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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 April 22, 2025 the NIRB received a referral to screen Greenridge Exploration Inc’s “Nut Lake Project” project proposal (NIRB File No: **25EN025**) from the Nunavut Planning Commission (Commission), with an accompanying positive conformity determination with the Keewatin 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.

- **Project Name:** Nut Lake Project
- **NIRB File No.:** 25EN025
- **NIRB Application No.:** 126165

**Table 1: NIRB’s Assessment Process**

<b>Date</b>	<b>Stage</b>
April 8, 2025	Receipt of project proposal
April 22, 2025	Receipt of online application from Proponent
June 17, 2025	Request to Proponent for additional information and scope update in order to carry out screening pursuant to s. s. 144(1) of the <i>NuPPAA</i>
June 18, 2025	Proponent responded to information request(s) and provided additional information

<b>Date</b>	<b>Stage</b>
June 25, 2025	Public engagement and comment request was issued in English with translated accompanying documents
June 25, 2025	Receipt of public comments
July 16, 2025	Pursuant to Article 12 s 12.4.5 of the <i>Nunavut Agreement</i> and s. 92(3) of the <i>NuPPAA</i> , a ministerial extension requested due to capacity constraints from the Minister of Northern and Arctic Affairs, Minister Responsible for the Canadian Northern Economic Development Agency seeking an extension to the 45-day timeline for the provision of the Board's Report
August 12, 2025	Proponent provided with an opportunity to address comments/concerns raised by public
August 11, 2025	Proponent responded to comments/concerns raised by public
October 9, 2025	Issuance of Screening Decision Report

## 1. Project Scope

<b>Location</b>	Kivalliq region, about 175 kilometres (km) southwest of Baker Lake (Qamani'tuaq), within a 5,853-hectare claim block
<b>Objective</b>	The Proponent intends to conduct a multi-year, phased exploration program aimed at identifying and evaluating the presence of uranium-bearing mineralization within the Nut Lake claim area.
<b>Timeline</b>	May 2025 to April 2029 during the open-water season (30 to 60 days) over a five-year period

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

### Drilling and Sampling

- Prospecting, geological sampling (rock, soil and till) sampling, geological mapping, drone photogrammetry, and airborne or ground geophysics.
- Diamond drilling up to 5,000 meters per year.
- Storage of non-radioactive drill cuttings in natural depressions sumps located at each drill site.
- Storage of radioactive cuttings within steel drums at property and removal to an approved facility for proper disposal.

### Transportation

- Use of a fixed-wing aircraft to transport personnel, equipment, fuel and supplies to and from the project site.
- Use of a fixed-wing aircraft to conduct airborne geophysics surveys.
- Use of helicopters to transport personnel, and equipment to the proposed drill sites.
- Use of helicopters to support aerial surveys, resupply, and core sample transport.

## **Camp**

- A 13-person seasonal camp would be established between April and September annually and include:
  - Arctic Oven or canvas sleeping tents
  - Kitchen and dry tents with showers
  - Outhouses, generator shack, incinerator, and core logging tents

## **Fuel**

- A fuel cache would be established for:
  - Jet Fuel: up to 24 drums (4,920 L)
  - Diesel: up to 12 drums (2,460 L)
  - Gasoline: up to 12 drums (2,460 L)
  - Propane: up to 4 x 100 lb. cylinders

## **Water Use**

- To be sourced from nearby lakes/rivers for the following uses:
  - Domestic camp purposes
  - Drilling operations
  - Fire safety or dust suppression if required

## **Waste Management**

- Incineration of organic and inorganic wastes.
- Use of chemicals and hazardous materials.
- Removal of hazardous wastes and other materials to Baker Lake or an approved facility for proper disposal.
- Greywater and drill fluids would be collected into sumps at least 31 m from waterbodies.

As required under s. 86(1) of the *NuPPAA*, the Board accepts the scope of the project as set out by Greenridge Exploration Inc. in the proposal. The scope of the project proposal includes the following undertakings, works, or activities:

## **2. Inclusion or Exclusion to Scoping List**

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

## **3. Public Comments and Concerns**

Notices regarding the NIRB's screening of this project proposal were distributed to community organizations (Table 1) as well as to relevant federal and territorial government agencies, Inuit organizations and other parties requesting they 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 July 16, 2025, the NIRB received comments from the following interested parties:

**Table 2: Comments Received**

<b>Commenting Party</b>	<b>NIRB Doc ID No.</b>
Government of Nunavut (GN)	356744
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	356517
Transport Canada (TC)	356473
Ghotelnene K’odintech Dene (GKD)	356523 & 356524
Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	356743
A Andreassen	356444
P.K. Hughson	356556
H Tagoona	356555

***a. Summary of Comments and Concerns Received***

The following provides a summary of the comments and concerns received by the NIRB in relation to Nut Lake Project:

**Government of Nunavut (Department of Environment)**

*Key Concerns:*

- Caribou Protection Measures in the Proponent’s Environmental and Wildlife Management Plan (EWMP) are inconsistent, lack clarity, and do not adequately account for seasonal sensitivities.
- Conflicting distance buffers: EWMP alternately requires suspending operations when caribou are within 1 km or 2 km of activities, creating uncertainty.
- Minimum helicopter altitude requirement (610 m) is applied inconsistently across different parts of the EWMP (unclear if it applies at all times, only when wildlife present, or only in undefined “wildlife areas”).
- Thresholds for caribou group size are unclear (e.g., suspension at 50 animals vs. suspension when any caribou present).
- EWMP suggests restrictions apply mainly during migration periods, leaving gaps for other sensitive seasons (e.g., calving, post-calving, summer).

*Recommendations:*

- Update the EWMP to:
  - Ensure internal consistency.
  - Clearly define thresholds (distance, group size, season) for suspension of drilling and flights.
  - Explicitly address caribou vulnerabilities across all sensitive periods.

- Align with or exceed caribou protection measures from other Nunavut projects (e.g., Meliadine Project uses a 5 km buffer).

*Support/No Support:*

- GN does not oppose the project but requests significant strengthening of caribou protection measures in the EWMP

### **Crown–Indigenous Relations and Northern Affairs Canada (CIRNAC)**

• *Key Points & Concerns:*

- CIRNAC considers potential project impacts *predictable and mitigable* using known practices and technology.
- Fuel and Hazardous Materials Management: Large volumes of diesel, jet fuel, gasoline, propane, and other chemicals require strict containment and handling measures. Recommendations include ensuring berm capacity, proper drum inspections, spill kits, fire extinguishers, and refresher spill-response training.
- Waste Management: Gaps identified in the Waste Management Plan regarding burn logs, ash testing, and wildlife-proof storage. Recommendations include segregation at source, bear-proof food storage, wildlife interaction reporting, and scheduling back-haul of hazardous/inert materials.
- Consultation: Proponent should continue meaningful consultation with Baker Lake Hamlet, Hunters & Trappers Organization, Kivalliq Inuit Association, and other relevant groups. Consultations should incorporate Inuit Qaujimajatuqangit, ensure protection of wildlife and cultural sites, consider traditional land use, provide training/employment opportunities, support Inuit-owned businesses, and deliver regular project updates.

• *Support/No Support:*

- CIRNAC does not oppose the project but emphasizes stronger mitigation, waste/fuel management, and community consultation measures.

### **Transport Canada**

• *Key Points & Concerns:*

- Project activities involving water withdrawals may trigger requirements under the *Canadian Navigable Waters Act (CNWA)* if intakes are located in navigable waters.
- Project must also comply with the *Transportation of Dangerous Goods Act and Regulations (TDG)*, particularly Part 12 for air transport, requiring ICAO-certified training for shippers.

• *Recommendations/Advice:*

- Proponent should conduct self-assessments of navigability for all water sources using Transport Canada’s Project Review Tool.
- If water intakes qualify as “minor works,” requirements under the *CNWA* Minor Works Order must be followed; otherwise, the proponent must seek approval or follow the *CNWA* public resolution process.
- Dangerous goods shipments must comply fully with *TDG* regulations, including training and certification requirements for air transport.

• *Support/No Support:*

- No concerns raised, no position on project approval

## **Ghotelnene K'odtineh Dene (Sayisi Dene First Nation and Northlands Denesuline First Nation)**

### • *Key Points & Concerns:*

- Project activities (camp construction, drilling, fuel caches, helicopter use) risk disturbing and displacing Beverly and Qamanirjuaq caribou during migration (July–September), calving, and other sensitive periods.
- Caribou are central to the culture, rights, and way of life of the Dene; any harm to caribou is a direct harm to their people.
- Risk of significant adverse and potentially irreversible cumulative effects when combined with other projects in the caribou range (e.g., Aberdeen Uranium, Meadowbank, Meliadine, Kivalliq Hydro-Fibre Link).
- Concerns extend beyond ecological impacts to include harvesting activities and socio-economic effects for Dene communities.

### • *Recommendations:*

- The project should be modified or abandoned unless a thorough regional cumulative effects assessment of caribou and caribou habitat is completed.

### • *Support/No Support:*

- Do not support the project in its current form. Call for modification or abandonment until cumulative effects are fully assessed

## **Beverly Qamanirjuaq Caribou Management Board (BQCMB)**

### • *Key Points & Concerns:*

- Caribou Habitat Overlap
  - Project area overlaps with Qamanirjuaq herd's spring migration, calving, and post-calving habitat.
  - Disturbances (drilling, helicopter use) risk displacement, stress, reduced calf survival, and long-term herd recruitment impacts.
- Monitoring and Mitigation Gaps
  - Lack of clarity on whether wildlife monitors would be hired.
  - No clear authority identified to halt operations when caribou are present.
  - No communication plan to inform communities of caribou interactions.
- Limited Indigenous Engagement
  - No evidence of consultation with Ghotelnene K'odtineh Dene (GKD) despite overlap with settlement lands.
  - Engagement with Baker Lake community (downstream and within caribou range) appears absent.
  - Caribou are essential for Inuit and Indigenous well-being.
- Cumulative Effects
  - Additional pressure on Beverly and Qamanirjuaq ranges from expanding development.
  - No regional cumulative effects assessment has been conducted, despite repeated calls from Indigenous groups.
- Uranium Exploration Risks
  - If uranium is a target, concerns arise due to radioactive risks and long-standing public opposition in Baker Lake region.

### *Recommendations*

- Seasonal Avoidance: Avoid drilling and helicopter use during spring migration, calving, and post-calving periods.
- Hire Indigenous Wildlife Monitors: Work with Baker Lake Inuit organizations and GKD to employ monitors for caribou observation, decision-making, and accountability.
- Clarify Mitigation Authority: Define decision-making roles for halting operations and establish a reporting system to Baker Lake and GKD.
- Meaningful Engagement: Consult directly with GKD, Baker Lake leadership, and Inuit organizations, verifying land use data with Indigenous knowledge holders.
- Regional Cumulative Effects Assessment: Urge NIRB to require or lead a broader cumulative effects assessment before further exploration proceeds.
- Address Uranium-Specific Risks: If applicable, provide full transparency on radioactive material handling, emergency response, and community information sessions.

### *Support/No Support:*

- BQCMB does not support project approval in its current form.
- Conditions for moving forward should include:
  - Full Indigenous consultation,
  - Verified land use data from Indigenous knowledge holders,
  - Robust caribou protection measures,
  - A regional cumulative effects framework
- Does not support the project proposal

### **Paula Kigjugalik Hughson (Inuk, Nunavut Land Claims Beneficiary, Baker Lake)**

#### • *Key Points & Concerns:*

- Uranium Industry: Longstanding opposition in Baker Lake; uranium moratorium lifted without meaningful public consultation; regulatory system seen as favoring industry and bypassing community voices.
- Water: Unclear quantities compared to community use; concerns over handling, storage, transport, and final destination of hazardous and radioactive wastewater.
- Wildlife & Habitat: Caribou central to food security and culture; concern that habitat is treated in fragmented “patchwork” fashion, ignoring whole landscape use.
- Birds, Fish, and Habitat: Risks to important food sources and to the Kazan River watershed, vital for fishing and cultural use by Inuit (Harvaqturmiut, Ahirmiut, Padlirmiut).
- Heritage & Land Use: Proponent’s claim that locals are “not impacted” is rejected; Inuit have deep ancestral ties and continue traditional uses, particularly in winter.
- Consultation: Lack of open, accessible public consultations; decisions made by governments and organizations without community-level engagement; insufficient transparency and accountability.
- Human Health: Risks from wastewater and radioactive materials entering fish, wildlife, and water used by Inuit.
- Cumulative Impacts: Exploration permits viewed as fragmented/piecemeal; calls for full-life-cycle consideration (exploration to decommissioning) and recognition of the broader footprint.

#### • *Recommendations:*

- Uranium issues must be discussed fully from exploration through decommissioning with open, community-level consultation.

- Exploration should not proceed until training and capacity-building ensure Inuit can access more than entry-level jobs in the industry.
- Question raised: “*Are we ready for this activity?*” — rocks and minerals would remain until communities are prepared.
- *Support/No Support:*
  - Does not support the project proposal

### **Hilu Tagoona (Baker Lake resident)**

- *Key Points & Concerns:*
  - Project is upstream of Baker Lake, creating risks to the community’s drinking water supply.
  - Proposed activities overlap with the Qamanirjuaq caribou range; drilling and aerial surveys could disrupt migrations and affect water crossings.
  - Multiple exploration projects are occurring in the region, raising concerns about cumulative effects on caribou health and Inuit traditional land use/harvesting.
  - Public consultation is seen as insufficient, particularly given the history of strong opposition to uranium mining in Baker Lake since the 1970s (including the Kiggavik mine review).
- *Recommendations:*
  - The project should be modified or abandoned due to risks to water, caribou, and harvesting.
  - No further uranium exploration should proceed on the Qamanirjuaq range until a comprehensive cumulative effects assessment is completed.
- *Support/No Support:*
  - Does not support the project proposal.

### **Anne Andreassen (Public Comment – Baker Lake)**

- *Key Points & Concerns:*
  - Risk of long-term devastation associated with uranium mining; while this is a drilling proposal, drilling is a step toward advancing mining.
  - Lack of direct communication with the general public of Baker Lake; reliance on KIA and the Hunters and Trappers Organization (HTO) is inadequate.
- *Recommendations:*
  - Proponent, KIA, Hamlet, and HTO should ensure transparent, open public consultations directly with Baker Lake residents.
- *Support/No Support:*
  - Does not support the project proposal.

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

The following is a summary of the concerns or comments received with respect to Inuit Qaujimaningit, Indigenous and Community Knowledge with respect to the project proposal:

- **Traditional uses of land and Inuit harvesting activities overlooked**

*Raised by:* Paula Kigjugalik Hughson (Inuk, Nunavut Land Claims Beneficiary, Baker Lake)

- The Proponent’s claims that locals are “not impacted” are false.
- Inuit have ancestral ties to the area and continue harvesting, hunting, trapping, camping.

- Seasonal use (snowmobile in winter, hunting in spring/fall) shows continued reliance.

- **Caribou as major food source and way of life**

*Raised by:* Paula Kigjugalik Hughson (Baker Lake) and Hilu Tagoona (Baker Lake)

- Caribou and their habitat are essential for Inuit subsistence and cultural continuity.
- Exploration overlaps Qamanirjuaq herd range, affecting migration and water crossings.
- Cumulative effects across multiple exploration projects threaten herd health.

- **Community involvement and consultation lacking**

*Raised by:* Paula Kigjugalik Hughson (Baker Lake), Hilu Tagoona (Baker Lake), Anne Andreassen (Baker Lake), BQCMB, and CIRNAC

- No proper community meetings or accessible public discussions held.
- Decisions on uranium and exploration being made by boards/governments without input from Inuit communities.
- Calls for direct communication with general public, not just HTOs/KIA.

- **Cultural/heritage areas, Harvaqtuuq (Kazan) River**

*Raised by:* Paula Kigjugalik Hughson (Baker Lake)

- River and watershed are significant to Harvaqturmiut, Ahirmiut, Padlirmiut Inuit.
- Proponent downplays this cultural importance.
- Area used for fishing, hunting, camping — central to identity.

- **Cumulative effects on Inuit harvesting and knowledge systems**

*Raised by:* Hilu Tagoona (Baker Lake), Ghotelnene K'odtineh Dene, and BQCMB

- Multiple uranium/mineral projects overlap Qamanirjuaq range.
- Long-term impacts to caribou herds and harvesting rights are unacceptable without a cumulative effects assessment.
- Indigenous peoples stress the need to evaluate combined footprint.

- **Indigenous harvesting rights and way of life**

*Raised by:* Ghotelnene K'odtineh Dene

- Section 35 rights tied to caribou harvesting across Nunavut, Manitoba, Saskatchewan, NWT.
- Any harm to caribou results in direct harm to Dene existence, culture, and way of life.
- Stress from noise, drilling, air traffic could disturb caribou migrations.

- **Integration of Inuit Qaujimajatuqangit**

*Raised by:* CIRNAC

- Proponent should incorporate Inuit Qaujimajatuqangit into project activities.
- Consult Baker Lake Hunters and Trappers Org., Kivalliq Inuit Association, and local Inuit organizations.
- Include Inuit training, employment, and business opportunities.

- **Indigenous-led monitoring and use of local knowledge**

*Raised by:* BQCMB

- Recommend hiring Indigenous wildlife monitors from Baker Lake and Ghotelnene K'odtineh Dene.
- Need Inuit/Indigenous knowledge to identify caribou crossings and seasonal use areas.
- Ensure Indigenous observers can stop/adjust operations when caribou are near.
- Stress on meaningful consultation and verification of land-use with Inuit knowledge holders

## 5. Proponent's Response to Public Comments and Concerns

Due to the comments, and questions received from parties, the NIRB provided an opportunity for the Proponent to respond. The following is a summary of the Proponent's response to concerns:

### Response to the Government of Nunavut

- Greenridge acknowledges GN's concerns on caribou protection and has refined the *Environmental and Wildlife Management Plan (August 1, 2025)* to address seasonal caribou sensitivities.
- The Project would adhere to the **KIA Mobile Caribou Conservation Measures Guidelines** on Crown land.
- Mitigation measures were updated in line with feedback from the **Ghotelnene K'odtineh Dene** and the **Beverly and Qamanirjuaq Caribou Management Board**.

### Response to CIRNAC

- **Fuel and Hazardous Materials:** Fuel storage/handling would follow all regulations and the *Spill Contingency and Fuel Management Plan (August 1, 2025)*, with bermed containment, hydrocarbon filters, inspections, spill kits, and refresher training to minimize risks.
- **Waste Management:** Waste would be segregated, stored in labelled/bear-proof containers, and removed off-site to approved facilities. Burn log protocols, defined removal schedules, and regular inspections were included for compliance.
- **Consultation and Engagement:** Ongoing consultation with Baker Lake municipality, HTO, Kivalliq Inuit Association, Elders, and land users would continue, with Inuit Qaujimajatuqangit guiding planning and operations.
- **Wildlife and Community Protection:** Indigenous monitors would have authority to pause operations during caribou presence; seasonal harvesting and cultural land use would be respected. Inuit employment, training, and local procurement would be prioritized.

### Response to Transport Canada

- **Canadian Navigable Waters Act:** No water withdrawals are expected to trigger the Act. Minimal water use would come only from approved sources and would not impede navigation. If withdrawal from a navigable waterway becomes necessary, approvals would be obtained in advance. All use would follow best management practices under the *Environmental and Wildlife Management Plan (August 1, 2025)*.
- **Transportation of Dangerous Goods:** Compliance with TDG Regulations and ICAO standards would be ensured per the *Radiation Hazard Control Plan (March 18, 2025)*. All personnel handling dangerous goods would be trained/certified, with records kept on site. Packaging, labeling, and documentation would meet federal requirements, and only certified carriers would be used. Regular inspections and documentation checks would confirm compliance.

## Response to BQCMB

- **Acknowledgement:** Greenridge thanks the BQCMB for their recommendations and recognizes that caribou ranges and cultural use extend beyond administrative boundaries.
- **Caribou Protection Commitments (EWMP August 1, 2025):**
  - Apply **KIA Mobile Caribou Conservation Measures (2022 Update, Table 2)** to trigger work stoppages, even though developed for Inuit Owned Lands.
  - Maintain **minimum aircraft altitude of 610 m** in presence of caribou.
  - Apply **buffers:** 10 km for camps/fuel caches and 5 km for drilling (May 15–Sept 1).
  - Avoid habitat disturbance and conduct additional monitoring during sensitive periods (July–Sept).
  - Retain **independent wildlife monitors** through Baker Lake HTO with authority to stop or adjust work.
  - Train all personnel in wildlife observation, reporting, and immediate notification protocols.
- **Engagement:** Commitment to early and ongoing engagement, including expanding beyond Baker Lake HTO to share information with Dene Nations and other Indigenous communities whose members rely on the Beverly and Qamanirjuaq herds.
- **Ongoing Commitment:** Greenridge would continue to minimize disturbance to caribou and maintain open communication with Indigenous rights holders, regulators, and stakeholders for wildlife-related feedback.

## Response to Ghotelnene K’odtineh Dene (GKD)

- **Acknowledgement of Concerns:** Greenridge thanks the GKD for their review and recognizes the cultural, subsistence, and rights-based importance of the Beverly and Qamanirjuaq caribou herds.
- **Caribou Protection Measures:** The *Environmental and Wildlife Management Plan (August 1, 2025)* incorporates the **KIA Mobile Caribou Conservation Measures (2022 Update)**, including seasonal restrictions, buffer zones, aircraft altitude limits ( $\geq 610$  m when caribou observed), and use of independent wildlife monitors (via Baker Lake HTO) with authority to pause operations.
- **Cumulative Effects:** Greenridge acknowledges cumulative impacts from multiple projects in the region. While not conducting a full regional cumulative effects assessment, the Project would limit scale/duration, follow caribou protection measures, document wildlife observations, and adapt operations to reduce disturbance. Open to collaboration with other operators.
- **Ongoing Engagement:** Greenridge would continue sharing project information with Indigenous organizations, welcomes feedback to refine mitigation, and is open to incorporating local knowledge into seasonal planning to respect harvesting rights and cultural practices.

## Response to Hilu Tagoona

- **Acknowledgement:** Greenridge recognizes concerns about water quality, caribou, cumulative effects, Inuit harvesting, and consultation, and commits to ensuring exploration is respectful of community values and the environment.
- **Water Quality:** Exploration water use would be minimal and from approved sources. Strict procedures in the *Waste Management Plan (August 1, 2025)* and *Radiation Hazard Control Plan (March 18, 2025)* would prevent contamination from drill cuttings, wastewater, and mineralized material.
- **Caribou Protection:** The *Environmental and Wildlife Management Plan* incorporates **KIA Mobile Caribou Conservation Measures**, including distance buffers, seasonal thresholds, and work stoppages. Independent wildlife monitors (via Baker Lake HTO) would have authority to pause activities. Aircraft must maintain **≥610 m altitude** and avoid landing in the presence of wildlife.
- **Cumulative Effects:** While unable to complete a full regional cumulative effects assessment, Greenridge would minimize contributions by following caribou protection measures, keeping detailed wildlife records, and adapting operations based on monitoring and community input.
- **Inuit Harvesting and Traditional Land Use:** Project Proposal planning avoids migration/harvesting periods, applies buffers around crossings, and incorporates input from local organizations. Activities may be rescheduled or relocated to reduce impacts.
- **Community Engagement:** Engagement with Baker Lake Hamlet and HTO is ongoing. Greenridge is open to holding further discussions and in-person meetings during the project to share updates and address community concerns, recognizing uranium exploration is a sensitive issue.

## Response to Paula Kigjugalik Hughson

- **Acknowledgement and Cultural Importance:** Greenridge recognizes the cultural, environmental, and socio-economic importance of the **Harvarqtuuq (Kazan) River** and surrounding lands to Inuit communities, including seasonal use for hunting, trapping, camping, and tourism (canoeing, fishing, sport hunting). Project activities would be planned to avoid interference, with adjustments made based on community input.
- **Water and Wastewater Management:** Exploration water use would be minimal, from approved sources, and managed to avoid contamination. Wastewater would follow the *Radiation Hazard Control Plan (March 18, 2025)* and *Waste Management Plan (August 1, 2025)*.
- **Radioactive Waste Management:** Drill cuttings  $>0.05\%$   $U_3O_8$  would be sealed in labelled containers, stored  $\geq 100$  m from water, and shipped to a licensed hazardous waste facility in Saskatchewan. Drill holes  $>1\%$   $U_3O_8$  would be permanently sealed with grout. Sumps for benign cuttings/water would be  $\geq 31$  m from waterbodies and reclaimed after use. Artesian flows would be promptly sealed. All sites inspected for radiation before closure.
- **Fuel and Hazardous Materials:** Stored  $\geq 31$  m from waterbodies in secondary containment, with spill kits, firefighting equipment, and drip trays at fueling points to prevent contamination risks.
- **Commitment:** Through strict protective measures, regulatory compliance, and community engagement, Greenridge aims to safeguard environmental, cultural, and recreational values while securely managing hazardous and radioactive materials.

## Response to Anne Andreassen

- **Acknowledgement:** Greenridge thanks Anne Andreassen for her review and concerns about long-term uranium mining impacts and the need for accessible public information.
- **Clarification:** The current application is for small-scale, low-impact exploration drilling only. No mining or development can proceed without a separate, rigorous environmental assessment, regulatory review, and full community consultation.
- **Future Safeguards:** If a viable deposit is identified, any mining proposal would require strict permitting, environmental studies, and best available practices to protect water, wildlife, and land.
- **Engagement:** Greenridge would continue to share updates with the Hamlet of Baker Lake, the HTO, and affected communities, using agreed communication channels. The company is open to direct engagement with community members, including in-person discussions, to incorporate local perspectives and address concerns.

### 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 in Table 3. The Board took particular care to consider Inuit Qaujimaningit and 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
<p>The size of the geographic area, including the size of wildlife habitats, likely to be affected by the impacts.</p>	<p>The Nut Lake Project lies in a sensitive tundra ecosystem with freshwater bodies and established barren-ground caribou migration routes. The direct project footprint is about 20 hectares, but the potential zone of influence, from noise, dust, and spill risk could extend several kilometres.</p> <p>Sensitive areas include:</p> <ul style="list-style-type: none"> <li>• Caribou ranges within 5–10 km that could be disrupted during migration and post-calving.</li> <li>• Aquatic habitats supporting Arctic char and other harvested fish species.</li> <li>• Ground-nesting bird areas less than 1–2 km.</li> </ul> <p>While these sensitivities could justify a full review, the proponent’s binding commitments—including strict wildlife buffer zones, helicopter altitude limitations, and zero-discharge water systems—are anticipated to mitigate potential adverse effects, assuming full compliance and enforcement of commitments and</p>

Factor	Comment
<p>The ecosystemic sensitivity of that area.</p>	<p>regulatory requirements, as well as adherence to monitoring and reporting obligations.</p> <p>The Nut Lake area is ecologically sensitive, featuring tundra landscapes with fragile vegetation, interconnected freshwater lakes, and important habitat for barren-ground caribou, migratory birds, and fish species such as Arctic char.</p> <p>The region's low resilience to disturbance, slow vegetation recovery rates, and the presence of critical wildlife corridors and breeding grounds heighten its sensitivity. Seasonal activities such as caribou post-calving and bird nesting make the ecosystem particularly vulnerable during specific time windows.</p> <p>Due to these factors, even small disturbances can have disproportionate ecological effects, which justifies the application of a heightened level of the precautionary principle, strict mitigation, adaptive management and monitoring to avoid potential for cumulative impacts.</p>
<p>The historical, cultural and archaeological significance of that area.</p>	<p>The Nut Lake area holds important cultural and historical value for the Inuit and other Indigenous peoples of the region. It is traditionally used for hunting, fishing, and harvesting, with archaeological sites indicating past habitation and land use over generations.</p> <p>While no major archaeological sites were reported within the immediate project footprint, however, the broader region contains recorded and potential archaeological resources that warrant careful management. The Project Proposal is near established travel routes and harvesting areas critical to community food security and cultural practices.</p> <p>The Proponent has committed to implementing archaeological impact assessments, heritage resource monitoring, and culturally appropriate consultation to minimize disturbance to these values. If the Proponent complies with these commitments and meets applicable regulatory requirements, the impacts on historical and cultural resources associated with the Project Proposal can be prevented and managed.</p>

Factor	Comment
<p>The size of the human and the animal populations likely to be affected by the impacts.</p>	<p>The human population directly relying on the Nut Lake area is relatively small, primarily comprising nearby Inuit communities who use the region seasonally for traditional harvesting of caribou, fish, and other wildlife. While permanent residents are few, the project's proximity to key harvesting areas means impacts could affect subsistence activities for several dozen to a few hundred people in these communities.</p> <p>Animal populations include barren-ground caribou herds, migratory birds, and aquatic species such as Arctic char. Caribou herds passing through the area number in the thousands, but only a portion would be affected temporarily during migration or calving seasons. Bird populations are locally significant but dispersed. Fish populations in connected waterways are vital for both ecological balance and community harvest.</p> <p>Given these population sizes and seasonal use patterns, impacts are considered localized and temporary, but their significance to both wildlife and community well-being warrants strict mitigation and monitoring, and justifies the application of the precautionary principle to the Board's assessment of the potential for effects.</p>
<p>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.</p>	<p>The Nut Lake Project's impacts are primarily related to localized habitat disturbance, noise, dust emissions, and potential spills of hazardous materials such as fuel. The magnitude is moderate but focused, limited to a small footprint (~20 hectares), although indirect effects like noise could extend for several kilometres.</p> <p>The impacts are complex due to the ecological sensitivity of caribou migration corridors and aquatic systems downstream. The probability of impacts occurring is high without mitigation, especially during critical wildlife periods, but would be significantly reduced with strict controls in place.</p> <p>Impacts are expected to be intermittent, corresponding mainly to exploration activities (e.g., drilling seasons), lasting months to a few years. With proper reclamation and contingency measures, most impacts are reversible over the medium term, although some habitat alteration</p>

Factor	Comment
	<p>(e.g., vegetation clearing) may take longer to fully recover.</p> <p>While the potential exists for significant adverse effects, the proponent's commitment to enforceable mitigation measures, ongoing monitoring, and adaptive management supports a conclusion that the impacts are manageable if the proponent's binding commitments are implemented and enforced and the activities are carried out in accordance with the terms and conditions included in this Screening Decision Report.</p>
<p>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.</p>	<p>The Board recognizes an extensive number of past, ongoing, and reasonably foreseeable projects may occur within the project's zone of influence. The Board has recommended mitigation measures designed to prevent, manage and monitor the potential for cumulative effects associated with this proposal.</p>
<p>Any other factor that the Board considers relevant to the assessment of the significance of impacts.</p>	<p>No other relevant factors were identified; however, see below for Regulatory Requirements mandating mitigation and/or reporting.</p>

## 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](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](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/>).
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/>).
7. The Wildlife Area Regulations under the Canada Wildlife Act ([https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,\\_c.\\_1609/FullText.html](https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1609/FullText.html)).
8. The Transportation of Dangerous Goods Act (<http://laws-lois.justice.gc.ca/eng/acts/t-19.01/>) and the Transportation of Dangerous Goods Regulations (<http://www.tc.gc.ca/eng/tdg/clear-tofc-211.htm>).
9. The Nuclear Safety and Control Act: (<https://laws-lois.justice.gc.ca/eng/acts/N-28.3/>)
10. The Canadian Environmental Protection Act (<http://laws-lois.justice.gc.ca/eng/acts/C-15.31/>).

11. The Proponent is advised that the Canadian Environmental Protection Act lists calcium chloride (CaCl) as a toxic substance. The Proponent should assess alternatives to the use of CaCl as a drill additive, including biodegradable and non-toxic additives.
12. 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> ).
13. 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](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> ).
14. General Nuclear Safety and Control Regulations (<https://laws-lois.justice.gc.ca/eng/regulations/SOR-2000-202/>)
15. Uranium Mines and Mills Regulations (<https://laws.justice.gc.ca/eng/regulations/sor-2000-206/page-1.html>)
16. The Aeronautics Act (<http://laws-lois.justice.gc.ca/eng/acts/A-2/> ) and the Canadian Aviation Regulations (<https://www.tc.gc.ca/eng/acts-regulations/regulations-sor96-433.html> ).
17. The Canadian Navigable Waters Act (<https://laws.justice.gc.ca/eng/acts/N-22/> ).

### **Other Applicable Guidelines**

1. Fisheries and Oceans Canada Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut  
[https://registry.mvlwb.ca/Documents/W2010C0005/W2010C0005%20-%20Land%20Use%20Permit%20Application%20-%20DFO%20Water%20Withdrawal%20Protocol%20-%20Aug%2025\\_10.pdf](https://registry.mvlwb.ca/Documents/W2010C0005/W2010C0005%20-%20Land%20Use%20Permit%20Application%20-%20DFO%20Water%20Withdrawal%20Protocol%20-%20Aug%2025_10.pdf)
2. The Federal Guidelines for Landfarming Petroleum Hydrocarbon Contaminated Soils (Science Applications International Corporation Canada, March 2006).  
[https://www.canada.ca/content/dam/eccc/migration/fcs-scf/B15E990A-C0A8-4780-9124-07650F3A68EA/Landfarming\\_en.pdf](https://www.canada.ca/content/dam/eccc/migration/fcs-scf/B15E990A-C0A8-4780-9124-07650F3A68EA/Landfarming_en.pdf)
3. 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>
4. The Canadian Guidelines for the Management of Naturally Occurring Radioactive Materials  
[Canadian Guidelines for the Management of Naturally Occurring Radioactive Materials \(NORM\) - Canada.ca](#)
5. The Guidance Document for Canadian Jurisdictions on Open-Air Burning”  
<https://ccme.ca/en/res/guidancedocumentonopenairburning-e.pdf>
6. Environmental Guideline for the Burning and Incineration of Solid Waste, Government of Nunavut, Revised January 2012 <https://assembly.nu.ca/library/GNedocs/2012/001321-e.pdf>
7. Environmental Guidelines for the Management of Hazardous Waste, Government of Nunavut, Revised October 2010  
[https://nwb-oen.ca/sites/default/files/cms\\_uploads/techguides/Guideline%20-%20General%20Management%20of%20Hazardous%20Waste%20\(revised%20Oct%202010\).pdf](https://nwb-oen.ca/sites/default/files/cms_uploads/techguides/Guideline%20-%20General%20Management%20of%20Hazardous%20Waste%20(revised%20Oct%202010).pdf)

VIEWS OF THE BOARD

At the outset, the Board notes that 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 presented to the Board during the Board’s previous assessments of these types of 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 that if the early exploration activities proposed in this proposal were to be allowed to proceed that a potential uranium mine project would inevitably follow. The Board emphasizes that 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 those activities 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 Inuit harvesting activities**

Valued Component	Ecosystem
Potential Effects	Disturbance and alteration of tundra vegetation and soils; risk of water quality degradation from drilling and camp operations.
Nature of Impacts	Seasonal disturbance of approximately 1–3 hectares (ha) (up to 20 ha cumulative in a multi-season scenario) in lichen–shrub heath and wet sedge tundra underlain by continuous permafrost. Soil compaction and alteration of surface drainage may accelerate localized permafrost thaw. Water withdrawal of up to 299 cubic metres per day (m <sup>3</sup> /day) for drilling and camp needs poses potential for localized sedimentation, turbidity, and hydrocarbon contamination of small lakes and streams if not managed. Vegetation regrowth in the proposed project area is naturally slow due to short growing seasons and thin active layers, meaning even small disturbances can persist for decades if not properly managed.
Mitigating Factors	Limit disturbance footprint by using helicopter support (no road construction) and concentrating activities on previously disturbed sites where feasible. Conduct site selection to avoid wetlands, steep slopes, or areas with high ice content. Apply Arctic-specific erosion and sediment controls. Secure all fuel, lubricants, and hazardous materials in

	secondary containment with spill kits on-site. Use screened water intakes and select water bodies with adequate volume to minimize habitat impacts. Implement progressive reclamation, including stabilization and revegetation of disturbed areas as practical.
Proposed Terms and Conditions	Water courses/Water bodies 6-9 Waste Management 10 and 11 Fuel and Chemical Storage, 12-20 Wildlife General 21 and 24 Ground Disturbance 39 Drilling General 40-42 Drilling on Land 44-47 Land Use and Restoration 54-58 Camps 59 and 60

Valued Component	Wildlife Habitat
Potential Effects	Direct habitat loss, temporary displacement of wildlife from active work areas, seasonal disruption during sensitive life stages, and potential cumulative effects from concurrent regional projects.
Nature of Impacts	Permanent loss of $\leq 3$ ha of tundra habitat due to camp and drill pad construction, although the footprint would be dispersed. Noise, vibration, and human activity can cause temporary avoidance of a 2 km radius ( $\sim 13\text{--}38$ km <sup>2</sup> ) around active sites by caribou, muskox, and birds. Helicopter activity may cause short-term flushing and displacement, particularly at altitudes $< 610$ m AGL. The area lies within potential seasonal ranges for Beverly and Qamanirjuaq barren-ground caribou herds (COSEWIC: Threatened), with heightened sensitivity during migration, calving/post-calving, and at major water crossings. Potential exists for cumulative impacts associated with these activities in conjunction with other exploration activities through additive displacement and energetic stress.
Mitigating Factors	<p>Restrict physical footprint to the smallest practical size, reusing disturbed sites where possible, and reclaiming promptly after use. Maintain a <math>\geq 610</math> m AGL flight altitude except during landing/take-off, and avoid repeated passes over wildlife. Implement the Kivalliq Mobile Caribou Conservation Measures, including work pauses or relocation if <math>\geq 25</math> caribou are within 5 km. Apply seasonal buffers of 4.8–10 km around calving areas and major crossings. Adapt operations (timing/location) based on real-time wildlife observations. Coordinate activities and timing with other regional operators to minimize overlap in sensitive areas. Participate in community-based and regional wildlife monitoring programs.</p> <p>The Board is recommending the Proponent submit an Annual Report regarding annual project activities to keep parties up to date and to assist with the monitoring of the proposed project. This also allows the</p>

Valued Component	Wildlife Habitat
	Proponent and the Board to observe wildlife impacts and adaptively manage any year over year changes.
Proposed Terms and Conditions	Wildlife General 22 Migratory Birds and Raptors 24 and 25 Aircraft Flight Restrictions 26-31 Caribou and Muskoxen Disturbance 32-38

Valued Component	Inuit Harvesting Activities
Potential Effects	Temporary reduction in availability of game species (e.g., caribou, waterfowl) in accessible harvesting areas; interference with traditional travel and harvesting routes; potential scheduling conflicts with peak harvesting periods.
Nature of Impacts	Disturbance from drilling and aircraft may displace wildlife from areas used for subsistence harvesting, particularly during sensitive migration or staging periods. Aircraft noise may disrupt Inuit travel on the land and water, altering access to hunting and fishing locations. While the project footprint is small, seasonal presence of machinery and helicopters can reduce harvesting efficiency in certain areas, and overlap with harvesting seasons could heighten effects. No permanent loss of harvesting land is expected, but short-term displacement can have disproportionate effects in remote Arctic communities reliant on predictable wildlife availability.
Mitigating Factors	Engage with Qamani'tuaq (Baker Lake) harvesters before each field season to share project schedules, drilling locations, and flight paths. Avoid siting activities in high use harvesting zones where feasible. Adjust timing or location of work to avoid peak harvesting periods. Reroute flights to avoid known harvesting corridors and minimize low altitude flying near active harvesting. Maintain an open communication line with harvesters throughout the field season for real-time adjustments.  The Board is recommending a Community Consultation Report including a Community Engagement Strategy Plan to ensure community engagement is included in the undertaking of the proposed project.
Proposed Terms and Conditions	Wildlife General 22 and 23 Aircraft Flight Restrictions 26-31 Other 61 and 62

Valued Component	Radiological Environment and Public/Worker Health
Potential Effects	Potential exposure to uranium-bearing material during exploration; risk of airborne dust and radon gas release; potential contamination of water, soil, or equipment; worker health and safety risks from drilling and handling core samples.
Nature of Impacts	Short-term radiological exposure possible during drilling through mineralized zones or core handling; airborne radon and dust generation

Valued Component	Radiological Environment and Public/Worker Health
	risk at drill sites; localized contamination potential if drill water or cuttings are not contained; no public exposure expected due to remoteness, but workers at site are primary receptors.
Mitigating Factors	Implement a Radiation Protection Program in compliance with Canadian Nuclear Safety Commission (CNSC) and Workers' Safety and Compensation Commission (WSCC) guidelines; use wet drilling to suppress dust; core logging in ventilated areas; personal dosimeters for workers; routine radiological monitoring of air, water, and drill cuttings; secure storage of mineralized core; train all workers in radiation safety.
Proposed Terms and Conditions	Drilling and Disposal of Related Radioactive Substances 48-53

**Socio-economic effects on northerners:**

Valued Component	Socio-Economic Effects on Northerners
Potential Effects	Seasonal employment and training for northern and Inuit workers; contracting opportunities for local businesses; potential strain on community services; cultural and social impacts from transient workforce; uneven access to opportunities without proactive measures.
Nature of Impacts	Short-term jobs in drilling support, camp operations, logistics, and environmental monitoring; economic stimulus from wages and contracts; benefits limited to exploration season; increased demand for accommodations and transport in Qamani'tuaq; potential cultural friction between transient workers and community; risk of underrepresentation of Inuit in hiring/contracts if not addressed.
Mitigating Factors	<p>Prioritize northern/Inuit hiring; work with Nunavut Tunngavik Inc. (NTI), the Kivalliq Inuit Association (KIA), and Hamlets to match candidates to jobs; pre-tender engagement with local suppliers; mandatory cultural awareness training for all staff; pre-season engagement with community leadership; coordinate mobilization to avoid overloading local services.</p> <p>The Board is recommending a Community Consultation Report including a Community Engagement Strategy Plan to ensure community engagement is included in the undertaking of the proposed project. The Annual Report will also include information related to community engagement and other topics for observation through monitoring.</p>
Proposed Terms and Conditions	Other 63

**Significant public concern:**

Significant public concerns were expressed during the public commenting period for this file from the Beverly and Qamanirjuaq Board, Ghotelnene K'odtineh Dene (Sayisi Dene and Northlands Denesuline First Nations), and various Baker Lake community Members (see Interested Parties Comments and Concerns, and Public Comments and Concerns with respect

to Inuit Qaujimaningit, Indigenous and Community Knowledge). The Board noted the following concerns:

- The lack of community engagement about the Project Proposal;
- The lack of incorporation of Inuit Qaujimaningit into the project proposal (including design, mitigations and management plans);
- The spatial and temporal overlap of the Project Proposal with sensitive wildlife habitats, including caribou, birds and freshwater species, and the potential overall impacts to wildlife caused by exploration activities of the Project Proposal alone and in combination with existing or reasonably foreseeable projects in the area;
- General concerns about uranium exploration and potential mining;
- The potential impacts to traditional land use sites and possible archaeological sites;
- The potential impacts to traditional land use and harvesting activities;

In summary, concerns about the potential for the Project Proposal to have impacts on air quality, water quality, soil quality, wildlife and heritage resources resulted in the Beverly and Qamanirjuaq Board, Ghotelnene K'odtjneh Dene (Sayisi Dene and Northlands Denesuline First Nations), and various Baker Lake community members indicating they did not support the Project Proposal moving forward in its current form, and making recommendations regarding modifications, additional commitments and specific mitigations to address these concerns.

#### **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. Greenridge Exploration Inc (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.: 150746 and the NIRB (Online Application Form, April 19, 2025; response to comments, August 11, 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.

## Water courses/Water bodies (including fresh waters)

6. The Proponent shall not extract water from any fish-bearing water body unless the water intake hose is equipped with a screen of appropriate mesh size to ensure that there is no entrapment of fish. Small lakes or streams should not be used for water withdrawal unless otherwise authorized by the appropriate authorizing agency.
7. The Proponent shall ensure that no disturbance of the stream bed, lakebed or the banks of any definable watercourse be permitted, except where deemed necessary for maintaining project-specific operational commitments or approved by a responsible authority in cases of spill management.
8. The Proponent shall implement erosion and sediment suppression measures on all areas during all project activities in order to prevent sediment or fugitive dust from entering any water body or surrounding environment. Erosion prevention measures may include berms or silt fences.
9. The Proponent shall not deposit, nor permit the deposit of any fuel, chemicals, wastes (including wastewater) or sediment into any water body. The Proponent should have in place an Emergency Spill Response Plan that is approved by the appropriate authorizing agency(ies).

## Waste Management

10. 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.

11. 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**

12. 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.
13. 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.
14. 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.
15. 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.
16. All fuel and chemical storage containers must be clearly marked with the Proponent's name for ease of identification.
17. 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.
18. 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.
19. 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).
20. 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.

### **Wildlife General**

21. 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.
22. 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.
23. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.

## **Migratory Birds and Raptors Disturbance**

24. 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*.
25. 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<sup>1</sup> appropriate for the species and the surrounding habitat.

## **Aircraft Flight Restrictions**

26. The Proponent shall not alter flight paths to approach wildlife and avoid flying directly over animals.
27. 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.
28. 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.
29. 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.
30. The Proponent shall ensure that aircraft/helicopter do not, unless for emergency, touch-down in areas where wildlife are present.
31. 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**

32. 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.
33. The Proponent shall immediately cease activities likely to interfere with the migration or calving of caribou or muskoxen until such time as the caribou or muskox have passed.
34. The Proponent shall not locate any operation or undertake activities that could block or cause any diversion to migration of caribou or muskoxen.

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

35. 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.
36. 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.
37. 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.
38. 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.

### **Ground Disturbance**

39. 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.

### **Drilling General**

40. The Proponent shall ensure that all drill areas are constructed to facilitate minimizing the environmental footprint of the project area.
41. 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.
42. The Proponent shall ensure that all drill areas are constructed to facilitate minimizing the environmental footprint of the project area.

### **Drilling on Land**

43. 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
44. If an artesian flow is encountered, the Proponent shall ensure the drill hole is immediately plugged and permanently sealed.

45. 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.
46. 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.
47. 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 and Disposal of Related Radioactive Substances**

48. 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.
49. 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.
50. The Proponent shall ensure that drill cuttings with a uranium concentration greater than 0.05% are disposed of down the drill hole and the hole subsequently sealed.
51. 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.
52. 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.
53. The Proponent shall ensure that gamma radiation levels of a long-term core storage area are not greater than 1.0 micro Sievert ( $\mu\text{Sv}$ ), and never exceeds 2.5  $\mu\text{Sv}$ . 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.

### **Land Use and Restoration of Disturbed Areas**

54. The Proponent shall ensure that the land use area is kept clean and tidy at all times.
55. The Proponent shall avoid disturbance on slopes prone to natural erosion, and alternative locations shall be utilized.
56. The Proponent shall remove all garbage, fuel and equipment at the end of each field season and/or upon completion of work and/or upon abandonment
57. The Proponent shall ensure that all disturbed areas are restored to a stable or pre-disturbed state using Best Available Technology Economically Achievable (BATEA) upon completion of work and/or abandonment.
58. The Proponent shall ensure that all camps are located on durable surfaces, such as gravel or sand that is consolidated and that can withstand repeated, heavy use. Measures shall be put in place to prevent erosion, trail formation and damage to the ground.

## 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

## Other

61. Prior to undertaking project activities, the Proponent shall engage with local residents to provide them with information regarding planned activities in the area and to solicit available Inuit Qaujimaningit, Indigenous and Community Knowledge about the project area (including, but not limited to information about the current recreational and traditional uses, wildlife and wildlife habitats and areas of cultural or archaeological value within the project area) to inform project activities. To facilitate the engagements, the Proponent shall post public notices (translated into the predominant languages used in the community e.g. Inuktitut, Dene, etc.) in advance of the engagement with potentially interested groups and individuals prior to undertaking project activities.
62. The Proponent shall ensure that project activities do not interfere with Inuit wildlife harvesting or traditional land use activities
63. 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 public consultation report prior to the commencement of project activities. The report shall include a copy of materials presented to community members, a description of issues and concerns raised, 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.
2. The Proponent shall submit a community engagement strategy plan and a public consultation report to the Nunavut Impact Review Board as follows:
3. Community Engagement Strategy Plan should be provided prior to the commencement of project activities and include:
  - a. information on how the Proponent plans to inform local residents of the project proposal; and
  - b. how the community will be briefed on the monitoring results.
  - c. Public Consultation Report should be provided following completion of project activities and include:
  - d. copy of materials presented to community members.
  - e. a description of issues and concerns raised; and
  - f. 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

1. The Proponent shall submit a comprehensive annual report with copies provided to the Nunavut Impact Review Board, and other agencies that requested the report, by March 31st of each year of permitted activities beginning March 31, 2026. The annual report must contain at least the following information:
  - a. A summary of activities undertaken for the year, including:
    1. a map showing the approximate location of drill sites;
    2. a map showing the location of the fuel cache;
    3. a description of local hires, contracting opportunities and initiatives;
    4. flight altitudes, frequency of flights and anticipated flight routes;
    5. 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 EWMP 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 requests that responsible authorities submit a copy of each licence, permit or other authorization issued for the Project to the NIRB to assist with required project monitoring. Please forward a copy of the licences, permits and/or other authorizations to the NIRB directly at [info@nirb.ca](mailto:info@nirb.ca) or upload a copy to the NIRB's public registry at [www.nirb.ca](http://www.nirb.ca).

### Use of Inuit Qaujimaningit

3. Throughout the project, the Proponent is encouraged to work with local communities and knowledge holders to inform project design, the development, implementation and monitoring of mitigation measures, carrying out project activities, 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, Indigenous and Community knowledge collected for the project is used with permission and is accurately represented.

### Species at Risk

4. 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](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.

### Heritage Resources

5. 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.

### **Incineration of Wastes**

6. The Proponent review Environment and Climate Change Canada's "Technical Document for Batch Waste Incineration", available at the following link: <http://www.ec.gc.ca/gdd-mw/default.asp?lang=En&ndn=F53EDE13-1>. The technical document provides information on appropriate incineration technologies, best management and operational practices, monitoring and reporting.

### **Transport of Dangerous Goods and Waste Management**

7. Environment and Climate Change Canada recommends that all hazardous wastes, including waste oil, receive proper treatment and disposal at an approved facility.
8. The Proponent shall ensure that proper shipping documents (waste manifests, transportation of dangerous goods, etc.) accompany all movements of dangerous goods. Further, the Proponent shall ensure that the shipment of all dangerous goods is registered with the Government of Nunavut Department of Environment, Department of Environment Manager. Contact the Manager (867) 975-7748 to obtain a manifest if dangerous goods including hazardous wastes will be transported.
9. The Proponent shall provide an authorization or letter of conformation of disposal be obtained from the owner/operator of the landfill to be used for disposal of project-related wastes.

### **Aircraft Identification**

10. The Proponent shall provide the communities 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**

11. 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).
12. Territorial and federal government agencies update the Caribou Protection Map with updated data and information from the Beverly Qamanirjuaq Caribou Management Board.
13. 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.

14. The NPC should be aware of the public concerns regarding a perceived lack of protection for caribou and caribou habitat within the Kivalliq region of Nunavut. In developing a Nunavut-wide land use plan, the Commission may wish to consider formalized protection of important caribou habitat, and seasonal restrictions on potentially disruptive activities in these areas to minimize disturbance to caribou lifecycles and Inuit harvesting activities.

### **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).

### **Nunavut Water Board**

18. 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.
19. In particular, mitigation measures, conditions and monitoring requirements should be considered for the use of water, snow and ice for the development and maintenance of the winter road/trail for this project.

## Crown Indigenous and Northern Affairs Canada – Water Resources Division

20. 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 Greenridge Exploration Inc’s “Nut Lake Project”. The NIRB remains available for consultation with the Minister regarding this report as necessary.

Dated October 9, 2025 at Iqaluit, NU.



Albert Ehloak, Acting Chairperson

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

## 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](http://www.sararegistry.gc.ca)) to get the current status of a species.

Updated: September 2024

<b>Terrestrial Species at Risk<sup>2</sup></b>	<b>COSEWIC Designation</b>	<b>Schedule of SARA</b>	<b>Government Organization with Primary Management Responsibility<sup>3</sup></b>
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

<sup>2</sup> The Department of Fisheries and Oceans has responsibility for aquatic species.

<sup>3</sup> 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 PALAEOLOGICAL 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:

	<b>Types of Development</b> (See Guidelines below)	<b>Function</b> (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*<sup>4</sup> to issue such permits.

<sup>4</sup>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*<sup>5</sup>, 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*<sup>6</sup>, 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](http://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.

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<sup>5</sup> s. 51(1)

<sup>6</sup> 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.