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Nunavut Impact Review Board

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RE: Comments Response for Generation Uranium Inc. Yath Property, NIRB File No. 24EN039

Generation Uranium Inc. (Generation Uranium) has reviewed the comments provided from Transport Canada (TC), the Government of Nunavut (GN), Environment and Climate Change Canada (ECCC), and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) regarding the Yath Property project proposal, NIRB File # 24EN039. Generation Uranium would like to express our appreciation for the time these agencies and individuals spent reviewing the proposed Project activities and providing their comments.

Response to Transport Canada

Generation Uranium thanks Transport Canada for their comment confirming the company's commitment to proper transportation of hazardous materials.

Response to the Government of Nunavut

Generation Uranium looks forward to working with the Government of Nunavut and is happy to address any concerns regarding the proposed Project that may arise in the future.

Response to Environment and Climate Change Canada

ECCC #1: Migratory Birds

Generation Uranium has amended their Environment and Wildlife Management Plan to include mitigation measures pertaining to migratory birds. This included mitigation measures to avoid breeding and nesting birds during the nesting season (May until mid-August) and preparing low-level flight plans to avoid areas of migratory bird concentrations during the spring, summer or fall.

ECCC #2: Species at Risk

Generation Uranium has amended the Environment and Wildlife Management Plan to include information, disturbance mitigation and monitoring measures for species at risk specific to Barren-Ground Caribou, Grizzly Bear, Harris' Sparrow, Red-necked Phalarope, Rusty Blackbird, Short-eared Owl, Transverse Lady Beetle and Wolverine. The primary mitigation measures will always be avoidance. Any sightings of the species will be recorded and included in the Annual Report submission. The information provided for each wildlife sighting will include:

- Date and time of observation
- Weather conditions
- Species
- Number observed
- Age & sex (if able to be determined)
- Physical description (size, colour, distinguishing features, etc.)
- Behavior (what the animal was doing and for how long, etc.)
- Any actions taken to avoid disturbance

Response to Crown-Indigenous Relations and Northern Affairs Canada

CIRNAC #1: Impacts to Groundwater Quantity and Quality

Generation Uranium has amended their Environment and Wildlife Management to include a section (3.3) addressing groundwater impacts. The new section 3.3 describes the potential impacts drilling may have on the quantity and quality of groundwater such as disruption of flow, contamination from spills and an increased concentration of solids and metals. The section also outlines the measures Generation Uranium will take to mitigate these impacts. These mitigation measures include the following:

- Drilling fluids will be directed into a properly constructed sump or an appropriate natural depression, at least 31 m from the ordinary high-water mark of any waterbody, where direct flow into a water body is not possible and no additional impacts are created.
- If any artesian water flow is detected, the hole will be plugged immediately and cemented in bedrock to prevent continued flow.
- Generation Uranium will ensure that the capacity of the watercourse or waterbody will be sufficient enough to allow for drilling water usage and will have no impact on lake level or flow.
- Drilling will utilize recirculation and filtration systems to minimize loss of water and drill additives.
- Nontoxic and bio-degradable drilling fluids will be used at all times wherever possible.
- All fuel and other hazardous materials located at drill sites or remote fuel caches will be stored within “Arctic Insta-Berms”, or similar products, for secondary containment. “RainDrain” or similar hydrocarbon filtration systems will be used to safely remove any water collected inside secondary containment berms, and as a safeguard against any potential overflows of contaminated water.
- All hazardous materials will be used, stored or transferred a minimum distance of 31 m from the normal high-water mark of any water body. Spill kits and firefighting equipment will be strategically located near where any hazardous materials are stored, used or transferred, including the drill sites, remote fuel caches and in the helicopter.
- All hazardous materials containers will be inspected before and after transfer and regularly during storage.

CIRNAC #2: Waste Management Plan

Generation Uranium has amended their Waste Management Plan to more clearly define non-hazardous and hazardous wastes. Hazardous waste is defined in the management plan as “a contaminant or dangerous good that is no longer used for its original purpose, and is intended for recycling, treatment, disposal or storage” (Guideline for the General Management of Hazardous

Waste, 2010). Based on this definition and feedback from CIRNAC, waste oil, radioactive drill cuttings and contaminated soils have been moved to Table 2 Hazardous Waste and are discussed in more detail as such.

CIRNAC #3: Spill Contingency Plan

Generation Uranium agrees with CIRNAC that the information within Appendix IV is substantial and not easily retrieved. However, Appendix IV is meant to be a reference read for employees to familiarize themselves with examples of the types of chemicals stored on site and the hazards they pose. In the event of an emergency, Generation Uranium does not recommend consulting Appendix IV. Instead, a dedicated collection of SDS sheets from the suppliers of the chemicals will be kept on-site. Chemicals will be grouped together based on use and an appendix will be available to improve findability. All employees are encouraged to familiarize themselves with the example chemicals in Appendix IV, however the on-site SDS collection should be used in the event of a spill or emergency.

CIRNAC #4: Potential for Positive Effects to Inuit through Employment, Training, and Contracting Opportunities

Wherever possible, local residents will be hired to assist in many aspects of the projects to utilize their skilled labour, and extensive knowledge of the land and wildlife. Positions may include wildlife and environmental monitors, camp management, cooks, core processing technicians, geo technical assistants and translators. Generation Uranium will also strive to use local and/or northern businesses whenever possible.

CIRNAC #5: Consultation with Interest Parties

In-person consultation visits will be at minimum, conducted annually, prior to the commencement of operations, to discuss the proposed exploration program, any concerns that the Kivalliq Inuit Association, Hamlets, HTO's, and community members may have and to incorporate any available Inuit Qaujimajatuqangit traditional knowledge.

CIRNAC #6: Mitigation Measures Designed to Prevent any Disturbance to Wildlife and the Environment

Generation Uranium is committed to adhering to all applicable regulatory requirements and accepted best practices to prevent, mitigate, and manage any potential environmental impacts of activities conducted at the Yath Project.

All equipment on the Project, including helicopters, fixed wing aircraft, snow machines and drill rigs will be operated in a manner that avoids the possibility of causing negative impacts to wildlife through sensory (visual and sound) disturbance as much as possible.

Disturbance mitigation measures will include, but not be limited to:

- Whenever possible, drilling activities will be planned to avoid sensitive caribou and Muskox timing windows.
- Local community members will be employed as wildlife monitors.
- A wildlife alert system will be implemented to alert personnel of the number and distance of wildlife from camp, drill sites, and mapping, prospecting or sampling areas.

- All sightings of caribou and Muskox will be reported to the Project Field Supervisor, included in the report will be the number of animals and distance from camp or work site, their approximate numbers, direction of movement and general behaviour.
- Absolutely no activities will be conducted that will interfere with caribou or Muskox cows and calves. All activities that may interfere with caribou or Muskox cows and calves will cease.
- Aircraft will always maintain a minimum altitude of 610 m (2,100 ft) above ground level except during landing, take-off or if there is a specific requirement for low-level flying (e.g. airborne surveys).
- All flights lower than 610 m above ground level (e.g. airborne surveys) will be suspended, when safe to do so, in the presence of caribou or Muskox cows and calves.
- No camp will be constructed or operated or any fuel cache established within ten (10) kilometres, or any drilling operation conducted within five (5) kilometres of any paths or crossings known to be frequented by caribou (e.g., designated caribou crossings).
- Activities will be suspended if concentrations of caribou (50 or more) approach within 2 km of drilling operations. Activities will not resume until all of the caribou have moved out of the area.
- A 1 km buffer zone will be used as a measure of a safe distance for working in areas where caribou (less than 50) are present. If caribou come within 1 km of any work site, work activities will immediately cease until the caribou have moved safely beyond the buffer zone.
- Generation Uranium will ensure that absolutely no exploration activities will cause a diversion to the migration patterns of any caribou.
- Generation Uranium will communicate with the Hamlets of Baker Lake and Rankin Inlet, the Baker Lake and Rankin Inlet HTO's and any other interested parties regarding sightings and appraised movements in the area of caribou, Muskox or any other species requested.