

COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title: Ferguson Lake, Nunavut, Environmental Baseline Studies					
Proponent: Canadian North Resources Inc.					
Location:	Kivalliq				
Comments Due By:	February 4, 2025	NIRB #: 24YN037			
Indicate your concerns about the project proposal below:					
\square no concerns		☐ traditional uses of land			
□ water quality		☐ Inuit harvesting activities			
□ terrain		□ community involvement and consultation			
□ air quality		□ local development in the area			
X wildlife and their habitat		□ tourism in the area			
☐ marine mammals and their habitat		□ human health issues			
□ birds and their habitat		□ other:			
\square fish and their habitat					
☐ heritage resources in are	a				
Please describe the con	cerns indicated abov	e:			
Nunavut Impact Review Board (NIRB) for the opportunity to provide comment on the Ferguson Lake, Nunavut, Environmental Baseline Studies project (NIRB File 24YN037). The mandate of the BQCMB is to safeguard the Beverly and Qamanirjuaq caribou herds, primarily in the interests of Indigenous peoples from Nunavut, the Northwest Territories, Saskatchewan and Manitoba who have traditionally relied upon these herds, and to advise governments and caribou range communities on conservation and management of the herds and their ranges.					
Caribou herds are conventionally named for the areas in which they calve, and Qamanirjuaq Lake, located approximately 50 km from the Ferguson Lake site, underscores the proximity of this project to a critical calving ground. We are concerned about the potential adverse impacts of the proposed baseline study activities for the Sea-Linkages Options Analysis on the Qamanirjuaq caribou herd particularly given that the project location overlaps with well-documented calving and post-calving areas, as evidenced by years of telemetry data. These areas are critical for breeding females, and disturbances during these sensitive periods can have long-term consequences for herd health and population sustainability.					
Helicopter activity during the calving and post-calving seasons poses a significant risk, as it may disrupt pregnant caribou cows and those with young calves. Additionally, the Ferguson Lake location falls directly within the Qamanirjuaq caribou herd's spring (April–June), summer (July–September), and fall (September–November) range. We note that the proposed project activities are planned from June to October, overlapping with key periods of caribou movement and habitat use. However, the absence of spatial data on study site locations limits the ability of stakeholders and rights holders to provide informed					



reviews. This information should be made available to ensure a comprehensive assessment of potential impacts.

Do you have any suggestions or recommendations for this application?

We recommend that the Proponent fully incorporate and adhere to best practices outlined in the Kivalliq Inuit Association (KIA) Mobile Caribou Protection Measures Guidelines to minimize impacts on caribou. The KIA Mobile Caribou Protection Measures are specifically designed to reduce indirect habitat loss by minimizing activities that could displace caribou from their natural range. Given the well-documented sensitivity of caribou to anthropogenic disturbances, we urge the Proponent to take a precautionary approach and implement strong protective measures to avoid further pressure on this already vulnerable herd.

We also recommend the Proponent provide spatial data regarding where the study site locations are so that we can better assess how these activities may impact Qamanirjuaq caribou.

(see next page)



Do you support the project proposal? Yes \square No X Any additional comments?

We noted that the Proponent stated that field activities will be scheduled outside the migratory period for barren-ground period however acknowledgement and consideration for calving and post-calving periods were not made. We recommend that the Proponent clearly outline in their proposal how caribou disturbance mitigation practices will be implemented during calving and post-calving periods.

In addition, while we are aware that this proposed project's intent is to undertake baseline data collection and reconnaissance for assessing transportation and logistics infrastructure options, we have deeper concerns regarding the long-term implications of potential future road developments on sensitive caribou habitat. The Beverly and Qamanirjuaq caribou herds are integral to the cultural and subsistence practices of Indigenous communities across multiple jurisdictions, and any disturbance to their critical habitat poses a significant risk to herd sustainability. The baseline study results will inform decisions on infrastructure routes, including winter and all-weather roads, as well as SeaLink facility locations, and we stress that these developments must be carefully evaluated with a strong precautionary approach. The overlap of the study area with key calving, post-calving, and seasonal movement ranges for the Qamanirjuaq herd raises much concern, particularly given the well-documented sensitivity of caribou to anthropogenic disturbances such as linear infrastructure.

The BQCMB recognizes that the Proponent has stated plans for future community engagement, including an Inuit Advisory Committee and other consultation mechanisms, however these initiatives must not serve as a justification for advancing infrastructure routes through critical caribou habitat. Engagement must be meaningful and lead to concrete measures that prioritize the protection of caribou rather than merely mitigating impacts after routes have been determined. We also remind the Proponent that there are multiple Indigenous communities throughout Nunavut, the Northwest Territories, northern Saskatchewan and northern Manitoba who rely upon this herd and who must also be consulted if potential development may impact the herd.

While we have outlined recommended measures for the baseline study as proposed to the NIRB, our broader concern remains the cumulative impacts of increased infrastructure development and associated human activities on caribou migration routes, habitat fragmentation, and overall herd health. We urge the Proponent to integrate robust caribou protection measures at every stage of project planning and decision-making, ensuring that the ecological integrity of caribou ranges remains a top priority.

Name of pe	rson commenting: Gilly Mo	Gilly McNaughton/Tina Giroux- of		
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Position:	Biologist/Executive Director	Organization:	Beverly and Qamanirjuaq Caribou	
	0 -01	_	Management Board	
Signature:	Jwa mon	Date:	February 24 2025	