

GN # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Mitigation and Monitoring Plan – Mitigation Measures for Caribou
References	<ul style="list-style-type: none"> • 6106 Resources Ltd. Wildlife Mitigation and Monitoring Plan – Hook Lake Project, Nunavut (October 2025). • 6106 Resources Ltd. Revised NIRB Application for Screening #12648 Hook Lake Project (December 2025).
IDENTIFICATION OF ISSUE	
<p>6106 Resources Ltd.'s (Proponent) Wildlife Mitigation and Monitoring Plan (Wildlife Plan) for the Hook Lake Project (Project) and Nunavut Impact Review Board (NIRB) Application for Screening (Project Application) documents describe the Proponent's mitigation plan for caribou and other wildlife. However, the Government of Nunavut (GN) believes that these documents do not clearly define the thresholds that would trigger a suspension of Project activities when caribou are present. The lack of clarity limits the GN's ability to evaluate potential Project impacts on caribou.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Proponent's Wildlife Plan states the following:</p> <p style="padding-left: 40px;"><i>"...6106 Resources Ltd. will suspend all low-altitude flights by aircraft (take off and landing), diamond drilling activities and equipment movement, if caribou are observed during pre-calving or post-calving periods..."</i> (Page 3)</p> <p>And</p> <p style="padding-left: 40px;"><i>"...if caribou calving is observed in the area all activities will be suspended immediately..."</i> (Page 3)</p> <p>And</p> <p style="padding-left: 40px;"><i>"...6106 Resources Ltd. will suspend all low-altitude flights by aircraft (take off and landing), diamond drilling activities and equipment movement, if caribou are observed during pre-calving or post-calving periods..."</i> (Page 3)</p> <p>And</p> <p style="padding-left: 40px;"><i>"...Low-level flying should be avoided when possible. If a concentration of caribou is encountered an altitude of at least 610 m above ground should be maintained..."</i> (Page 3)</p> <p>Additionally, the Project Application states that the Proponent will:</p> <p style="padding-left: 40px;"><i>"Closely monitor activities during Qamanirjuaq caribou calving and post-calving (June 9–22 and June 23–July 3) and halt work if caribou approach,"</i> (Page 18)</p> <p>The contradictory statements within the Wildlife Plan and the Project application create uncertainty regarding:</p> <ul style="list-style-type: none"> • The number of caribou (if more than one) required to trigger each mitigation action; 	

- The criteria to be used by the Proponent to determine if caribou calving is occurring;
- How wildlife monitoring will occur and who will undertake it;
- The dates and source being used to define the period for pre-calving, and
- The spatial extent to which the mitigation actions apply, whether they are limited to the Project footprint or include an additional buffer distance.

REQUEST(S)/RECOMMENDATION(S)

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

1. The number of caribou (if more than one) required to trigger each mitigation action.
2. The criteria to be used by the Proponent to determine if caribou calving is occurring.
3. How wildlife monitoring will occur and by whom.
4. The dates being used to define pre-calving.
5. The spatial extent to which the mitigation actions apply, whether they are limited to the Project footprint or include an additional buffer distance.

GN # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Mitigation and Monitoring Plan – Mitigation Measures for Raptors
References	6106 Resources Ltd. Wildlife Mitigation and Monitoring Plan – Hook Lake Project, Nunavut (October 2025).
IDENTIFICATION OF ISSUE	
<p>The Wildlife Plan indicates that certain mitigation measures will occur to minimize Project impacts on raptors. These mitigation measures are based on the raptor nesting season and a setback distance from nests. However, the Proponent’s Wildlife Plan does not clearly indicate how potential raptor nest locations will be identified, which limits the GN’s ability to evaluate the efficacy of the applicable mitigations in reducing Project impacts on raptors.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Wildlife Plan does not provide information on how locations of known (or likely) raptor nests will be determined, only stating that:</p> <p style="text-align: center;"><i>“6106 Resources Ltd. shall ensure that there will be no disturbance of nesting raptors from 15 April to September 1 by staying at least 1.5 km away from them when in transit by aircraft and avoiding approaching nests closely while on foot” (Page 4)</i></p> <p>As such, it is unclear whether the Proponent will conduct raptor nest surveys or if nest avoidance activities will rely solely on existing data.</p>	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN requests that the Proponent revise the Wildlife Plan to include a description of how known or potential raptor nest locations will be identified:</p> <ol style="list-style-type: none"> 1. If existing data sources will be used, the Proponent should specify those sources, or 2. If new surveys are planned, the Wildlife Plan should be updated accordingly. 	

GN # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Bear Safety – Minimizing Human-Wildlife Conflict
References	<ul style="list-style-type: none"> • 6106 Resources Ltd. Wildlife Mitigation and Monitoring Plan – Hook Lake Project, Nunavut (October 2025). • Government of Nunavut. Bear Safety: Reducing Bear-People Conflicts in Nunavut (n.d.).
IDENTIFICATION OF ISSUE	
The Proponent’s Wildlife Plan states that both polar bears and grizzly bears may be encountered but it only includes safety procedures for grizzly bears and black bears.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The Proponent’s Wildlife Plan acknowledges that both polar and grizzly bears may be encountered (Page 4). However, the safety procedures provided only address grizzly and black bears (Pages 10–12). The GN emphasizes the need for clear, appropriate safety measures that minimize the potential for human-wildlife conflict and the loss of human life during polar bear encounters. Information on this topic can be found in the GN’s ‘Bear Safety: Reducing Bear-People Conflicts in Nunavut’.	
REQUEST(S)/RECOMMENDATION(S)	
The GN recommends that the Proponent review the GN’s ‘Bear Safety: Reducing Bear-People Conflicts in Nunavut’ and update the Wildlife Plan accordingly.	

GN # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Kivalliq Inuit Association - Mobile Protection Measures
References	<ul style="list-style-type: none"> • 6106 Resources Ltd. Revised NIRB Application for Screening #12648 Hook Lake Project (December 2025). • 6106 Resources Ltd. Wildlife Mitigation and Monitoring Plan – Hook Lake Project, Nunavut (October 2025).
IDENTIFICATION OF ISSUE	
<p>The Proponent's Wildlife Plan and Application for Screening both state that the Kivalliq Inuit Association's (KIA) Mobile Protection Measures will be followed for this Project. However, the Proponent does not describe KIA's Mobile Protection Measures or provide a link or appendix to them.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Proponent states in both the Wildlife Plan and the Application for Screening that KIA's Mobile Protection Measures will be followed for this Project, but they are not provided. This omission reduces transparency and clarity for the GN and other reviewers regarding the specific mitigation measures the Proponent will be following to minimize Project impacts on caribou and hinders the ability to monitor the Project for future compliance. Additionally, without inclusion of the Mobile Protection Measures, the Wildlife Plan may not be as effective for staff responsible for implementing protection measures in the field, creating uncertainty regarding the Project's ability to mitigate impacts to caribou.</p>	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN requests that the Proponent edit their Wildlife Plan and any other relevant documents to provide details on how KIA's Mobile Protection Measures would be applied. Additionally, the GN recommends that the KIA's Mobile Protection Measures be included as an appendix to the Wildlife Plan.</p>	

GN # 05	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Fuel Spill Contingency Plan – Storage and Secondary Containment
References	6106 Resources Ltd. Fuel Spill Contingency Plan – Hook Lake Project, Nunavut. October 2025
IDENTIFICATION OF ISSUE	
<p>The Proponent's Fuel Spill Contingency Plan (Spill Plan) does not include information regarding storage and secondary containment for fuels and hazardous materials. Additionally, the Proponent makes reference to "fuel-related products", but it is unclear what fuels and hazardous materials are included in this term.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Proponent's Spill Plan does not include information regarding storage and secondary containment for fuels and hazardous materials, which is necessary to understand how the Proponent manages these hazards at the Project site. This lack of information limits the GN's ability to evaluate potential Project impacts on the environment from spills, and the efficacy of mitigations outlined in a spill response plan in the event of a spill or release.</p>	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN recommends that the Proponent revise their Spill Plan to include details regarding the storage and secondary containment of "fuel-related products," where applicable.</p>	

GN # 06	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Fuel Spill Contingency Plan – Various
References	6106 Resources Ltd. Fuel Spill Contingency Plan – Hook Lake Project, Nunavut. October 2025
IDENTIFICATION OF ISSUE	
<p>The Proponent's Spill Plan is missing information and clarity in the spill response action plans. This creates uncertainty regarding the adequacy of the Proponent's spill preparedness and limits the GN's ability to evaluate the effectiveness of proposed mitigation measures.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Information outlining the required steps during the initial stages of spill response, in the GN's view, is essential for ensuring timely recovery and remediation, as well as preventing further harm to people and the environment. These details are critical for understanding how the Proponent intends to manage spills or releases at the Project site and for confirming that appropriate mitigation measures are in place.</p> <p>The Spill Plan lacks sufficient detail and clarity within the spill response Action Plans (Section 6.0) regarding spill-handling practices, particularly:</p> <ul style="list-style-type: none"> • Section 6.1 appears to be missing a step between steps 5 and 6 about placing contaminated material and absorbent materials in sealed drums/containers for transport. • Section 6.2 text in step 6 should state that spill contents are properly sealed in drums/containers for transport. • Sections 6.1 to 6.4 should refer to the use of spill kits located at the camp and drill sites. • Sections 6.2 and 6.3 are missing a step about the use of adsorbent pads to prevent expansion of the spill area. • Section 6.4 is missing a step at the end about the collection and disposal of contaminated material in sealed drums/containers for disposal. 	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN recommends that the Proponent revise section 6.0 of the Action Plans of the Spill Plan to address the deficiencies identified above.</p>	

GN # 07	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Mitigation and Monitoring Plan – GN Contacts
References	6106 Resources Ltd. Wildlife Mitigation and Monitoring Plan – Hook Lake Project, Nunavut. October 2025
IDENTIFICATION OF ISSUE	
The Proponent’s WMMP includes out-of-date contact information for GN, Department of Environment staff.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The GN notes that the information listed on page 4 of the WMMP is incorrect.	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN requests that the Proponent update the text on Page 4 of the WMMP with the following bolded text:</p> <p>“6106 Resources Ltd. will report all wildlife observations near the project area at the end of the operational season to GN-ENV (Wildlife Division): Regional Wildlife Manager: Joe Savikataaq Jr., (867) 857-2976, jsavikataaqjr@gov.nu.ca and Biologist: Mitch Campbell, (867-857-6717), mcampbell1@gov.nu.ca”</p>	

GN # 08	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological Assessment
References	NIRB 126248/25EN080: Notice of Screening and Comment Request for 6106 Resources Limited's "Hook Lake" Project Proposal
CONCERNS	
<p><i>Project Summary</i> 6106 Resources Limited (a subsidiary of Manhattan Corporation) proposes to continue and expand mineral exploration activities at the Hook Lake Project, located within the Rankin–Ennadai greenstone belt approximately 140 kilometres northwest of the community of Arviat. Proposed activities include diamond drilling, ground and airborne geophysical surveys, prospecting and sampling, and the establishment and operation of a temporary exploration camp accommodating up to 20 persons (the specific location has not yet been finalized). Project logistics include helicopter support, potential off-strip fixed-wing aircraft landings, and the potential use of a winter access route from Arviat. Based on the application materials, Project activities may occur year-round and over multiple field seasons, and Project components and areas of ground disturbance may be modified or relocated between seasons. The Project area includes both Crown Land and Inuit Owned Land (IOL).</p> <p>A search of Government of Nunavut (GN) records did not identify any archaeological assessments that can be relied upon to confirm that any portion of the Hook Lake Project footprint has been assessed and cleared for ground disturbance. Accordingly, no areas within the proposed Project footprint have been confirmed as having been previously assessed by a qualified individual under a permit issued by the Department of Culture and Heritage (CH) and accepted by the Department.</p> <p>A search of the Nunavut Archaeological Sites Database indicates that no registered archaeological sites are located within or immediately adjacent to the proposed areas of impact based on the mapping provided with the Project application. While the NIRB public registry depicts a proposed winter travel route to Arviat, the precision and accuracy of this route have not been confirmed. GN notes that the absence of recorded sites does not preclude the existence of unidentified archaeological resources.</p> <p>GN notes that archaeological sites have previously been recorded along the shores of Maguse Lake, Upper Maguse Lake, and the Maguse River. These sites demonstrate established land-use patterns and travel corridors in the broader regional landscape. The broader Project area forms part of an interconnected system of lakes and waterways that is associated with documented routes of traditional travel, harvesting, and settlement patterns, evidenced by these previously recorded sites.</p>	

Based on landscape-level considerations, including proximity to waterbodies, the presence of eskers, ridges, and raised landforms, known and potential travel corridors, and established land-use patterns demonstrated by nearby recorded sites, GN considers that there are reasonable grounds to believe that there could be sites of archaeological significance on the lands affected by the Project, pursuant to Article 33.5.12 of the *Nunavut Agreement*.

Project-Specific Concerns

GN notes that the proposed Project includes activities involving ground disturbance, which constitute potential impacts to archaeological resources, including:

- diamond drilling locations, including drill pads, sumps, and associated areas of ground disturbance, including temporary staging or laydown areas;
- trenching, stripping, grubbing, sampling, or other surface or subsurface disturbance;
- establishment and operation of camps, caches, laydown areas, fuel storage areas, berms, sumps, or other Project infrastructure;
- construction, development, and/or use of any new, re-opened, or modified access routes or trails, including winter access routes;
- borrow areas, quarries, or any use of eskers, ridges, or raised landforms;
- water intake locations, including pumping areas, hose alignments, and any linear disturbance between water sources and Project infrastructure;
- off-strip fixed-wing aircraft landings on unprepared 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 the Department of Culture and Heritage constitutes a potential impact to archaeological resources.

RECOMMENDATIONS

GN recommends that NIRB include the following project-specific Terms and Conditions in the Screening Decision Report:

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 multi-year mineral exploration

Where Project components are modified, expanded, or relocated between or within field seasons, the Proponent shall ensure that archaeological assessment and permitting are completed prior to ground disturbance in 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 use in support of Project activities shall be archaeologically assessed prior to use.
- Opportunistic helicopter landings required for safety or operational reasons 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.