



Athabasca Denesuline Né Né Land Corporation

February 9, 2026

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

RE: Screening Comments on ATHA Energy Corp Angilak Property Screening NIRB # 25EN084

Project Proposal Title:	Angilak property		
Proponent:	ATHA Energy Corp		
Location:	Kivalliq region		
Comments Due By:	February 6, 2026	NIRB #:	25EN084

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 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 precautions are being taken in order to reduce harm to caribou and caribou habitat. Further, more information is required about the proposed trails and overall project infrastructure and as this is a location very close to Athabasca Denesúliné Nuhenéné (AD lands), we are concerned about the potential for artifacts to be found or harmed during the proposed exploration activities and certainly if a linear feature such as a trail is to be built.

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. The proposed project is also very close to our AD territories, lands where our people have travelled, fished, hunted, gathered medicines, and lived for thousands of years so we have additional

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concerns about potential impacts to water and aquatic wildlife. Before any permits are issued, we would need to speak to ATHA Energy Corp to have a better understanding of their plans, to see more detailed maps of the project camps, proposed trails and other infrastructure, as well as to better understand potential impacts to aquatic systems, and to ensure ongoing communication in the case that artifacts are discovered or any issues such as spills or other events that may impact AD territories occur. Maps of AD land use in this area have been made public through the Nunavut Land Use Plan process and you can see the project is directly adjacent to areas heavily used by Athabasca Denesuline for generations.

Our Specific Questions and Concerns include:

1. **Proposed trails.** Any linear feature on the landscape has the potential to cause great and permanent harm and we require more information to understand what type of trail is proposed, how long it is expected to be on the landscape, what reclamation methods will be used and whether there is known success in these landscapes for trail/road reclamation. We'd also like to better understand the types and levels of activity expected on the trail and how much it is expected to minimize helicopter traffic. Clearer maps of the trail system and camps are needed in order for us to understand what is being proposed.
2. **Avoidance of and communication regarding potential artifacts** The Athabasca Denesuline have a long history of land use in the project area as well. We would like to be included in all communications regarding potential archaeological finds or artifacts. We request that ATHA Energy Corp speak with us before any permits are issued to answer our questions and develop a communications plan.
3. **Avoidance of caribou critical habitat and migration.** ATHA Energy Corp has stated that no fresh water crossings have been identified in the study area and no concerns about critical habitat exist there. We require more time than that provided by this short screening window to review our records and perhaps provide Knowledge of the area. We also request to see the sources that ATHA Energy Corp used to determine that there were no important caribou sites in the project area. Further, we request to see more detailed information regarding caribou mitigation measures and avoidance. For example – is ATHA doing any planning ahead to determine if the timing of project activities will overlap with times that caribou are expected to be moving through the area and creating clear plans for how to avoid that overlap as the first step. Mitigation measures with clear monitoring for caribou, and triggers for shut down of operations should be outlined as well as how caribou response to the mitigation will be monitored.
4. **Monitoring and reporting on disturbance to caribou and effectiveness of avoidance and mitigation measures.** We would like to be included in ongoing communications regarding any interactions with wildlife including but not limited to caribou and aquatic species. Finally, we recommend hiring wildlife monitors from the AD and GKD communities and HTOs in the region to ensure that caribou people are observing if and how caribou are affected by the project. ATHA should provide a report at the end of the

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season outlining any interactions with caribou or other wildlife as well as successes or challenges of avoidance and mitigation plans.

5. **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 across the Qamanirjuaq annual range 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 ATHA Energy Corp provide more information regarding the above questions and meet with Athabasca Denesųłin  to discuss the project in more depth.

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

At this time, we require more information about the project in order to properly understand and assess any potential impacts to caribou , caribou habitat, and the overall environment.

Sincerely,



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