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Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU X0B 1J0
robert.hunter@nwb-oen.ca
licensing@nwb-oen.ca

RE: Comments Response for Yath Property NWB Water Licence Application

Generation Uranium Inc. (GEN or the Company) has reviewed the comments provided by Fisheries and Oceans Canada (DFO), Environment and Climate Change Canada (ECCC) and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) regarding the Yath Property (the Project or Property) Nunavut Water Board (NWB) water licence application. The company would like to express appreciation for the time the DFO, ECCC and CIRNAC staff spent reviewing the licence application and providing their comments.

Response to Fisheries and Oceans Canada

DFO #1: Protective Measures and Standard Code of Practice

GEN will comply with DFO's protective *measures for fish and fish habitat* and all applicable standard codes of practice, including the Interim code of practice: end-of-pipe fish protection screens for small water intakes in freshwater.

DFO #2: Restricted Activity Timing Windows

GEN will ensure the restricted activity timing windows for Nunavut in-water works are reviewed and considered during Project planning.

DFO #3: End-of-Pipe Fish Protection Screens

GEN will follow the DFO's *interim code of practice for End-of-pipe fish protection screens for small water intakes in freshwater*. Design opening of the screen material will not exceed 2.54 mm.

DFO #4: Framework for Assessing the Ecological Flow Requirements

Currently GEN does not have any plans to withdraw water from any watercourses. In the event a watercourse is identified as a source for a water intake site for a camp or drillpad, GEN will ensure that water withdrawal rate remains <10% of actual (instantaneous) flow and does not result in flows <30% of mean annual discharge (MAD). E.g. small streams or watercourses during low flow events will not be used for water withdrawal.

DFO #5: Protocol for Winter Water Withdrawal

If water is withdrawn during the winter, the *2010 Protocol for Winter Water Withdrawal in the NWT* will be followed and a maximum of 10% of under-ice water volumes will be withdrawn.

DFO #6: Site-Specific Review Criteria

GEN will ensure the Project activities can follow the *measures to protect fish and fish habitat*, or a request for a site-specific review will be submitted.

DFO #7: Death of Fish

GEN does not anticipate any activities undertaken at the Project will cause death of fish, but if in the event any operation causes or is about to cause the death of fish by means other than fishing and/or the harmful alteration, disruption, or the destruction of fish habitat, the DFO will be notified.

Response to Environment and Climate Change Canada

ECCC #1: Analyzing for Non-Radiological COPCs

Substantial historical exploration of the areas indicates there are no areas outside of the mineralized zone where potential contaminants, such as heavy metals, would be of concern. Therefore, non-radioactive drill cuttings do not pose a heavy metal contamination risk. If in the future, analyses suggest high levels of metals outside the zone of mineralization, an operating procedure will be produced for disposing of the drill cuttings and protecting groundwater from contamination.

ECCC #2: Naturally Occurring Radioactive Materials

GenU has reviewed the standard operating procedure used to determine the radiological risk associated with drill cuttings and determined that naturally occurring radioactive materials (NORMs) are already accounted for. The Radiation Hazard Control Plan has been updated to reflect this.

ECCC #3: Flowing Out of Suspended Solids

All drill water is recirculated and returned downhole. Non-radioactive drill cuttings are put through a centrifuge to remove any remaining moisture. The centrifuge gives the drill cuttings a cake-like texture that rapidly hardens and becomes resistant to fluidization after deposition and sun exposure. Therefore, no suspended solids are ever deposited in the natural depression and the drill cuttings are unlikely to become fluidized.

ECCC #4: Geosynthetic Impermeable Material

See ECCC #3 for a description of non-radioactive drill cutting disposal. As the drill cuttings are virtually impermeable after deposition and sun exposure, use of a geosynthetic barrier is not required.

Response to Crown-Indigenous Relations and Northern Affairs Canada

CIRNAC #1: Contact Information for CIRNAC

The CIRNAC contact information has been reviewed and updated in all the management plans.

CIRNAC #2: Waste Storage

The proposed location of hazardous waste storage, fuel caches, camps with waste storage, and drill sites are all provided to the regulatory authorities once they are known and prior to any construction. No waste is to be generated or stored outside of those locations, which are all stated to be a minimum of 31 metres from the normal high-water mark of any waterbody. Therefore, no waste will be within 31 metres of a waterbody.

CIRNAC #3: Abandonment and Restoration Plan

As information and circumstances surrounding the Project change, management plans will be updated and submitted to the appropriate regulatory bodies. As this is a new application, all of the management plans are considered drafts pending feedback from the regulatory process. Once authorizations are granted and the plans considered finalized, any updates made after will be tracked using version numbers and summary of change tables.

CIRNAC #4: Open Burning

Open burning will be undertaken during the final camp closure at the discretion and only with the written approval of the Land Use Inspector. Open Burning will always be conducted in accordance with the requirements of the inspector's approval, and all applicable legislation and regulations, including but not limited

to the Government of Nunavut's Environmental Guideline for the Burning and Incineration of Solid Waste. Combustible waste otherwise present on the Property is incinerated regularly with the ash stored in sealed 205-L drums that are backhauled to an approved disposal facility. The Abandonment and Restoration Plan has been updated to reflect these practices and the guidelines followed when open burns are considered.

CIRNAC #5: Seasonal Shutdown

Prior to seasonal shutdown, as much waste will be removed from camp as is reasonably feasible. Any waste that is required to be stored over the shutdown period will be sealed, stored away from any nearby waterbodies (minimum 31 m from the ordinary high-water mark) and secured on flat land to prevent tipping over and discharge into the environment.

CIRNAC #6: Bioremediation – Landfarm

GEN is not seeking to construct a landfarm at this time. Bioremediation is included as a potential option in the Abandonment and Restoration Plan if it became necessary, at which point all the required authorizations would be sought.

CIRNAC #7: Helicopter Landing Area and Airplane Strip

Aircraft are equipped with Tundra tires and landed on durable surfaces with no vegetation. Therefore, no construction is undertaken to land aircraft.

CIRNAC #8: Spill Contingency Plan

Discussion with the CIRNAC staff confirmed the SDS in the plan submitted on behalf of GEN had the pages oriented properly. The appendix number in step 2 of section 6.2 has been corrected.

CIRNAC #9: Reporting Threshold Guidelines

GEN will adhere to all the reporting requirements laid out in the legislation, regulations, and permit requirements. The Spill Contingency Plan has been updated to include the reporting table. All spills within 31 m of the ordinary high-water mark will be reported, regardless of quantity.

CIRNAC #10: Property Radiation Hazard Control Plan

The Radiation Hazard Control Plan has been internally reviewed and updated. The summary of changes are described below:

- Repetitive descriptions or sections were removed so that they only occur once in the document (i.e describing Alpha particles, Beta particles, and Gamma rays, exposure factors, PPE and hygiene procedures.
- Section 12 Drilling and Handling Radioactive Drill Core and Rock Chips was removed and condensed into a subsection of Activity Based Precautions.
- Sections 7 Training, 8 Worker Responsibilities, 10 Work Site Mitigation and Personal Hygiene, and 11 Personal Protective Equipment were removed and condensed into subsections of Section 6 Radiation Safety.
- Section 9 ALARA was removed as it is repetitive.
- Subsections 5.2 Exposure limits for Nuclear Energy Workerss and 5.3 Exposure Limits for General Public were removed due to repetition.
- Personal hygiene was clarified as a preventative measure so that there is no implication of irradiated water (Subsection 6.3).
- Disposal procedure for contaminated PPE was added (Subsection 6.3).

CIRNAC #11: Possible Radiated Water from Washing

The concerns regarding radiated water from washing were addressed in the updated Radiation Hazard Control Plan. Please see the response to CIRNAC #10 for a summary list of changes to the plan. GEN also wishes to

clarify that personal hygiene is utilized as a control measure to prevent any potential build up of radiation on personnel and maintain background count levels. Therefore, radiated water is not a risk from personal hygiene. Water is no longer suggested as a method once levels reach above 100 CPS.