



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:	Thelon Property		
Proponent:	Atha Energy Corp		
Location:	(Kivalliq Region)		
Comments Due By:	January 31, 2025	NIRB #:	24EN052

Indicate your concerns about the project proposal below:

<input type="checkbox"/> no concerns	<input type="checkbox"/> traditional uses of land
<input type="checkbox"/> water quality	<input checked="" type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain	<input checked="" type="checkbox"/> community involvement and consultation
<input type="checkbox"/> air quality	<input type="checkbox"/> local development in the area
<input checked="" type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input type="checkbox"/> birds and their habitat	<input type="checkbox"/> other: _____
<input type="checkbox"/> fish and their habitat	_____
<input type="checkbox"/> heritage resources in area	_____

Please describe the concerns 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 BQCMB'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 Qamanirjuaq caribou herd for sustenance.
- Consultations should also take place with other communities that harvest and rely on the Qamanirjuaq caribou, including the Ghotelnene K'odtjeh 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

