



<b>GN # 01</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Setback Distances to Protect Caribou
<b>References</b>	<ul style="list-style-type: none"> <li>• Blue Star Gold Corp. Revised NIRB Application for Screening #12636 Blue Star Gold Corp. (November 2025).</li> <li>• Blue Star Gold Corp. Wildlife Protection Plan – Ulu Gold Project (including Hood River, Roma and other licensed projects) (March 2024).</li> </ul>
<b>IDENTIFICATION OF ISSUE</b>	
<p>Blue Star Gold Corp.’s (Proponent) Wildlife Protection Plan (Wildlife Plan) outlines caribou protection measures, including setback distances for the Blue Star Gold Corp. Project (Project). The Government of Nunavut (GN) has identified inconsistencies and potential operational gaps in how these setback distances are defined.</p> <p>These issues create uncertainty in how caribou mitigation measures are to be applied and may lead to confusion among project personnel or non-compliance with the Wildlife Plan. This lack of clarity also constrains the GN’s ability to effectively assess the Project’s potential impacts on caribou.</p>	
<b>IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE</b>	
<p>In the Wildlife Plan, the Proponent states that,</p> <p>“...[i]f caribou cows and calves, muskoxen groups or other wildlife aggregations are observed foraging or migrating within a work area as crews approach, avoid the work area until the animals have moved a minimum distance of 300 m from the site...” (Page 17)</p> <p>And;</p> <p>“...[s]hould work be undertaken during the calving season (May 15 to July 15), the following measures will be implemented: ...</p> <ul style="list-style-type: none"> <li>• <i>If a group of 50 or more caribou are observed within 1 km of project operations or camp at any time all activities within 1 km will be suspended including low-level over flights, drilling, blasting/trenching, and use of snow mobiles, all-terrain vehicle and light and heavy trucks outside the <b>immediate vicinity</b> of the work area, until caribou are no longer in the immediate area;</i></li> <li>• <i>If a cow and calf are observed within 1 km of Project Activities:</i></li> </ul>	

- *Activities within 1 km will be suspended or relocated until the Wildlife Monitor deems that the observed animals have moved 2 km away from the area;*
- *Helicopters will be grounded, and personnel will remain in the camp until caribou **are no longer in the immediate area**; ...” (Pages 25 & 26)*

**Emphasis added**

The Proponent provides similar protection measures for caribou for all other caribou seasons, for example:

*“...if a group of 50 or more caribou are observed within 1 km of Project Activities at any time all activities within 1 km will be suspended including low-level over flights, until caribou **are no longer in the immediate area**..*

*Should caribou migration occur **in the vicinity** of Project Activities, caribou will be given the right of way, and activities modified if needed to confirm that migration is neither blocked nor diverted.” (Page 26)*

**Emphasis added**

Finally, Table 4 of the Wildlife Plan provides specific vertical and horizontal setbacks for aircraft to maintain, which vary based on the season and caribou group size.

Season	Number of Caribou	Avoidance Distance
Early Summer (June 5 to July 31)	Group > 250	610 m vertical 4 km horizontal
Early Summer (June 5 to July 31)	Group > 50	610 m vertical 2 km horizontal
All other seasons (August 1 to June 4)	Group > 50	300 m vertical 1 km horizontal

(Page 27)

However, the GN notes several inconsistencies and potential operational gaps within the Wildlife Plan. These include:

1. The use of undefined terms (*“immediate area”* and *“immediate vicinity”*) that are not clearly tied to the 1 km or 2 km triggers. This creates uncertainty about when suspensions can be lifted.
2. Inconsistent/duplicated information in Table 4 (e.g., “Early Summer” is duplicated; 4 km versus 2 km horizontal set back distances).
3. Missing information in Table 4 (i.e., calving season).
4. Absence of horizontal and ground-based setbacks for non-aircraft activities, represented in a table, despite their critical operational relevance to wildlife monitors.
5. Setback distances and group size information are scattered across multiple sections of the Wildlife Plan, appearing in both narrative text and tables, instead of being presented in a single, consolidated summary table.

**REQUEST(S)/RECOMMENDATION(S)**

The GN requests that the Proponent revise their Wildlife Plan to:

1. Consolidate all caribou-related group sizes and setback distances, including those for aircraft, ground-based activities, airstrip procedures, and cow-calf specific measures, into an expanded version of Table 4, ensuring internal consistency and ease of use for Project personnel.
2. Align narrative mitigation measures with the setback distances presented in tables, ensuring that all mitigation thresholds are clearly and explicitly captured within a single comprehensive table.
3. Remove the terms “immediate area” and “immediate vicinity” and replace them with clearly defined distance thresholds.

<b>GN # 02</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Spill Response
<b>References</b>	<ul style="list-style-type: none"> <li>• Blue Star Gold Corp. Spill Response Plan – Ulu Gold Project (including Hood River, Roma and other licensed projects). (March 2024)</li> <li>• Environmental Protection Act Spill Contingency Planning and Reporting Regulations, R-068-93.</li> </ul>
<b>IDENTIFICATION OF ISSUE</b>	
<p>The GN has identified two minor issues regarding the Proponent’s Spill Response Plan (Spill Plan). Addressing these items will help strengthen the Spill Plan’s alignment with applicable legislation and regulations and enhance overall Project transparency.</p>	
<b>IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE</b>	
<p>The two minor issues and their justification for identifying these issues include the following:</p> <ol style="list-style-type: none"> <li>1. In section 3.2 of the Spill Plan, the Proponent states that, <ul style="list-style-type: none"> <li>“...[the proponent will] inspect material storage areas weekly or in accordance with permit and licence requirements, for capacity, ventilation, stability, organization, cleanliness and leak detection...”. (Page 11)</li> </ul> <p>However, the GN notes that there is no clear reporting/documentation mechanism for inspections described in the Spill Plan.</p> </li> <li>2. The SRP states that, <ul style="list-style-type: none"> <li>“...the Plan will be reviewed annually by the Project Manager and updated as needed. When material changes occur, the updated document will be provided to the Nunavut Water Board...” (Page 7)</li> </ul> <p>This aligns with Section 7(1) Spill Contingency Planning and Reporting Regulations, R-068-93, under the <i>Environmental Protection Act</i>, which requires that spill contingency plans be reviewed annually. However, the GN notes that while the Proponent includes a ‘Revision History’ table,</p> </li> </ol>	

there is no evidence provided to suggest a review of the Spill Plan has occurred since November 2023. Additionally, the date of the provided Spill Plan is March 2024.

**REQUEST(S)/RECOMMENDATION(S)**

The GN recommends that the Proponent:

1. Document material storage area inspections.
2. Confirm whether the Spill Plan was reviewed and updated (if applicable) annually since November 2023.

<b>GN # 03</b>	
<b>Department</b>	Culture and Heritage
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Archaeology
<b>References</b>	NIRB 126236/19EA019: Notice of Screening and Comment Request
<b>CONCERNS</b>	
<p><b><i>Project Summary</i></b></p> <p>The Proponent is requesting an amendment to existing authorizations for the Roma Project to allow exploration activities currently approved on existing mineral claims to be extended to three newly acquired mineral claims: 103030 (BAM01), 103529 (HIGH01), and 105216 (CYGNET_EXT). Proposed activities include general mineral exploration, diamond drilling, ground geophysical surveys, establishment and operation of temporary remote exploration camps, aviation support, and potential overland winter access. The amendment forms part of an existing, multi-year mineral exploration program, and Project components and areas of ground disturbance may be modified, expanded, or relocated over time.</p> <p>The Government of Nunavut (GN) acknowledges that archaeological assessments have been conducted historically for specific components of the Roma Project footprint under permits issued by the Department of Culture and Heritage (CH). However, based on a review of the current amendment application, GN notes that those prior assessments were component-specific and do not appear to extend to the three newly acquired mineral claims now proposed to be incorporated into the Project.</p> <p>A review of the Nunavut Archaeological Sites Database indicates that a substantial number of archaeological sites have been previously recorded within portions of the broader regional landscape. The absence of recorded sites within specific portions of the Project area, particularly where archaeological assessment has not been conducted, does not preclude the presence of undocumented archaeological resources.</p> <p>Based on landscape-level considerations, including proximity to shorelines and coastal margins along Coronation Gulf and Bathurst Inlet, the presence of raised beach features and former shorelines, eskers, lakes, rivers, ridges, and established and potential travel corridors, and in light of the absence of confirmed prior archaeological assessment for the newly proposed claims, GN considers that there are reasonable grounds to believe that there could be sites of archaeological significance on the lands affected by the proposed amendment, pursuant to Article 33.5.12 of the <i>Nunavut Agreement</i>.</p> <p><b><i>Project-Specific Concerns</i></b></p> <p>GN notes that the proposed amendment includes activities involving terrestrial ground disturbance, which constitute potential impacts to archaeological resources. Activities requiring archaeological assessment include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• drill site preparation, drilling pads, sumps, and associated staging or laydown areas;</li> </ul>	

- trenching, stripping, grubbing, sampling, or other surface or subsurface disturbance;
- establishment, expansion, and operation of temporary exploration camps, fuel caches, laydown areas, and other Project infrastructure;
- construction, development, or use of access routes or trails, including overland winter access;
- borrow areas, material sources, or any use of eskers, ridges, raised beach features, or other raised landforms;
- off-strip fixed-wing aircraft landings on unprepared natural terrain; and
- helicopter landing areas that are planned, identified, or intended for use in support of Project activities.

Any ground disturbance occurring outside areas that have been cleared for disturbance through an archaeological impact assessment conducted under a permit issued by CH constitutes a potential impact to archaeological resources.

## RECOMMENDATIONS

GN recommends that the Nunavut Impact Review Board include the following project-specific Terms and Conditions in the Screening Decision Report to ensure compliance with the *Nunavut Act* and the *Nunavut Archaeological and Palaeontological Sites Regulations*.

### 1) Requirement for Archaeological Assessment (Proponent responsibility)

The Proponent shall retain a qualified archaeologist eligible to hold a Class 2 Nunavut Archaeologist Permit to conduct an archaeological impact assessment of all Project activities involving ground disturbance.

- Archaeological assessment shall be completed prior to the commencement of ground disturbance in the affected areas and under conditions that provide sufficient surface visibility for CH to accept the area for proposed disturbance.
- The Proponent shall implement the recommendations of the qualified archaeologist, including avoidance, buffering, and/or mitigation measures, as applicable.

### 2) Adaptive Management for Mineral Exploration

Where Project components are modified, expanded, or relocated in subsequent field seasons, the Proponent shall ensure that archaeological assessment and permitting are completed prior to ground disturbance in any newly affected areas.

### 3) Aviation

- Off-strip fixed-wing aircraft landings on unprepared natural terrain shall not occur unless the landing areas have been archaeologically assessed prior to use.
- Helicopter landing areas that are planned, identified, or intended for repeated use in support of Project activities shall be archaeologically assessed prior to use.
- Opportunistic, single-use helicopter landings supporting foot traffic only may proceed only where no ground disturbance occurs.

### 4) Standard Protective Measures

- **Site protection:** All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. No Project activities shall occur within 50 metres of any known or suspected heritage site. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed during the course of Project activities.

- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the 50 metre buffer area. The site shall be documented (including coordinates, description, and photographs) and reported to CH, and work shall not resume within the buffer area until direction is provided by CH.
- **General protections:** No alteration, disturbance, artifact removal, littering, or defacement of archaeological sites is permitted. No collection or disturbance shall occur unless authorized through the appropriate permitting process. The Proponent shall ensure that all staff and contractors are informed of these legal obligations. The construction of inuksuit is not supported.

#### ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *Nunavut Archaeological and Palaeontological Sites Regulations* provide for the protection, care, and preservation of archaeological and palaeontological resources. The Department of Culture and Heritage (GN-CH) is the Designated Agency responsible for the administration of the archaeological and palaeontological permitting system, in close coordination with Inuit land claim partners, including the Inuit Heritage Trust (IHT), which serves as the Designated Organization under Article 33 of the *Nunavut Agreement*. All archaeological and palaeontological sites in Nunavut are protected by law. It is illegal to search for, survey, excavate, alter, or otherwise disturb any archaeological or palaeontological site without a valid permit issued by the Government of Nunavut.