



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:

Project Proposal Title:	Hook Lake Project		
Proponent:	6106 Resources Ltd		
Location:	Kivalliq region		
Comments Due By:	February 6, 2026	NIRB #:	25EN080

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 comments on the proposed Hook Lake Project (NIRB File 25EN080). 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

The BQCMB notes the Proponent’s acknowledgement that the project lies within the range of the Qamanirjuaq herd, and appreciates the Proponent’s effort to overlay proposed activity locations with the BQCMB’s telemetry map as accessible to the public on the Board’s website. As reflected on those maps, the proposed activities overlap habitat that is heavily used by Qamanirjuaq caribou during sensitive periods, including spring migration, calving, and post-calving. The BQCMB also notes that barren-ground caribou show strong fidelity to annual calving areas, while recognizing calving distribution can shift within a broader geographic zone over time.

While the Proponent identifies June 8–22 as a particularly sensitive period, the BQCMB emphasizes that they must also address spring migration of pregnant cows, the post-calving period when cows and calves are vulnerable to disturbances, and movement corridors including important water crossings. The BQCMB believes the current mitigation approach is not sufficiently precautionary for a project occurring in caribou habitat used during these sensitive seasons.



5. Dedicated Inuit wildlife monitors

NIRB should require dedicated wildlife monitors during operations, and that monitoring include Inuit wildlife monitors from the region, hired in collaboration with the community of Arviat and relevant bodies (e.g., Kivalliq Regional Wildlife Board and the Arviat Hunters and Trappers Organization). Monitors should have clear authority to recommend and trigger operational slowdowns and shutdowns when thresholds are met.

6. Protect movement corridors and water crossings

The Proponent should clearly define “important caribou crossings” (data sources, how crossings are identified/updated, and how buffers apply), and ensure mitigation protects movement corridors during the seasons when crossings are most likely to be used.


7. Cumulative effects and disturbance

The NIRB should assess cumulative effects of repeated disturbance in this area during sensitive periods, including the combined effects of this project and other nearby activity. Conditions should require annual reporting on activity levels and caribou interactions, and adaptive management triggers that increase mitigation if disturbance or encounter rise.

The BQCMB appreciates the opportunity to comment and would welcome continued engagement as screening proceeds. Our key message is that in habitat used heavily during sensitive periods, caribou protections must be clear, precautionary, and enforceable, and must include dedicated monitoring and operational triggers that can be implemented consistently.

Do you support the project proposal? Yes No Any additional comments?

The BQCMB notes in the Proponent’s statement that the region has a long history of exploration. Past activity does not lessen the importance of avoiding impacts. Where exploration has been ongoing or is expected to continue, clear, enforceable mitigation and monitoring are even more important because cumulative effects can become more significant over time, particularly for culturally significant species such as barren-ground caribou.

Name of person commenting:	<u>Gilly McNaughton</u>	of	<u></u>
Position:	<u>Biologist</u>	Organization:	<u>Beverly and Qamanirjuaq Caribou Management Board</u>
Signature:	<u></u>	Date:	<u>February 6, 2026</u>