



# **Wildlife Management Plan**

Thelon Project  
ATHA Energy Corp.  
February 2025

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# 1.0 Introduction

This Wildlife Management Plan (Plan) applies to the Thelon Property (the Property or the Project) operated by ATHA Energy Corp. (ATHA) (through its subsidiary, ATHA Energy (NU) Corp. (ATHA NU)). This Plan shall be in effect from date of issue of applicable land use license(s) until the expiry of such licenses. The purpose of this plan is to outline expectations for employees and contractors for operating in an environmentally responsible manner.

All employees and contractors working on the Property are to be aware of and follow this Plan. A copy of this Plan is to be posted in an office on the Project, once established. In addition, this Plan is available digitally on ATHA's internal network. Contact the Project Manager for a copy of this Plan.

ATHA is committed to:

- Ensuring all personnel and contractors adhere to ATHA's environmental policies, programs, and procedures.
- Minimizing the risks to the health and safety of all employees.
- Complying with all applicable legislation and regulations.
- Assessing and mitigating potentially adverse environmental impacts.
- Advancing the project in an environmentally and socially responsible manner, that includes community consultations.
- Cooperating with relevant regulatory bodies and governments on all aspects of environmental protection, and policy.
- Reviewing relevant plans, licenses, and permits with employees and contractors when onboarded, and copies of the relevant documents will be available at the Project site office for reference.

ATHA acknowledges the potential impact to wildlife and wildlife habitat while undertaking exploration. Displacement, habituation, and disruption to wildlife are all potential impacts. ATHA also recognizes the importance of caribou and their habitat within the Project area. Accordingly, ATHA will work to avoid or minimize potential impacts on caribou as well as other wildlife and wildlife habitat through the implementation of this Plan.

This Plan is to be used in conjunction with other ATHA work procedures and management plans including the:

- Abandonment and Restoration Plan
- Spill Contingency Plan
- Waste Management Plan
- Radiation Hazard Control Plan

## 2.0 Training

Every person arriving at the Property is to attend an orientation, which includes information on health, safety, and environmental responsibilities and stewardship. This orientation is to be done upon first arrival on the Property, and annually thereafter. This orientation is to include training on relevant internal policies, management plans, and standard operating procedures and made familiar with the terms and conditions of the Project's licences and permits.

In addition, employees and contractors working at the Project are to receive wildlife interaction training which will include bear safety. In addition, bear safety information and material is to be available in a binder on site including the Government of Nunavut published manual *Bear Safety-Reducing Bear-People Conflicts in Nunavut*.

## 3.0 Potential Impacts & Wildlife Management

### 3.1 Potential Impacts to Wildlife

Exploration programs have the potential to impact wildlife and wildlife habitat. This Plan works to mitigate potential impacts to wildlife, including those of special concern listed in Table 1 below.

*Table 1: Terrestrial Species at Risk*

Terrestrial Species at Risk	Scientific Name	COSEWIC Designation	SARA Status
Caribou (Barren-ground population)	Rangifer tarandus	Threatened (2016)	
Grizzly Bear (Western population)	Ursus arctos	Special Concern (2012)	Special Concern (2018)
Harris's Sparrow	Zonotrichia querula	Special Concern (2017)	Special Concern (2023)
Red-necked Phalarope	Phalaropus lobatus	Special Concern (2014)	Special Concern (2019)
Rusty Blackbird	Euphagus carolinus	Special Concern (2017)	Special Concern (2009)
Short-eared Owl	Asio flammeus	Threatened (2021)	Special Concern (2012)
Transverse Lady Beetle	Coccinella transversoguttata	Special Concern (2016)	Special Concern (2021)
Wolverine	Gulo gulo	Special Concern (2014)	Special Concern (2018)

Potential impacts to wildlife and wildlife habitat include displacement from and avoidance of wildlife habitat, habituation and attraction of wildlife, and unintentional interactions and disturbance. Mitigation measures specific to these areas of potential impact are outlined below.

### 3.1.1 Attracting Wildlife

Every effort is to be made to ensure that wildlife is not attracted or encouraged to linger at the project. This includes:

- Material handling practices – petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) can attract wildlife. These materials, whenever possible, are to be stored in such a way that makes them inaccessible to wildlife.
- Waste handling practices – All garbage must be sorted, with food waste stored such that it is not accessible to wildlife. Food wastes are to be incinerated daily to limit odours which could attract wildlife.
- Feeding wildlife is prohibited – all personnel, contractors or consultants are forbidden to feed wildlife.
- Keep lunches out of reach – Field crews and drill crews are to store lunches so that they are not accessible to wildlife. All food wastes, wrappers, drink containers are to be brought back to camp for disposal, recycling and/or cleaning.
- Keep work areas clean and tidy – Field crews and drill crews are to keep the work areas free of litter and garbage. No food or beverage is to be dumped out or left behind, this includes contents of thermoses.

Refer to ATHA's *Waste Management Plan* for more information on waste management.

### 3.1.2 Habitat Disturbance

Activities planned for the Project are considered to be low impact and are predicted to have no to very little effect on vegetation and soil. Potential impacts to vegetation and soil on the Property include disturbance due to camp and exploration activities, which are temporary in nature.

Progressive reclamation is to be practiced at the site, meaning that before an exploration program is considered complete, every effort is to be made to reclaim and restore the area to its original state. Refer to the ATHA *Abandonment and Restoration Plan* for more details.

Soil quality can be impacted by material spills and waste discharge. Refer to the *Spill Contingency Plan* for mitigation measure regarding spills.

### 3.1.3 Unintentional Interactions and Disturbances

The potential exists for unintentional wildlife interactions and disturbances despite best efforts of avoidance. Every effort is to be made to avoid nest and den sites. However, should a field crew happen upon nests or dens, the coordinates are to be recorded, and the crew is to immediately vacate the area. These areas are to be avoided until they are no longer being inhabited and will be reported to the Government of Nunavut and the Kivalliq Inuit Association (KIA). All unintentional disturbances, no matter what the nature, are to be reported to the Project Manager for further reporting to the appropriate regulators and are to be documented in the annual report.

## 3.2 Wildlife Mitigation Measures

### 3.2.1 General

The following general wildlife mitigation measures apply to all species.

- Approaching and feeding wildlife is prohibited.
- Harassment and disturbance of wildlife is prohibited.
- If wildlife is encountered, every effort is to be made to stay out of sight of wildlife or redirect travel away from wildlife where possible, to avoid impact to the wildlife.
- All incidental sightings of wildlife must be reported to the Project Manager and documented using ATHA's Wildlife Incidental Observation Form.
- Registered firearms are to only be carried to ensure the safety of personnel on the Property.
- Firearms on site are required to be properly registered and stored in accordance with applicable legislation.
- All personnel handling a firearm must have a valid firearms licence and be approved by the Project Manager.
- Hunting by all employees and contractors is strictly prohibited.
- All firearm discharges must be reported immediately to the Project Manager. The use of firearms against dangerous wildlife is considered a last resort.

### 3.2.2 Airborne Work

To minimize disturbance to wildlife, the first flight of the day is to be used as an observation flight to determine the presence and movement of wildlife which will inform any avoidance or mitigation measures required.

Aircraft are to maintain an altitude >300-meter during flight except during geophysical surveys, slinging operations, inclement weather, or during an emergency. Slinging is not to be carried out when caribou are present.

In areas where wildlife is observed, flight elevations are to be a minimum altitude of 610 meters and pilots are to be instructed not to fly over wildlife in a way to cause them to change behavior, run or flee at any time, within or outside of migration, unless it is an immediate safety risk.

No landings, other than emergency landings, are allowed in areas where there are migrating caribou, caribou cows and/or calves and/or muskox nurse groups present. Flight paths are to be such that they avoid caribou calving grounds on their way to and from the project area.

Prior to conducting any low-level airborne geophysical surveys, work plans outlining the dates, locations and duration of the surveys are sent to the KIA and CIRNAC. If caribou and/or muskox are seen in the area, the geophysical survey is not to be flown until they have moved at least one kilometer from the area to be surveyed.

### 3.2.3 Caribou

ATHA recognizes both the importance and sensitivity of caribou in the region and is committed to preventing and minimizing potential impacts. Minimizing disturbance of caribou is to be done by following this Plan and adhering to all terms and conditions of licenses and permits, including following the KIA's Mobile Caribou Monitoring Measures on both Crown Lands and Inuit Owned Lands. ATHA also seeks the advice of local hunter and trapper organizations and others on wildlife protective measures, including for caribou. The following table summarizes the timings, distances, and group size thresholds for any work stoppages due to caribou that may occur on the Project.

*Table 2: Caribou Work Stoppage Summary*

Date	Number of Caribou	Distance From Active Work Site	Mitigation Measure
June 1 – July 15	10	5	Stop Work
July 16 – September 30	25	5	Stop Work
October 1 – April 15	50	2.5	Operation reduction
April 16 – May 31	25	5	Stop Work
May 15 – September 30	50 – moving towards water crossing	5	Stop Work

### 3.2.4 Muskox

Muskox might be observed on the Property area during activities. Muskox may be in a weakened condition by late winter and vulnerable, especially breeding adults and young animals. Staff is not to approach or interact with muskox herds so as to avoid herd dispersion and displacement from calving areas, which could have negative effects on muskox breeding. The critical time to avoid male muskox is during the breeding season (August to September).

The Government of Nunavut (GN) recommends that field workers not approach muskox closer than 200 metres during the calving season (April to June). Similar to the Caribou Protection Measures, ATHA's work programs are to also cease the use of ground equipment/vehicles (drills, snowmobiles and ATVs) and aircraft overflights at altitudes less than 610 meters when muskox, especially when cows and calves approach operations.

### 3.2.5 Bear and Other Carnivores

If bears are present in the area, work is to cease until the bears have moved out of the area. All human-bear interactions or incidents are to be reported to the KIA and to the GN Wildlife Biologist as soon as practicable.

Known carnivore dens are to be avoided. Any new dens discovered are to be avoided and reported to the regional wildlife biologist and the KIA.

If a den site is discovered, the GPS coordinates are to be recorded so that the site can be avoided. These coordinates are to be provided to the appropriate regulatory authorities. No dens are to be disturbed.

Any exploration activities within the den buffers stated below will cease immediately. The following buffers are provided (by the Government of the Northwest Territories) for active dens, between the den and all exploration activities between May 1 and July 15:

- Wolves: 800 m buffer
- Grizzly Bear: 300 m buffer
- Wolverine: 2 km buffer
- Fox: 150 m buffer

### 3.2.6 Breeding and Nesting Birds

No eggs or nests are to be disturbed by any activities. If any employee or contractor comes across any active nests, they are to cease all activities immediately to ensure that the nest is not disturbed. Coordinates are to be recorded on the wildlife incidental observation log and these coordinates are to be reported to Environment Canada. Moving or disturbing the nest of a migratory bird is in contravention of *the Migratory Birds Convention Act*.

The peregrine falcon has been identified as a species of Special Concern by COSEWIC. If any nests are found, a buffer will be maintained. A 1.5-kilometer buffer is recommended for the peregrine falcon. Any nests discovered will be recorded on the wildlife incidental observation log and the GPS coordinates provided to the applicable regulatory authorities and interested parties.

Environment and Climate Change Canada (ECCC) has management responsibilities for migratory birds. ECCC will be contacted for guidance as required, and in instances involving mortalities or interactions with individuals, nests or eggs of the bird species listed in Table 1.

### 3.2.7 Aquatic Life

The following practices are in place to ensure aquatic life will be protected on the Property:

- Working in and around waterbodies is to be done in such a way that prevents disturbance to aquatic life and habitat.
- Waterlines are to be properly placed and screened in accordance with the *Freshwater Intake End-of-Pipe Screen Guideline* (DFO).
- No wastes are to enter any waterbodies. This includes any discharge from any exploration camp.
- All sumps, fuel caches and camps are to be located at least 31 metres from the high-water mark of any water body unless otherwise approved by the appropriate regulatory authority.
- Fishing is allowed only with a valid Nunavut fishing license during non-work hours.



The Property does not occur in or near any aquatic species at risk or their critical habitat according to the *Aquatic Species at Risk Maps* provided by the Department of Fisheries and Oceans.

### 3.2.8 Wildlife Monitoring

During all on-the-ground exploration activities, a Wildlife Monitor is to be employed. The Wildlife Monitor is responsible for advising the Project Manager regarding caribou sightings within distances set out within the KIA Mobile Caribou Measure Guidelines such that activities can be halted accordingly. In addition, as the dedicated position on site with a firearm, the Wildlife Monitor will support with safety related to bears and other wildlife.

All personnel on site, including the Wildlife Monitor, are to report wildlife sightings to the Project Manager or their designate, and the sighting is to be recorded using ATHA Wildlife Incidental Observation Form. This information is to be compiled and submitted to regulators in the annual report.

## 4.0 Archeological Sites

Prior to any ground disturbance, a desktop review of the area is to be completed by a Professional Archaeologist who will identify if any further work, including an on-the-ground survey, is required. If any archeological sites are identified through the Archaeologist's work or otherwise, site coordinates are to be recorded and reported (see below for reporting instructions). The site is to be designated off-limits to all workers and disturbance prohibited. Locations of archeological sites are not permitted to be made public by ATHA (i.e. through a community presentation).

ATHA shall assist communities and government(s) in identifying and protecting archaeological sites and carving-stone sites. Any archeological sites identified are to be reported to the Chief Archaeologist at the Department of Culture and Heritage, the CIRNAC Land Administrator and the KIA.

## 5.0 Contacts

Bear incidents or interactions, wolf or fox den sightings, and large heard sightings are to be reported as soon as practicable to:

Name	Position	Phone Number
Daniel Kaludjak	Wildlife Officer II, Government of Nunavut	867-645-8084
Johanne Coutu-Autut	Conservation Officer II, Government of Nunavut	867-645-8083
	Baker Lake Hunter and Trappers Organization	867-793-2520
Luis Manzo	Director of Lands, Kivalliq Inuit Association	867-645-5731

# **Appendix A: Kivalliq Inuit Association Mobile Mitigation Measures for Caribou**

## APPENDIX A.

Schedule B is part of <https://www.kivalliqinuit.ca/wp-content/uploads/2022/02/KIA-Land-Use-License-Terms-Conditions.pdf>

### Schedule “B”

#### MOBILE CONSERVATION MEASURES GUIDELINES

### Introduction

The Tenant shall comply with the measures set out herein. The Tenant shall immediately report to the Landlord any deviation from these measures, including the reason for the deviation.

The Landlord reserves the right, based on the presence of caribou within the area of the Land in any year, to vary the dates set out herein and shall provide notice to the Tenant of any such variation.

### Wildlife Monitoring Personnel

The Tenant shall have wildlife monitoring personnel present at the Property during any season when caribou are reasonably expected to be present. The names of such personnel shall be sent to the Landlord and they shall maintain communication at all reasonable times. The Tenant shall monitor and immediately report the presence of caribou to the Landlord in accordance with the following directives. The report shall specify the location and estimated numbers.

### A. IOL within designated calving grounds

**Section 1.** On IOL within designated calving grounds (as designated by the Government of Nunavut) between May 1<sup>st</sup> and July 31<sup>st</sup> (the closure period):

- 1) No activities shall occur except as authorized by the Landlord.

**Section 2.** On IOL within designated calving grounds between August 1<sup>st</sup> and September 30<sup>th</sup>, the Tenant shall conduct monitoring and mitigation as follows:

- 2i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within the thirty (30) km early warning zone from the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).

2ii) If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the Property boundary, then the Tenant shall monitor within a five (5) km buffer zone around the Property on a daily basis, and shall immediately suspend work that has the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone.

**Section 3.** On IOL within designated calving grounds between October 1<sup>st</sup> and April 15<sup>th</sup>, the Tenant shall conduct monitoring and mitigation as follows:

- (3i) If collar data or observations indicate that there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).
- (3ii) If monitoring indicates that there are fifty (50) or more caribou within two and a half (2.5) km of the Property, then the Tenant shall immediately reduce above-ground activities that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), until caribou numbers are below the threshold within the buffer zone.

**Section 4.** On IOL within designated calving grounds between April 16<sup>th</sup> and April 30<sup>th</sup>, the Tenant shall conduct monitoring and mitigation as follows:

(4i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou within fifty (50) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(4ii) If monitoring indicates that there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations, and camp closure, until caribou numbers are below the threshold within the buffer zone.

## B. IOL within other seasonal caribou ranges

**Section 5.** On IOL between June 1<sup>st</sup> and July 15<sup>th</sup> outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(5i) If collar data or observations indicate that there are one (1) or more collared caribou or ten (10) or more caribou observed within the fifty (50) km early warning zone for the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land, road surveys, snow track counts (if appropriate), remote camera surveys).

(5ii) If monitoring indicates that there are an estimated ten (10) or more caribou within the five (5) km buffer zone for the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure until caribou numbers are below the threshold within the buffer zone.

**Section 6.** On IOL between July 16<sup>th</sup> and September 30<sup>th</sup> outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(6i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within thirty (30) km of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(6ii) If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the boundary of the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities, non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), and camp closure until caribou numbers are below the threshold within the buffer zone.

**Section 7.** On IOL between October 1<sup>st</sup> and April 15<sup>th</sup> outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(7i) If collar data or observations indicate that there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).

(7ii) If monitoring indicates that there are fifty (50) or more caribou within 2.5 km of the boundary of the Property, then the Tenant shall immediately reduce aboveground operations that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for

emergency purposes), and suspension of above ground operations, until caribou numbers are below the threshold within the buffer zone.

**Section 8.** On IOL between April 16<sup>th</sup> and May 31<sup>st</sup>, the Tenant shall conduct monitoring and mitigation as follows:

(8i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within fifty (50) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(8ii) If monitoring indicates that there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the Property, then then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone.

## C. Freshwater crossings

**Section 9.** On IOL between May 15<sup>th</sup> and September 30<sup>th</sup>, the Tenant will not construct camps or other permanent structures or conduct blasting within ten (10) km of designated caribou freshwater water crossings. Exploration activities will not be permitted within five (5) km of water-crossings between May 15<sup>th</sup> and September 30<sup>th</sup>. Between May 15<sup>th</sup> and September 30<sup>th</sup>, the Tenant shall conduct monitoring and mitigation as follows:

(9i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within twenty-five (25) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone around the water crossing shall be conducted every second day (e.g., height of land surveys, remote camera surveys).

(9ii) If monitoring indicates that there are fifty (50) or more caribou within five (5) km of the boundary of the Property that appear to be moving in the direction of the water crossing, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations,

camp closure, and removal of all non-essential personnel, until caribou numbers are below the threshold within the buffer zone.

## D. Aircraft

**Section 10.** The Tenant shall ensure that aircraft (fixed-wing and helicopter) flights over occupied calving and post-calving areas shall be at least 610 m above ground level and avoid areas of known caribou concentrations (subject to pilot discretion regarding aircraft and human safety). In other seasons aircraft shall be at least 300 m above ground level.