressing concern regarding potential impacts of the Project on caribou, traditional land use, and cumulative effects within their asserted traditional territory.

Key Concerns

- Potential impacts to the Qamanirjuaq caribou herd and associated habitat.
- Disturbance from increased ground access (exploration trails) and aircraft traffic.
- Insufficient detail regarding mitigation, monitoring, and reporting commitments.
- Potential cumulative effects from multiple exploration projects across the caribou range.
- Impacts to traditional land use, including hunting and harvesting activities.
- Need for ongoing communication and engagement throughout project implementation.

Requested Clarifications and Conditions

- Provide detailed caribou avoidance and mitigation measures, including timing restrictions.
- Establish clear stop-work triggers when caribou are present.
- Implement wildlife monitoring during trail construction and other high-activity periods.
- Include GKD in wildlife interaction reporting.
- Clarify trail design, width limitations, and permanence.
- Provide detailed mapping of proposed linear features.
- Commit to progressive reclamation of trail segments.
- Provide regular updates regarding wildlife interactions and mitigation effectiveness.
- Share annual or seasonal monitoring reports with GKD.
- Include GKD in spill notification procedures where events may affect their traditional territory.
- Continue meaningful engagement with GKD throughout screening and project implementation.
- Provide sufficient project information to support assessment of potential impacts.

P. Hughson (Public Comment)

A submission was received from P. Hughson expressing concerns from a community and Inuit perspective.

Key Concerns

- Protection of caribou and wildlife habitat.
- Long-term cumulative impacts of exploration activities in the region.
- Radioactive material handling and environmental safeguards.
- Adequacy of spill prevention and emergency response planning.
- Transparency and ongoing communication with affected communities.

Requested Considerations

- Strong mitigation and monitoring commitments.
- Clear reporting mechanisms for environmental incidents.
- Meaningful community engagement throughout project implementation.
- Assurance that exploration activities would not compromise traditional land use.

b. Comments and Concerns with respect to Inuit Qaujimaningit, Indigenous and Community Knowledge

Several parties raised concerns related to caribou habitat and migration, seasonal land use, wildlife disturbance, cumulative effects, and traditional harvesting activities.

- Observations regarding caribou movement and seasonal sensitivities, including calving and post-calving periods;

- The importance of protecting traditional harvesting areas;
- Concerns regarding cumulative disturbance across the broader Qamanirjuaq caribou range;
- The need for wildlife monitoring, seasonal timing considerations, and stop-work measures where appropriate;
- Ongoing communication and engagement with Indigenous organizations during project implementation.
- Accumulated knowledge developed through long-term use and occupancy of the land;
- Observations and understandings of environmental conditions and wildlife behaviour; and
- Recognition of the relationships among living beings and between people and the environment.

4. Proponent's Response to Public Comments and Concerns

The NIRB provided an opportunity for the Proponent to respond to the above concerns. The following is a summary of the Proponent's response:

Nunavut Impact Review Board (NIRB)
In response to NIRB information requests, ATHA:

- Submitted the Radiation Hazard Management/Control Plan.
- Provided clarification regarding cumulative effects and stated, based on project design and mitigation measures, no residual effects are predicted.
- Confirmed the proposed 1.5m wide trail is intended for ATV and side-by-side use only.
- Stated there are no plans through the current screening, licensing, and authorization process to expand the trail into a road.
- Described monitoring and adaptive management measures, including potential work alterations or suspension if required.

Government of Nunavut (GN)
In response to GN's comments, ATHA:

- Confirmed domestic and drilling water use would remain within existing Nunavut Water Board licence limits.
- Indicated spill prevention and containment measures were addressed through updates to the Spill Contingency Plan.
- Clarified trail routing considered environmental features and referenced field observations conducted in 2025.
- Confirmed drill holes and sumps would be properly managed and closed at the end of each field season.
- Stated hazardous waste would be removed to approved facilities.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
In response to CIRNAC's comments, ATHA:

- Confirmed the exploration trail would be approximately 1.5m wide.
- Stated there are no current plans to widen, upgrade, or convert the trail into a road.
- Confirmed the transition from drum storage to CSA-approved fuel bladders with secondary containment.
- Indicated the Spill Contingency Plan was revised to incorporate comments received.

- Stated it would work with CIRNAC and KIA during the authorization phase to develop an approved reclamation plan.

Environment and Climate Change Canada (ECCC)
In response to ECCC's comments, ATHA:

- Updated the Environmental Management Plan to reflect the migratory bird nesting period (early May to mid-August).
- Confirmed avoidance measures and buffers would be applied.
- Stated drilling additives would be managed in accordance with regulatory requirements.
- Confirmed fuel storage and refuelling would comply with required setback distances.

Transport Canada (TC)
In response to Transport Canada's comments, ATHA:

- Confirmed applicable regulatory requirements, including Canadian Navigable Waters Act and Canadian Aviation Regulations processes, would be completed prior to implementing the airstrip extension.
- Indicated aviation fuel storage and handling would comply with regulatory standards.

Athabasca Denesųłiné NéNé Land Corporation (ADNLC)
In response to ADNLC's comments, ATHA:

- Referred to its main screening submission and information request responses regarding trail design and mapping.
- Reiterated the trail is intended to remain a 1.5m ATV/UTV trail.
- Stated cumulative effects were assessed and no overlapping residual effects were predicted.
- Confirmed regulatory procedures would be followed if archaeological materials are encountered.
- Indicated engagement would continue through the regulatory process.

Beverly and Qamanirjuaq Caribou Management Board (BQCMB)
In response to BQCMB's comments, ATHA:

- Reaffirmed the trail would remain approximately 1.5m wide.
- Confirmed implementation of Mobile Caribou Protection Measures.
- Indicated work alterations, including temporary stoppage, may occur during peak caribou movement periods.
- Confirmed use of Inuit wildlife monitors and standardized wildlife interaction reporting.
- Stated additional field studies are planned to refine seasonal timing protocols.
- Indicated it would work with CIRNAC and KIA to develop progressive reclamation measures.

Ghotelnene K'odtineh Dene (GKD)
In response to GKD's comments, ATHA:

- Reaffirmed implementation of Mobile Caribou Protection Measures.
- Indicated wildlife monitoring and reporting would occur.
- Stated work may be altered or suspended where caribou are present within defined proximity thresholds.
- Confirmed engagement and reporting would continue.

P. Hughson (Public Comment)
In response to public concerns, ATHA:

- Submitted the Radiation Hazard Management/Control Plan.
- Reiterated commitments to spill prevention, containment, inspection, and emergency response.
- Confirmed implementation of wildlife protection measures.
- Stated it would continue to work with the NIRB, intervenors, and public representatives through the authorization and permitting process.

ASSESSMENT OF THE PROJECT PROPOSAL IN ACCORDANCE WITH PART 3 OF *NUPPAA*

In determining whether a review of the project is required, the Board considered whether the project proposal had potential to result in significant ecosystemic or socio-economic impacts. The Board took particular care to consider Inuit Qaujimaningit, Indigenous and Community Knowledge in carrying out its assessment and determination of the significance of impacts.

Table 3: Summary of the Board's Assessment of Factors s. 90 *NuPPAA*

Factor	Comment
The size of the geographic area, including the size of wildlife habitats, likely to be affected by the impacts.	▪ The Project footprint is localized within the Angilak mineral claim block southwest of Baker Lake and consists of camp operations, drill sites, and associated trails. ▪ Although the claim block does not directly overlap mapped calving grounds, the area lies within the broader seasonal range of the Qamanirjuaq caribou herd and within a region that includes a designated Caribou Protection Area. Wildlife movement and habitat use extend beyond mapped polygons; therefore, disturbance may influence adjacent tundra and migration pathways. ▪ The region contains a dense network of interconnected lakes, wetlands, and heritage rivers. This hydrological connectivity increases the potential geographic extent of effects in the event of sedimentation or spill. ▪ When considered with other past, present, and proposed mineral exploration projects in the region (Table 4), the geographic area relevant to assessment extends beyond the project footprint to the broader regional landscape where cumulative disturbance may occur.
The ecosystemic sensitivity of that area.	▪ The Project is located within a tundra ecosystem characterized by slow vegetation recovery, permafrost conditions, and high hydrological connectivity. Surface disturbance may persist for extended periods due to limited natural regeneration.

Factor	Comment
	▪ The broader region includes designated Caribou Protection Areas and mapped calving grounds, indicating elevated wildlife sensitivity, particularly during seasonal migration and calving periods. Although the Project does not directly overlap calving grounds, it lies within the wider caribou range. ▪ The area also contains numerous interconnected lakes, wetlands, and heritage rivers, increasing sensitivity to potential spill or sediment-related impacts. ▪ Overall, the ecosystem is considered moderately to highly sensitive due to wildlife values, hydrological connectivity, and slow recovery capacity.
The historical, cultural and archaeological significance of that area.	▪ The Project is located within a region that supports ongoing traditional land use, including harvesting and travel. Portions of the broader area include Inuit Owned Lands, reflecting recognized land tenure and cultural value. ▪ Although no confirmed archaeological sites have been identified within the immediate project footprint, the region has a long history of Inuit and Indigenous land use and previous exploration activity. The potential for undocumented archaeological or culturally significant sites cannot be excluded. ▪ Given the importance of caribou and the surrounding landscape to Inuit and Indigenous communities, the area holds cultural and subsistence significance. Appropriate precaution and engagement are therefore warranted.
The size of the human and the animal populations likely to be affected by the impacts.	▪ The Project is located in a remote area and is not situated near permanent settlements. Direct impacts to human populations are therefore expected to be limited with impacts to hunting. ▪ However, the broader region supports Inuit and Indigenous communities that rely on wildlife, particularly caribou, for subsistence and cultural purposes. Indirect effects may occur if wildlife movement or availability is altered. ▪ Animal populations potentially affected include migratory species, most notably the Qamanirjuaq caribou herd. Although the Project does not directly overlap mapped calving grounds, it lies within the broader herd range. Given the regional distribution of

Factor	Comment
	multiple exploration projects, wildlife may be exposed to repeated disturbance across the landscape. ▪ Impacts to animal populations are expected to be behavioural in nature (e.g., displacement or avoidance), rather than direct mortality.
The nature, magnitude and complexity of the impacts; the probability of the impacts occurring; the frequency and duration of the impacts; and the reversibility or irreversibility of the impacts.	▪ The Project includes seasonal drilling, trail construction, camp operations, aircraft use, and fuel storage. Potential effects include localized ground disturbance, temporary wildlife disruption, and spill risk. ▪ Impacts are expected to be low to moderate in magnitude and largely confined to the immediate activity area. Routine disturbance during operations is likely; high-consequence events such as major spills are less probable. ▪ Activities are seasonal, and most effects are temporary. Some surface disturbance may persist due to slow tundra recovery. Effects are generally reversible with proper reclamation and compliance with regulatory requirements. Irreversible effects are not anticipated at the project scale.
The cumulative impacts that could result from the impacts of the project combined with those of any other project that has been carried out, is being carried out or is likely to be carried out.	▪ The Project occurs within a region where multiple mineral exploration projects have been carried out, are ongoing, or are proposed. While the Project's individual footprint is localized, cumulative effects may arise from repeated seasonal disturbance, incremental increases in linear features, and expanded human presence across the broader landscape. ▪ Wildlife, particularly migratory caribou, may be exposed to disturbance from multiple projects over time. Increased fuel storage and transport associated with regional exploration activity also contributes to cumulative risk. ▪ Although the Project alone is not expected to result in significant adverse effects, it contributes incrementally to regional disturbance within the broader ecosystem.
Any other factor that the Board considers relevant to the assessment of the significance of impacts.	▪ Additional relevant considerations include the remote location of the Project, limited seasonal duration of activities, and existing regulatory oversight. The effectiveness of mitigation measures, spill prevention and response planning, and reclamation practices would influence the overall level of impact.

Factor	Comment
	▪ Uncertainty related to wildlife movement patterns and the potential interaction of multiple regional projects also remains a relevant consideration. Ongoing monitoring and adaptive management are therefore important in addressing potential effects over time. ▪ Available information from prior assessments, Commission mapping, regional wildlife data, and established wildlife protection measures applicable to the designated area were considered in the assessment of potential environmental effects.

Regulatory Requirements

The Proponent is also advised that the following legislation may apply to the Project:

Acts and Regulations

1. The *Fisheries Act* (http://laws-lois.justice.gc.ca/eng/acts/F-14/index.html).
2. The *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (http://laws-lois.justice.gc.ca/eng/acts/n-28.8/).
3. The *Migratory Birds Convention Act* (http://laws-lois.justice.gc.ca/eng/acts/M-7.01/), the *Migratory Birds Regulations* (https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1035/index.html) and the *Migratory Bird Sanctuary Regulations* (https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1036/index.html).
4. The *Species at Risk Act* (https://laws-lois.justice.gc.ca/eng/acts/s-15.3/.). Attached in **Appendix A** is a list of Species at Risk in Nunavut.
5. The *Wildlife Act (Nunavut)* and its corresponding regulations (http://www.canlii.org/en/nu/laws/stat/snu-2003-c-26/latest/snu-2003-c-26.html).
6. The *Nunavut Act* (http://laws-lois.justice.gc.ca/eng/acts/N-28.6/). The Proponent must comply with the proposed terms and conditions listed in the attached **Appendix B**.
7. The *Canadian Environmental Protection Act* (http://laws-lois.justice.gc.ca/eng/acts/C-15.31/).
8. The *Storage Tank System for Petroleum Products and Allied Petroleum Products Regulations* (http://laws-lois.justice.gc.ca/eng/regulations/SOR-2008-197/FullText.html). The Proponent must identify their tank system to Environment and Climate Change Canada, and installation of new systems must comply with the regulations' design requirements.
9. The incineration of combustible camp wastes shall comply with the *Canadian Wide Standards for Dioxins and Furans* (https://www.ccme.ca/en/resources/air/dioxins_furans.html), and the *Canadian Wide Standards for Mercury* (https://www.ccme.ca/en/resources/air/mercury.html).

Other Applicable Guidelines

10. Solid Waste Management for Northern and Remote Communities (Environment and Climate Change Canada, 2017) (https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/municipal-solid/environment/northern-remote-communities.html).
11. The Canadian Guidelines for the Management of Naturally Occurring Radioactive Materials https://www.canada.ca/en/health-canada/services/publications/health-risks-safety/canadian-guidelines-management-naturally-occurring-radioactive-materials.html
12. The Guidance Document for Canadian Jurisdictions on Open-Air Burning"http://www.ccme.ca/files/Resources/air/wood_burning/pn_1548_CCME%20Guidance%20Document%20on%20Open%20Air%20Burning%20FINAL.pdf).
13. Environmental Guideline for the Burning and Incineration of Solid Waste, Government of Nunavut, Revised January 2012 (https://www.gov.nu.ca/sites/default/files/guideline_-_burning_and_incineration_of_solid_waste_2012.pdf).
14. Environmental Guidelines for the Management of Hazardous Waste, Government of Nunavut, Revised October 2010 (https://www.gov.nu.ca/sites/default/files/Guideline%20-%20General%20Management%20of%20Hazardous%20Waste%20%28revised%20Oct%202010%29_0.pdf).

Table 4: Past, Present, and Reasonably Foreseeable Projects Considered

NIRB Project Number	Project Title	Project Type
Proposed Developments – undergoing assessment		
26EN006	Victory Lake	Mineral Exploration
26EN012	Cache Zone 2026	Mineral Exploration
25EN080	Hook Lake	Mineral Exploration
Present Projects – approved or in operation		
25EN025	Nut Lake Project	Mineral Exploration
25RN083	Aberdeen Lake-Pelly Lake Overland Haul	Winter Road / Winter Trail
Past Projects		
19RA046/06EN008	Ferguson Lake Project	Mineral Exploration
07EN046	North Thelon Joint Venture	Mineral Exploration
07EN057	Schultz Lake Campsite and Exploration	Mineral Exploration
08EN015	Turqavik Aberdeen Project	Mineral Exploration
11EN046	Marce Claims Exploration	Mineral Exploration
16EN035	Huckleberry Claim	Mineral Exploration
16EN049	Tagak	Mineral Exploration
18EN033	Tugak Gold Project	Mineral Exploration
17EN044	Witch Lake Claim Staking	Mineral Exploration
17EA020	Meadowbank Precious Metal Property	Mineral Exploration
22EN032	Nunavut Uranium Project	Mineral Exploration
24EN052	Thelon Property	Mineral Exploration
21EN009	Turquetil-Esker Drilling Program	Mineral Exploration
24EN039	Yath Property	Mineral Exploration

VIEWS OF THE BOARD

At the outset, the Board notes some of the public concern expressed is based on general opposition to uranium exploration and concern that the exploration program will lead to uranium mining. These general concerns were also presented to the Board during the Board's previous assessments of similar projects. As there is currently no moratorium or other type of land use limitation for these types of activities in the region, the NIRB is tasked with assessing the potential for negative environmental and socio-economic impacts associated with this Project Proposal specifically as proposed. Several commenters expressed concern if the early exploration activities proposed in this proposal were to be allowed to proceed, a potential uranium mine project would inevitably follow. The Board emphasizes the scope of the activities proposed in this Project Proposal are limited to exploration activities only and do not include mining activities. If the Proponent were to decide in future to advance the Project Proposal to develop a mine, assessment of the full scope of activities associated with developing, operating, closing and reclaiming a uranium mine would be triggered and would be subject to a new NIRB impact assessment.

In reviewing the factors outlined above during the Board's screening of the Project Proposal, the Board has identified a series of specific issues. Below is a summary of the Board's views and conclusions regarding the potential for the Project Proposal to have significant negative impacts. The NIRB has also proposed terms and conditions that would prevent, mitigate and adaptively manage the potential for adverse impacts. The NIRB has recommended terms and conditions that require the proponent to monitor and report to the NIRB as the project progresses. These requirements ensure all commitments are fulfilled, mitigation measures remain effective, terms and conditions are properly implemented, and potential impacts are identified and adaptively managed.

Ecosystem, wildlife habitat and harvesting activities:

Valued Component	Ecosystem Integrity and Wildlife Habitat (with emphasis on Caribou)
Potential effects:	Exploration activities including helicopter transport, drilling operations, camp establishment, and overland travel may result in temporary disturbance to wildlife. Particular concern was raised regarding potential disturbance to caribou during migration and sensitive seasonal periods. Noise, low-level aircraft activity, and ground-based operations may result in short-term avoidance behaviour or temporary displacement. In combination with other past, present, and reasonably foreseeable activities in the region, the Project may contribute incrementally to cumulative disturbance within wildlife habitat and tundra ecosystems.
Nature of Impacts:	Impacts are expected to be localized and intermittent during active operations. Effects on caribou are anticipated to be behavioural in nature and reversible at the site level. No permanent infrastructure or barriers to migration are proposed. The Project's contribution to cumulative disturbance would occur during seasonal exploration periods within its operational area.

Mitigating Factors:	Disturbance would be minimized using temporary infrastructure, seasonal access planning, and adherence to wildlife interaction protocols. Aircraft flight restrictions and setback requirements would reduce wildlife disturbance. Fuel and hazardous materials would be stored within secondary containment systems, supported by routine inspection and spill response procedures. Disturbed areas would be stabilized following completion of activities.
Proposed Terms and Conditions:	General: 1 through 5 Waste Management: 6 through 7 Fuel and Chemical Storage: 8 through 17 Noise: 18 Wildlife – General: 19 through 24 Migratory Birds: 25 through 26 Aircraft Flight Restrictions: 27 through 32 Caribou and Muskoxen: 33 through 39 Road and Ground Disturbance: 40 through 42 Drilling – General: 43 through 45 Drilling on Land: 46 through 50 Drilling on Ice: 51 through 52 Drilling and Disposal of Related Radioactive Substances: 53 through 58 Camps: 59–60

Valued Component	Water Resources
Potential effects:	Drilling activities, temporary camp operations, fuel storage, and refuelling activities have the potential to affect surface water and groundwater quality. Accidental releases of fuel, lubricants, or drilling additives could result in localized contamination if not effectively contained and remediated. Given the Arctic setting, seasonal thaw and interconnected surface water systems may increase sensitivity to spill-related impacts. During the comment period, spill prevention and response planning were identified as areas requiring clarification. As such, water quality protection remains a key consideration for this Project.
Nature of Impacts:	Potential impacts are primarily related to water quality rather than water quantity and would be localized to areas near active operations. No watercourse diversions or permanent water control structures are proposed. The risk pathway is associated with accidental releases rather than routine operations. In a regional context, the Project may contribute incrementally to cumulative pressures on water resources, particularly where other exploration activities are occurring.
Mitigating Factors:	The Project is subject to strengthened fuel storage, inspection, reporting, and spill response requirements. Secondary containment systems, routine inspection protocols, and immediate reporting obligations

Valued Component	Water Resources
	reduce the likelihood and severity of contamination events. Drill holes and sumps would be properly managed and sealed at the end of each field season.
Proposed Terms and Conditions:	Fuel and Chemical Storage: 8 through 17 Road and Ground Disturbance: 40 through 42 Drilling – General: 43 through 45 Drilling on Land: 46 through 50 Drilling on Ice: 51 through 52 Drilling and Disposal of Related Radioactive Substances: 53 through 58 Camps: 59 through 60

Valued Component	Cultural Land Use and Access
Potential effects:	Exploration activities, including temporary camp establishment, helicopter transport, drilling operations, and overland travel, may interact with areas used for travel, harvesting, or other traditional land use activities. Increased aircraft traffic and localized ground disturbance may temporarily affect access routes or create avoidance behaviour in nearby wildlife, which could indirectly influence land use patterns. The presence of industrial activity may also affect perceptions of land use quality or safety within the project area. When considered alongside other regional exploration activities, there is potential for cumulative interaction with traditional land use and access within the broader landscape.
Nature of Impacts:	Potential impacts are expected to be localized and temporary, occurring during periods of active exploration. No permanent infrastructure or access restrictions are proposed. Effects would primarily relate to short-term disruption or perceived changes in land use conditions. The Project's contribution to cumulative effects would be associated with the timing and location of seasonal activities relative to traditional land use patterns.
Mitigating Factors:	The Proponent is required to avoid interference with harvesting and traditional land use activities. Engagement with local residents and incorporation of Inuit Qaujimaningit are encouraged to inform operational planning. Wildlife protection measures and seasonal operational controls reduce indirect impacts on harvesting access. Disturbed areas would be stabilized following completion of activities.
Proposed Terms and Conditions:	Wildlife – General: 19 through 24 Aircraft Flight Restrictions: 27 through 32 Caribou and Muskoxen: 33 through 39 Road and Ground Disturbance: 40 through 42 Other (Engagement and Land Use): 64 and 65

Socio-economic effects on northerners:

Valued Component	Archaeological and Cultural Heritage Sites
Potential effects:	Ground disturbance associated with drill pad preparation, temporary trail development, camp expansion, and equipment movement has the potential to inadvertently disturb undiscovered archaeological or palaeontological resources. Surface disturbance, soil excavation, or repeated vehicle traffic could damage or alter heritage features if present within the project area. No known designated heritage sites are identified within the immediate project footprint; however, previously undocumented sites may exist.
Nature of Impacts:	Any disturbance to archaeological or cultural heritage resources would be localized to the area of ground disturbance. Impacts to heritage sites are considered irreversible if destruction or alteration occurs. The likelihood of impact is dependent on the presence of previously unidentified resources within the active work areas.
Mitigating Factors:	Project personnel would be informed of heritage protection requirements prior to commencement of activities. Activities would avoid known heritage locations. If archaeological or palaeontological materials are encountered, work would cease in the immediate area, and the appropriate authority would be notified. A buffer zone would be maintained around identified sites in accordance with regulatory requirements.
Proposed Terms and Conditions:	General: 1 through 5 Road and Ground Disturbance: 40 through 42 Camps: 59 through 60 Heritage Sites: 61 through 63

Significant public concern:

Valued Component	Public Concern
Potential effects:	During the review process, comments were received regarding spill prevention and response planning, potential disturbance to wildlife particularly caribou and protection of water resources. Concerns also related to cumulative regional activity within caribou range and the protection of culturally significant land use areas. These concerns reflect the sensitivity of Arctic ecosystems and the importance of wildlife and land use to local communities.
Nature of Impacts:	Public concern relates primarily to environmental protection, cumulative regional activity, and confidence in mitigation and monitoring measures. The level and scope of concern would inform the Board's assessment of significance.
Mitigating Factors:	The Project is subject to detailed Terms and Conditions addressing fuel storage, spill response, wildlife protection, aircraft operations, and engagement with local residents. Clarifications provided during the comment period strengthen operational controls and transparency.

Proposed Terms and Conditions:	General: 1 through 5 Fuel and Chemical Storage: 8 through 17 Wildlife – General: 19 through 24 Migratory Birds: 25 through 26 Aircraft Flight Restrictions: 27 through 32 Caribou and Muskoxen: 33 through 39 Drilling and Disposal of Related Radioactive Substances: 53 through 58 Other (Engagement and Land Use): 64 through 66

Technological innovations for which the effects are unknown:

- No specific issues have been identified associated with this project proposal.

Administrative Conditions:

To encourage compliance with applicable regulatory requirements and assist the Board and responsible authorities with compliance and effects monitoring for project activities, the following project-specific terms and conditions have been recommended: 1-5.

In considering the above factors and subject to the Proponent's compliance with regulatory requirements and the terms and conditions necessary to mitigate against the potential adverse environmental and social effects, the Board despite public concerns expressed about uranium mining in the region in general, recognizing that the scope of activities in this screening is limited to early stage exploration only, if the project proposal is carried out in compliance with the recommended project-specific terms and conditions and the applicable laws and regulations, potential adverse ecosystemic and socioeconomic impacts associated with the Project Proposal are unlikely to be significant, or are highly predictable and can be adequately mitigated by known technologies.

RECOMMENDED PROJECT-SPECIFIC TERMS AND CONDITIONS

The Board is recommending the following specific terms and conditions to apply in respect of the project:

General

1. ATHA (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.:150928), and the NIRB (Online Application Form, December 16,2025; additional information, December 18, 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.
7. The Proponent shall incinerate all combustible wastes as needed and dispose of as required by the appropriate authorizing agencies. All non-combustible wastes from the project site shall be removed to an approved facility for disposal.

Fuel and Chemical Storage

8. The Proponent shall locate all fuel and other hazardous materials a minimum distance away from the high-water mark of any water body and environmentally sensitive areas as required by the appropriate authorizing agencies. The materials shall be stored in such a manner as to prevent their release into the environment.
9. The Proponent shall use adequate secondary containment or a surface liner (e.g., self-supporting insta-berms and fold-a-tanks) when storing barreled fuel and chemicals at all locations.
10. The Proponent shall ensure that re-fuelling of all equipment occurs a minimum distance away from the high-water mark of any water body as required by the appropriate authorizing agencies.
11. Fuel and hazardous material storage areas and fuel lines should be clearly marked with signs or flagging to avoid accidental breaks and punctures, and to ensure areas remain visible during the winter months.
12. All fuel and chemical storage containers must be clearly marked with the Proponent's name for ease of identification.
13. The Proponent shall routinely inspect and document the conditions of fuel and hazardous material storage containers and containment areas as required by the appropriate authorizing agencies. Fuel containment areas shall be kept clear of debris, water and snow to facilitate inspections for leaks.
14. The Proponent shall have a Spill Contingency Plan in place at all fuel storage or transfer locations and shall ensure that appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) are readily available.
15. The Proponent shall follow the authorizing agencies' direction for management and removal of hazardous materials and wastes (e.g., contaminated soils, sediment and waste oil).
16. The Proponent shall ensure that wildlife deterrent systems are utilized at the time of a spill incident in order to avoid wildlife (terrestrial or marine) and migratory birds from being contaminated.
17. The Proponent shall ensure that all spills of fuel or other deleterious materials of 100 litres or more must be reported immediately to the 24-hour Spill Line at (867) 920-8130.

Noise

18. All construction and road vehicles must be fitted with standard and well-maintained noise suppression devices.

Wildlife – General

19. 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.
20. 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.
21. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.
22. The Proponent shall ensure that all wildlife have the right-of-way on any roads or trails. Vehicles are required to slow down or stop and wait to permit the free and unrestricted movement of wildlife across roads or trails at any location.
23. The Proponent shall enforce safe speed limits for vehicles travelling along the road to ensure drivers have sufficient time to react in a safe manner if wildlife are encountered on or adjacent to the road or trail.
24. The Proponent shall ensure that drivers maintain spacing appropriate for driving and road conditions, and speed limits, to ensure drivers have time to safely react to any wildlife on the road.

Migratory Birds and Raptors Disturbance

25. 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.
26. 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 zone appropriate for the species and the surrounding habitat.

Aircraft Flight Restrictions

27. The Proponent shall not alter flight paths to approach wildlife and avoid flying directly over animals.
28. 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.

29. 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.
30. 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.
31. The Proponent shall ensure that aircraft/helicopter do not, unless for emergency, touch-down in areas where wildlife is present.
32. 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

33. 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.
34. The Proponent shall not locate any operation or undertake activities that could block or cause any diversion to migration of caribou or muskoxen.
35. The Proponent shall implement mobile caribou conservation measures and immediately cease activities that may interfere with the migration or calving of caribou or muskox, until the caribou or muskox have passed.
36. The Proponent shall not construct or operate any camp, cache any fuel or conduct blasting within ten (10) kilometres, or conduct any drilling operation within five (5) kilometres of any designated caribou water crossings.
37. During the period of May 15 to July 15, the Proponent shall suspend all operations and activities outside the immediate vicinity of the camps. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances, low-level over flights, blasting, and use of mobile equipment including snowmobiles and all terrain vehicles, and personnel walking within sight of the caribou group(s), until the caribou are no longer in the immediate area. Should the results of localized monitoring satisfy the land use inspector the project operations may resume without disturbing pregnant caribou cows or cows with young calves the suspension may be lifted for the periods specified.
38. Should pregnant caribou cows, cows with young calves, or groups of 50 or more caribou be observed within one (1) kilometer of project operations at any time, the Proponent shall suspend all operations in the vicinity, including low level overflights, drilling, blasting/trenching, and use of snowmobiles and all terrain vehicles outside the immediate vicinity of the camp, until caribou are no longer in the immediate area.
39. During the period of April 14 to June 1 when muskoxen are present, the Proponent shall not approach muskoxen closer than one (1) kilometer. This includes all operations, including low-level over flights, blasting, and use of snowmobiles and all-terrain vehicles outside the immediate vicinity of the camps.

Road and Ground Disturbance

40. The Proponent shall not move any equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging. Overland travel of equipment or vehicles must be suspended if rutting occurs.
41. The Proponent shall ensure snowbank heights along the road/trail are managed to allow wildlife visibility and passage. Further, the Proponent shall ensure breaks are created along snowbanks along the road/trail at regular intervals to allow wildlife passage.
42. The Proponent shall select a winter route that maximizes the use of frozen water bodies.

Drilling – General

43. The Proponent shall not allow any drilling wastes to spread to the surrounding lands or water bodies.
44. The Proponent shall ensure that that any deleterious substances (as defined in the Fisheries Act) resulting from its activities do not enter into any water bodies frequented by fish.
45. The Proponent shall ensure that all drill areas are constructed to facilitate minimizing the environmental footprint of the project area.

Drilling on Land

46. The Proponent shall not conduct any land-based drilling or mechanized clearing activities a minimum distance of the normal high-water mark of any water body as required by an authorizing agency.
47. If an artesian flow is encountered, the Proponent shall ensure the drill hole is immediately plugged and permanently sealed.
48. The Proponent shall ensure that all sump/depression capacities are sufficient to accommodate the volume of wastewater and any fines that are produced. The sumps shall only be used for inert drilling fluids, and not any other materials or substances.
49. The Proponent shall not locate any sumps within a minimum distance of the normal high-water mark of any water body as required by an authorizing agency.
50. The Proponent shall ensure all drill holes are backfilled or capped prior to the end of each field season. All sumps must be backfilled and restored to original or stable profile prior to the end of each field season.

Drilling on Ice

51. The Proponent shall ensure that drill muds and additives are not used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water body or are demonstrated to be non-toxic.
52. The Proponent shall ensure that all drill cuttings are removed from ice surfaces daily.

Drilling and Disposal of Related Radioactive Substances

53. The Proponent shall ensure that all drill holes are sealed by cementing (grouting) the upper 31 meters of the bedrock or the entire depth of the holes; whichever is less.
54. The Proponent shall ensure that drill holes which encounter uranium mineralization with a content greater than 1.0% over a length of one (1) metre, or with a metre-percent

concentration greater than 5%, are sealed by cementing over the entire mineralization zone; this shall be at least ten (10) metres above and below each mineralization zone.

55. The Proponent shall ensure that drill holes which encounter uranium mineralization with a content greater than 1.0% over a length of one (1) metre, or with a metre-percent concentration greater than 5%, are sealed by cementing over the entire mineralization zone; this shall be at least ten (10) metres above and below each mineralization zone.
56. Following backfilling, the Proponent shall conduct a radiometric survey. When material is found to exceed background radiation levels, the appropriate authorizing agencies must be contacted for review and approval of actions and handling procedures, required to remedy radioactivity.
57. The Proponent shall ensure that core storage shacks/tents are well ventilated and remain open when employees or contractors are working within. Core storage areas should be located at least 100 metres from the high-water mark of all water bodies.
58. The Proponent shall ensure that gamma radiation levels of a long-term core storage area are not greater than 1.0 micro-Sievert (μSv) and never exceeds 2.5 μSv. When core is found to exceed the levels identified, then the appropriate authorizing agencies must be contacted for review and approval of the handling procedures.

Camps

59. The Proponent shall ensure that all camps are located durable surfaces, such as gravel or sand that is consolidated and can withstand repeated, heavy use. Measures shall be put in place to prevent erosion, trail formation and damage to the ground.
60. The Proponent shall not erect camps or store materials on the surface ice of lakes or streams, except that which is for immediate use.

Heritage Sites

61. The Proponent shall ensure that archaeological and paleontological sites are not purposely or inadvertently disturbed by clients or staff as a result of project activities.
62. The Proponent shall ensure that all clients and staff are aware of the Proponent's responsibilities and requirements regarding archaeological or palaeontological sites that are encountered during land-based activities. This should include briefings explaining the prohibitions regarding removal of artifacts, and defacing or writing on rocks and infrastructure.
63. No activities shall be conducted in the vicinity (50 metres buffer zone) of any archaeological/historical sites. If archaeological sites or features are encountered, activities shall immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Government of Nunavut-Department of Culture and Heritage.

Other

64. 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.

65. The Proponent shall ensure that project activities do not interfere with wildlife harvesting or traditional land use activities.
66. The Proponent should, to the extent possible, hire local people and access local services where possible.

MONITORING AND REPORTING REQUIREMENTS

In addition, the Board is recommending the following:

Community Consultation Report:

1. The Proponent shall submit a community engagement strategy plan and a public consultation report to the Nunavut Impact Review Board as follows:
    a. Community Engagement Strategy Plan should be provided prior to the commencement of project activities and include:
        i. information on how the Proponent plans to inform local residents of the project proposal; and
        ii. how the community will be briefed on the monitoring results.
    b. Public Consultation Report should be provided following completion of project activities and include:
        i. copy of materials presented to community members;
        ii. a description of issues and concerns raised; and
        iii. advice offered to the Proponent as well as any follow-up actions that were required or taken to resolve any concerns expressed about the project.

Annual Report

2. The Proponent shall submit a comprehensive annual report with copies provided to the Nunavut Impact Review Board, Crown-Indigenous Relations and Northern Affairs Canada, Athabasca Denesųłiné NéNé Land Corporation and the Beverly and Qamanirjuaq Caribou Management Board, by March 31st of each year of permitted activities beginning March 31, 2027. The annual report must contain at least the following information:
    a) A summary of activities undertaken for the year, including:
        - a map showing the approximate location of drill sites;
        - a map showing the location of the fuel cache;
        - a description of local hires, contracting opportunities and initiatives;
        - flight altitudes, frequency of flights and anticipated flight routes;
        - site photos;
    b) A work plan for the following year, including any progressive reclamation work undertaken;
    c) A summary of community consultations undertaken throughout the year, providing copy of materials presented to community members, a description of issues and concerns raised, discussions with community members and advice offered to the company as well as any follow-up actions that were required or taken to resolve any concerns expressed about the project proposal;

d) A log of instances in which community residents occupy or transit through the project area for the purpose of traditional land use or harvesting. This log should include the location and number of people encountered, activity being undertaken (e.g., berry picking, fishing, hunting, camping, etc.), date and time; and any mitigation measures or adaptive management undertaken to prevent disturbance;

e) A discussion of issues related to wildlife and environmental monitoring, including the number of cease-work orders required as a result of proximity to caribou and any other wildlife;

f) A brief summary of WMMP results as well as any mitigation actions that were undertaken. In addition, the Proponent shall maintain a record of wildlife observations while operating within the project area and include it as part of the summary report. The summary report based on wildlife observations should include the following:

    1. Locations (i.e., latitude and longitude), species, number of animals, a description of the animal activity, and a description of the gender and age of animals if possible.
    2. Prior to conducting project activities, the Proponent should map the location of any sensitive wildlife sites such as denning sites, calving areas, caribou crossing sites, and raptor nests in the project area, and identify the timing of critical life history events (i.e., calving, mating, denning and nesting).
    3. Additionally, the Proponent should indicate potential impacts from the project, and ensure that operational activities are managed and modified to avoid impacts on wildlife and sensitive sites.

g) An analysis of the effectiveness of mitigation measures for wildlife;

h) Summary of any heritage sites encountered during the exploration activities, any follow-up action or reporting required as a result and how project activities were modified to mitigate impacts on the heritage sites;

i) Summary of its knowledge of Inuit land use in/near the project area and explain how project activities were modified to mitigate impacts on Inuit land use; and

j) A summary of how the Proponent has complied with conditions contained within this Screening Decision, and all conditions as required by other authorizations associated with the project proposal.

OTHER NIRB CONCERNS AND RECOMMENDATIONS

In addition to the project-specific terms and conditions, the Board is recommending the following:

Change in Project Scope

1. Responsible authorities or Proponent shall notify the Nunavut Planning Commission and/or Parks Canada as appropriate, and the NIRB of any changes in operating plans or conditions, including phase advancement, associated with this project prior to any such change.

Copy of licences, etc. to the Board and Commission

2. The NIRB respectfully requests that responsible authorities submit a copy of each licence, permit or other authorization issued for the Project to the NIRB to assist in enabling

possible project monitoring that may be required. Please forward a copy of the licences, permits and/or other authorizations to the NIRB directly at info@nirb.ca or upload a copy to the NIRB's online registry at www.nirb.ca.

Use of Inuit Qaujimaningit

3. The Proponent is encouraged to work with local communities and knowledge holders to inform project design, to carry out the project, and to confirm or validate the perspectives represented in publications, and reports as part of the project. Care should be taken to ensure that Inuit Qaujimaningit and local knowledge collected for the project is used with permission and is accurately represented.

Bear and Carnivore Safety

4. The Proponent should review the Government of Nunavut's booklet on Bear Safety, which can be downloaded from this link: http://gov.nu.ca/sites/default/files/bear_safety_-_reducing_bear-people_conflicts_in_nunavut.pdf. Further information on bear/carnivore detection and deterrent techniques can be found in the "*Safety in Grizzly and Black Bear Country*" pamphlet, which can be downloaded from this link: https://www.enr.gov.nt.ca/sites/enr/files/resources/safety_in_grizzly_and_black_bear_country_english.pdf.
5. There are polar bear and grizzly bear safety resources available from the Bear Smart Society with videos on polar bear safety available in English, French and Inuktitut at http://www.bearsmart.com/play/safety-in-polar-bear-country/. Information can also be obtained from Parks Canada's website on bear safety at the following link: http://www.pc.gc.ca/eng/pn-np/nu/quttinirpaaq/visit/visit6/d.aspx or in reviewing the "*Safety in Polar Bear Country*" pamphlet, which can be downloaded from the following link:http://www.pc.gc.ca/eng/pnnp/nu/quttinirpaaq/visit/visit6/~/media/pnnp/nu/auyuittuq/pdf/shared/PolarBearSafety_English.ashx
6. Any problem wildlife or any interaction with carnivores should be reported immediately to the local Government of Nunavut, Department of Environment Conservation Office (Conservation Officer of Baker Lake, phone: (867) 793-2944.

Species at Risk

7. The Proponent review Environment and Climate Change Canada's "Environment Assessment Best Practice Guide for Wildlife at Risk in Canada", available at the following link:http://www.sararegistry.gc.ca/virtual_sara/files/policies/EA%20Best%20Practices%202004.pdf. The guide provides information to the Proponent on what is required when Wildlife at Risk, including *Species at Risk*, are encountered or affected by the project

Migratory Birds

8. The Proponent review Canadian Wildlife Services' "Key migratory bird terrestrial habitat sites in the Northwest Territories and Nunavut", available at the following link: http://publications.gc.ca/site/eng/317630/publication.html and "Key marine habitat sites for migratory birds in Nunavut and the Northwest Territories", available at the following link: http://publications.gc.ca/site/eng/392824/publication.html. The guide provides information to the Proponent on key terrestrial and marine habitat areas that are essential to the welfare of various migratory bird species in Canada

9. For further information on how to protect migratory birds, their nests and eggs when planning or carrying out project activities, consult Environment and Climate Change Canada's Incidental Take web page and the fact sheet "Planning Ahead to Reduce the Risk of Detrimental Effects to Migratory Birds, and their Nests and Eggs" available at: http://publications.gc.ca/collections/collection_2013/ec/CW66-324-2013-eng.pdf

Heritage Resources

10. During the assessment, the NIRB has identified that no archaeology surveys have been conducted in the proposed project areas and that potential for the presence of archaeological resources is likely, therefore the Proponent shall contact the Department of Culture and Heritage to initiate a field archaeology assessment program prior to undertaking any land disturbance activities.

Aircraft Identification

11. The Proponent shall provide the community of Baker Lake the planned helicopter activities, including photo(s) of the helicopter to be used, approximate flight paths, plans and times as available prior to commencement of activities to ensure community members are aware of the planned activities.

Caribou Management

12. Territorial and federal government agencies in Nunavut should work together with Regional Inuit Associations, co-management boards and industry to develop an action plan to identify and mitigate potential cumulative effects of human land use activities, including mineral exploration, on barren-ground caribou. This assessment of cumulative effects should occur at a regional scale (i.e., larger than individual project areas).
13. Territorial and federal government agencies update the Caribou Protection Map with updated data and information from the Beverly Qamanirjuaq Caribou Management Board.
14. As a result of expressed concerns regarding mineral exploration and the associated potential for cumulative effects on caribou and caribou habitat within the Kivalliq region, the NPC, territorial and federal government agencies should work together with Regional Inuit Associations, co-management boards, the public, and industry to develop a plan that identifies appropriate land use in these areas prior to potential mineral exploration. The plan should identify and mitigate potential cumulative effects of human land use activities on barren-ground caribou on both localized and regional scales.

Crown Indigenous and Northern Affairs Canada

15. Crown Indigenous and Northern Affairs Canada (CIRNAC) impose mitigation measures, conditions and monitoring requirements pursuant to the Federal Land Use Permit, which require the Proponent to respect the sensitivities and importance of the area. These mitigation measures, conditions and monitoring requirements should be in regard to the location and area; type, location, capacity and operation of facilities; use, storage, handling and disposal of chemical or toxic material; wildlife and fisheries habitat; and petroleum fuel storage.
16. CIRNAC consider the importance of conducting regular Land Use Inspections, pursuant to the authority of the Federal Land Use Permit, while the project is in operation. The Land

Use Inspections should be focused on ensuring the Proponent is in compliance with the conditions imposed through the Federal Land Use Permit.

17. CIRNAC forward to the NIRB copies of any decisions by Inspectors which allow project activities to continue in areas of caribou presence between dates indicating work stoppages are necessary (exemptions from Caribou Protection Measures).
18. It is recommended to CIRNAC that no extension be issued to the Land Use Permit until Spill Contingency Plan report is received.

Kivalliq Inuit Association

19. The Kivalliq Inuit Association impose strict mitigation measures and/or conditions upon the Proponent pursuant to the Inuit Owned Lands License in regard to fuel and chemical storage, drilling, water conditions, ground disturbance, and wildlife on Inuit Owned Lands.

Nunavut Water Board

20. The Nunavut Water Board impose mitigation measures, conditions and monitoring requirements pursuant to the Water Licence, which require the Proponent to respect the sensitivities and importance of water in the area. These mitigation measures, conditions and monitoring requirements should be in regard to use of water, snow and ice; waste disposal; access infrastructure and operation for camps; drilling operations; spill contingency planning; abandonment and restoration planning; and monitoring programs.

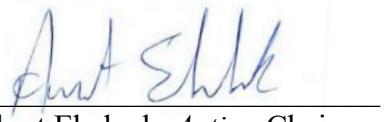
Crown Indigenous and Northern Affairs Canada – Water Resources Division

21. CIRNAC – Water Resources Division should consider the importance of conducting regular inspections, pursuant to the authority of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, while the project is in operation. Inspectors should focus on ensuring the Proponent is in compliance with the conditions imposed through the Water Licence.

CONCLUSION

The foregoing constitutes the Board's screening decision with respect to the ATHA Energy Corp.'s Angilak Property. The NIRB remains available for consultation with the Minister regarding this report as necessary.

Dated March 13, 2026 at Iqaluit, NU.



Albert Ehaloak, *Acting* Chairperson

Attachments: Appendix A: Species at Risk in Nunavut
Appendix B: Archaeological and Palaeontological Resources Terms and Conditions for Land Use Permit Holders

APPENDIX A: SPECIES AT RISK IN NUNAVUT

Due to the requirements of Section 79(2) of the *Species at Risk Act*, S.C. 2002, c. 29 *(SARA)*, and the potential for project-specific adverse effects on listed wildlife species and its critical habitat, measures should be taken as appropriate to avoid or lessen those effects, and the effects need to be monitored. Project effects could include species disturbance, attraction to operations and destruction of habitat. This section applies to all species listed on Schedule 1 of *SARA*, as listed in the table below, or have been assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), which may be encountered in the project area. This list may not include all species identified as at risk by the Territorial Government. The following points provide clarification on the applicability of the species outlined in the table.

- Schedule 1 is the official legal list of Species at Risk for *SARA*. *SARA* applies to all species on Schedule 1. The term "listed" species refers to species on Schedule 1.
- Schedule 2 and 3 of *SARA* identify species that were designated at risk by the COSEWIC prior to October 1999 and must be reassessed using revised criteria before they can be considered for addition to Schedule 1.
- Some species identified at risk by COSEWIC are "pending" addition to Schedule 1 of *SARA*. These species are under consideration for addition to Schedule 1, subject to further consultation or assessment.

If species at risk are encountered or affected, the primary mitigation measure should be avoidance. The Proponent should avoid contact with or disturbance to each species, its habitat and/or its residence. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk Registry at http://www.sararegistry.gc.ca for information on specific species.

Monitoring should be undertaken by the Proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested.

For species primarily managed by the Territorial Government, the Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize effects to these species from the project.

Mitigation and monitoring measures must be undertaken in a way that is consistent with applicable recovery strategies and action/management plans.

Schedules of *SARA* are amended on a regular basis, so it is important to check the *SARA* registry (www.sararegistry.gc.ca) to get the current status of a species.

Updated: September 2024

Terrestrial Species at Risk[1]	COSEWIC Designation	Schedule of *SARA*	Government Organization with Primary Management Responsibility[2]
Buff-breasted Sandpiper	Special Concern	Schedule 1	Environment and Climate Change Canada (ECCC)
Common Nighthawk	Threatened	Schedule 1	ECCC
Eskimo Curlew	Endangered	Schedule 1	ECCC
Harlequin Duck	Special Concern	Schedule 1	ECCC
Harris's Sparrow	Special Concern	Schedule 1	ECCC
Horned Grebe	Special Concern	Schedule 1	ECCC
Ivory Gull	Endangered	Schedule 1	ECCC
Olive-sided Flycatcher	Threatened	Schedule 1	ECCC
Peregrine Falcon	Special Concern	Schedule 1	ECCC
Red Knot Islandica Subspecies	Special Concern	Schedule 1	ECCC
Red-necked Phalarope	Special Concern	Schedule 1	ECCC
Ross's Gull	Threatened	Schedule 1	ECCC
Rusty Blackbird	Special Concern	Schedule 1	ECCC
Short-eared Owl	Special Concern	Schedule 1	ECCC
Porsild's Bryum	Threatened	Schedule 1	Government of Nunavut (GN)
Transverse Lady Beetle	Special Concern	No Schedule	GN
Caribou (Dolphin and Union Population)	Endangered	Schedule 1	GN
Caribou (Barren-ground Population)	Threatened	No Schedule	GN
Caribou (Torngat Mountains Population)	Endangered	No Schedule	GN
Grizzly Bear (Western Population)	Special Concern	Schedule 1	ECCC
Peary Caribou	Endangered	Schedule 1	GN
Polar Bear	Special Concern	Schedule 1	ECCC
Wolverine	Special Concern	Schedule 1	GN
Atlantic Walrus (High Arctic Population)	Special Concern	No Schedule	Fisheries and Oceans Canada (DFO)
Atlantic Walrus (Central/Low Arctic Population)	Special Concern	No Schedule	DFO
Beluga Whale (Cumberland Sound Population)	Threatened	Schedule 1	DFO
Beluga Whale (Eastern Hudson Bay Population)	Endangered	No Schedule	DFO
Beluga Whale (Eastern High Arctic-Baffin Bay Population)	Special Concern	No Schedule	DFO
Beluga Whale (Western Hudson Bay Population)	Special Concern	No Schedule	DFO
Atlantic Cod (Arctic Lakes Population)	Special Concern	No Schedule	DFO
Fourhorn Sculpin (Freshwater Form)	Data Deficient	Schedule 3	DFO
Lumpfish	Threatened	No Schedule	DFO
Thorny Skate	Special Concern	No Schedule	DFO

1 The Department of Fisheries and Oceans has responsibility for aquatic species.

2 Environment and Climate Change Canada (ECCC) has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the Migratory Birds Convention Act (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of the Territorial Government. Populations that exist in National Parks are also managed under the authority of the Parks Canada Agency.

APPENDIX B: ARCHAEOLOGICAL AND PALAEONTOLOGICAL RESOURCES TERMS AND CONDITIONS FOR LAND USE PERMIT HOLDERS

INTRODUCTION

The Department of Culture and Heritage (CH) routinely reviews land use applications sent to the Nunavut Water Board, Nunavut Impact Review Board and the Indigenous and Northern Affairs Canada. These terms and conditions provide general direction to the permittee/proponent regarding the appropriate actions to be taken to ensure the permittee/proponent carries out its role in the protection of Nunavut's archaeological and palaeontological resources.

TERMS AND CONDITIONS

1) The permittee/proponent shall have a professional archaeologist and/or palaeontologist perform the following **Functions** associated with the **Types of Development** listed below or similar development activities:

	Types of Development (See Guidelines below)	**Function** (See Guidelines below)
a)	Large scale prospecting	Archaeological/Palaeontological Overview Assessment
b)	Diamond drilling for exploration or geotechnical purpose or planning of linear disturbances	Archaeological/Palaeontological Overview Assessment and/or Inventory and Documentation and/or Mitigation
c)	Construction of linear disturbances, Extractive disturbances, Impounding disturbances and other land disturbance activities	Archaeological/Palaeontological Overview Assessment and/or Inventory and Documentation and/or Mitigation

Note that the above-mentioned functions require either a Nunavut Archaeologist Permit or a Nunavut Palaeontologist Permit. CH is authorized by way of the *Nunavut and Archaeological and Palaeontological Site Regulations*[3] to issue such permits.

[3] P.C. 2001-1111 14 June, 2001

2) The permittee/proponent shall not operate any vehicle over a known or suspected archaeological or palaeontological site.
3) The permittee/proponent shall not remove, disturb, or displace any archaeological artifact or site, or any fossil or palaeontological site.
4) The permittee/proponent shall immediately contact CH at (867) 934-2046 or (867) 975-5500 should an archaeological site or specimen, or a palaeontological site or fossil, be encountered or disturbed by any land use activity.
5) The permittee/proponent shall immediately cease any activity that disturbs an archaeological or palaeontological site encountered during the course of a land use operation until permitted to proceed with the authorization of CH.
6) The permittee/proponent shall follow the direction of CH in restoring disturbed archaeological or palaeontological sites to an acceptable condition. If these conditions are attached to either a Class A or B Permit under the Territorial Lands Act Indigenous and Northern Affairs Canada directions will also be followed.
7) The permittee/proponent shall provide all information requested by CH concerning all archaeological sites or artifacts and all palaeontological sites and fossils encountered in the course of any land use activity.
8) The permittee/proponent shall make best efforts to ensure that all persons working under its authority are aware of these conditions concerning archaeological sites and artifacts and palaeontological sites and fossils.
9) If a list of recorded archaeological and/or palaeontological sites is provided to the permittee/proponent by CH as part of the review of the land use application the permittee/proponent shall avoid the archaeological and/or palaeontological sites listed.
10) Should a list of recorded sites be provided to the permittee/proponent, the information is provided solely for the purpose of the proponent's land use activities as described in the land use application, and must otherwise be treated confidentially by the proponent.

Legal Framework

As stated in Article 33 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (*Nunavut Agreement*):

Where an application is made for a land use permit in the Nunavut Settlement Area, and there are reasonable grounds to believe that there could be sites of archaeological importance on the lands affected, no land use permit shall be issued without written consent of the Designated Agency. Such consent shall not be unreasonably withheld. [33.5.12]

Each land use permit referred to in Section 33.5.12 shall specify the plans and methods of archeological site protection and restoration to be followed by the permit holder, and any other conditions the Designated Agency may deem fit. [33.5.13]

Palaeontology and Archaeology
Under the *Nunavut Act*[4], the federal government can make regulations for the protection, care and preservation of palaeontological and archaeological sites and specimens in Nunavut. Under the *Nunavut Archaeological and Palaeontological Sites Regulations*[5], it is illegal to alter or disturb any palaeontological or archaeological site in Nunavut unless permission is first granted through the permitting process.

Definitions
As defined in the *Nunavut Archaeological and Palaeontological Sites Regulations*, the following definitions apply:

> *"archaeological site" means a place where an archaeological artifact is found.*
>
> *"archaeological artifact" means any tangible evidence of human activity that is more than 50 years old and in respect of which an unbroken chain of possession or regular pattern of usage cannot be demonstrated, and includes a Denesuline archaeological specimen referred to in section 40.4.9 of the Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement).*
>
> *"palaeontological site" means a site where a fossil is found.*
>
> *"fossil" includes:*
> *Fossil means the hardened or preserved remains or impression of previously living organisms or vegetation and includes:*
> *(a) natural casts;*
> *(b) preserved tracks, coprolites and plant remains; and*
> *(c) the preserved shells and exoskeletons of invertebrates and the preserved eggs, teeth and bones of vertebrates.*

Guidelines for Developers for the Protection of Archaeological Resources in the Nunavut Territory

(**Note:** Partial document only, complete document at: www.ch.gov.nu.ca/en/Archaeology.aspx)

Introduction
The following guidelines have been formulated to ensure that the impacts of proposed developments upon heritage resources are assessed and mitigated before ground surface altering activities occur. Heritage resources are defined as, but not limited to, archaeological and historical sites, burial grounds, palaeontological sites, historic buildings and cairns Effective collaboration between the developer, the Department of Culture, and Heritage (CH), and the contract archaeologist(s) will ensure proper preservation of heritage resources in the Nunavut Territory. The roles of each are briefly described.

[4] s. 51(1)
[5] P.C. 2001-1111 14 June, 2001

CH is the Nunavut Government agency which oversees the protection and management of heritage resources in Nunavut, in partnership with land claim authorities, regulatory agencies, and the federal government. Its role in mitigating impacts of developments on heritage resources is as follows: to identify the need for an impact assessment and make recommendations to the appropriate regulatory agency; set the terms of reference for the study depending upon the scope of the development; suggest the names of qualified individuals prepared to undertake the study to the developer; issue an archaeologist or palaeontologist permit authorizing field work; assess the completeness of the study and its recommendations; and ensure that the developer complies with the recommendations.

The primary regulatory agencies that CH provides information and assistance to are the Nunavut Impact Review Board, for development activities proposed for Inuit Owned Lands (as defined in Section 1.1.1 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada* (*Nunavut Agreement*)), and the Indigenous and Northern Affairs Canada, for development activities proposed for federal Crown Lands.

A developer is the initiator of a land use activity. It is the obligation of the developer to ensure that a qualified archaeologist or palaeontologist is hired to perform the required study and that provisions of the contract with the archaeologist or palaeontologist allow permit requirements to be met; i.e. fieldwork, collections management, artifact and specimen conservation, and report preparation. On the recommendation of the contract archaeologist or palaeontologist in the field and the Government of Nunavut, the developer shall implement avoidance or mitigative measures to protect heritage resources or to salvage the information they contain through excavation, analysis, and report writing. The developer assumes all costs associated with the study in its entirety.

Through his or her active participation and supervision of the study, the contract archaeologist or palaeontologist is accountable for the quality of work undertaken and the quality of the report produced. Facilities to conduct fieldwork, analysis, and report preparation should be available to this individual through institutional, agency, or company affiliations. Responsibility for the curation of objects recovered during field work while under study and for documents generated in the course of the study as well as remittance of artifacts, specimens and documents to the repository specified on the permit accrue to the contract archaeologist or palaeontologist. This individual is also bound by the legal requirements of the *Nunavut Archaeological and Palaeontological Sites Regulations*.

Types of Development

In general, those developments that cause concern for the safety of heritage resources will include one or more of the following kinds of surface disturbances. These categories, in combination, are comprehensive of the major kinds of developments commonly proposed in Nunavut. For any single development proposal, several kinds of these disturbances may be involved

- *Linear disturbances: including the construction of highways, roads, winter roads, transmission lines, and pipelines;*
- *Extractive disturbances: including mining, gravel removal, quarrying, and land filling;*

- *Impoundment disturbances: including dams, reservoirs, and tailings ponds;*
- *Intensive land use disturbances: including industrial, residential, commercial, recreational, and land reclamation work, and use of heritage resources as tourist developments.*
- *Mineral, oil and gas exploration: establishment of camps, temporary airstrips, access routes, well sites, or quarries all have potential for impacting heritage resources*.

Types of Studies Undertaken to Preserve Heritage Resources

Overview: An overview study of heritage resources should be conducted at the same time as the development project is being designed or its feasibility addressed. They usually lack specificity with regard to the exact location(s) and form(s) of impact and involve limited, if any, field surveys. Their main aim is to accumulate, evaluate, and synthesize the existing knowledge of the heritage of the known area of impact. The overview study provides managers with baseline data from which recommendations for future research and forecasts of potential impacts can be made. A Class I Permit is required for this type of study if field surveys are undertaken.

Reconnaissance: This is done to provide a judgmental appraisal of a region sufficient to provide the developer, the consultant, and government managers with recommendations for further development planning. This study may be implemented as a preliminary step to inventory and assessment investigations except in cases where a reconnaissance may indicate a very low or negligible heritage resource potential. Alternately, in the case of small-scale or linear developments, an inventory study may be recommended and obviate the need for a reconnaissance.

The main goal of a reconnaissance study is to provide baseline data for the verification of the presence of potential heritage resources, the determination of impacts to these resources, the generation of terms of reference for further studies and, if required, the advancement of preliminary mitigative and compensatory plans. The results of reconnaissance studies are primarily useful for the selection of alternatives and secondarily as a means of identifying impacts that must be mitigated after the final siting and design of the development project. Depending on the scope of the study, a Class 1 or Class 2 Permit is required for this type of investigation.

Inventory: A resource inventory is generally conducted at that stage in a project's development at which the geographical area(s) likely to sustain direct, indirect, and perceived impacts can be well defined. This requires systematic and intensive fieldwork to ascertain the effects of all possible and alternate construction components on heritage resources. All heritage sites must be recorded on Government of Nunavut Site Survey forms. Sufficient information must be amassed from field, library and archival components of the study to generate a predictive model of the heritage resource base that will:

- allow the identification of research and conservation opportunities;
- enable the developer to make planning decisions and recognize their likely effects on the known or predicted resources; and

- make the developer aware of the expenditures, which may be required for subsequent studies and mitigation. A Class 1 or 2 permit is required.

Assessment: At this stage, sufficient information concerning the numbers and locations of heritage resources will be available, as well as data to predict the forms and magnitude of impacts. Assessments provide information on the size, volume, complexity and content of a heritage resource, which is used to rank the values of different sites or site types given current archaeological knowledge. As this information will shape subsequent mitigation program(s), great care is necessary during this phase.

Mitigation: This refers to the amelioration of adverse impacts to heritage resources and involves the avoidance of impact through the redesign or relocation of a development or its components; the protection of the resource by constructing physical facilities; or, the scientific investigation and recovery of information from the resource by excavation or other method. The type(s) of appropriate mitigative measures are dictated by their viability in the context of the development project. Mitigation strategies must be developed in consultation with, and approved by, the Department of Culture and Heritage. It is important to note that mitigation activities should be initiated as far in advance of the construction of the development as possible.

Surveillance and monitoring: These may be required as part of the mitigation program.

Surveillance may be conducted during the construction phase of a project to ensure that the developer has complied with the recommendations.

Monitoring involves identification and inspection of residual and long-term impacts of a development (i.e. shoreline stability of a reservoir); or the use of impacts to disclose the presence of heritage resources, for example, the uncovering of buried sites during the construction of a pipeline.