



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: Angilak property	
Proponent: ATHA Energy Corp	
Location: Kivalliq region	
Comments Due By: January 29, 2026 ext. Feb 2026	
NIRB #: 25EN084	
Indicate your concerns about the project proposal below:	
<input type="checkbox"/> no concerns	<input checked="" type="checkbox"/> traditional uses of land
<input checked="" type="checkbox"/> water quality	<input checked="" type="checkbox"/> Inuit harvesting activities
<input checked="" type="checkbox"/> terrain	<input checked="" type="checkbox"/> community involvement and consultation
<input checked="" type="checkbox"/> air quality	<input type="checkbox"/> local development in the area
<input checked="" type="checkbox"/> wildlife and their habitat	<input checked="" type="checkbox"/> tourism in the area
<input type="checkbox"/> marine mammals and their habitat	<input checked="" type="checkbox"/> human health issues
<input checked="" type="checkbox"/> birds and their habitat	<input checked="" type="checkbox"/> other: 1) Consultation 2) Critical Mineral Strategy
<input checked="" type="checkbox"/> fish and their habitat	
<input checked="" type="checkbox"/> heritage resources in area	
Please describe the concerns indicated above:	
<p>This project encompasses large quantum of Land in the Kazan River watershed and much larger than in the past years for this project. This Land is important to Inuit as it is part of Inuit cultural ancestral connection to Land. Our ancestors have lived there, and evidence shows with archaeological sites, place names and family connecting to Land for hunting or camping. Today we do not live there because of politics and policies, but this does not mean we do not feel connected to places where our ancestors once lived and doesn't mean we cannot reconnect to places.</p>	
<p>1) Consultation at the LOCAL COMMUNITY level. This application was sent to NPC plus various levels of federal and territorial governments, NWB, NTI, KIA, KitIA, QIA, Hamlets, HTOs and CLARCs as set out in NuPPAA so NIRB sends the applications it receives as its obligated to do through regulations and legislation. When did these some elected, some nominated officials ask their constituents, community members if they agree with this or not. NuPPAA says send to these various governments, hamlets, htos, clarc but there is no accountability transparency for those who make these important decisions, the system NuPPAA and this way of “consulting” with Nunavut is very colonial and legal in nature when the Land is more than rocks and minerals to those who live here and have ancestral ties to the land not just the post-colonial communities. This is our BACKYARD just like the lake is for southern people, it is our home, where our food, water, spiritual wellbeing is. Some may not access it as much as they like due to lack of knowledge or transportation but that does not diminish their connection to place.</p>	



It is for our future generations as well not just today. How does a company thousands of kilometers away get more rights than those who live here?

It's in NuPPAA and important documents like these that are passed around governments and other parties who are signatories that follow the colonial system and perpetuate and allow industry to own our land. Agreements are signed to trade for access and jobs are promised etc but those who signed these agreements have yet to come to the community level and learn if the community agrees or not with these activities on our landscape. We have wildlife; caribou, muskox, birds, fish and millions cubic liters of fresh water, fresh air, cultural homelands, archeological sites, burial sites to just name a few besides rocks and minerals. How do rocks and minerals trump the Land that is everything else but rocks and minerals to us at the community level? NuPPAA and NPC have done great at engaging with industry, but at the local level it is nonexistent. Leaving consultation to hamlet when they are responsible for municipal lands and the project is outside their jurisdiction or no consultation with the wider population about these projects that have mineral permits/leases and agree with the projects.

The HTOs have no support to understand these applications and the potential environmental, social or other unknown or known impacts. This is a very large project and the size of a small country that may lie in the Caribbean when all the leases are added up. Communities are at a disadvantage to professional knowledge about scientific data and Inuit elders and knowledgeable community members seems to be an afterthought even though the intent of the Nunavut Agreement says otherwise.

Upper government decision makers (federal or territorial) are not made up of majority Inuit or people who live and grew up in Nunavut their whole lives and understand the local community. They are making decisions on our behalf without consulting the people who live in the area about contentious issues such as Uranium.

2) Critical Mineral Strategy – federal, consultation at the local level was nonexistent and impacted the most. Consultation with industry was high priority. Consultation with higher level signatories and parties to the Nunavut Agreement likely happened but did not trickle down to the impacted communities for consultation or understanding the implications of this strategy. Industry is the biggest player and lobbies the governments and other signatories to push their viewpoint to this strategy – jobs, etc at the expense of the Land: Inuit homelands, Inuit spiritual places, Inuit cultural landscapes, Inuit grave sites, Inuit Archaeological sites, the environment, wildlife animals and fish, clean water, clean air, healthy plants etc. Rocks and Minerals are not the only aspect of the Land. We see the Land as so much more.

This Critical Mineral Strategy when passed by the federal Government Sept. 12, 2023, you could see the lands in Nunavut taken by industry through the regulatory claims process which is very colonial as it sees the landscape as legal tenure, staking claims on our ancestral lands, even though some are now classified in the colonial legal system as federal crown and Inuit owned lands. The regulatory system is geared to industry and not the local land users whether it be Inuit, wildlife – caribou for example, fish, cultural, spiritual or other lenses that the landscape is seen by Inuit besides rocks and minerals. Inuit want their land to be there for future generations and to keep it healthy. This strategy basically opened the flood gates and hundreds of claims were staked on our landscape for Uranium. This was done without



want this activity which must include all the phases of this mineral - Uranium; exploration, mining, decommissioning and long-term transportation and or storage of radioactive toxic waste to name a few, not piece by piece of the regulatory process. It's more important than ever to understand what Inuit want on their Lands and not hide behind regulatory policies or legal contracts that give companies more rights than the Inuit people who call this home since time immemorial. Inuit have not been fully informed of the decisions made on their behalf. This issue needs to be addressed to all Inuit of Nunavut by Inuit orgs and truly learn what the communities want to see. Some may say these provide jobs but investing in education now to get the better jobs in the future would benefit people in the long run. The Uranium is not going anywhere it is a limited resource meaning it doesn't grow back once it is removed from the land.

9) Dust – what are the mitigation measure for dust on the trails and runway? What monitoring or baseline data is there to learn what the landscape is before this activity?

10). Project Submission: This is the second time this company has submitted a very large project and has submitted the project proposal just before Christmas break. It may fulfil the legal terms by the regulatory rules but is not a good way to build trust or play fair. The legal 45 days sure is reduced especially when most do not see the submission until after the new year. This not fair for proper review of the proposal to give review. There should be a rule for this and shame on all who use this way to submit proposals for review.

Do you have any suggestions or recommendations for this application?

Ask the hard question and learn if Inuit of Nunavut and Nunavummiut want this type of activity taking place in our territory. Give us back the moratorium on uranium and put it to a vote for federal crown lands and Inuit owned lands (NTI and designated Inuit orgs). The uranium is not going anywhere. Invest in the people of the territory with proper education infrastructure in Inuktitut and English to get us on par and to be able to enter any post-secondary school. Then maybe we will be ready, the length of time depends on the quality of education provided and our successful on par graduates that are the majority like the Nunavut agreement where 70 to 80% should be employed in upper management jobs. We are not there yet either. Investment in Education is key! Uranium is not going anywhere and lets invest in our peoples education first to be at a level playing field and then maybe we can then decide if this is the type of activity is what we want.

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

Name of person commenting: Paula Kigjuglaik Hughson **of** Baker Lake, NU
Position: Inuk **Organization:** Nunavut Land Claims Beneficiary
Signature: _____ **Date:** Feb. 5, 2026