

# 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:

<b>Project Proposal Title:</b>	Thelon Property					
Proponent:	Atha Energy Corp					
Location:	(Kivalliq Region)					
<b>Comments Due By:</b>	<b>January 31, 2025</b>	NIRB #:	24EN052			
Indicate your concerns about the project proposal below:						
$\square$ no concerns		traditional uses of land				
☐ water quality						
	□ terrain X community involvement and consultation					
$\square$ air quality		local development in the area				
X wildlife and their habita		tourism in the area				
$\square$ marine mammals and the		human health issues				
$\Box$ birds and their habitat		other:				
$\square$ fish and their habitat	-					
☐ heritage resources in are						
Please describe the con	cerns indicated above:					
On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), we thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comment on the ATHA Energy Corp. Thelon Property (NIRB File 24EN052). 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. Due to a technical issue with NIRB's notification system, the BQCMB was only notified of this application after the deadline and was granted an extension of 2.5 business days to submit comments. While we appreciate the NIRB granting this extension, the limited timeframe only allowed for a preliminary review, and a more comprehensive assessment would have been possible with additional time.						
We have significant concerns regarding the potential adverse impacts of the proposed project on the Beverly and Qamanirjuaq caribou herds, particularly as the project location overlaps with an area well-documented through years of telemetry data as a critical spring migration corridor leading to Beverly and Qamanirjuaq calving grounds. This western data is also supported through Inuit Qaujimajatuqangit of the herds. The spring migration is particularly sensitive for breeding females and disturbances can have long-term repercussions on herd health and population sustainability. There is also concern surrounding the proposed project's overlap and/or proximity with post-calving areas that have been documented through telemetry data to be used by both herds.						



# The BOCMB's concerns are as follows:

- 1. Potential Disturbance to Caribou Migration and Calving Grounds
  - The proposed project location falls within an area critical for spring caribou migration to their calving grounds, making it highly vulnerable to disturbances.
  - Noise, aircraft activity, and ground operations are likely to disrupt migration patterns, increasing energy expenditure for already stressed pregnant females.
  - While the Proponent stated that airborne geophysical surveys will occur, they did not provide sufficient location data on where these surveys will take place. Given the proximity to sensitive caribou habitat, this lack of detail is concerning. This information should be made available so stakeholders and rights holders can provide informed input on potential impacts.
  - Any alteration in migratory behavior may lead to long-term displacement or reduced reproductive success of caribou.

## 2. Impact on Indigenous Harvesting

- Since time immemorial Indigenous peoples have relied upon sustenance harvesting of country foods such as caribou as an integral part of their diet, culture and economy. Mineral exploration in critical caribou habitats poses significant risks to these sustenance practices. Disruptions to caribou migration and populations can lead to food insecurity and undermine the cultural and economic foundations of Indigenous communities.
- Harvesters of the Beverly and Qamanirjuaq caribou herds are predominantly Indigenous communities on or near the caribou ranges. These harvesters include Inuit, Dene, Cree and Métis peoples in Nunavut, the Northwest Territories, Saskatchewan, Manitoba, and Alberta.
- The cumulative effects of commercial activities and mineral exploration are not adequately monitored or regulated, further increasing the potential negative impacts on caribou herds and Indigenous peoples' livelihoods and well-being.

### 3. Absence of Engagement with Indigenous Communities

- While the Proponent stated that consultation visits will be conducted at least annually to discuss exploration activities with the KIA, HTO and Hamlet, there is no indication that they have engaged or consulted with these organizations or nearby communities so far. Given its proximity to Baker Lake and the significant land-based economy and subsistence culture found within Nunavut, it is concerning that this disruptive exploration activity has not yet been discussed with those who will be directly affected as well as the many other communities who rely upon the Oamanirjuag caribou herd for sustenance.
- Consultations should also take place with other communities that harvest and rely on the Qamanirjuaq caribou, including the Ghotelnene K'odtineh Dene and the Athabasca Denesuline.

# 4. History of Concern

There has been longstanding concern from communities about the impact of uranium exploration and potential mining activities on wildlife and the environment. Any impact to migration has the possibility to impact these communities in a significant way. Any alteration in migratory behavior may lead to long-term displacement subsequently



impacting communities that depend on these caribou for cultural conservation and food security.

#### 5. Cumulative Effects

In 2016, the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) assessed barren-ground caribou as a Threatened species due to severe population declines since the 1990s. Among the key factors contributing to this decline is industrial exploration and development. Increasing mineral exploration and development add to the cumulative pressures on Beverly and Qamanirjuaq caribou by disrupting habitat, altering migration patterns, and increasing overall herd vulnerability.

In addition, some of our concerns echo those expressed through the comment submission from Government of Nunavut (GN) for this project surrounding discrepancies in the Thelon Property Wildlife Mitigation Plan (WMP) and Application, particularly regarding stop-work distance buffers and caribou group-size thresholds:

#### 6. Inconsistent and Insufficient Caribou Protection Measures

- The Kivalliq Inuit Association (KIA)-Mineral and Mining Management Committee (MMMC) requires a 5 km buffer, while the Department of Crown-Indigenous Relations and Northern Affairs Canada, formerly Department of Indian Affairs and Northern Development (DIAND) Caribou Protection Measure (DIAND-CPM) stipulates work stoppage when caribou are "approaching the area of operation."
- The Proponent's WMP and Application list varying distance buffers, including a 1 km buffer for geophysical surveys and a 2 km buffer for groups of 50 or more caribou.
- The lack of consistency and clarity in these measures creates uncertainty in ensuring adequate protection for caribou. Based upon this, the BQCMB does not find their proposed measures are sufficient.

# 7. Group-Size Thresholds and Work Stoppage Protocols

- The KIA-MMMC requires different thresholds based on season and proximity to calving grounds (ranging from 10 to 50 caribou).
- The DIAND-CPM does not specify a group size but mandates stopping operations when caribou are present.
- The Proponent's plan inconsistently states that operations will cease when 50 or more caribou are within 2 km, while also committing to avoiding areas occupied by migrating or calving caribou. Given that the proposed site falls within a well-documented spring migration corridor, with activities to take place during the time of their spring migration, it is unclear how the Proponent can commit to avoiding migrating caribou.
- A clear and enforceable mitigation strategy is necessary to prevent disruption during this crucial period.

## 8. Wildlife Monitoring

It is unclear from the Caribou Protection Measures whether wildlife monitors will be providing 24-hour coverage through shifts and whether these monitors will be independent to ensure compliance.



# Do you have any suggestions or recommendations for this application?

We strongly recommend that the Proponent refrain from all exploration activities in the proposed area during the entire Qamanirjuaq caribou herd spring migration periods. We also recommend that the Proponent be required to provide detailed mitigation and monitoring plans that address critical concerns regarding the potential impacts of the Thelon Property Project on caribou. These plans should include:

- Comprehensive wildlife monitoring programs.
- Clear strategies to mitigate disturbances to caribou.
- Collaboration with local Inuit organizations to integrate Inuit Qaujimaningit into caribou protection measures.

## In addition, we recommend that:

- Meaningful consultations with local communities and Inuit organisations must occur prior to exploration activities commencing.
- Engagement occurs with Qamanirjuaq caribou range communities who may be impacted by potential effects on the herds migration and/or population.
- Location data should be provided surrounding areas where airborne surveys will take place.
- A standardized buffer distance should be established, considering the most precautionary approach for protecting migrating and calving caribou.
- The Proponent's WMP and Application should align with the most stringent mitigation measures currently in place to ensure consistent and enforceable protection.
- Independent monitoring should be conducted to ensure adherence to mitigation measures, with clear consequences for non-compliance.

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

The Kivalliq region has a long history of proposed uranium exploration and development, which has consistently raised concern, particularly over its impact on caribou and their habitat. These concerns are not new but reflect a substantiated understanding of the environmental risks associated with such projects. Further mineral exploration and development could open the door to irreversible changes in this area, disrupting critical caribou habitat and accelerating the decline of an already vulnerable herd. Given the cultural and sustenance importance of caribou for Indigenous peoples, it is critical to take a precautionary approach to any mineral exploration or commercial development in this area.

Name of per	rson commenting: Gilly M	cNaughton/Tina Gir	roux of
<b>Position:</b>	Biologist/Executive Director	Organization:	Beverly and Qamanirjuaq Caribou
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Signature:	- Twatnow	Date:	February 18, 2025