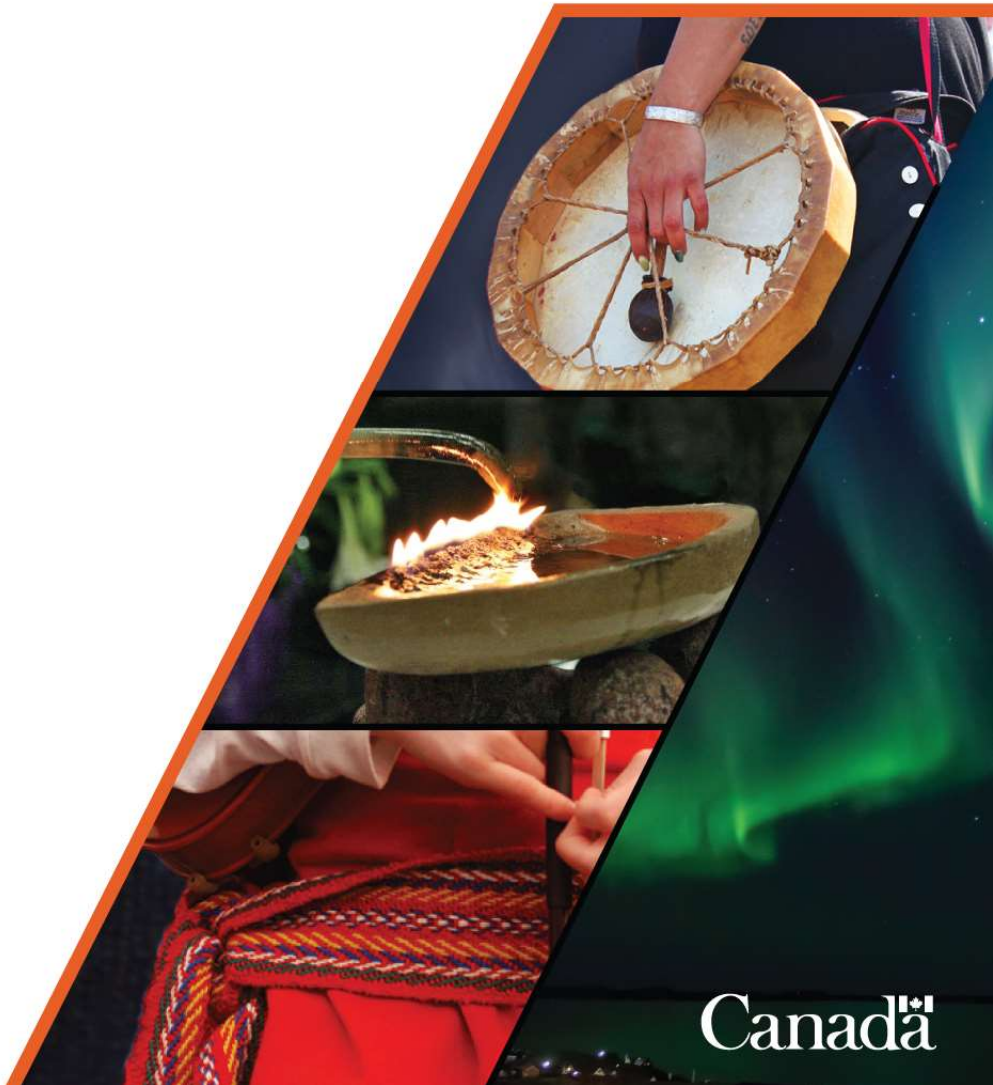




CIRNAC Comments to NIRB

Re: Notice of Screening for ATHA Energy Corp's "Angilak Property" Project Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
25EN084
Our file - Notre référence
GCdocs# 143008281

January 27, 2026

Viren Nasit
Senior Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for ATHA Energy Corp's "Angilak Property" Project Proposal

Dear Viren Nasit,

On January 8, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on ATHA Energy Corp's "Angilak Property" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal

CIRNAC #1: Fuel and Hazardous Material Storage and Spill Prevention

The Proponent plans substantial on-site fuel storage, including 250,000 litres each of diesel and aviation fuel, supplemented by gasoline, propane, lubricating oils, and other hazardous materials. Storage will be supported by large collapsible fabric bladders, with smaller mobile caches (< 4,000 L) positioned at drill sites and temporary depots established as needed. The volume and diversity of fuel types pose significant spill risks. Hazardous items such as lead-acid batteries are also noted; however, the Proponent indicates that "secondary containment measures are not contemplated," which may be insufficient given the associated acid and heavy metal contamination risks. Without stronger verification and containment measures, even small leaks have the potential to contaminate soil, degrade permafrost, and migrate into surrounding water bodies. CIRNAC recommends that the Proponent consider:

- Establishing a designated fueling station at recommended setbacks from the ordinary high water mark, equipped with a spill berm or impervious liner; and
- Storing all batteries in leak-proof secondary containment with acid-resistant lining and ensuring regular inspection for damage or corrosion to prevent localized contamination.



CIRNAC #2: Soil Disturbance and Permafrost Degradation from Trail Construction

The Proponent proposes construction of approximately 17.5 kilometres of overland trail to connect exploration areas. Surface stripping or placement of fill on ice-rich permafrost may induce localized thaw, ponding, and long-term terrain instability. Borrow pits, if not stabilized, may form thermokarst (e.g., ground subsidence and terrain deformation) or erosional features. Construction timing and techniques are not linked to permafrost conditions. Without further design measures, linear disturbance may accelerate degradation. CIRNAC recommends that the Proponent consider:

- Undertaking trail construction during frozen ground conditions, especially in areas of known or suspected ice-rich soils;
- Monitoring ground stability and thaw through seasonal site inspections or temperature logging methods; and
- Recontouring and stabilizing disturbed areas and borrow pits with organic cover to reduce erosion and enhance site recovery.

CIRNAC #3: Consultation With Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the Hamlet of Baker Lake, the Hamlet of Arviat, the Baker Lake Hunters' & Trappers' Organization, the Arviat Hunters' & Trappers' Organization, the Kivalliq Inuit Association, the Ghotelnene K'odtjneh Dene, and any other relevant organizations or individuals.

As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit, Indigenous knowledge, and Community Knowledge, in addition to scientific ways of knowing into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC #4: Project Materials for Ghotelnene K'odtjneh Dene

The Ghotelnene K'odtjneh Dene are Indigenous peoples who have traditionally used and occupied their ancestral lands, including areas within what is now the territory of Nunavut, since time immemorial. They continue to maintain a presence and connection to these lands today. Based on the information available, the proposed project appears to be of possible interest to the Ghotelnene K'odtjneh Dene.



CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

