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| GN # 01 | |
| Department | Environment |
| Organization | Government of Nunavut |
| Subject/Topic | Wildlife Plan |
| References | <ul style="list-style-type: none"> • Whale Cove Gold Corp. NIRB Revised Application for Screening #126326 Whale Cove Project Camp Regional Exploration Expansion. (February 2026). • Whale Cove Gold Corp. Whale Cove Project: Vickers Camp Expansion. (n.d.) • Nunavut Planning Commission. Keewatin Regional Land Use Plan. (June 2000). Available: https://www.nunavut.ca/sites/default/files/keewatin_regional_land_use_plan.pdf. |
| IDENTIFICATION OF ISSUE | |
| <p>The Government of Nunavut (GN) notes that Whale Cove Gold Corp.'s (Proponent) submission materials for the Whale Cove Project Camp and Regional Exploration Expansion (Project) do not include a wildlife mitigation and monitoring plan (Wildlife Plan). This is inconsistent with other mineral exploration projects and prevents the GN from effectively assessing the Project's potential impacts on caribou and other wildlife.</p> | |
| IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE | |
| <p>The GN notes that the proposed Vickers Camp Expansion represents a significant expansion of the Whale Cove Project and includes:</p> <ul style="list-style-type: none"> • an expansion of the regional mineral exploration area; • near tripling in size of the all-season camp; • doubling exploration drill capacity; • the addition of a mobile 20-person camp; and • anticipated construction in June and mobile camp operations in July. <p>While the proposed camp expansion occurs within the municipal boundary of Whale Cove, the expanded regional exploration overlaps the identified critical Caribou Calving Zone and Caribou Freshwater Crossings under the Keewatin Regional Land Use Plan (2000).</p> <p>In their Whale Cove Project: Vickers Camp Expansion document, the Proponent stated that "potential impacts on wildlife and terrestrial environments will be mitigated" (Page 5). Other proponents operating in similarly sensitive caribou habitats have submitted Wildlife Plans to demonstrate how they will reduce risks to caribou and other wildlife. The absence of a Wildlife Plan for this Project represents a notable gap and prevents the GN from assessing the Proponent's ability to avoid, reduce, or mitigate potential disturbance.</p> | |

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent submit a Wildlife Plan for the Project. At a minimum, the Wildlife Plan should include:

- The potential risks to wildlife, including caribou;
- The specific measures the Proponent will use to avoid impacts to wildlife, including caribou;
- Measures to reduce and/or mitigate risks to wildlife, including caribou, where avoidance is not being exercised;
- Procedures for preventing human-wildlife conflicts;
- Methods for detecting wildlife before fieldwork;
- A plan for how the presence of wildlife, including caribou, will be monitored (using a professional or wildlife monitor);
- How operational pauses will be implemented if caribou are encountered;
- Clear identification of who has decision-making authority for the Project (e.g., regarding operational pauses); and
- A recording and reporting procedure that will be implemented by the Proponent (including staff as well as any contractors or sub-contractors) to document wildlife observations, mitigation measures implemented, and any adaptive management actions taken.

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| GN # 02 | |
| Department | Environment |
| Organization | Government of Nunavut |
| Subject/Topic | Spill Plan |
| References | <ul style="list-style-type: none"> Whale Cove Corp. Whale Cove Corp. (“WCGC”) Spill Contingency Plan for Exploration Camp and Drill Sites Pistol Bay Area, Kivalliq Region Nunavut. Whale Cove Gold Corp. (December 2025) Environmental Protection Act Spill Contingency Planning and Reporting Regulations, R-068-93 |
| IDENTIFICATION OF ISSUE | |
| <p>The GN has identified several opportunities for improvements concerning the Proponent’s Spill Contingency 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> | |
| IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE | |
| <p>The GN has identified the following opportunities for improvement:</p> <ol style="list-style-type: none"> Section 5.2 of the Spill Plan states, “a Spill Report Form (Appendix 1) is filled out as completely as possible before or after contacting the 24-Hour Spill Line” (Page 7). Meanwhile, section 5.3 of the Spill Plan states that “the Spill Report Form is attached as Appendix C.” (Page 8) The GN notes that the Northwest Territories-Nunavut Spill Report Form is included on page 15 of the Spill Plan, but not identified as Appendix 1 or Appendix C. Section 5.2 of the Spill Plan states, “a Spill Report Form (Appendix 1) is filled out as completely as possible before or after contacting the 24-Hour Spill Line” (Page 7). As written, it is unclear who would be responsible or accountable for completing the described Spill Report Form. Section 3.0 of the Spill Plan states that Material Safety Data Sheets (MSDSs) for products used during the drilling program are in Appendix B (Page 11). However, Appendix B states that “copies not included herein but retained on-site” (Page 14). Section 3.0 of the Spill Plan states that “fuel cache inspections will occur on a regular basis for leaks, damaged or punctured drums” (Page 6). However, the Proponent’s Spill Plan does not outline the frequency or procedures for conducting and documenting these inspections. | |

5. Environmental Protection Act Spill Contingency Planning and Reporting, Section 4 (2) (i) states that a spill contingency plan for a facility must contain “an inventory of and the location of response and clean-up equipment available to implement the spill contingency plan;” While the Proponent’s Spill Plan lists the items to be included in each spill kit and their locations, it does not outline the procedures for replenishing spill kit materials.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the proponent undertake the following:

1. Identify the Spill Report Form as Appendix C and adjust the referenced text accordingly. Ensure that Appendix C is included in the table of contents.
2. Where appropriate, indicate who is responsible and accountable for completing the Spill Report Form and submitting it to the appropriate regulatory agency.
3. To ensure quick access by project staff, consider also including MSDSs in Appendix B.
4. Indicate the procedures (including frequency and individuals responsible) for conducting and documenting fuel cache inspections. Consider developing a checklist/documentation to verify that daily inspections are carried out and that if issues are identified, they are corrected.
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.

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| GN # 03 | |
| Department | Culture and Heritage |
| Organization | Government of Nunavut |
| Subject/Topic | Whale Cove Project Camp and Regional Exploration Expansion |
| References | NIRB 126326/25EA090: Notice of Screening and Comment Request for Whale Cove Gold Corp's "Whale Cove Project Camp and Regional Exploration Expansion" Project Proposal |
| CONCERNS | |
| <p><i>Project Summary</i></p> <p>The Proponent, Whale Cove Gold Corp., has submitted an amendment application for the Whale Cove Project, a mineral exploration project located near Whale Cove. CH notes that the application proposes to expand regional exploration across the broader project area, expand the Vickers camp from 35 persons to 100 persons for all-season use, increase the number of operating exploration drills from two to four, and operate an as-needed 20-person mobile camp.</p> <p>A review of Government of Nunavut (GN) records and the application materials indicates that archaeological assessments have previously been completed in association with the Whale Cove/Pistol Bay projects, including for the Vickers camp area and associated access routes, as well as portions of the associated mineral claims. It is not clear, however, whether all areas now proposed for impact (regional exploration, mobile camp use and related support activities) have been fully assessed through an archaeological assessment conducted under a permit issued by the Department of Culture and Heritage (CH).</p> <p>A review of the Nunavut Archaeological Sites Database indicates that archaeological sites have been previously recorded both within and adjacent to the general area of the proposed project impacts. Based on landscape-level considerations, including the presence of current lakes and waterways, evidence of raised beach ridges reflecting isostatic rebound, eskers, ridges and other raised landforms, as well as patterns of regional travel and land use patterns demonstrated by previously recorded sites in the surrounding area, GN considers that there are reasonable grounds to believe there could be sites of archaeological significance on the lands proposed for project impacts, pursuant to Article 33.5.12 of the Nunavut Agreement. The GN notes that the revised NIRB application (dated 2026-02-26) refers to potential archaeological features having been documented by a geologist during field activities and that these have not been reviewed by a qualified archaeologist.</p> <p><i>Project-Specific Concerns</i></p> <p>GN notes that the proposed project includes activities involving terrestrial ground disturbance, which constitute potential impacts to archaeological resources. Impacts include, but are not limited to:</p> <ul style="list-style-type: none"> • expansion of the Vickers Camp, including levelling, construction, installation, operation, and eventual decommissioning within the expanded footprint, together with | |

any associated laydown areas, utility corridors, water intake locations, water lines or hose routes, sumps, fuel storage or handling areas, waste management areas, and any other associated areas of terrestrial ground disturbance;

- drill site preparation, drilling pads, sumps, water lines, fuel caches, and associated staging or laydown areas for the additional regional exploration drilling proposed within the broader Project area;
- establishment, operation, and removal of any as-needed 20-person mobile camp, including all associated infrastructure and support areas;
- helicopter landing areas that are planned, identified, or intended for use in support of Project activities;
- use, improvement, widening, establishment, or repeated operational use of terrestrial access routes and trails associated with camp or drilling support, including existing trails around camp and terrestrial routes used to move crews, drills, fuel, goods, or equipment between camp and work areas;
- reclamation, cleanup, removal, or restoration works where terrestrial ground disturbance is required to remove infrastructure, materials, wastes, or associated equipment.

Any ground disturbance occurring outside areas previously assessed through an archaeological assessment conducted under a permit issued by CH constitutes a potential impact to archaeological resources and requires archaeological assessment prior to disturbance.

RECOMMENDATIONS

To ensure compliance with the *Nunavut Act* and the *Nunavut Archaeological and Palaeontological Sites Regulations*, the GN recommends that archaeological requirements for specific Project components be addressed directly with the Proponent through CH's archaeological permitting and regulatory review processes prior to any ground disturbance, including any requirements for archaeological assessment, avoidance, buffering, monitoring, mitigation, and chance-find response. GN notes that this approach is appropriate given the expanded scope of the current amendment and the absence of formal archaeological assessment confirmation for portions of the broader Project area.

GN further recommends the following

- **Site protection:** All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. No Project activities shall occur within 30 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 30 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 direction is provided 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. The GN's Department of Culture and Heritage 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.