



<b>GN # 01</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Terrestrial Environment – Exploration Trail
<b>References</b>	<ul style="list-style-type: none"> <li>• 2SG Inc. Angilak Project: Exploration Trail and Camp Upgrades. (December 2025).</li> <li>• ATHA Energy Corp. Revised NIRB Application for Screening #126266 Angilak Property. (December 2025).</li> </ul>
<b>IDENTIFICATION OF ISSUE</b>	
<p>Table 2-1 of ATHA Energy Corp.’s (the Proponent’s) Angilak Project: Exploration Trail and Camp Upgrades document states that the proposed exploration trail will be located within ‘low value terrestrial habitat’.</p> <p>The Government of Nunavut (GN) notes that this and other Project documents do not sufficiently explain how the value of terrestrial habitat was determined. The lack of justification for this classification impacts the GN’s ability to determine whether the Project will have significant adverse environmental effects.</p>	
<b>IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE</b>	
<p>The GN notes that while the Proponent provides general descriptions of the terrestrial environment along the proposed exploration trail route (e.g., 2SG Inc. 2025, Page 13; ATHA Energy Corp. 2025, Page 12), the criteria used to classify areas as ‘low value’ habitat are not clearly articulated.</p> <p>An explanation/justification of how habitat value was determined is necessary to properly assess potential effects on wildlife and to evaluate whether the proposed mitigation measures are appropriate.</p>	
<b>REQUEST(S)/RECOMMENDATION(S)</b>	
<p>The GN recommends that the Proponent explain how terrestrial habitat value was determined (e.g., criteria used) in the Project materials.</p>	

<b>GN # 02</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Permafrost, Soils – Exploration Trail
<b>References</b>	<ul style="list-style-type: none"> <li>• 2SG Inc. Angilak Project: Exploration Trail and Camp Upgrades. (December 2025).</li> <li>• ATHA Energy Corp. Revised NIRB Application for Screening #126266 Angilak Property. (December 2025).</li> </ul>
<b>IDENTIFICATION OF ISSUE</b>	
<p>The GN notes inconsistencies across Project documents regarding the design considerations and mitigation measures intended to limit the exploration trail’s impacts on vegetation, soil, and permafrost. Information presented in these documents and other documents should be consistent or include clear cross-references to support efficient and accurate review.</p>	
<b>IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE</b>	
<p>Section 3.1.2 Impacts, Mitigation, and Monitoring of the Angilak Project: Exploration Trail and Camp Upgrades includes details on design considerations and mitigation measures intended to minimize the exploration trail’s impacts on vegetation, soil and permafrost. However, these details are not reflected in Section 3.2 Vegetation, Soil and Permafrost Disturbance Mitigation of the Proponent’s Environmental Monitoring Plan.</p>	
<b>REQUEST(S)/RECOMMENDATION(S)</b>	
<p>The GN recommends that the Proponent harmonize information or provide cross-references between these documents on this topic.</p>	

<b>GN # 03</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Environmental Protection, Emergency Spill Response
<b>References</b>	ATHA Energy Corp. Spill Contingency Management Plan – Angilak Property. (December 2025).
<b>IDENTIFICATION OF ISSUE</b>	
<p>The Proponent discusses storage and secondary containment of fuel in the Spill Contingency Management Plan (Spill Plan). However, it is unclear whether these management actions apply only to the Project’s large fuel caches or if they also include the smaller fuel caches located at drill sites and other remote locations.</p>	
<b>IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE</b>	
<p>Section 2.1 of the Spill Plan states that,</p> <p style="padding-left: 40px;"><i>“Small amounts (2-3 drums each) of diesel and gasoline are stored at the active drill sites as needed for drilling. Small remote fuel caches (&lt; 4,000 L or 19 drums) may be established temporarily to support the other exploration activities.” (Page 4)</i></p> <p>Section 5.1 of the Spill Plan discusses storage and secondary containment. However, the content appears to apply only to the larger fuel caches (i.e., at the Nutaaq Camp). As such, the Spill Plan does not clearly provide information on secondary containment measures for these smaller fuel caches.</p>	
<b>REQUEST(S)/RECOMMENDATION(S)</b>	
<p>The GN recommends that the Proponent provide details regarding secondary containment and storage for smaller fuel caches.</p>	

<b>GN # 04</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Environmental Protection, Emergency Spill Response
<b>References</b>	ATHA Energy Corp. Spill Contingency Management Plan – Angilak Property. (December 2025).
<b>IDENTIFICATION OF ISSUE</b>	
<p>Section 3.2 of the Spill Plan highlights how hazardous materials are a threat to the environment if spilled. However, the text only discusses impacts on wildlife and aquatic life. The GN notes the value of discussing potential impacts to soil and other media.</p>	
<b>IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE</b>	
<p>Section 3.2 of the Spill Plan currently only considers potential environmental impacts to wildlife and aquatic life.</p> <p>For example, section 3.2 states,</p> <p style="padding-left: 40px;"><i>“Gasoline may be harmful to wildlife and aquatic life. It is not readily biodegradable and has the potential for bioaccumulation in the environment. Gasoline volatilizes quickly and can be explosive and a fire hazard in the event of a spill”</i> (Page 7)</p> <p>The GN notes the importance of considering all relevant environmental media and receptors present at, or in proximity to, the site that could be affected by a spill or release of hazardous materials. This includes ecological receptors such as vegetation, mammals/wildlife, and aquatic life, as well as environmental media that may be impacted, including surface water, groundwater, soil, and air.</p>	
<b>REQUEST(S)/RECOMMENDATION(S)</b>	
<p>The GN recommends that the Proponent broaden its discussion on potential impacts to other environmental media/receptors. At a minimum, each bullet in Section 3.2 that references wildlife and aquatic life should also explicitly include soil, vegetation, and the groundwater/permafrost layer.</p>	

<b>GN # 05</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Environmental Protection, Emergency Spill Response
<b>References</b>	<ul style="list-style-type: none"> <li>• ATHA Energy Corp. Spill Contingency Management Plan – Angilak Property. (December 2025).</li> <li>• Environmental Protection Act Spill Contingency Planning and Reporting Regulations, R-068-93</li> </ul>
<b>IDENTIFICATION OF ISSUE</b>	
<p>The GN has identified several issues and opportunities for improvements concerning the Proponent's Spill Contingency Management Plan (Spill Plan). The issues and opportunities for improvement described by the GN below are intended to reduce the potential environmental impacts of the project and improve the Spill Plan's alignment with applicable legislation and regulations.</p>	
<b>IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE</b>	
<p>The GN has identified the following issues and opportunities for improvement:</p> <p><b>Issues</b></p> <ol style="list-style-type: none"> <li>1. The Environmental Protection Act Spill Contingency Planning and Reporting Regulations R-068-93 4. (2) (a) states that a spill contingency plan for a facility must contain the following information: "...the name, address and job title of the owner or person in charge, management or control;". The Proponent's Spill Plan provides some of this information, but does not include an address (e.g., Page 13).</li> <li>2. The Environmental Protection Act Spill Contingency Planning and Reporting Regulations R-068-93 4. (2) (e) states that a site map of the location of the facility must be included in the spill contingency plan. However, a map is not included in the Proponent's Spill Plan</li> <li>3. The Environmental Protection Act Spill Contingency Planning and Reporting Regulations R-068-93 Section 7. (1) states the person responsible for preparing a spill contingency plan shall review the plan annually. However, the Proponent's Spill Plan does not specify that this action must be carried out annually.</li> <li>4. The Environmental Protection Act Spill Contingency Planning and Reporting Regulations R-068-93 9(1) and (2) and Schedule B describe the contaminant and amount spilled. This schedule specifies the quantity or amount of the contaminant that triggers reporting requirements to the Government of Nunavut/Government of Northwest Territories using the 24 Hour Spill Report Line or related form. However, the Proponent's Spill Plan does not specify when to report a spill based on the quantity spilled.</li> </ol>	

**Opportunities for Improvement**

5. The GN acknowledges that the Proponent's Spill Plan includes an itemized list of resources that will be included on site generally and within spill kits (e.g., pages 6 and 7). However, the Spill Plan does not indicate the procedures for replenishing spill kit materials.

6. The Spill Plan should be easy to navigate during an emergency, with clear documentation of spill reporting, recording, and response procedures. The organization of the Proponent's Spill Plan does not Section 4 (General Practices) does not describe how spills are reported or recorded, and it lacks general information on remedial actions and clean-up. Spill response steps do not appear until Sections 7 and 8, which are located at the end of the document and provide limited direction for on-site personnel.

**REQUEST(S)/RECOMMENDATION(S)**

The GN requests that the Proponent undertake the following:

1. Provide the full address of the owner, person in charge, management or control.
2. Provide a site map of the location of the facility
3. Include the requirement for reviewing the spill plan annually under Section 3 Roles, and who will be responsible for undertaking this action.
4. Incorporate the requirements for reporting a spill as described in Section 9 and Schedule B of the Regulations.

The GN recommends that the Proponent undertake the following:

5. Identify who will conduct an inventory of the response and clean-up equipment. Additionally, identify who will be responsible for replenishing spill kit materials after a spill occurs.
6. Present spill-reporting procedures and initial remedial actions earlier in the document (e.g., Section 4), including references to the Spill Report Form in Section 7 and the response steps in Section 8.1. Alternatively, provide clear cross-references to these later sections so readers can quickly locate the required emergency response procedures.

<b>GN # 6</b>	
<b>Department</b>	Culture and Heritage
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Archaeological Assessment
<b>References</b>	NIRB 251216/25EN084: Notice of Screening and Comment Request for ATHA Energy Corp's "Angilak Property" Project Proposal
<b>CONCERNS</b>	
<p><b><i>Project Summary</i></b>          ATHA Energy Corp. proposes to continue and expand mineral exploration activities at the Angilak Property in the Kivalliq Region. Proposed activities include continued use and expansion of existing exploration infrastructure, extension of the primary airstrip, construction of new low-profile exploration trails, expansion of the Nutaaq Camp, use of material sources, and advanced exploration drilling to support late-stage exploration at the Lac 50 Deposit. Project activities are proposed to occur over multiple field seasons, and certain Project components and areas of ground disturbance may be modified or expanded over time.</p> <p>The GN acknowledges that mineral exploration activities at the Angilak Property have occurred historically and that archaeological permits have been issued previously for portions of the broader Project area. However, based on a review of the current Project Proposal, the Department of Culture and Heritage (GN-CH) notes that new Project components and spatial expansions are proposed in areas that do not appear to have been subject to previous archaeological assessment.</p> <p>GN notes that a review of the Nunavut Archaeological Sites Database indicates that archaeological sites have previously been recorded in the vicinity of the proposed Project area. The absence of recorded sites within specific portions of the proposed footprint does not preclude the presence of undocumented archaeological resources. In addition, the distribution of previously recorded sites in the surrounding landscape suggests that additional, as yet unrecorded, archaeological sites may be present within areas proposed for new or expanded ground disturbance.</p> <p>Based on landscape-level considerations, including proximity to waterbodies, eskers, ridges, shorelines, and established travel corridors, and in light of the absence of prior field-based archaeological assessment for portions of the proposed footprint, 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.</p>	

### ***Project-Specific Concerns***

GN notes that the proposed Project includes activities involving ground disturbance, which constitute potential impacts to archaeological resources. Activities requiring archaeological assessment include, but are not limited to:

- extension and use of airstrips, including associated clearing, grading, or surfacing;
- construction, development, and use of new low-profile exploration trails and spur trails;
- establishment or expansion of camps, laydown areas, fuel storage areas, caches, and other Project infrastructure;
- drill site preparation, drilling pads, sumps, and associated staging areas;
- use of eskers, ridges, or other raised landforms as material sources or borrow areas;
- 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 the NIRB include the following Terms and Conditions in the Screening Decision Report to ensure compliance with the *Nunavut Act* and the *Nunavut Archaeological and Palaeontological Sites Regulations*.

### **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 Mineral Exploration**

Where Project components are modified, expanded, or relocated in subsequent field seasons, the Proponent shall ensure that archaeological assessment and permitting are completed prior to ground disturbance in any 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 repeated use in support of Project activities shall be archaeologically assessed prior to use.
- Opportunistic, single-use helicopter landings supporting foot traffic only 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 authorized 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. 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.