



NIRB File #: 26EN014

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GN # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Overland Hauling
References	• Bayridge Resources Corp. Revised NIRB Application for Screening #126353: Baker Basin Project. (March 2026). • Bayridge Resources Corp. Bissett Lake Property Non-Technical Summary. (January 2025).
IDENTIFICATION OF ISSUE	
Bayridge Resources Corp.'s (Proponent) submission materials for the Baker Basin Project (Project) include references to overland hauling. However, no details are provided by the Proponent about route selection, what material/equipment will be hauled, or the mitigation measures that will be implemented. Without this information, the Government of Nunavut cannot fully assess the potential impacts of the Project on the terrestrial environment, including wildlife.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The Proponent's Non-Technical Summary states that the Project will include a "...one-time mid-to late-April-May 2026 overland hauling, subject to approvals and ground conditions..." (Page 1). However, details regarding route selection, material/equipment to be hauled, and mitigation measures for overland hauling are not provided in the Project submission materials. For example, the Proponent's Revised NIRB Application for Screening only states the following regarding this aspect of the Project, "...overland haul with Peters Expediting based in Baker Lake..." (Page 4). Overland hauling can result in environmental impacts such as disturbance to wildlife and or an increase in spill risks if not properly managed. As such, clearly defining its scope and planned mitigation measures is essential to assess impacts and identify effective mitigation measures.	
REQUEST(S)/RECOMMENDATION(S)	
The GN requests that the Proponent provide clarification on the proposed overland hauling activities, including: • General route approach; • What equipment/materials will be hauled; and • Mitigation measures.	

GN # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Management Plan: Nests of Raptors and Non-migratory Birds Mitigation Measures
References	• Bayridge Resources Corp. Revised NIRB Application for Screening #126353: Baker Basin Project. (March 2026). • Bayridge Resources Corp. Wildlife Management Plan: Unlocking Canada's Next High-grade Uranium Basin. (January 2026).
IDENTIFICATION OF ISSUE	
The mitigation measures for breeding and nesting birds identified in the Proponent's Wildlife Management Plan (Wildlife Plan) lack sufficient detail about how personnel will address encounters with nests of raptors and non-migratory birds. The GN needs this information to assess potential effects from the Project on wildlife, particularly raptors and non-migratory birds, and to determine if the mitigation measures are suitable.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The mitigation measures for breeding and nesting birds identified in the Wildlife Plan lack sufficient detail. For example, the only information on this topic is presented in section 3.2.6 of the Wildlife Plan, which states: “ • <i>Avoid disturbing nests and eggs; halt activities if active nests are found.</i> • <i>Maintain a 1.5km buffer around peregrine falcon nests.</i> • <i>Report sightings to Environment Canada and log GPS coordinates.</i> • <i>Follow the Migratory Birds Convention Act to avoid contraventions.”</i> (Pages 7&8) This text illustrates that buffer zones are not specified for other raptor species or non-migratory birds (only Peregrine Falcon). Additionally, this text illustrates that there is no detail as to how long buffer zones will be maintained or who is responsible for deciding when they are implemented.	
REQUEST(S)/RECOMMENDATION(S)	
The GN requests that the Proponent update their Wildlife Plan to provide details about how raptor and non-migratory bird nests will be avoided and protected during project activities, including: • Identify buffer zones around nests of species other than Peregrine Falcon; • Clarify how long buffer zones will be in place; and	

- Identify who will determine if/when project activities can occur within buffer zones (e.g., Project Manager or Wildlife Monitor).

GN # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Management Plan: Furbearers and Other Terrestrial Mammals Mitigation Measures
References	• Bayridge Resources Corp. Revised NIRB Application for Screening #126353: Baker Basin Project. (March 2026) • Bayridge Resources Corp. Wildlife Management Plan: Unlocking Canada's Next High-grade Uranium Basin. (January 2026).
IDENTIFICATION OF ISSUE	
The GN notes that the Wildlife Plan lacks sufficient detail about how terrestrial mammals, along with their dens, will be avoided and protected. The GN needs this information to assess potential effects from the Project on the terrestrial mammals and their dens, and whether mitigations are suitable.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The Proponent includes the following information regarding terrestrial mammals (specifically furbearers) under section 3.2 of the Wildlife Plan: “ • <i>Halt work if bears are present until they leave the area.</i> • <i>Report all bear interactions or incidents to the KIA and GN Wildlife Biologist.</i> • <i>Avoid and report active dens (e.g., wolf, grizzly bear, wolverine, fox) to authorities. Maintain these buffers:</i> ○ <i>Wolves: 800m</i> ○ <i>Grizzly Bear: 300m</i> ○ <i>Wolverine: 2km</i> ○ <i>Fox: 150m</i> • <i>Do not disturb dens, report GPS coordinates to regulatory authorities.” (Page 6)</i> This text illustrates that steps to be taken if animals enter work areas are not provided in the Wildlife Management Plan. Additionally, it is not explicit whether the buffer zones apply to the animals themselves or strictly to dens.	
REQUEST(S)/RECOMMENDATION(S)	
The GN requests that the Proponent provide more details about how terrestrial mammals and their dens will be avoided and protected during project activities, through the following: • Detail protocol and mitigation measures to be followed if an animal enters active work areas;	

- Identify buffer zones to be respected around dens of other furbearing mammals;
- Clarify how long buffer zones will be in place; and
- Identify who will determine if/when project activities can occur within buffer zones (e.g., Project Manager or Wildlife Monitor).

GN # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Management Plan - Roles and Responsibilities
References	• Bayridge Resources Corp. Revised NIRB Application for Screening #126353: Baker Basin Project. (March 2026) • Bayridge Resources Corp. Wildlife Management Plan: Unlocking Canada's Next High-grade Uranium Basin. (January 2026).
IDENTIFICATION OF ISSUE	
The Wildlife Plan lacks clarity on the roles and responsibilities of key team members, including the Project Manager, Wildlife Monitor, and other personnel. This information is required for the GN to understand how the mitigation measures identified in the Project Proposal will be implemented.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The Wildlife Plan does not clearly define the roles and responsibilities of key personnel, including the Project Manager, Wildlife Monitor, and other team members. It also contains inconsistencies and lacks sufficient detail on who is responsible for reporting wildlife encounters, identifying buffer zones, issuing stop-work or start-work orders, determining when nests or dens are inactive, and notifying regulatory agencies. To be effective, the Wildlife Plan must clearly outline who is accountable for reporting wildlife encounters, establishing buffers, making work-stoppage decisions, assessing the status of animal residences, and communicating incidents to regulators.	
REQUEST(S)/RECOMMENDATION(S)	
The GN requests that the Proponent clearly define the roles and responsibilities of the Project Manager, Wildlife Monitor, and other personnel with respect to reporting wildlife encounters, deciding where to establish buffers, when to stop or start work, determining when an animal residence is inactive, and reporting incidents to regulatory agencies.	

GN # 05	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Waste Management
References	• Bayridge Resources Corp. Waste Management Plan. (December 2025). • Government of Nunavut. Environmental Guideline: General Management of Special and Hazardous Waste. (March 2023).
IDENTIFICATION OF ISSUE	
The GN notes several concerns with the Proponent's Waste Management Plan (Waste Plan). These generally include: - Missing management plans (referred to in the Waste Plan but missing from the submission materials) - An out-of-date reference to GN Environmental Guidelines - Unclear alignment with GN Environmental Guidelines This information is necessary for the GN to assess the Project's potential effects on the terrestrial environment and to determine whether the proposed mitigation measures are adequate.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The Proponent's Waste Plan identifies the expected waste streams associated with Project activities and describes management measures for hazardous, non-hazardous, and special wastes, including radioactive drill cuttings. Availability of Related Management Plans While the Waste Plan refers to other related management plans (e.g., a Spill Contingency Plan, Radiation and a Hazard Control Plan) on page 2, these plans were not provided with the Project's submission materials. Out of Date Reference On page 2 of the Waste Plan, the Proponent cites "Government of Nunavut Environmental Guideline for the General Management of Hazardous Waste (2010)". The GN notes that an updated version of this document, from 2023, is available. Alignment with GN Guidelines The Government of Nunavut's General Management of Special and Hazardous Waste (March 2023) outlines requirements for the identification, characterization, segregation, storage, transport, treatment, and disposal of waste in a manner that protects the environment. The Waste Plan outlines measures such as secondary containment, setback distances, incineration	

practices, backhauling, and transportation requirements. However, the GN notes that the Waste Plan could be strengthened by confirming implementation, authorized disposal pathways, and record-keeping demonstrating alignment with GN guidelines.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent:

1. Provide a copy of the Spill Contingency Plan, Radiation and a Hazard Control Plan for review with the application.
2. Confirm that all waste streams, including special and hazardous wastes, will be classified, segregated, labelled, stored, transported, treated, and disposed of in accordance with the GN's Environmental Guidelines: General Management of Special and Hazardous Waste (March 2023), applicable incineration guidelines, and relevant permit and license conditions.
3. Confirm that all waste removed from the Project area will be transported to authorized recycling or disposal facilities, and that waste tracking, manifests, and disposal records will be retained and made available to GN regulators upon request.
4. Commit to maintaining records of waste management training, incinerator operation, inspections, and monitoring, and to implementing the Waste Plan in coordination with other applicable Project management plans.

GN # 06	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Spill Reporting, Response and Contingency
References	• Bayridge Resources Corp. Spill Contingency Plan. (December 2025). • Environmental Protection Act, Spill Contingency Planning and Reporting Regulations, R-068-93.
IDENTIFICATION OF ISSUE	
The GN has reviewed the Proponent's Spill Contingency Plan (spill plan) and notes that the document does not reference the GN's <i>Spill Contingency Planning and Reporting Regulations</i> (Regulations). Without this reference, it is unclear whether the Proponent is aware of the applicable legislative requirements or whether these requirements informed the development of the Spill Plan.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
The GN notes that the Spill Plan does not reference the GN's Regulations. Without this reference, it is unclear whether the Proponent is aware of the applicable legislative requirements. For example, it is unclear if the Proponent is aware of reportable spill amounts as outlined in Schedule B of the Regulations. Additionally, it is unclear if the Proponent is aware of section 4.2 (a-j) of the Regulations, which describes mandatory information to be included with spill plans.	
REQUEST(S)/RECOMMENDATION(S)	
The GN requests that the Proponent revise the Spill Plan to: - Include a reference to the Regulations; - Ensure that information required per the Regulations is included; - Clearly reference Schedule B to ensure spills are reported when necessary.	

GN # 07	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Abandonment and Restoration
References	Bayridge Resources Corp. Abandonment and Restoration Plan. (December 2025).
IDENTIFICATION OF ISSUE	
The Abandonment and Restoration Plan commits to site inspections during and following Project activities to confirm that infrastructure has been removed and disturbed areas are restored. However, the GN notes that clarification is requested regarding inspection procedures, documentation, and the steps that will be followed if evidence of contamination or residual waste is identified during inspections.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
Post-activity site inspections are a key element of effective abandonment and restoration, and support verification that Project activities have not resulted in residual contamination or unmanaged waste. Clear inspection procedures and defined response measures are an important component in the Abandonment and Restoration Plan to ensure that any contamination is identified promptly and appropriately addressed.	
REQUEST(S)/RECOMMENDATION(S)	
The GN recommends that the Proponent in the Abandonment and Restoration Plan: 1. Clarify how site inspections will be conducted and how inspection results will be documented. 2. Describe the procedure that will be followed if evidence of contamination is identified during inspections, including assessment of the extent of contamination and implementation of appropriate cleanup or remediation measures.	

GN # 8	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeological and Palaeontological Resources
References	NIRB 126353/ 26EN014: Notice of Screening and Comment Request for Bayridge Resources Corp.'s "Baker Basin Project" Proposal
CONCERNS	
<i>Project Summary</i> Bayridge Resources Corp. proposes to conduct a single-season mineral exploration program at the Baker Basin Project, located approximately 65 km southeast of Baker Lake. The proposed activities include geological mapping, prospecting, ground-based radiometric surveys, verification of historic drill hole locations, and diamond drilling. The Project is proposed to operate on a daily fly-in / fly-out basis from Baker Lake using fixed-wing and rotary-wing aircraft, with a small temporary exploration outpost to be established at a previous exploration camp location. The outpost is described as including temporary tents for core logging, emergency shelter, and storage, together with fuel storage, a generator, toilet, incinerator, helicopter landing area, and associated support functions. Project materials also refer to one-time mid- to late-April–May 2026 overland hauling, the use of snowmobiles and ATVs in support of Project activities, pumping water from nearby lakes using portable pumps and hoses, excavation and use of greywater and drill sumps, and the storage and handling of fuel and hazardous materials at the outpost and, in some cases, at drill sites. A review of Government of Nunavut (GN) records identified a previous archaeological impact assessment that has been completed within the mineral claims associated with the Baker Basin Project. In addition, at least one archaeological research project involved archaeological fieldwork within the mineral claims outline. Further, a significant number of archaeological sites have been recorded and reported to GN-CH for formal registration in the Nunavut Archaeological Sites Database. Based on landscape-level considerations, including the presence of current lakes and waterways, eskers, ridges, and other raised landforms, together with 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 additional, as yet unrecorded, sites of archaeological significance on the lands proposed for Project-related impacts, pursuant to Article 33.5.12 of the <i>Nunavut Agreement</i>. While the revised NIRB application refers to no known archaeological sites within the areas of impact, the project application does not include mapping at a sufficient scale to confirm whether these areas have been subject to archaeological assessment under a CH-issued permit and it is likely that the lack of recorded archaeological sites reflects the lack of systematic archaeological assessments having been completed in these areas. <i>Project-Specific Concerns</i>	

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:

- establishment, operation, servicing, and removal of the temporary exploration outpost at the previous exploration camp location, including tents, generator locations, toilet, incinerator, storage areas, fuel handling and storage areas, helicopter landing areas, and any associated laydown, staging, or support areas;
- drill site preparation, drilling, drill sumps, laying and removal of water lines or hoses, fuel and consumables storage, and associated temporary work areas;
- greywater sump excavation, use, backfilling, and restoration, together with any other waste management or wastewater disposal areas requiring terrestrial ground disturbance;
- helicopter landing areas that are planned, identified, or intended for use in support of Project activities;
- any terrestrial fixed-wing landing or support areas proposed outside existing authorized airstrips;
- use of terrestrial access routes associated with overland hauling, ATV travel, drill support, mobilization, servicing, resupply, or demobilization, including any terrestrial portions of winter or spring access routes; and
- demobilization, back-hauling, cleanup, reclamation, removal, or closure activities associated with drill sites, support areas, fuel caches, waste storage areas, landing areas, and any other Project components where terrestrial access or terrestrial ground disturbance is required.

GN notes that the application materials refer to the absence of currently known heritage sites (archaeological or palaeontological) and to the use of standard chance-find procedures. CH does not consider a chance-find protocol to be a substitute for prior archaeological assessment. A chance-find protocol is a contingency response measure that applies only if archaeological materials or features are encountered during Project activities. The identification of an area of previous disturbance at a former exploration camp site does not remove the requirement for archaeological assessment where current Project activities involve terrestrial ground disturbance. 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 (to ensure the Proponent can comply with the *Nunavut Archaeological and Palaeontological Sites Regulations* (NAPSR)).

GN notes that the proposal includes one-time mid- to late-April–May 2026 overland hauling and identifies snowmobiles and ATVs for use in support of Project activities. However, the application does not identify the proposed overland route, whether travel would be confined to existing/established trails, or whether any trail construction is proposed. As such, the submission package does not provide sufficient information to assess the potential for impacts to heritage sites or to determine the requirement for an archaeological assessment or other requirements, including site avoidance, may apply to the proposed access arrangements.

RECOMMENDATIONS

To ensure compliance with the *Nunavut Act* and the NAPSRS, the GN recommends that the Proponent consult directly with CH on archaeological requirements for specific Project components 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 further recommends the following:

- **Site protection:** All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed during the course of Project activities. CH recommends that known or newly recorded archaeological sites are avoided using a minimum 50 metre buffer, or greater where directed by CH.
- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the protective 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 Department of Culture and Heritage (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.