

To: Nunavut Impact Review Board
PO Box 1360, Cambridge Bay, NU.
X0B 0C0

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From: Brian May
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NIRB File No. 25EA090 – Opportunity to Address Comments Regarding the Whale Cove Gold Project and Regional Exploration Expansion.

On April 2nd, 2026, Whale Cove Gold Corp. (WCGC) received comments and additional information requests from NIRB and various parties, with an opportunity to respond by April 16, 2026.

WCGC appreciates the timely review of our application and will continue to work with the NIRB, intervenors, regulators and community members through the authorization and permitting process. The following is a summary¹ of the intervener comments and recommendations, and to support NIRB, responses are provided by WCGC.

Response to Government of Nunavut (GN) Comments and Recommendations

GN# 01: Wildlife Plan.

The GN recommends that the Proponent submit a Wildlife Plan for the Project that includes a series of specific recommendations including:

- *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*

¹ Full comments and recommendations of intervener and public comments are posted on the NIRB portal.

- *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.*

Response: WCGC has updated the Wildlife Management Plan to incorporate these recommendations, including implementation of a trigger-based monitoring and mitigation framework to reflect the GN recommendations. The plan provides detailed measures and procedures to protect wildlife habitat and avoidance of wildlife, including caribou in accordance with NIRB Screening 21CN042 and KIA land use permits. More specifically, WCGC refers the GN to Section 6 of the plan (pg 17- 19) for caribou specific mitigation and management of exploration activities or measures to protect caribou.

GN #02: Spill Plan

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.*

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

GN # 03: Archaeological Assessment

GN recommends that 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: WCGC agrees with these recommendations. WCGC will hire a qualified archaeologist to conduct the necessary archaeological surveys in 2026, record sites and ensure the protection of heritage and culturally significant areas prior to camp construction and drilling. WCGC will

continue to adhere to the Nunavut Act and the Nunavut Archaeological and Paleontological Sites Regulations.

Responses to CIRNAC Comments and Recommendations

CIRNAC #1: Fuel and Hazardous Material Storage

CIRNAC recommends:

- *Specifying secondary containment capacity sufficient to retain at least the largest container volume (e.g., $\geq 110\%$), including allowance for snow, ice, and precipitation accumulation;*
- *Maintaining a regular inspection and maintenance program for containment systems and fuel-handling components; Ensuring spill kits are readily available at each fuel storage and transfer location, and maintaining functional drain covers on all berms;*
- *Maintaining appropriate setbacks from waterbodies for fuel storage and refueling activities; and*
- *Storing any used oil or fuel-contaminated materials in labelled, sealed containers and backhauling them to an approved facility for disposal or recycling.*

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

CIRNAC #2: Sewage and Solid Waste Management

CIRNAC recommends that the Proponent considers:

- *Segregating waste streams so only appropriate combustible materials are incinerated (excluding non-combustibles); and*
- *Confirming ash acceptance requirements with the receiving landfill and testing only if required by the facility prior to disposal.*

Response: WCGC agrees to these recommendations and will implement them.

CIRNAC #3: Land Disturbance and Site Reclamation

CIRNAC recommends:

- *Avoiding expansion into wetlands and drainage lines, and routing activity on durable ground and existing trails;*
- *Using erosion and sediment controls where clearing/levelling is necessary, and re-vegetating disturbed areas where feasible;*
- *Monitoring for permafrost settlement in the camp area during and after construction seasons;*
- *Inspecting the old camp footprint and removing any debris or contaminated soil encountered, with proper disposal and documentation; and*
- *Restoring natural contours and stockpiling/replacing salvaged organic material for site stabilization and vegetation recovery.*

Response: WCGC agrees to these recommendations and will implement them during the progressive closure of Pistol Bay Camp and future closure of Vickers Camp.

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 Qaujimajatuqangit, 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: WCGC acknowledges DFO's recommendations. WCGC will continue to engage, train, employ and consult with land users and local Inuit.

Response to Fisheries and Oceans Canada

The Department of Fisheries and Oceans Canada, Fish and Fish Habitat Protection Program (DFO-FFHPP) has reviewed the Whale Cove Project Camp & Regional Exploration Expansion Project Proposal Application in accordance with DFO's mandate. The documents outline the projects water withdrawal activities which have the potential to impact fish and fish habitat.

Direct fish mortality can occur during water withdrawal activities through entrainment/impingement. Entrainment occurs when a fish is drawn into a water intake and cannot escape. Impingement occurs when a fish is held in contact with the intake screen and is unable to free itself.

Excessive amounts of water withdrawn from ice-covered waterbodies can impact fish through oxygen depletion, loss of over-wintering habitat and/or reductions in littoral habitat.

DFO recommends that in order to comply with the Fisheries Act, it recommends that the proponent follow protective measures outlined by DFO, follow in-water works restrictions, end of pipe fish protection code of practice, follow best practices for water withdrawal and notify DFO if a HADD occurs.

Response: Thank you for your recommendations and support for the project. WCGC will continue to follow DFO guidance and best practices as outlined in your comments and recommendations.

Responses to Transport Canada Recommendations

Transport Canada (TC) has reviewed the project proposal. For this project, the proponent proposes, among other activities, water withdrawal from Fish Lake. Works, such as water withdrawal, in

navigable waterways are subject to the Canadian Navigable Waters Act (CNWA) and in some cases may require an approval under the CNWA. Works in non-navigable waters are not subject to the CNWA.

The proponent is advised to self-assess using the Navigation Protection Program (NPP) Project Review Tool to determine if approval under the CNWA will be required.

Response: WCGC would like to thank TC for their review and support of our project. As per the comments, WCGC will complete the CNWA self-assessment and adhere to the CNWA for water withdrawal using the information provided.

Response to Ghotelnene K'odtineh Dene Comments

GKD Comment 1:

The Ghotelnene K'odtineh Dene (GKD) have noted their long-standing reliance on the Beverly/Qamanirjuaq caribou across their traditional territory, where they hold Section 35 rights. The GKD raise concerns that the Whale Cove Project Camp and Regional Exploration Expansion could cause significant negative impacts on ecosystems, wildlife, and their harvesting practices, along with broader socio-economic effects. In particular, they highlight that the project is located in critical calving and seasonal use areas of the Qamanirjuaq herd, making it especially sensitive. Given the increased scale and intensity of exploration activities, they are concerned about potential harm to caribou and their habitat and do not have confidence in the proposed mitigation measures.

Response: Thank you for your comments. WCGC recognizes and respects the importance of caribou to the Ghotelnene K'odtineh Dene and shares your concern for the protection of caribou and their habitat in areas that may be influenced by WCGC's exploration activities. In response to your input and the GNs, WCGC has updated the Wildlife Monitoring and Management Plan (WMMP) to strengthen caribou-specific mitigation, including implementation of a trigger-based monitoring framework, operational controls, and the ability to suspend activities where required. The revised WMMP is attached for NIRB to review.

WCGC remains committed to engagement with GKD and welcomes dialogue to ensure that your concerns are meaningfully reflected in project planning and implementation.

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.

Response:

Under the Impact Assessment Agency of Canada (IAAC, 2025²), cumulative effects are defined as changes to environmental, health, social, or economic conditions resulting from a project's

² 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->

residual effects in combination with the residual effects of other past, existing, and reasonably foreseeable physical activities. Whale Cove Gold Corp. (WCGC) has prepared this response to document activities from nearby projects and communities which may overlap spatially and temporally with the works proposed in the NIRB application. As stated in the application, WCGC's proposal was not anticipated to result in adverse environmental or socioeconomic impacts. The activities described in the application were incremental and reversible, including:

- Increasing the size of the already-approved, Vickers camp from 35 to 100 persons
- Adding two exploration drills for a total of four operating drills
- Operating a mobile 20-person camp in the project area as needed.

Relocation of the Pistol Bay camp reduces impacts by placing workers and equipment closer to exploration targets with improved access and year-round water use. Exploration camps are minimalist in nature and designed for quick set-up and take-down. The Weatherhaven tents and plywood shelters proposed are typical in the Kivalliq region, and do not require permanent foundations in the ground. Upon removal of an exploration camp, the landscape is returned to its original condition. Drill holes associated with exploration are reclaimed as they are completed, and equipment is moved either by helicopter, or over snow and ice to eliminate ground disturbance. Lastly, to reduce potential impacts to wildlife including caribou and caribou habitat, WCGC is committed to adhering to the Wildlife Monitoring and Management Plan (WMMP). There are no expected residual effects for the low-intensity nature and reversibility of the activities proposed by WCGC, following implementation of mitigation and standard management plans.

Methodology

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. An assessment must consider other *physical activities* that have been conducted up to the time of the analysis, or that will be conducted in the reasonably foreseeable future. In addition to eliminating residual effects through design, operation and management, this principle forms the basis of WCGC's methodology for evaluating cumulative effects. For this screening assessment, nearby communities, infrastructure, and projects in a 300km radius surrounding the Whale Cove Project were plotted using GIS software. Projects were identified and classified from the NIRB public registry³ followed by articles from news outlets or company releases. The activity causing disturbance (active mining, exploration, staking, etc.) was considered, along with whether or not the project was active. Active projects were considered to be those with reported and planned physical activities in 2026 and beyond, or applications in progress to permit land use. Existing infrastructure on the land was noted where information was available, including camps or drill pads. Linear distance from each project was calculated to the WCGC Vickers Camp.

guidance/practitioners-guide-impact-assessment-act/policy-framework-assessing-cumulative-effects-under-impact-assessment-act.html . Accessed on Feb 24, 2026.

³ Nunavut Impact Review Board. 2026. NIRB Public Registry – Application Portal. <https://www.nirb.ca/application?strP=r> . Accessed on April 8, 2026

Results

The spatial information considered for the cumulative effects assessment is plotted on a map in **Figure 1**. Many of the mineral exploration projects were found to be inactive or historic, resulting in no present-day physical activities, effects nor residual effects. A fuller context is provided by considering the summaries in Tables 1, 2, and 3.



Figure 1: Historic, Planned, and Active Projects nearest to the Whale Cove Gold Corporation Project

To facilitate screening of projects with spatial and temporal overlap, the results were grouped into three categories: communities, active projects, and inactive projects. The Whale Cove Project Vickers Camp is located inland from the community of Whale Cove: 23 km northwest of the townsite and 16 km northwest of the Whale Cove airport. Access is via an existing all-weather road. Whale Cove is not connected by road to any other communities, and WCGC is the closest known exploration project to the community. Table 1 shows distances from the WCGC project to permanent communities.

Table 1: Communities in the Vicinity of WCGC Vickers Camp by Distance

Community	Distance (km)
Whale Cove	23
Rankin Inlet	65
Arviat	152
Chesterfield Inlet	155
Baker Lake	272

There is no active extraction in the vicinity of Whale Cove, the nearest operating projects being the Meliadine gold mine (25 km north of Rankin Inlet) and Meadowbank gold mine (110 km north of Baker Lake). Active projects in the vicinity of the WCGC project are listed in Table 2. Meliadine Mine is the closest project (83 km from Vickers) and most likely to overlap temporally with the physical activities proposed by WCGC. The mine is expected to operate beyond 2030 and has undergone Impact Assessments; environmental effects are mitigated and managed in accordance with NIRB conditions and regulatory requirements. The remaining projects in Table 2 are diffusely spaced at increasing distances from the WCGC project. They are all low-intensity land uses for mineral exploration, similar to the WCGC project. They consist of temporary or seasonal camps, served by helicopter or fixed wing aircraft landing on short airstrips. No other linear infrastructure exists or is proposed among projects in Table 2. The limited activities from exploration projects in the vicinity are not sufficiently advanced to influence environmental conditions. Given that the scope of the activities in the WCGC application are also low intensity and reversible, there is no anticipated shared pathway of residual environmental effects with these other exploration projects.

Table 2: 2026 Active Projects in the Vicinity of WCGC Vickers Camp by Distance

Project Name	Distance (km)	Project Stage	Resource	Land Use
Meliadine Mine	83	Operating mine	Gold	Mine site, airstrip, all-weather road
Cache Zone 2026	91	Early-Stage Exploration	Unknown	Temporary camp

Victory Lake	147	Early-Stage Exploration	Uranium	Seasonal camp
Hook Lake	168	Early-Stage Exploration	Gold	Seasonal camp
Baker Basin	200	Early-Stage Exploration	Uranium	Temporary one-person camp
Ferguson Lake	217	Advanced Exploration	Ni–Cu–Co	Seasonal exploration camp; short airstrip, drill pads
Angilak	292	Advanced Exploration	Uranium	Seasonal exploration camp; short airstrip, drill pads, exploration trails

Table 3 lists projects within 300 km of WCGC which are dormant or without a proposed timeline. They are not expected to temporally overlap with the WCGC application and hence could not contribute to cumulative effects. They are included for completion to support the features shown in Figure 1 which are not active projects. 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 still in the pre-development phase and there is no certainty the project will proceed or be approved.

Table 3: Inactive Projects in the Vicinity of WCGC Vickers Camp by Distance

Project Name	Distance (km)	Project Stage	Resource	Land Use
Kivalliq Hydro-Fibre Link	<5	Proposed project	Power & data link corridor	Not built
Huckleberry Claim	57	Early-stage exploration	Uranium	None
Peter Lake	88	Early-stage exploration	Gold	None
Fox Lake	113	Early-stage exploration	Gold	None
Tugak Gold	152	Historic early-stage exploration	Gold	Small seasonal camp
Parker Lake	153	Early-Stage Exploration	Gold	None
Marce Claims Exploration	160	Historic exploration	Base metals	None

Tagak	161	Historic early-stage exploration	Uranium	None
Turquetil–Esker Drilling Program	167	Historic Exploration	Uranium	Old drill pads
Cone Hill	194	Early-stage exploration	Gold	None
Witch Lake Claim Staking	206	Claim staking	Unknown	None
Aberdeen Lake–Pelly Lake Overland Haul	240	Proposed winter road corridor	Infrastructure (haul route)	Not built
Turqavik Aberdeen	282	Early-Stage Exploration	Uranium	Seasonal camp
Nut Lake	289	Early-Stage Exploration	Uranium	Seasonal camp
Yath Property	292	Historic Early exploration	Uranium	None
North Thelon Joint Venture	297	Historic Exploration	Uranium	Historic drill pads

Conclusion

WCGC has applied to NIRB to conduct exploration activities centred at their Vickers Camp, near the community of Whale Cove. These include increasing the size of the already-approved, Vickers camp from 35 to 100 persons; adding two exploration drills for a total of four operating drills; and operating a mobile 20-person camp in the project area, as needed. These physical activities are low-intensity and reversible with no anticipated residual effects. Furthermore, to reduce potential impacts to wildlife, including caribou, WCGC is committed to implementing the WMMP.

In this assessment, nearby projects and communities were screened to identify if spatial or temporal overlap between projects may warrant further assessment of cumulative environmental effects. The screening showed that the land in the area is mostly undisturbed. Many projects (Table 3) could be screened out based on being dormant and having no active land use. The remaining projects (Table 2) were distant, limited to small exploration programs, or in the case of the Meliadine Mine, have been subject to their own impact assessment, management, and mitigations. When assessed against the IAAC connection principle, no nearby projects or communities present overlapping spatial or temporal effects nor have residual effects that could interact cumulatively with the WCGC proposal.

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

In summary the BQCMB had the following concerns and recommendations:

The BQCMB emphasizes the importance of protecting the Beverly and Qamanirjuaq caribou herds, which are affected by the project's expansion, including increased camp capacity, drilling, and exploration activities. At present, based on the materials reviewed, the Board does not have enough information to understand the project's potential implications for caribou. For a project of this nature, the BQCMB would expect to see clear information on:

- *Whether the proposed expansion footprint overlaps with calving or post-calving areas, as the BQCMB does not support the expansion proceeding in such areas*
- *Whether the project area overlaps with other important habitat areas including migratory areas*
- *Whether local caribou use or caribou harvesting may be affected*
- *What caribou-specific mitigation, monitoring, oversight, and adaptive management measures are proposed*
- *Whether seasonal timing restrictions are needed to reduce disturbance to caribou*

Response: WCGC thanks the BQCMB for these recommendations. WCGC recognizes the importance of protecting caribou and their habitat within and near the Project area. WCGC currently adheres to the mobile protection measures and KIA recommendations for caribou protection as outlined in our land use permits. As a result, WCGC has recently updated the Wildlife Monitoring and Management Plan (WMMP) to reflect these comments and have attached them to this submission to NIRB.

Based on recent available data, the Project is not located within currently identified core calving areas; however, WCGC recognizes that caribou distribution may vary between years and that animals may occur within or near the Project area. As such, WCGC has implemented a conservative, trigger-based mitigation framework within the WMMP, including monitoring, setbacks, and operational controls, with the ability to suspend activities where required.

For a project of this nature, the BQCMB would expect to see clear information on:

- *How cumulative effects on caribou will be considered given other existing and foreseeable activities in the project area*

Response: WCGC refers the BQCMB to the GKD Comment 2 response. The scale of this proposed project is small and focused on low impact exploration camp construction and activities, progressive closure of Pistol Bay Camp and a commitment to monitor caribou and manage our activities as outlined in the WMMP. No significant cumulative effects are anticipated on caribou as WCGC will ensure no barriers to caribou movement and will adhere to the WMMP triggers and action levels. Furthermore, given the projects isolation from nearby, foreseeable mining projects, there are no predicted cumulative effects on disturbance to caribou and caribou habitat.

For a project of this nature, the BQCMB would expect to see clear information on:

- *Whether updated community engagement has occurred in relation to the current expansion, and how caribou-related concerns raised in consultation have been addressed*

WCGC has undertaken engagement with the Hamlet of Whale Cove, local land users, and Inuit organizations in relation to the proposed expansion. Feedback received has informed the development of mitigation measures within the WMMP, including caribou monitoring, adaptive management triggers, and operational controls.

WCGC remains committed to ongoing engagement with community members and welcome continued dialogue to ensure that your concerns are meaningfully reflected in project planning and implementation.