



CIRNAC Comments to NIRB

Re: Notice of Screening for Bayridge Resources Corp's "Baker Basin Project" Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
26EN014
Our file - Notre référence
GCdocs# 145126009

April 9, 2026

Jordan Takkirug
Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Bayridge Resources Corp's "Baker Basin Project" Proposal

Dear Jordan Takkirug,

On March 16, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Bayridge Resources Corp's "Baker Basin Project" proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal

CIRNAC #1: Fuel Storage and Spill Response

The Project proposes on-site storage of approximately 10,000–15,000 L of fuel at the temporary outpost, including approximately 10,250 L Jet A and 5,125 L diesel, with an additional up to 2,000 L per drill site, resulting in multiple distributed storage locations. Fuel will be stored in 205-L drums within bermed areas, with spill kits providing ~240 L sorbent capacity per unit. While the Spill Contingency Plan considers failure of the largest container with potential involvement of adjacent drums, it is not demonstrated that secondary containment or response capacity is commensurate with credible worst-case spill volumes, including multi-drum releases at the outpost or across drill sites. The use of multiple storage and transfer locations increases handling frequency and spatial spill risk, particularly under sub-Arctic conditions (frozen ground, seasonal thaw, shallow active layer) that may reduce containment effectiveness and complicate recovery. CIRNAC recommends that the Proponent considers:

- Demonstrating that secondary containment capacity is sufficient to contain at least 110% of the volume of the largest fuel container, with allowance for precipitation and snowmelt;
- Aligning spill response capacity (equipment, personnel, recovery volumes) with credible worst-case spill scenarios at the outpost and drill sites; and,



- Updating the spill response plan to include descriptions of handling and disposition of contaminated materials (e.g., soil, snow, water, sorbents) generated during a spill response.

CIRNAC #2: Waste Management

The Project proposes up to 100 days of field activities and approximately 3,500 m of diamond drilling, with drill returns water and cuttings identified as <25 m³/day. Drill returns and other liquid wastes are proposed to be managed using sumps/trenches. The proponent also identifies outpost greywater as <5 m³/day and sewage as variable. In a sensitive receiving environment with limited baseline water quality information, drill returns, fine sediments, and dissolved constituents (e.g., associated metals) to reach nearby waterbodies via overtopping, seepage, or runoff, particularly during rain events or seasonal thaw when near-surface flow connectivity increases. CIRNAC recommends that the Proponent consider:

- Demonstrating sump/trench capacity, siting, and operation remain effective under field conditions (e.g., precipitation, snowmelt, thaw);
- Describing a water-quality verification approach capable of detecting potential changes in receiving environments, including baseline characterization where practicable and monitoring at representative locations; and
- Undertaking sump inspection, maintenance, and end-of-season closure (e.g., backfilling and stabilization) to maintain containment and limit seepage.

CIRNAC #3: Acid Rock Drainage / Metal Leaching

The Project includes drilling and management of drill returns and cuttings through sump-based containment, with drill returns water and cuttings in the Waste Management Plan. While the proponent documents include detailed procedures for drill returns management, sump use/closure, and handling of mineralized/radioactive cuttings based on radiometric thresholds, they do not clearly demonstrate whether acid-generating or metal-leaching potential (ARD/ML) has been screened out for drill cuttings/core, or how potentially reactive materials would be identified and managed if encountered. Acid generation and metal leaching from exposed minerals are a recognized pathway for exploration/drilling activities and highlights the importance of avoiding or managing materials with ARD/ML potential. CIRNAC recommends that the Proponent consider identifying whether ARD/ML is expected based on site geology/history and state what field screening or sampling will be used where uncertainty exists (i.e., how potentially reactive material will be recognized early).

CIRNAC #4: Consultation with Interested Parties

CIRNAC recommends that the Proponent engage with potentially interested parties on its project proposal. These parties include the Baker Lake Hunters and Trappers Organization, the Hamlet of Baker Lake, the Kivalliq Inuit Association, the Ghotelnene K'odtjeh Dene, and any other relevant organizations or individuals. As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit, Indigenous knowledge, and local knowledge in 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.

CIRNAC #5: Project Materials for Ghotelnene K'odtjneh 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.

CIRNAC recommends that, if not already undertaken, the Proponent ensure that they consult with the Ghotelnene K'odtjneh Dene.

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

