

February 19, 2026

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Re: response to comments received (NIRB:19EA019 application 126236; NPC: 150893)

Dear Francis,

On February 3, 2026 comments were received through the public registry pertaining to our application to amend the Kitikmeot Inuit Association (KIA) Class III Licence KTL311C013 and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Land Use Permit (LUP) N2022C0006 to include three recently staked mineral claims in the Kitikmeot Region. The Company thanks the commentors providing detailed reviews and recommendations. Blue Star Gold Corp has addressed the comments below.

As the Project Management Plans are currently undergoing annual review and revision, Blue Star will incorporate the recommendations provided by the commentors and the revised plans will be submitted with the Annual Reports.

Response to Transport Canada (TC)

Blue Star will ensure that the water intake source locations and activities comply with the Canadian Navigable Waters Act and associated Regulations and Orders. The appropriate applications and notices will be submitted as required for any work done on known or suspected navigable waters. The Company will review its management plans and operating procedures to ensure the recommended measures are properly incorporated into our working documents.

Response to Department of Fisheries and Oceans (DFO)

Blue Star will ensure project staff review and follow DFO’s protective measures for fish and fish habitat and standard codes of practice to ensure operations at the Project do not cause death of fish or harmful alteration, disruption or destruction of fish habitat.

Response to Government of Nunavut (GN)

GN #1: Setback Distances to Protect Caribou

The GN requested clarification and structural improvements to strengthen the caribou-related mitigation measures in the Company’s Wildlife Protection Plan (WPP). Blue Star will incorporate all GN recommendations into the revised WPP including:

- Consolidation of all caribou-related group size thresholds and activity suspension distances into a single, clearly structured section;
- Alignment of narrative descriptions with tabulated mitigation thresholds to ensure internal consistency and eliminate ambiguity; and
- Replacement of qualitative descriptors such as “immediate area” and “immediate vicinity” with clearly defined, quantitative suspension-of-activities distance thresholds measured from the active work site or camp.

These revisions will improve clarity, enforceability, and regulatory alignment of the caribou mitigation framework.

An updated version of Table 4 of the WPP is included below and reflects the clarified caribou-specific setback distances and activity suspension distance thresholds.

Table 4. List of caribou-specific avoidance measures.

	Season	Number of Caribou	Vertical Avoidance	Horizontal Avoidance
All Activities	Calving Season (May 15 - July 15)	1	610 m	1 km
		≥50	610 m	2 km
		≥250	610 m	4 km
	All other seasons (July 16 – May 14)	≥50	610 m	1 km
		≥250	610 m	2 km
	All Seasons	Pregnant Cow		1 km
Calf			1 km	2 km

"... [s]hould work be undertaken during the calving season (May 15 to July 15), the following measures will be implemented: ...

and

*"... 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 within **1 km of Project Activities**;*

*Should caribou migration occur **within 2km 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)*

GN #2: Spill Response

The Spill Response Plan (SRP), will be amended to incorporate the recommendations of the GN, including the establishment of clear standards for inspection documentation reporting procedures, and record retention requirements related to material storage inspections. These commitments will be reflected in the revised SRP currently in development and will be submitted with the 2025 annual reports.

The SRP is reviewed and updated annually, as required. The plan underwent reviews in 2024 and 2025, no changes were necessary during those reviews. However, the title page and amendments table were not appropriately updated, this has been corrected during these current reviews.

GN #3: Archaeology

The GN provides a number of concerns and recommendations that are all addressed within our field level standard operating procedures. Co-ordination of these activities is through an accepted consulting Archeologist, which includes a pre-field desktop study and then a field survey prior to any planned activities that could cause disturbance. Nunavut Culture and Heritage is important to our team and is presented as a key element in our on-boarding site orientations.

All prior work programs that included potential disturbance activities have been screened initially by desktop study and then by field survey and cleared for the proposed exploration activities. As new exploration areas are advanced the same process of an initial desktop study followed by a field survey are followed. Any known archaeological sites, identified through desktop studies or field surveys will be avoided using protective setbacks recommended by the archaeologist and in accordance with direction from the Department of Culture and Heritage. If previously

undocumented archaeological sites are identified during planned surveys, they are properly documented and reported by the consulting archeologist. Sites encountered incidentally during exploration activities, work in the immediate area will cease, a 30 m buffer zone will be established, and the consulting Archeologist will be notified. No artifacts or materials will be removed or disturbed at any archaeological or paleontological site.

Response to Beverly and Qamanirjuaq Caribou Management Board (BQCMB)

We appreciate the Board's mandate and long-standing role in safeguarding the Beverly and Qamanirjuaq caribou herds. Blue Star values the Board's guidance in supporting responsible project planning and adaptive operational practices. The company is committed to implementing science-based, and Inuit Qaujimajatuqangit (IQ)-informed mitigation measures, with a primary focus on minimizing potential effects to caribou during sensitive life stages, including calving, post-calving, and migration periods.

Blue Star will update the Wildlife Management Plan (WPP) to ensure references to the current co-management guidance, specifically the 2023–2032 Beverly and Qamanirjuaq Caribou Management Plan. Updates will confirm that monitoring protocols, mitigation triggers, and adaptive management measures are consistent with the objectives and recommended practices set out in the 2023–2032 Plan.

Blue Star acknowledges the recommendation that wildlife monitors be Inuit from the region and appreciates the BQCMB's emphasis on culturally informed, community-based, and effective monitoring. The WPP will be updated to explicitly state that wildlife monitors will be Inuit from the region, engaged in collaboration with local organizations, including the Kugluktuk Hunters and Trappers Organization and the Kitikmeot Regional Wildlife Board. This approach will ensure monitoring incorporates Inuit Qaujimajatuqangit (IQ), local knowledge, and regional expertise in project implementation.

Blue Star recognizes the concerns raised by Inuit communities regarding helicopter activity. Our WPP is based on the guidance sourced from the Kivalliq Inuit Association's Mobile Caribou Conservation Measures (MCCM). In the WPP revision, the Company will strengthen and clarify our aircraft mitigation measures to ensure they are precautionary, clearly defined, and fully aligned with the MCCM to minimize disturbance to caribou. Enhancements will include clearly articulated setback distances, flight altitude requirements, adaptive response triggers where caribou are observed, and monitoring documentation protocols to minimize disturbance.

The above updates, including revised citations, clarified commitments to Inuit wildlife monitors, and clarified aircraft mitigation measures will be incorporated in the revision of the Wildlife Management Plan to be submitted with the 2025 Annual Report.

Response to Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

Blue Star notes that the CIRNAC comments #1 to #3 appear to pertain to aspects of existing management plans related to Ulu camp and infrastructure authorizations, which are outside the scope of the exploration activities and authorizations addressed in this amendment application. The Company is available to discuss any of these items in advance of the Annual Report submissions to satisfy all of the comments raised are being addressed appropriately.

CIRNAC#4: Management of Saline Substances

The Spill Response Plan and the Environment and Heritage Protection Plan are currently being revised. All recommendations provided by Crown-Indigenous Relations and Northern Affairs Canada will be incorporated into the updated documents. Revisions will include the addition of material-specific information outlining potential environmental effects, as well as prevention, mitigation, and response measures for saline substances, including calcium chloride (CaCl₂). The revised management plans will be submitted with the 2025 Annual Reports.

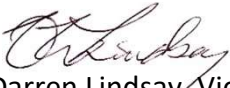
CIRNAC #5: Consultation with Interested Parties

The Company continues to strengthen its efforts to fulfill the commitments outlined in its Engagement Plan and has taken the comments provided by Crown-Indigenous Relations and Northern Affairs Canada under advisement. As part of these efforts, a community visit was conducted in November 2025 to Kugluktuk, and an additional community visit is planned for March 2026 to Cambridge Bay.

Blue Star is also happy to discuss the proposed updates with CIRNAC in advance and can provide draft sections of the revised Engagement Plan prior to the formal submission with the 2025 Annual Reports.

Blue Star is currently updating its Management Plans and commits to incorporating revisions that address these collective concerns. The revised plans will be submitted with the 2025 Annual Reports.

Sincerely,



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