



To: Nunavut Impact Review Board  
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## NIRB File No. 25EN084 – Opportunity to Address Comments Regarding the Angilak Property: Exploration Trail and Camp Upgrades

The Angilak Property is owned by ATHA Energy Corp. (ATHA) and is located in the Angikuni Basin in the Kivalliq Region, Nunavut. The Angilak Project infrastructure consists of the 40-person Nutaaq Camp with fuel cache, 20-person mobile temporary camp, primary airstrip adjacent to Nutaaq Camp, secondary airstrip, and winter/spring ice airstrip.

To improve late-stage exploration drilling efficiency and reduce costs at the Lac 50 Deposit, reduce green house gas emissions, improve safety for personnel and decrease reliance on helicopters, ATHA is proposing to:

- Construct low profile exploration trails,
- Extend the primary airstrip,
- Increase the number of Weatherhavens at Nutaaq camp to accommodate 20 additional personnel, and
- Use bladders for storage of fuel.

On November 17<sup>th</sup>, 2025, the Nunavut Planning Commission noted positive conformity, and on December 18<sup>th</sup>, 2025, the Nunavut Impact Review Board (NIRB) received a complete application and assigned file number 25EN084 for this application. Public notice and the opportunity for comments was provided by NIRB on January 8<sup>th</sup>, 2026; comments and recommendations were received by NIRB on February 9<sup>th</sup>, 2026.

On February 16<sup>th</sup>, 2026, ATHA received comments and additional information requests from NIRB and various parties, with an opportunity to respond by March 2<sup>nd</sup>, 2026.

ATHA appreciates the thoroughness and timely review of our application and will continue to work with the NIRB, intervenors and public representatives through the authorization and permitting process. For brevity, the following is a summary<sup>1</sup> of the intervenor and public representative information requests, comments and recommendations, and to support NIRB, responses are provided by ATHA.

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<sup>1</sup> Full comments and recommendations of intervenor and public comments are posted on the NIRB portal.

## Additional Information Requested by NIRB

### ***Submission of the Radiation Hazard Management/Control Plan.***

Please find attached to this submission the Radiation Hazard Management Plan.

### ***What methodology was used to conclude that no cumulative effects are predicted. What other past, existing, or reasonably foreseeable projects were included in the cumulative effects assessment?***

Under the Impact Assessment Agency of Canada (IAAC, 2025<sup>2</sup>), cumulative effects (impacts) are defined as changes to environmental, health, social, or economic conditions resulting from a project's residual effects in combination with the residual effects of other past, existing, and reasonably foreseeable physical activities. The Nunavut Impact Review Board (NIRB) is referred to Section 3: Description of Environmental Setting, Impacts and Mitigation for a detailed discussion of the Angilak Project's effects.

In summary, the proposed trail is low-impact and will be constructed using small exploration sized equipment already available on site. The trail is intended for use by small off-road vehicles (e.g., ATVs and side-by-sides) to support exploration activities at the Angilak Project. The trail alignment has been designed to avoid cultural areas, minimize stream crossings, and reduce the use of esker material<sup>3</sup>, thereby limiting the number of material sources requiring reclamation. Its low profile also allows for straightforward reclamation and closure. Approximately 85% of the trail will follow the height of land, avoiding wetlands, graminoid, and wetted habitats. Only about 15% of the trail will require minor fill placement in localized low areas. As a result, no barriers to caribou movement are anticipated. Environmental interactions during construction and operation will be monitored in accordance with the main NIRB submission, permits, licenses and applicable management plans. ATHA will continue to manage exploration activities to ensure environmental protection. Based on the proposed design and mitigation measures, no residual effects are predicted.

Under the Impact Assessment Agency of Canada (IAAC, 2025), inclusion of other projects in a cumulative effects assessment is governed by the *connection principle*, whereby a project is considered only if its effects overlap spatially and temporally with the project under review. In addition to eliminating residual effects through design, operation and management, this principle forms the basis of ATHA's methodology for evaluating cumulative effects for this project.

The Angilak Project is spatially isolated from communities, active mining operations, and reasonably foreseeable development projects. At present, the nearest mining operations are the Meadowbank Mine and the Meliadine Mine, operated by Agnico Eagle Mines Ltd. While these mines overlap temporally with the Angilak Project, they are located more than 300 and 325 km away,

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<sup>2</sup> Impact Assessment Agency of Canada. 2025. Policy Framework for Assessing Cumulative Effects Under the Impact Assessment Act. <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/policy-framework-assessing-cumulative-effects-under-impact-assessment-act.html> . Accessed on Feb 24, 2026.

<sup>3</sup> The trail routing is designed to avoid use of hard rock quarries.

respectively, and therefore do not spatially overlap with respect to environmental pathways of residual effect (refer to **Figure 1 and Table 1**). The nearest advanced exploration-stage project is the Ferguson Lake Project, located approximately 87 km west of Angilak. However, this project is not advancing rapidly and is not expected to temporally overlap in the reasonably foreseeable future. The other exploration projects listed in **Table 1** are very early-stage exploration projects or have not been approved by NIRB. The Kivalliq Hydro-Fibre Link (KHFL) Project has recently been submitted for review by the Nunavut Planning Commission and, if developed, may connect regional communities in the future; however, it is located more than 225 km from the Angilak Project.

As a result, other mining projects, reasonably foreseeable projects and physical activities:

- do not spatially overlap with the Angilak Project (i.e. no shared environmental pathways of residual effect);
- are not sufficiently advanced to influence environmental conditions; and
- therefore, are not expected to result in cumulative environmental effects.



**Figure 1: Past, existing, and reasonably foreseeable physical activities or projects nearest to the Angilak Project.**

**Table 1: Exploration and Mining Projects Stage and Temporal Overlap with Angilak Project.**

<b>Project Name</b>	<b>Distance from Angilak Property</b>	<b>Project stage</b>	<b>Temporal Overlap</b>
<i>Ferguson Lake</i>	87km	Advanced Exploration	Not foreseeable
<i>Kiggavik</i>	210km	Advanced Exploration	Not foreseeable; Not approved by NIRB
<i>Meadowbank</i>	300km	Operating mine	Overlap
<i>Meliadine</i>	325km	Operating mine	Overlap
<i>Aberdeen Uranium Project</i>	200km	Early Exploration	Not foreseeable
<i>Amer Lake</i>	340km	Early Exploration	Not foreseeable
<i>Fenix</i>	320km	Early Exploration	Not foreseeable
<i>Hook Lake</i>	150km	Early Exploration	Not foreseeable
<i>Nut Lake</i>	55km	Early Exploration	Not foreseeable
<i>Victory Lake</i>	150km	Early Exploration	Not foreseeable
<i>Yath</i>	23km	Early Exploration	Not foreseeable

**Citation:** Impact Assessment Agency of Canada. (2024/2025). *Policy Framework for Assessing Cumulative Effects under the Impact Assessment Act*. Government of Canada.

***If mitigation measures prove ineffective, what adaptive management framework will be applied.***

If mitigation measures are determined to be ineffective, ATHA will apply an adaptive management framework consistent with best practices and the expectations of the Nunavut Impact Review Board. The adaptive management framework includes the following components:

- **Monitoring and Early Detection** - Environmental monitoring will be conducted as outlined in the screening decisions and management plans to identify deviations from predicted conditions. More specifically, monitoring, early detection and protection of caribou will be based on best practices outlined in the KIA's Mobile Caribou Protection Measures.
- **Evaluation and Response** - Upon identification of ineffective mitigation, ATHA will evaluate the cause and implement corrective actions, which may include modifying construction methods, adjusting activity timing, enhancing setbacks, increasing monitoring frequency, or temporarily suspending activities in affected areas.
- **Implementation of Revised Mitigation** – We will consult with KIA and revise or add mitigation measures which will be promptly implemented to reduce or eliminate the identified effects.
- **Verification and Follow-up Monitoring** - Follow-up monitoring will be conducted to confirm the effectiveness of the revised mitigation measures and to ensure environmental protection objectives are being met.
- **Reporting and Communication** - Results of monitoring, adaptive responses, and outcomes will be documented and reported to NIRB, KIA, stakeholders and regulatory agencies at least annually or as required, and adjustments will be incorporated into management plans as necessary.

Through this adaptive management approach, ATHA will ensure that unanticipated effects are identified early and addressed effectively, thereby maintaining protection of environmental and cultural values throughout the life of the Angilak project.

## Responses to CIRNAC Comments and Recommendations

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

*CIRNAC recommends:*

- *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.*

Response: ATHA agrees to these recommendations, currently adheres to these comments and has updated the Spill Contingency Plan to reflect these recommendations. An updated Spill Contingency Plan is attached to this submission.

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

*CIRNAC recommends:*

- *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.*

Response: To reduce overall environmental impacts, eliminate the need for blasting and large machinery and reduce green house gas (GHGs) emissions, ATHA proposes to construct the trail during the summer months, when esker materials can be excavated by small tractors. The trail will be inspected for ground stability prior to construction, photos will be taken and conditions pre-construction will be documented. ATHA commits to recontour and stabilize the disturbed areas such as material sources, to reduce erosion, which may include organic cover. We will work with CIRNAC and KIA to ensure reclamation and closure objectives are met and that we meet the requirements of the land use permits, Type B licenses and associated authorizations.

As described in the application, the proposed 1.5-metre-wide trail will be constructed and operated solely to allow the safe use of ATVs and side-by-side vehicles for exploration activities.

### **CIRNAC #3: Consultation With Interested Parties**

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.

Response: Thank you for your recommendations. We will continue to engage, listen, incorporate Inuit Qauijimajatuqangit, train, employ and consult with land users and local Inuit.

#### **CIRNAC #4: Project Material for Ghotelnene K’odtneh 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.

Response: Thank you for your comment. ATHA will initiate communications with Ghotelnene K’odtjneh Dene (GKD) to determine how and how often they would like to be engaged, consulted and meet in the future; timing, frequency and project updates will be collaborative and as acceptable by GKD and ATHA.

## **Responses to Transport Canada Recommendations**

*Transport Canada (TC) has reviewed the project proposal and notes the project includes water withdrawals from Nutaaq Lake and unnamed waterbodies and the expansion of the project’s primary airstrip. Given this, Transport Canada is bringing the following information about the Canadian Navigable Waters Act (CNWA) and the Canadian Aviation Regulations (CAR) that are particularly relevant for this project to the attention of the Board and the proponent.*

Response: ATHA would like to thank TC for their review. As per the comments, ATHA will complete the CNWA self-assessment and adhere to the CNWA for stream crossings associated with the trail. ATHA will also complete CAR 307 prior to expanding the airstrip using the information provided and provide needed information to TC.

## **Response to ECCC Comment and Recommendation**

*ATHA Energy Corp’s Environmental Management Plan Pt 1 Section 5.2.3 Breeding, Nesting and Migratory Birds indicate the migratory bird nesting period in the project area is mid-May to mid-August. The correct migratory bird nesting period for the project location (C8) is early May to mid-August.*

*ECCC recommends the Proponent update the migratory bird nesting period from mid-May to mid-August to early May to mid-August.*

Response: ATHA has updated the migratory bird nesting period in the Environmental Management Plan. Part 1 Section 5.2.3.

## Response to Government of Nunavut (GN) Comments and Recommendations

### **GN# 01: Terrestrial Environment- Exploration Trail**

The GN recommends that the Proponent explain how terrestrial habitat value was determined (e.g., criteria used) in the Project materials.

Response: The GN is citing Table 2-1 on page 13, which provides a summary and “general” observational criteria for the selection of the location, routing and sizing of the trail. This was the first “high-level” step in selection of the route. Late summer field surveys in 2025 confirmed no perennial caribou water-crossings, bear or wolf dens, raptor nests or any other known sensitive wildlife habitat features have been detected adjacent to the proposed exploration trail. One arctic fox den was detected near to the proposed trail alignment. As the trail routing selection prioritized avoidance of these terrestrial habitat features, any further description of habitat as low, medium or high value is not part of the scope, nor deemed necessary.

### **GN # 02: Permafrost, Soils – Exploration Trail**

The GN recommends that the Proponent harmonize information or provide cross-references between these documents on this topic.

Response: ATHA agrees to these recommendations and has updated the Environmental Monitoring Plan to reflect these comments and recommendations.

### **GN # 03: Environmental Protection, Emergency Spill Response**

*The GN recommends that the Proponent provide details regarding secondary containment and storage for smaller fuel caches.*

Response: ATHA agrees to these recommendations and has updated the Spill Contingency Plan to reflect these comments and recommendations.

### **GN # 04: Environmental Protection, Emergency Spill Response**

*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.*

Response: ATHA agrees to these recommendations and has updated the Spill Contingency Plan to reflect these comments and recommendations.

### **GN # 05: Environmental Protection, Emergency Spill Response**

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.

Response: ATHA agrees to these recommendations and has updated the Spill Contingency Plan to reflect these comments and recommendations.

#### **GN # 06: Archaeological Assessment**

*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. 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.*

Response: ATHA agrees with these recommendations. As stated in Section 3.5 of Angilak Project: Exploration Trail and Camp Upgrades- NIRB Screening Document, ATHA will hire a qualified archaeologist to conduct the necessary archaeological surveys, record sites and ensure the protection of heritage and culturally significant areas prior to construction. ATHA will continue to adhere to the conditions of our NIRB Screening Decision which includes adherence to Nunavut Act and the Nunavut Archaeological and Paleontological Sites Regulations.

## **Response to KIA Comments and Recommendations**

*As long as the Kivalliq Inuit Association Mobile Caribou protection measure are followed, and all the permits/ license are in order, there is no issue with KIA for the project, area may be used for Hunting between winter and spring months.*

*The area of the project covers Crown and Kivalliq Inuit Association private lands the proponent will contract Inuit monitors in regard of the wildlife.*

Response: ATHA appreciates the continued support of the Kivalliq Inuit Association for the Angilak Project. ATHA remains fully committed to complying with all applicable permits and licences, and to continue implementing the Mobile Caribou Protection Measures throughout project activities. We will continue to meet regularly with the KIA, KIA CLARC and host annual site visits to Angilak. Consistent with this commitment, ATHA will continue to engage and contract Inuit environmental monitors from local communities, including, but not limited to Baker Lake and Najuaat, to support on-the-ground oversight, wildlife monitoring, traditional knowledge integration, and adaptive management as required.

## Response to Ghotelnene K'odtineh Dene Comments

### **GKD Comment 1:**

*In summary, Ghotelnene K'odtineh Dene (GKD) have significant concerns related to the proposed activities, particularly on the potential impacts to caribou and their habitat. As noted above, caribou are critical to our well-being, way of life and the exercise of our rights. The proposed mineral exploration activities could result in potential adverse effects to caribou and caribou habitat from disturbance and disruption of movement from project-related noise, including the continued use and expansion of existing exploration infrastructure such as the camp, airstrip and fuel cache, construction of exploration trails, drilling, exploration and air transportation activities. Project activities would occur when caribou are known to migrate through the proposed exploration area from July to mid-October and are sensitive to noise and other disturbances.*

Response: Thank you for your comments. We continue to adhere to the Mobile Caribou Protection Measures as required. As noted by GKD, caribou occupy and migrate through the study area during sensitive phases of their annual cycle. ATHA will continue to ground-truth the detailed phenology of caribou movement within the study area and report on this annually. Observations indicate that late June to early July has been a known peak for caribou movements in the study area. Caribou telemetry data, shows diffuse presence of caribou throughout the area and adjacent lands. There is evidence of small concentrations of caribou occurring near the site, corroborated by evidence of caribou trail features observed in 2025 and discussed in Section 3.2 of the screening document. An adaptive management plan that follows the Caribou Mobile Protection Measures will continue to mitigate caribou sensory disturbance. Alterations to site work, up-to-and-including work stoppage are considered during peak caribou movement periods (e.g. late June to early July) to prevent excess stress, migration deflection or effective habitat loss.

Furthermore, as described in the application, the proposed 1.5-metre-wide trail will be constructed and operated solely to allow the safe use of ATVs and side-by-side vehicles for exploration activities. There are no plans, through this NIRB screening, licensing and authorization process to expand this trail into a road.

**GKD Comment 2:**

*Also of concern for Ghotelnene K'odtineh Dene is the need for greater assessment of the cumulative impacts to wildlife and wildlife habitat, particularly caribou, from this project proposal. There is potential for cumulative effects on disturbance to caribou from other projects in the Beverly/Qamanirjuaq herds' range. These include the Aberdeen Uranium Project, Amer Lake Trend, Amer Lake, Baker Lake South, Fenix, Ferguson Lake, Meadowbank Mine's Complex, Thelon Basin Generative Project, Hook Lake, Nut Lake, Victory Lake and Yath Property. There are also other projects and proposed projects within the Beverly/Qamanirjuaq herds' range that add to the potential for cumulative effects on disturbance to caribou and caribou habitat. These include, but are not limited to, the Meliadine Mine's complex and the proposed Kivalliq Hydro-Fibre Link (KHFL). Potential long-term adverse irreversible cumulative effects are possible from increased stress to caribou and impacts to caribou habitat.*

Response: We refer the GKD to the NIRB information request for more details. The scale of this proposed project is small and focused on low impact, cost effective construction, progressive closure and GHG reduction solutions for advanced exploration activities. No residual effects are predicted on caribou as ATHA will ensure no barriers to caribou movement and we will adhere to the Mobile Caribou Protection Measures. Furthermore, given its isolation from nearby, foreseeable mining projects, communities and KHGL, there are no predicted cumulative effects on disturbance to caribou and caribou habitat.

## Response to Beverly and Qamaniruaq Caribou Management Board (BQCMB) Recommendations

*In summary the BQCMB recommended:*

*1) Clearly define the "trail" including trail reclamation plans, and prevent incremental upgrading.*

Response: As described in the application, the proposed 1.5-metre-wide trail will be constructed and operated solely to allow the safe use of ATVs and side-by-side vehicles for exploration activities. There are no plans, through this NIRB screening, licensing and authorization process to expand this trail into a road. As noted previously, the project is located approximately 225 km from Baker Lake, the nearest community, which implicitly restricts use. However, as it is situated on Inuit Owned Land, unless otherwise requested by KIA and authorizing agencies, the proponent is not permitted to restrict use of the trail. We will record trail use and work with hunters and land users to ensure safe access for traditional land uses in the region.

During the authorization phase, ATHA will work with CIRNAC and KIA to develop an approved reclamation plan that follows best practices for progressive reclamation.

*2) Strengthen caribou protection thresholds, monitoring, and stop-work triggers*

*The Proponent's Environmental Management Plan includes caribou mitigation commitments, including using buffers around known caribou crossings/paths, stopping work if groups of caribou approach within specified distances, and not interfering with cows and calves.*

Response: ATHA remains fully committed to complying with all applicable permits and licences, and to continue implementing the Mobile Caribou Protection Measures throughout project activities. We will work with the KIA to ensure seasonal constraints, standardized reporting, standardized management responses and Inuit wildlife monitors will be employed over the long-term to mitigate impacts to caribou. Additional field studies will be undertaken in 2026 to better understand peak movement periods, inform timing for Inuit led wildlife monitor work and refine the parameters of the adaptive management and seasonal constraint protocols.

*3) Require a credible closure plan that removes the linear feature The Proponent indicates an intention to fully reclaim trails by removing structures, restoring drainage, stabilizing materials, and encouraging natural revegetation.*

Response: During the authorization phase, ATHA will work with CIRNAC and KIA to develop an approved reclamation plan that follows best practices for progressive reclamation and post closure reclamation.

## Response to Athabasca Denesulinē NēNē Land Corporation (ADNLC) Recommendations

*In summary, the Athabasca Denesulinē NēNē Land Corporation (ADNLC) represents the three Denesulinē 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. Our specific questions and concerns include:*

*ADNLC 1) Use of proposed trails, maps and activities.*

*ADNLC 2) Avoidance of and communication regarding the potential artifacts and communications.*

*ADNLC 3) Avoidance of caribou critical habitat and migration.*

*ADNLC 4) Monitoring and reporting on disturbance to caribou and effectiveness of avoidance and mitigation measures*

*ADNLC 5) Unknown Cumulative impacts.*

Response: In response to the ADNLC comments, ATHA provides the following references. ADNLC Comment (1) regarding proposed trail use, mapping, and planned activities is addressed in the Main Screening Document and the application submitted to the Nunavut Impact Review Board, which ATHA believes provide sufficient detail. ADNLC Comment (2) regarding avoidance of and communication about potential artifacts is addressed in GN Response #06. ADNLC comments (3) and (4) regarding avoidance of caribou critical habitat and migration, and monitoring and reporting on caribou disturbance and mitigation effectiveness, are addressed in the Kivalliq Inuit Association response and BQCMB Comment 2. ADNLC Comment (5) regarding potential cumulative effects is addressed in NIRB information requests and GKD Comment 2. Please note the distances of various existing, foreseeable and past projects to the Angilak site; there is no spatial or temporal overlap (as presented in **Table 1**), therefore no predicted cumulative effects.

## Response to Paula Kigjuglaik Hughson Comments

*In summary, Paula's submission commented about the proposed Angilak Project by ATHA Energy Corp in Nunavut, citing potential environmental, cultural, and socio-economic impacts. It emphasizes the cultural significance of the Kazan River watershed, criticizes existing consultation and regulatory processes as insufficiently reflective of Inuit perspectives, and expresses concern that industry priorities, particularly under the Critical Minerals Strategy, are being advanced ahead of community interests. Paul highlights potential long-term environmental and health risks associated with uranium exploration, capacity gaps related to education and participation in land-use decision-making, and calls for improved transparency, stronger community engagement, and meaningful Inuit-led consultation.*

Response: In response to the concerns outlined by Paula, ATHA acknowledges the importance of protecting culturally and environmentally significant areas and ensuring meaningful Inuit involvement in project planning and implementation. We refer Paula to previous responses (above) that address many of her comments. With respect to submissions over the holiday season, public notice and the opportunity for comments was provided by NIRB beginning on January 8th, 2026, after the holiday season; comments and recommendations were received by NIRB on February 9th, 2026. The NIRB have struck a balance of meeting project timelines, while extending the review period to allow for public comment in January.

ATHA appreciates the continued support of the Kivalliq Inuit Association and various community members for the Angilak Project and remains fully committed to meet with and engage with community members. Furthermore, we will comply with all applicable permits, licences, and regulatory requirements. Consistent with this commitment, ATHA will continue to implement the Mobile Caribou Protection Measures throughout all project activities and to engage and contract Inuit environmental and wildlife monitors from local communities, including but not limited to Baker Lake. ATHA will also support workplace training and education opportunities for local Inuit workers and adaptive management in response to observed conditions and community input.