



**Athabasca Denesuline Né Né Land Corporation**

February 9, 2026

To: The Nunavut Impact Review Board  
via email: info@nirb.ca

**RE: Screening Comments on Hook Lake Project NIRB # 25EN080**

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

Dear Nunavut Impact Review Board.

The Athabasca Denesúliné NéNé Land Corporation (ADNLC) represents the three Denesúliné First Nations of Fond du Lac, Black Lake, and Hatchet Lake. We have reviewed this project proposal and have significant concerns about how the proposed activities may impact the Qamanirjuaq caribou herd and habitat. There is not enough information provided here for us to understand how the project may impact caribou and what avoidance, mitigation, and monitoring tools will be used to ensure that all tools and precautions are being taken in order to reduce harm to caribou.

As Athabasca Denesúliné, we are caribou people. The Qamanirjuaq caribou herd is our primary source of food, culture, and way of life. If disturbances and activities throughout their annual range cause them to shift their migration patterns, delay migrations, or avoid certain important habitats, our communities' well-being and inherent and Section 35 Rights will be impacted. We are very concerned about any activities that may disrupt caribou migrations and water crossings, and any activities that would cause stress to the caribou or lead to avoidance behaviors during their most vulnerable times such as spring migration with heavily pregnant females, during calving and in the post-calving period.

Chief Joseph Custer Reserve # 201  
Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7  
Phone: (306) 953-7287 Fax: (306) 763-2973

The proposed Hook Lake Project includes drilling activities, helicopter flights, ground travel and a possible new winter road, as well as creation of a camp all within important Qamanirjuaq caribou habitats. These are all activities that have the potential to disturb caribou for a great many kilometers away from the project area as caribou are very sensitive to smells, sounds, vibrations, and new infrastructure on the landscape.

Our Specific Questions and Concerns include:

1. **Disturbance to caribou during the very sensitive times of spring migration, calving, and post-calving.** While 6106 Resources Ltd. has noted that their proposed work site is on the edge of the calving ground as defined in the map shared by the BQCMB, we would like to see them also include the area overlaid with the Nunavut Planning Commission definition of the calving grounds, as well as collar data previous to the data used in the BQCMB map in order to better understand the spatial relationship between the proposed project and traditional calving grounds defined by a number of processes. The location is a highly critical habitat for the caribou and if the project moves forward the most precautionary avoidance and mitigation measures should be used such as a shut down period if caribou are seen to be moving close to the area pre, post, and during calving. And no infrastructure, trails/roads should be built within or on the edge of the calving grounds.
2. **Protection of migration routes and fresh water crossings.** We can see from both the NPC maps and the BQCMB maps that the project proposed location is in an area of spring and fall migration and important water crossings as well as on the edge of the calving grounds (or perhaps within it depending on which maps are being used?). We require a more detailed map and plans of how 6106 Resources Ltd. plans to avoid disturbing these critical habitats and migrating caribou. Not enough clear information is provided in the Wildlife Plan such as triggers for mitigation, how staff will be trained to observe whether caribou are being disturbed, exactly what mitigation or avoidance will be used. In such a sensitive habitat this information needs to be much more clearly laid out.
3. **Avoidance of caribou critical habitat.** In the event that caribou are calving near the project sight, or are near the project area during pre and post calving, many activities such as drilling and helicopter flights can be sensed by caribou from a great distance. These activities are not compatible with calving caribou and should be stopped.
4. **Monitoring and reporting on disturbance to caribou and effectiveness of avoidance and mitigation measures.** We require a more specific plan within the Wildlife Plan that details how disturbance to caribou and success of mitigation and avoidance techniques will be monitored for, and reported back. We recommend hiring members of local HTOs who know the land and know the caribou and caribou behaviour.

Chief Joseph Custer Reserve # 201

Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7

Phone: (306) 953-7287 Fax: (306) 763-2973

5. **Potential for permanent or long-term disturbance on the landscape.** We are concerned to see that there is a plan to put in a winter road. Winter roads are known to cause major disruptions in caribou migration and much more information and analysis would need to be conducted in order for us to have an understanding of where the proposed road would be in relation to important caribou migration routes and how the road may impact caribou, and what mitigations would be used on the road to prevent harm.
6. **Inclusion of Athabasca Denesūliné, in all engagement.** 6106 Resources Ltd. did include Athabasca Denesūline in their outreach and engagement. This is a serious oversight as **any impacts to the Qamanirjuaq herd that take place on any part of their annual range have the potential to have severe, negative, inter-generational and permanent impacts on the Athabasca Denesūliné**, our inherent and Section 35 rights to continue our way of life. The caribou are our life, we are caribou people, and every precaution must be taken to protect the herd.
7. **Unknown Cumulative Impacts.** We would also like to express to the Nunavut Impact Review Board our growing concern for the cumulative impacts of so many exploration and development projects that are happening throughout the range of the Qamanirjuaq herd. These screenings provide us only a very short window to provide comments and do not give us enough time or information to properly analyze cumulative impacts, nor do the project proposals provide meaningful information on cumulative impacts of their proposed activities with other exploration and activities taking place across the Qamanirjuaq caribou range. Caribou are very sensitive animals who will respond to the sounds, smells, vibrations, and visual disturbance of these activities for many kilometers. We have heard increasing accounts of how much helicopter and other human activity are taking place on their spring, summer, calving, and post-calving ranges leading to changes in how caribou are navigating the landscape. Any new project considerations, including exploration activities, must consider the cumulative impacts of all projects in the region over time and space.

Before any approvals are issued for these permits, we ask that:

1. The 6106 Resources Ltd. provide maps with specific locations of any planned camps, trails, drill sights, or other land disturbances along with caribou collar data as well as local Indigenous Knowledge showing caribou habitat, fresh water crossings, and movement corridors in relation to proposed activities;
2. Provide clear avoidance and mitigation measures for planning the project and associated activities and infrastructure to avoid critical habitat and sensitive times, and mitigation measures clearly laid out for the event of encountering caribou during fall migration, spring migration, calving, and post-calving season including trigger distances for mitigation

Chief Joseph Custer Reserve # 201

Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7

Phone: (306) 953-7287 Fax: (306) 763-2973

3. Provide an explanation with maps using local Indigenous Knowledge as well as collar data showing how activities are being planned to AVOID caribou throughout the lifetime of the project;
4. Provide information on whether local HTOs will be hired for wildlife monitoring and to assess stress and disturbance to the caribou and what methods and reporting will be used to detail whether and how caribou avoidance and mitigations worked;
5. A plan to engage with Athabasca Denesuline for this and any future proposed activities as well as for reporting and monitoring;
6. Provide an assessment of cumulative impacts with consideration to time- duration of potential disturbance to caribou through the year (how many cumulative days will they be disturbed by the proposed project?) as well as with consideration to the cumulative impacts of other projects increasing the frequency of disturbance.

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

Until a proper cumulative effects assessment can be done to understand how all the combined activities on the landscape may be impacting the Qamanirjuaq Caribou, we do not support any projects that have the potential to cause such great disturbance to caribou during a sensitive time. We look forward to further engaging with the COMPANY once our above questions have been answered.

Sincerely,



Ron Robillard,  
Chief Negotiator, Athabasca Denesuliné Néné Land Corporation (ADNLC):  
[rrobillard@adnlc.ca](mailto:rrobillard@adnlc.ca)

CC:

Katie Rasmussen, Ecological Consultant, ADNLC:  
[katiebeth.rasmussen@gmail.com](mailto:katiebeth.rasmussen@gmail.com)

Chief Joseph Custer Reserve # 201  
Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7  
Phone: (306) 953-7287 Fax: (306) 763-2973