



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

April 13, 2026

To: The Nunavut Impact Review Board

Via email: info@nirb.ca

Re: Screening comments on the Baker Basin Project (NIRB # 26EN014)

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), we thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comment on the Baker Basin Project (NIRB file # 26EN014). The mandate of the BQCMB is to safeguard the Beverly and Qamanirjuaq caribou herds, primarily in the interests of Indigenous peoples from Nunavut, the Northwest Territories, Saskatchewan and Manitoba who have traditionally relied upon these herds, and to advise governments and caribou range communities on conservation and management of the herds and their ranges.

The BQCMB is providing these comments because the proposed Baker Basin Project overlaps with sensitive Qamanirjuaq calving, post-calving and summer habitat. Calving and post-calving grounds are among the most sensitive and important habitats used by barren-ground caribou, and their protection is fundamental to the long-term conservation of the herd.

Specifically, our concerns are:

1. **Caribou habitat overlap and timing:** The proposed project area overlaps known calving, post-calving, and summer habitat of the Qamanirjuaq herd. The proposed operating season also overlaps these sensitive periods. This is particularly concerning given the importance of calving and post-calving areas to cows and calves, and the fact that the Proponent's own Wildlife Management Plan (WMP) recognizes that parts of the project area are subject to the Nunavut Land Use Plan (NLUP) measures for caribou calving and post-calving habitat, including seasonal restrictions, monitoring requirements, and work stoppage measures. Disturbances during these periods can have consequences for calf survival and herd recruitment. In BQCMB's view, the core issue is not only whether mitigation is proposed, but whether industrial exploration should proceed at all in habitat this sensitive during these times of the year.
2. **Scale and type of activity:** Although the project is described as a single-season exploration program, it includes up to 100 days of activity, daily fixed-wing and helicopter-supported access from Baker Lake, a temporary outpost, and up to 3,500 m of diamond drilling. It also includes a defined flight line from Baker Lake to the project area and a temporary outpost intended to support drilling and helicopter operations. In our view, this is a substantial level of activity in an area used by caribou, particularly during sensitive times of the year and in habitat that includes calving and post-calving grounds.
3. **Monitoring and mitigation:** The Proponent has included a WMP and refers to adaptive measures if caribou are present. However, it is still not clear enough how those measures would work in practice, including who will be responsible for monitoring caribou presence, who will have authority to pause or



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relocate activities, and how those decisions will be documented and communicated. While the WMP states that the Project Manager or Wildlife Monitor may suspend activities, the application materials do not clearly explain when a Wildlife Monitor will be present on site, whether Indigenous wildlife monitors will be used, what thresholds will trigger a stop-work decision, or how nearby communities and rights holders will be informed when caribou interactions occur.

4. **Aircraft disturbance and harvesting impacts:** The proposed use of fixed-wing and helicopter access is a particular concern in an area used by the Qamanirjuaq herd. Aircraft activity can disturb caribou movements and may also affect harvesting opportunities for Indigenous land users. This concern is heightened where repeated flights are tied to daily fly in / fly out operations and drilling support, rather than a short one-time access event. Community comments also reflect concern that aircraft activity may interfere with caribou movement and reduce harvesting opportunities.
5. **Cumulative effects:** This project is not the only source of disturbance in the Beverly and Qamanirjuaq caribou ranges. It adds to a broader pattern of exploration and development across the range, and the combined effects of these projects on caribou and their habitat remain a serious concern. As other reviewers have noted, there is still no effective framework for identifying and assessing cumulative effects to caribou from the growing number of projects across the range, even though repeated disturbance from flights, drilling, and other exploration activity may affect caribou over time.
6. **Community and Indigenous concerns:** While the Proponent has undertaken engagement in Baker Lake and indicates that some changes were made in response to feedback, significant concerns remain regarding caribou, harvesting, and disturbance during sensitive periods. We recognize that the Proponent appears to have undertaken community engagement, however ongoing concern about caribou, harvesting, and aircraft disturbance suggests that stronger protections should be built into the project itself rather than relying on adaptive management once work is underway.

To address the above concerns, the BQCMB recommends the following:

1. Give substantial weight in screening to the project's overlap with Qamanirjuaq calving, post-calving and summer habitat. In the BQCMB's view industrial exploration should not proceed within Qamanirjuaq calving and post-calving grounds and the Baker Basin project should therefore not be advanced.
2. Assess the proposal in the context of the broader pattern of exploration and development across the Beverly and Qamanirjuaq ranges, rather than treating it as an isolated project.
3. If the NIRB determines that future consideration of the proposal is warranted, require the Proponent to work with Baker Lake and relevant Indigenous organizations to hire Indigenous wildlife monitors to observe caribou presence and movement, inform on-the-ground decisions, and support accountability to communities.



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4. If the NIRB determines that future consideration of the proposal is warranted, require the Proponent to clearly identify who has the authority to stop, delay, or relocate activities when caribou are present, what situations would trigger those measures, and how wildlife interactions and responses will be recorded and communicated.
5. If the NIRB determines that future consideration of the proposal is warranted, require the Proponent to minimize helicopter and fixed-wing activity as much as possible and to avoid aircraft activity when caribou are present or moving through the area.
6. Continue engagement with affected communities and rights holders: The Proponent should continue direct engagement with Baker Lake and with Indigenous organizations and rights holders whose harvesting and caribou use may be affected by the project.

The BQCMB does not support approval of this project due to its overlap with sensitive Qamanirjuaq calving, post-calving, and summer habitat, the likelihood of disturbance from the scale and type of proposed activity, and ongoing cumulative effects concerns. As the Board has stated in other files, calving and post-calving grounds warrant the highest level of protection and caution and in the Board's view, industrial exploration should not proceed in these areas.

We look forward to supporting further dialogue to help ensure that decisions about development in barren-ground caribou habitat reflect Indigenous rights, local knowledge, harvesting interests, and long-term herd sustainability.

Please contact Gilly McNaughton, BQCMB Biologist, at gmcaughton@arctic-caribou.com if you have any questions or wish to discuss these comments further.

Sincerely,

Tina Giroux-Robillard
BQCMB Executive Director

cc.

Earl Evans, BQCMB Chairperson

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