



## 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> Ferguson Lake, Nunavut, Environmental Baseline Studies	
<b>Proponent:</b> Canadian North Resources Inc.	
<b>Location:</b> Kivalliq	
<b>Comments Due By:</b> February 4, 2025	<b>NIRB #:</b> 24YN037

**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 type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain	<input 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 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.

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