

Bayridge Resources Corp.

Wildlife Management Plan

Baker Lake Uranium Project / Baker Basin Project

Revised April 27, 2026

This revised version incorporates clarifications to wildlife mitigation, field authority, and current 2026 program scope.

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1.0 Introduction

This Wildlife Management Plan (the Plan) applies to Bayridge Resources Corp.'s Baker Lake Uranium Project (also referred to in screening materials as the Baker Basin Project) and establishes mandatory requirements for employees and contractors to conduct exploration activities in a manner that avoids or minimizes potential effects on wildlife and wildlife habitat.

The current 2026 program is temporary, exploration-only, and helicopter-supported. Planned activities include geological mapping, prospecting, ground-based radiometric work, verification of historical drill hole locations, environmental and archaeological field work, limited refurbishment of a previously disturbed outpost area, and diamond drilling, subject to approvals. In response to regulatory and stakeholder feedback regarding caribou sensitivity periods, higher-impact activities such as diamond drilling are planned to occur after mid-July to reduce potential interactions during calving and early post-calving periods. No overland hauling, ATV use, snowmobile use, or low-level airborne geophysical surveying is proposed as part of the 2026 program.

This Plan is effective from the issuance of applicable licences, permits, and authorizations until their expiry or replacement. All personnel working on the Project are required to comply with this Plan. A copy of the Plan will be available in digital form and at the Project office or field outpost, as applicable.

- Comply with applicable federal, territorial, and Inuit land administration requirements and minimize risks to human health, safety, and the environment.
- Avoid or minimize adverse effects on wildlife and wildlife habitat, with particular emphasis on caribou and other sensitive species that may occur in the Project area.
- Ensure Project activities are conducted in an environmentally and socially responsible manner, including appropriate consideration of community engagement and regulatory reporting.

This Plan is implemented in conjunction with other Project management plans and procedures, including the Abandonment and Restoration Plan, Spill Contingency Plan, Waste Management Plan, and Radiation Hazard Control Plan.

Personnel will be supported through applicable policies, management plans, and standard operating procedures; familiarization with the terms and conditions of Project licences and permits; and wildlife interaction training,

including bear awareness and response procedures supported by Government of Nunavut guidance such as Bear Safety - Reducing Bear-People Conflicts in Nunavut.

Project activities occurring within areas designated as Limited Use - Caribou Calving (Class 26) under Nunavut Land Use Plan Map A will be conducted in accordance with Sections 2.2.1-1 to 2.2.1-4 of the Nunavut Land Use Plan, including applicable seasonal restrictions, monitoring requirements, and work stoppage measures. Project activities occurring within areas designated as Conditional Use - Caribou Post-Calving (Class 28) under Map A will be conducted in accordance with Sections 2.2.2-1 to 2.2.2-3, with activities adjusted or suspended as necessary based on caribou presence, movement, and aggregation.

2.0 Potential Impacts on Wildlife

Exploration activities may affect wildlife and wildlife habitat through the following pathways:

- Displacement or avoidance: temporary disturbance may cause wildlife to move away from active work areas.
- Habituation or attraction: improper handling of food, waste, or other attractants may draw wildlife into operational areas.
- Unintentional interactions: personnel may encounter nests, dens, calving areas, or other sensitive wildlife features during field activities.

All personnel will receive wildlife awareness training before commencing field activities. Intentionally approaching, feeding, harassing, or disturbing wildlife is strictly prohibited. Employees and contractors are expected to respect wildlife and their habitats, record observations, and follow established reporting protocols. All wildlife sightings will be documented in the Wildlife Record Log and summarized in annual reporting, as required. If wildlife enters the operational area, protective measures will be initiated and work will be paused until the animal has safely moved on. Any encounters involving bears or nuisance wildlife will be reported immediately to project supervisors and the appropriate authorities.

Exploration activities such as geochemical sampling, mapping, prospecting, and ground-based surveys are generally low impact and short in duration. Drilling activities may generate localized noise and human presence that could temporarily disturb wildlife in the immediate area. Project planning has incorporated design-based mitigation measures, including a helicopter-supported access model, avoidance of overland travel, and scheduling of higher-impact activities later in the field season, to reduce the likelihood of interaction with wildlife.

Species at Risk in the Project Area

Species	Scientific Name	COSEWIC Designation	SARA Status
Caribou (Barren-ground population)	Rangifer tarandus	Threatened (2016)	-
Grizzly Bear (Western population)	Ursus arctos	Special Concern (2012)	Special Concern (2018)
Harris's Sparrow	Zonotrichia querula	Special Concern (2017)	Special Concern (2018)
Peregrine Falcon	Falco peregrinus anatum/tundrius	Not at Risk	Special Concern (2012)
Red-necked Phalarope	Phalaropus lobatus	Special Concern (2014)	Special Concern (2019)

Species	Scientific Name	COSEWIC Designation	SARA Status
Short-eared Owl	Asio flammeus	Threatened (2021)	Special Concern (2012)
Transverse Lady Beetle	Coccinella transversoguttata	Special Concern (2016)	Special Concern (2021)
Wolverine	Gulo gulo	Special Concern (2014)	Special Concern (2018)

Mitigation measures in this Plan emphasize avoidance, waste management, personnel awareness, and activity-specific work adjustment. Operational responses will be scaled based on wildlife behaviour, group size, and duration of presence, and will be aligned with permit conditions and the Nunavut Land Use Plan.

3.0 Attracting Wildlife

Efforts will be made at all times to avoid attracting wildlife to the Project area.

- Store petroleum products, chemicals, and other attractants securely and in a manner that is inaccessible to wildlife.
- Sort, store, and manage garbage properly. Food waste will be handled in accordance with the Waste Management Plan to minimize odours and wildlife attraction.
- Personnel are strictly forbidden from feeding wildlife.
- Keep lunches and other food items out of wildlife reach and return all food waste and wrappers to camp or approved storage.
- Maintain clean work areas and prevent littering. No food or beverage waste will be left behind at work sites.

4.0 Habitat Disturbance

Project activities are designed to minimize impacts on vegetation, soil, and wildlife habitat.

- Low-impact operations: disturbance is intended to be temporary and minimal.
- Progressive reclamation: disturbed areas will be restored as practical before project completion or demobilization.
- Spill prevention: soil contamination will be prevented through adherence to the Spill Contingency Plan and fuel-handling procedures.

Unintentional Interactions and Disturbances

- Avoid nests, dens, and other sensitive wildlife features whenever identified.
- Record coordinates of sensitive wildlife features or wildlife incidents and document them in the Wildlife Record Log.
- Report significant encounters to the Project Manager or designated field lead for regulatory follow-up, as required.
- Document incidents and mitigation actions in annual reporting and in any project-specific incident records required under permits or licences.

5.0 Wildlife Mitigation Measures

General

- Do not approach, feed, or disturb wildlife.
- Report wildlife sightings to the Project Geologist, designated field lead, Wildlife Monitor, or Project Manager for documentation and response.
- Firearms, if present, are for safety only and must comply with legal storage and handling requirements.
- Hunting by employees and contractors is prohibited.

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Bayridge will apply a precautionary approach where uncertainty exists, implementing conservative mitigation measures in advance of confirmed thresholds where warranted.

Airborne Work and Helicopter Operations

- Use the first daily helicopter flight, where practical, to assist with wildlife awareness and to adjust operations if wildlife is present near active work areas.
- Maintain aircraft altitudes greater than 300 m above ground level during routine operations, and greater than 610 m above ground level near observed wildlife where safe and practical to do so. Avoid repeated low-altitude flights directly over animals.
- No sling operations will be conducted near caribou, and no landings will occur in the immediate vicinity of migrating or calving caribou or muskox nurse groups.
- The current 2026 program does not include a low-level airborne geophysical survey. If such a survey is later proposed, it will require separate planning, mitigation, and approval.

Caribou Mitigation

Bayridge will follow applicable Nunavut Land Use Plan requirements, permit conditions, and project-specific caribou protection measures. Because portions of the Project area overlap caribou calving and post-calving land use designations, activities will be planned and adjusted conservatively based on season, caribou presence, movement, and aggregation.

In response to regulatory and stakeholder feedback regarding caribou sensitivity periods, higher-impact activities such as diamond drilling are planned to occur after mid-July to reduce potential interactions during calving and early post-calving periods.

- Suspend or modify operations when caribou thresholds or work-stoppage triggers set out in applicable permits, licences, or screening terms are met, and implement additional conservative measures as directed by the Project Geologist, designated field lead, Wildlife Monitor, or Project Manager.
- If caribou are observed in or approaching an active work area, non-essential activity may be delayed, suspended, or relocated until the animals have moved away and it is safe to proceed.
- Project activities will not be located or conducted in a manner that blocks or causes substantial diversion of caribou movement.
- No overland hauling, ATV use, or snowmobile use is currently proposed as part of the 2026 program. Project access and support will be helicopter-based.

Operational Caribou Monitoring, Triggers, and Response

Bayridge will implement an operational caribou monitoring and response procedure during the 2026 field program. This procedure is intended to translate applicable Nunavut Land Use Plan requirements, permit and licence conditions, NIRB screening terms, and Inuit land access requirements, where applicable, into clear field-level actions. Where final permits, licences, authorizations, or screening terms prescribe more specific or more protective requirements, those requirements will govern.

Caribou monitoring will be conducted through routine field observations, Wildlife Monitor observations where applicable, height-of-land observations where practical, review of wildlife information provided by regulators or land administrators, and incidental observations during routine helicopter flights. The current 2026 program does not include dedicated low-level aerial wildlife surveys. The first daily helicopter flight may be used, where practical and safe, to assist with general wildlife awareness and to confirm whether caribou are present near active work areas.

All caribou observations will be recorded in the Wildlife Record Log, including date, time, location, estimated number of animals, direction of travel, distance from active work areas, observed behaviour, project activity occurring at the time, and mitigation actions taken. Observations of cows with calves, groups of caribou, or caribou moving toward active operations will be reported immediately to the Project Geologist, designated field lead, Wildlife Monitor, and Project Manager.

For field implementation, Bayridge will apply a conservative operational response based on an Early Warning Zone and a Zone of Influence around active work areas, drill sites, the temporary outpost, fuel caches, and other active project components. The Zone of Influence will be treated as a 5 km area around active operations, unless a different distance is required by permit, licence, land access condition, or regulatory direction. Early warning distances and thresholds will be applied in accordance with applicable permit, licence, and land access conditions, including seasonal sensitivity, caribou movement direction, and group size.

If caribou are observed within or approaching the Zone of Influence, the Project Geologist or designated field lead will assess the situation and may delay, suspend, relocate, or reduce non-essential activity until the animals have moved away and it is safe and appropriate to resume. Activities with the greatest potential to disturb caribou, including drilling, repeated helicopter traffic, sling loads, ground movement, and other noisy or repetitive work, will be reduced or suspended where caribou presence, behaviour, group size, or movement direction indicates a potential for disturbance.

At minimum, the following triggers will require immediate review by the Project Geologist or designated field lead and may result in work suspension or modification:

- caribou cows with calves are observed within or approaching an active work area;
- groups of caribou are observed within or approaching the Zone of Influence;
- caribou are moving in a direction that could intersect active work areas, drill sites, the outpost, fuel caches, or helicopter landing areas;
- caribou appear to be disturbed by project activity, including changes in movement, grouping, avoidance, or repeated displacement;
- any permit, licence, screening, or land access threshold is met or exceeded.

Where applicable caribou protection measures identify numeric thresholds, Bayridge will apply those thresholds as operational triggers. These may include increased monitoring when one or more collared

caribou or threshold numbers of observed caribou are present within an Early Warning Zone, and suspension or reduction of work when threshold numbers of caribou are present within the Zone of Influence. Seasonal thresholds and response actions will be implemented in accordance with the applicable permit, licence, land access, or screening requirements for the area being worked.

During sensitive periods, including calving, post-calving, and migration periods, Bayridge will apply a more conservative response. If pregnant cows, cows with young calves, or aggregations of caribou are observed near active operations, non-essential activities will be suspended or modified until the animals have passed through the area or moved away from the active work area. Project activities will not be conducted in a manner that blocks, diverts, or delays caribou movement or migration.

Aircraft operations will be adjusted when caribou are present. Routine aircraft operations will avoid repeated low-altitude flights over caribou. Aircraft will maintain altitudes of at least 300 m above ground level during routine operations where safe and practical, and at least 610 m above ground level over occupied calving or post-calving areas or near known caribou concentrations, subject to pilot discretion for aircraft and human safety. No sling operations, drilling support, or non-essential landings will occur in the immediate vicinity of caribou groups, cows with calves, or migrating animals.

Work may resume only when the Project Geologist or designated field lead determines that the wildlife concern has been resolved, caribou have moved away from the active work area, appropriate buffers or mitigation measures are in place, and any required regulatory or land administrator direction has been obtained. The reason for suspension, actions taken, restart decision, and supporting observations will be documented in the Wildlife Record Log and summarized in annual reporting, as required.

Muskox

- Avoid approaching or interacting with muskox, especially during calving (April-June) and breeding (August-September) seasons.
- Maintain a minimum 200 m distance from muskox during calving, unless a larger setback is warranted by animal behaviour or site conditions.
- Cease use of ground equipment and avoid low-altitude flights below 610 m above ground level near muskox, especially where cows and calves are present.

Bears and Other Carnivores

If a bear, wolf, wolverine, fox, or other terrestrial mammal enters an active work area, work in the immediate area will be suspended and personnel will maintain a safe distance until the animal has left the area and it is safe to resume activities. Wildlife will not be approached, harassed, followed, or intentionally displaced, except where necessary for human safety and in accordance with site procedures.

All bear interactions, nuisance wildlife incidents, and observations of active dens will be reported promptly to the Project Manager or designated field lead and documented in the wildlife incidental observation log. Bear incidents and other reportable wildlife interactions will be reported to the appropriate regulatory authority.

Active dens, including those of wolf, grizzly bear, wolverine, fox, or other carnivores, will be avoided and will not be disturbed by project activities. The following minimum no-disturbance buffers apply to active dens:

- Wolf dens: 800 m

- Grizzly bear dens: 300 m
- Wolverine dens: 2 km
- Fox dens: 150 m

These setbacks apply to dens and not to individual animals travelling through the area. Larger setbacks may be applied where warranted based on species sensitivity, observed behaviour, den status, terrain, visibility, or the nature of the activity.

Den locations will be recorded using GPS and documented in the wildlife incidental observation log. Coordinates and relevant details will be reported to the appropriate regulatory authorities.

Den buffers will remain in place until the den is confirmed to be inactive, young have dispersed, or the appropriate wildlife authority has confirmed that activities may resume.

The Project Geologist or designated field lead, with support from the Wildlife Monitor where applicable, will be responsible for identifying the need for den-related mitigation and establishing buffers in the field. Any proposed activity within an established den buffer will require review by the Project Manager and consultation with the appropriate wildlife authority, as required.

Breeding and Nesting Birds

The following species at risk may be encountered at the Property and require careful attention during project activities: Eskimo Curlew, Harris's Sparrow, Peregrine Falcon, Red-necked Phalarope, and Short-eared Owl.

No nests or eggs will be disturbed by project activities. Special care, including monitoring and awareness measures, will be taken during the migratory bird nesting period in the area, generally from May to mid-August. If an employee or contractor encounters an active nest, work in the immediate area will cease immediately to avoid disturbance. The nest location will be recorded in the wildlife incidental observation log, including GPS coordinates, and reported to the appropriate authority. Disturbing, damaging, or moving the nest of a migratory bird is prohibited under applicable federal legislation.

Peregrine Falcon nests require additional protection. A 1.5 km buffer will be maintained around any active Peregrine Falcon nest identified during project activities. Any such nests will be documented in the wildlife incidental observation log, and GPS coordinates will be provided to the relevant regulatory authorities.

A minimum 30 m buffer will be maintained around active nests of other bird species, including non-migratory birds, unless a larger setback is warranted based on species sensitivity, observed behaviour, habitat setting, or the nature of the activity. Buffer distances, and any modifications to them, will be determined by the Project Geologist or designated field lead, in consultation with the Government of Nunavut Department of Environment and, where applicable, Environment and Climate Change Canada's Canadian Wildlife Service.

Nest buffers will remain in place until the nest is no longer active, the young have permanently left the vicinity, or the appropriate wildlife authority has confirmed that activities may resume.

The Project Geologist or designated field lead will be responsible for identifying the need for nest-related mitigation measures and establishing buffers in the field, with support from the Wildlife Monitor where applicable. Any proposed activity within an established buffer will require review by project management and, where appropriate, consultation with the Government of Nunavut and/or the Canadian Wildlife Service.

Aquatic Life

- Minimize disturbance to aquatic habitats and follow Fisheries and Oceans Canada guidance for water lines and water withdrawal, as applicable.
- Prevent waste discharge into waterbodies and locate sumps, camps, and fuel caches at least 31 m from the high-water mark unless otherwise authorized.
- Fishing is permitted only with a valid Nunavut fishing licence during non-work hours.

Wildlife Monitoring

- A Wildlife Monitor may be employed to track wildlife sightings, report incidents, and support compliance with mitigation measures.
- Wildlife sightings and mitigation actions are to be logged and summarized in annual reporting to regulators, as required.
- The Wildlife Monitor will also assist with field safety concerning bears and other wildlife.
- Bear incidents, wolf or fox den sightings, and large herd sightings should be reported promptly to the Project Manager, designated field lead, and Wildlife Monitor, and to the appropriate authorities (such as GN, KIA, or federal authorities) where required.

Numeric distances cited in this Plan reflect established wildlife protection guidance and best-practice standards commonly applied in northern exploration projects. Where different or more specific distances are prescribed through permits, licences, or screening conditions, those requirements shall govern.

6.0 Archaeological and Palaeontological Resources

All on-site personnel, including employees and contractors, will receive environmental and heritage awareness training to support regulatory compliance. The Project Manager, with support from the designated field lead, will be responsible for overseeing implementation of heritage protection procedures, training, and any required incident reporting.

To safeguard archaeological and palaeontological sites and artefacts, Bayridge Resources Corp. will implement the following measures:

- All staff, contractors, and visitors are prohibited from operating over known or suspected archaeological or palaeontological sites.
- The disturbance or removal of artefacts, fossils, or heritage sites is strictly prohibited.
- If any archaeological or palaeontological site or specimen is encountered or disturbed, the Nunavut Department of Culture and Heritage (“CH”) must be notified immediately at **(867) 934-2046 or (867) 975-5500**.
- A detailed report, including GPS coordinates, a description, and photographs if available, will be submitted to CH and any other authority requiring notification.

Any activity that may disturb a discovered site must stop immediately, pending direction from CH. Restoration of disturbed sites will follow directives issued by CH and any other applicable authority. Full cooperation will be provided to CH in documenting and managing any encountered heritage resources.

Field personnel involved in geochemical sampling, geological mapping, prospecting, and ground-based surveys will be supplied with maps or spatial information identifying known archaeological and palaeontological sites, where available. This chance-find procedure does not replace any prior archaeological review or assessment that may be required before ground disturbance.

CONTACT	CONTACT NUMBERS
Nunavut Department of Culture and Heritage	867-975-5500
Jeremy Fraser CIRNAC Field Operations Manager	Telephone: 867-975-4553 Alternate Telephone: 867-975-2761 Fax: 867-979-6445 Email: jeremy.fraser@rcaanc-cirnac.gc.ca

7.0 Roles and Responsibilities

Project Manager

- ensure appropriate wildlife procedures, training, and reporting systems are in place before work begins;
- oversee compliance with wildlife mitigation commitments in the Project Proposal and this Plan;
- review significant wildlife incidents and reportable interactions;
- coordinate external reporting to the appropriate regulatory authorities, including the Government of Nunavut, the Kivalliq Inuit Association, and, where applicable, Environment and Climate Change Canada;
- authorize any proposed work within an established wildlife buffer, following internal review and any required consultation with the appropriate authority.

Project Geologist or Designated Field Lead

- receive and assess reports of wildlife sightings, encounters, nests, dens, or other sensitive wildlife features;
- direct immediate response actions in the field, including temporary work stoppage, avoidance, or relocation of activities;
- establish initial buffer zones or no-work areas around active nests, dens, or other sensitive wildlife features, with support from the Wildlife Monitor where applicable;
- maintain or modify field-level mitigation measures based on observed conditions, species behaviour, and applicable guidance;
- document wildlife observations and mitigation actions in the wildlife incidental observation log;
- advise the Project Manager when a wildlife incident, sensitive feature, or regulatory notification requires escalation.

Wildlife Monitor

- observe active work areas for wildlife, nests, dens, and signs of animal activity;
- advise field crews and the designated field lead when buffers, avoidance measures, or work stoppages may be required;
- assist with documentation of wildlife sightings, encounters, and mitigation actions;
- support communication of wildlife concerns to the designated field lead and Project Manager;
- assist in confirming when wildlife has moved away from an active work area, or when a nest or den appears inactive, subject to any required review by the appropriate wildlife authority.

All Employees and Contractors

- remain alert for wildlife and wildlife sign during project activities;
- immediately report wildlife sightings, encounters, nests, dens, and incidents to the Project Geologist, designated field lead, or Wildlife Monitor;
- comply with all stop-work directions, buffer zones, and avoidance measures;
- not approach, feed, harass, or disturb wildlife;
- not resume work in a restricted area unless directed to do so by the designated field lead or Project Manager.

Stop-Work and Restart Authority

Any employee or contractor who observes an immediate wildlife concern may notify the designated field lead and request that work be paused. The Project Geologist or designated field lead, with support from the Wildlife Monitor where applicable, has authority to direct an immediate stop-work in response to wildlife presence, active nests, active dens, or other sensitive wildlife features. Work may only restart once the designated field lead determines that the wildlife concern has been resolved, appropriate buffers or mitigation measures are in place, and any required regulatory guidance has been obtained. Where work within a buffer is being considered, restart authorization will require approval from the Project Manager and consultation with the appropriate wildlife authority, where applicable.

Determination of Inactive Nests or Dens

The Project Geologist or designated field lead, with support from the Wildlife Monitor where applicable, will make the initial field determination as to whether a nest or den appears active or inactive, based on direct observation, signs of current use, species behaviour, and applicable guidance. Where there is uncertainty, or where the species or circumstance warrants, the appropriate wildlife authority will be consulted before work resumes within or near the buffer area.

Regulatory Reporting

The Project Manager will be responsible for ensuring that wildlife incidents, active nests, active dens, and other reportable observations are communicated to the appropriate regulatory authorities, as required. Field personnel will provide the Project Manager with all necessary supporting information, including location coordinates, timing, species observed, and a description of the actions taken.

8.0 Important Contacts

Name	Position	Phone Number
Daniel Kaludjak	Wildlife Officer II, Government of Nunavut	867-645-8084
Johanne Coutu-Autut	Conservation Officer II, Government of Nunavut	867-645-8083
Baker Lake Hunters and Trappers Organization	-	867-793-2520
Luis Manzo	Director of Lands, Kivalliq Inuit Association	867-645-5731
Nunavut Department of Culture and Heritage	Main office	867-975-5500

All sightings, incidents, and site concerns are to be reported as soon as practicable to maintain compliance and safety.

Appendix A. Summary of Applicable Caribou Protection Measures

This appendix summarizes caribou protection measures that may apply through the Nunavut Land Use Plan, land use permits, and project-specific screening terms. Where permit conditions or screening terms are more specific or more protective than this summary, those conditions will govern. The current 2026 program does not include overland hauling, ATV use, snowmobile use, or low-level airborne geophysical surveying.

- Within designated Caribou Protection Areas, project activities will comply with restricted periods and any authorization requirements set out in applicable permits or land use plan provisions.
- If caribou cows or calves are present within or approaching an active work area, relevant activities will be suspended or modified until the animals have moved away or regulators otherwise authorize work to continue.
- Project activities will not be located or conducted in a manner that blocks or substantially diverts caribou migration.
- Sensitive areas such as designated caribou crossings will be respected in accordance with permit conditions, including any setbacks applicable to camps, fuel caches, blasting, or drilling.
- Where monitoring indicates that caribou movement, behaviour, or proximity warrants a more conservative response, Bayridge will modify or suspend project activities accordingly.

Appendix B. Property Outline with Nunavut Land Use Plan

Kivalliq Inuit Association's Mobile Caribou Conservation Measures: 2022 update for the Nunavut Planning Commission

Mobile Caribou Conservation Measures (thence Mobile Measures) are flexible (i.e., follow the caribou), protect caribou within all seasonal ranges, and offer a greater balance between protection of caribou and mineral exploration. Mobile Measures have three components: (i) monitoring, the results of which are compared to pre-assigned thresholds; (ii) thresholds which trigger decisions about the intensity of tiered mitigation; and (iii) mitigation. Mitigation is implemented to avoid or minimize sensory disturbance to caribou. In turn, monitoring can be used to gauge the effectiveness of the mitigation.

The Kivalliq Inuit Association (KivIA) brought Mobile Measures forward as part of their recommendations to the Nunavut Planning Commission (NPC) on the Draft Nunavut land Use Plan (DNLUP) in 2015 and again in 2021. KivIA's approach to Mobile Measures was presented, for example, at the November 2015 NWMB workshop¹. During reviews of the 2021 DNLUP, while the Kitikmeot and Qikiqtani Regional Inuit Associations (RIAs) and Kivalliq Wildlife Board are supportive of Mobile Measures, the 2021 DNLUP did not recommend Mobile Measures as a tool for protecting caribou and their habitat². During the public hearings and commentary phase on the 2021 DNLUP, there was both support for and questioning of Mobile Measures. During conversations with NPC staff, they expressed a willingness to have more information on the Mobile Measures which is provided in the following text.

KivIA's Mobile Measures have been applied to Inuit Owned Lands (IOL) in the Kivalliq Region since 2016. They are an additional level of protection for caribou within Nunavut's integrated regulatory approach to land management which requires that NPC determines whether a land use project will conform with land use plans and be exempt from screening. If a project is not exempt, the Nunavut Impact Review Board (NIRB) screens the land-use activity and through public and land use agency input may include recommendations to protect caribou. NIRB's recommendations in the screening reports are a Nunavut-wide approach to protecting caribou during permitted land use activities, while KivIA's Mobile Measures are more specific conditions applied to exploration on IOL in the Kivalliq Region.

The following text summarizes the KivIA's Mobile Measures as to what they do, how they work, whether they protect caribou habitat, and how they relate to Nunavut's integrated regulatory approach to land use management. We offer a possible pathway forward for Mobile Measures based on concerns raised during the 2021 DNLUP hearings and on the Government of the Northwest Territories (GNWT's) recent framework and implementation guides for Mobile Measures. The pathway will also be included in KivIA's updated final comments on the 2021 DNLUP. We recognize that any wider application of Mobile Measures in other regions will have to be tailored using Inuit Qaujimagatunqangit, community knowledge and technical information for the different caribou herds and their ecology.

1. KivIA's Mobile Caribou Conservation Measures

KivIA's Mobile Measures are a follow-up to the longstanding Caribou Protection Measures in the Kivalliq Region where the Qamanirjuaq caribou herd migrates within the region for calving, post-calving through

¹ <http://www.nwmb.com/en/public-hearings-a-meetings/workshops/november-2015-protecting-caribou-and-their-habitat-workshop#document-mobile-caribou-conservation-measures-eng>

² NPC Options and Recommendations Document- page 71

to the winter. Minimizing or avoiding any impacts of mineral exploration on the caribou has been incrementally developed since the 1970s. Relying on applying protection such as seasonal restrictions to fixed areas (DIAND's original Caribou Protection Measures) was effective unless caribou moved out of the Caribou Protection Area and were not monitored³. Land manager's attention shifted to considering protection that would move with the caribou – mobile measures⁴ - to counter the disadvantages of area-specific protection. The DIAND's original Caribou Protection Measures are still included in the 2000 Keewatin Land Use Plan⁵ which is applicable to Crown land. The Caribou Protection Measures are applied to a fixed area of calving, post-calving and water-crossings mapped in the late 1990s and are typically referenced in NIRB's screening reports for land use projects.

The KivIA subsequently developed Mobile Caribou Conservation Measures (Mobile Measures) in 2016 for land-use activities such as mineral exploration on IOL within the Kivalliq Region. KivIA's Mobile Measures work through monitoring caribou in the vicinity of a land use site to give early warning for mitigation. The monitoring component is flexible, does not rely on or require aerial monitoring, and can accommodate innovative technologies including drones or ground-based surveillance. The monitoring triggers mitigation based on pre-assigned thresholds (numbers and proximity of caribou to development coupled with seasonal sensitivity and movement rates). The thresholds trigger tiered mitigation applied with increasing intensity as increasing numbers of caribou approach the project, to avoid or minimize any potential sensory disturbance to caribou.

KivIA applies Mobile Measures in conditions attached to Land Use Licenses⁶. KivIA's Schedule B attached to licenses and leases is the guideline to Mobile Measures⁷. Schedule B provides for closure during calving and Mobile Measures for other seasons on calving grounds and for other seasonal ranges including water-crossings. Schedule B provides seasonal thresholds to trigger mitigation and the types of mitigation and for illustration, it is attached here as Appendix A.

Mobile Measures are only applicable to mineral exploration and not for mineral development such as active mine development sites, which are governed by NIRB's terms and conditions. NIRB's terms and conditions are determined during and following an environmental assessment that is part of Nunavut's robust regulatory system. With respect to enforcement of conditions attached to Land Use Licenses, KivIA relies on its land-use inspectors.

2. Mobile Measures and caribou habitat protection

Mobile Measures are designed to avoid and minimize indirect habitat loss by reducing or halting activities that would otherwise displace caribou from their habitat. Mobile Measures themselves do not protect against direct impacts to habitat, however, the KivIA's Mobile Measures are part of Land Use Licenses issued for access to IOL, that include conditions to avoid or minimize direct impacts to habitat from mineral exploration, inspection for compliance and the need for reclamation if habitat was

³ Gunn, A., K.G. Poole, J. Wierchowski, and M. Campbell. 2007. Assessment of Caribou Protection Measures. Unpublished report submitted to Indian and Northern Affairs Canada, Gatineau, Québec, 45pp.

⁴ Weihs, F.H., and P.J. Usher. 2001. Towards the development of a policy on the management of human activities in caribou calving and post-calving grounds. Contract # 00-0210 for Department of Indian Affairs and Northern Development, Ottawa.

⁵ Keewatin Regional Land Use Plan, NPC Public Registry: <https://lupit.nunavut.ca/portal/registry.php?public=docs>

⁶ <https://www.kivalliqinuit.ca/access-to-inuit-owned-lands-2/>

⁷ <https://www.kivalliqinuit.ca/wp-content/uploads/2022/02/KIA-Land-Use-License-Terms-Conditions.pdf>

damaged. However, Mobile Measures benefit caribou habitat through their role in reducing caribou disturbance which otherwise can limit caribou habitat use.

3. Nunavut’s integrated regulatory system for mineral exploration.

Mineral exploration proposals within the Kivalliq Region start with the NPC who determines whether the proposal conforms to the land use plan and whether the proposal is exempt from screening⁸ (typically government activities or small-scale activities only requiring a Class B permit⁹). If the activity is not exempt, the proposal goes to NIRB for screening. NIRB’s screening includes public consultation and management agency review which lead to project-specific terms and conditions with monitoring and reporting requirements. NIRB’s screening requirements for mineral exploration apply to both Crown lands and IOL. NIRB’s screening terms for caribou vary (Table 1) and how they depend on conditions such as the likelihood of caribou exposure or type of mineral exploration activity is not always specified. NIRB’s terms in the screening reports for mineral exploration specific to caribou typically include that the proponent should cease activities when caribou (a specified number or sex and age class) are in the vicinity (specified distance) so as to avoid diverting or blocking migration or movements. NIRB’s screening recommendations are consistent with the intent of Mobile Measures in the sense that the terms apply to the caribou where they are relative to an exploration site and may be triggered by the approach of caribou within threshold distances (Table 1).

KiviA’s Mobile Measures are more detailed about seasons and thresholds than NIRB’s terms for screening (Table 2). KiviA applies monitoring based on caribou sightings within two concentric zones centered on the exploration site, with surveillance effort to assess the likely arrival or presence of caribou. Monitoring includes Height-of-land surveys, ground observations and collared caribou. An ‘Early Warning Zone’ varies in size with caribou season (15–45 km radius which begins at the outer extent of the 5 km Zone of Influence [ZOI]). For example, a smaller Early Warning Zone is used during winter when movement rates are generally lower and less directional, and a larger Early Warning Zone is used during spring migration when distances moved daily are generally higher and more directional. The 5 km radius ZOI is the area around a project site where the behaviour and distribution of caribou may change in response to the site’s activities. The level of mitigation depends on the caribou numbers and the season.

Both KiviA and NIRB screening have requirements for the proponent to provide annual reports. NIRB’s reporting requirements are detailed and include for wildlife a summary of results and mitigation actions, wildlife observations, potential impacts from the project, and an analysis of the effectiveness of mitigation measures for wildlife.

⁸ https://www.nirb.ca/sites/default/files/Integrated_Process_NuPPAA.pdf

⁹ https://www.nunavut.ca/sites/default/files/2020-10-23_revised_conformity_determination_internal_procedure.pdf

Table 1. Examples of Terms recommended in NIRB screening reports (not all Terms would be applied to any one project). We add bold font to emphasize the reference to caribou

<p>The Proponent shall avoid interfering with any paths or crossings known to be frequented by caribou during periods of migration as identified by current land use plans in place and/or by Inuit Qaujimaningit.</p>
<p>The Proponent shall not block or cause any diversion to caribou or muskox migration and shall cease activities likely to interfere with migration such as airborne geophysics surveys drilling or movement of equipment or personnel until such time as the caribou or muskox have passed.</p>
<p>Should pregnant caribou cows, cows with young calves, or groups of 50 or more caribou be observed within one (1) kilometer of project operations at any time, the Proponent shall suspend all operations in the vicinity, including low-level over flights, drilling, blasting/trenching, and use of snow mobiles and all-terrain vehicles outside the immediate vicinity of the camp, until caribou are no longer in the immediate area.</p>
<p>The Proponent shall implement mobile caribou conservation measures and immediately cease activities that may interfere with the migration or calving of caribou or muskox, until the caribou or muskox have passed.</p>
<p>The Proponent shall not construct or operate any camp cache any fuel or conduct blasting within ten (10) kilometers or conduct any drilling operation within five (5) kilometers of any paths or crossings known to be frequented by caribou (e.g., designated caribou crossings), the Proponent shall also suspend all operations in the vicinity including low-level over flights, blasting and use of snow mobiles and all-terrain vehicles until caribou are no longer in the immediate area.</p>
<p>During the period of May 15 to July 15, the Proponent shall suspend all project operations, including low-level over flights, drilling, blasting/trenching, and use of snow mobiles and all-terrain vehicles outside the immediate vicinity of the camp. Should the results of localized monitoring satisfy the Land Use Inspector that project operations may resume without disturbing pregnant caribou cows or cows with young calves, the suspension may be lifted for the period specified.</p>
<p>During the period of May 15 to July 15, the Proponent shall suspend all project operations outside of the . . . Camp, and activities at the . . . Camp are limited to those necessary to maintain the camp for occupation. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances, low-level overflights, blasting, and use of mobile equipment including snowmobiles and all-terrain vehicles, and personnel walking within sight of the caribou group(s), until the caribou are no longer in the immediate area. Should the results of localized monitoring satisfy the land use inspector the project operations may resume without disturbing pregnant caribou cows or cows with young calves the suspension may be lifted for the periods specified.</p>
<p>The Proponent shall retain independent wildlife monitors provided through the [named] Hunters and Trappers Organizations to undertake monitoring for caribou in proximity to project operations and ensure compliance with associated wildlife protection measures.</p>

Table 2. Seasons, zone sizes and thresholds of caribou numbers counted in the Early Warning Zone (EWZ) and Zone of Influence (ZOI) to trigger corresponding mitigation actions (from Schedule B¹⁰, KivIA land access license applicable to IOL) Analysis of movement rates and local input are needed to refine the dates and number of seasons for other regions.

Season	Timing	Suggested zone radii (km)		Threshold number of collars/adult caribou		Summarized mitigation actions if thresholds passed in the ZOI
		EWZ ²	ZOI	EWZ	ZOI ⁵	
Within designated calving grounds						
Calving / Post-calving	1 May – 31 Jul	N/A	N/A	N/A	N/A	Closed
Summer	1 Aug – 30 Sep	30	5	1/25	25	Immediately suspend drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes); Suspend ground operations and camp closure.
Fall/winter	1 Oct – 15 Apr	30	2.5	1/50	50	immediately reduce above-ground activities that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes).
Spring migration (pre-calving)	16 Apr – 30 Apr	50	5	1/25	25	Immediately suspend drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes); Suspend ground operations and camp closure.
Other seasonal ranges (outside of designated calving grounds)						
Calving / Post-calving	1 Jun – 15 Jul	50	5	1/10	10	Immediately suspend drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes); Suspend ground operations and camp closure.
Summer	16 Jul – 30 Sep	30	5	1/25	25	Immediately suspend drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes) and camp closure.

¹⁰ <https://www.kivalliqinuit.ca/wp-content/uploads/2022/02/KIA-Land-Use-License-Terms-Conditions.pdf>

Season	Timing	Suggested zone radii (km)		Threshold number of collars/adult caribou		Summarized mitigation actions if thresholds passed in the ZOI
		EWZ ²	ZOI	EWZ	ZOI ⁵	
Fall/winter	1 Oct – 15 Apr	30	2.5	1/50	50	immediately reduce above-ground activities that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes).
Spring migration (pre-calving)	16 Apr – 31 May	50	5	1/25	25	Immediately suspend drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes); Suspend ground operations and camp closure.

¹ Dates provided for the Qamanirjuaq herd from Caslys (2016). The actual dates will differ among herds.

² The Early Warning Zone radius begins at the outer extent of the 5 km radius Zone of Influence.

³ Proposed numbers based on differences in relative risk among seasons. Caribou thresholds (generally collared individuals or incidental sightings) within the Early Warning Zone would justify notice to the exploration manager and the land use inspector of a potential suspension of flights and operations should caribou enter the Zone of Influence, and would trigger monitoring surveys within the Zone of Influence (generally ground observations or incidental aerial observations).

⁴ xx/yy represent thresholds of number of collared/observed caribou within the Early Warning Zone. The lower value of the collars or caribou will trigger a response. Thresholds triggered within the Early Warning Zone trigger increased monitoring.

⁵ yy represent thresholds of number of observed caribou within the Zone of Influence to trigger main sets of mitigation responses.

4. Mobile Measures and GNWT's Bathurst Caribou Range Plan

KivIA was developing Mobile Measures in 2016, and by 2018 Mobile Measures were also being developed as a requirement for the Bathurst Caribou Range Plan (Range Plan)¹¹. The Range Plan was co-developed by Indigenous governments and organizations, GNWT, Government of Nunavut (GN) and industry partners. Between 2018 and 2020, GNWT led a collaboration to develop Mobile Measures¹² built on the KivIA's measures and updated with minimum standards of monitoring and mitigation. Minimum standards were also a recommendation from GN's draft 2016 review of KivIA's Mobile Measures¹³.

Developing Mobile Measures for the Bathurst caribou herd included a framework document and considerable implementation detail, especially on government and the land use permit operator's roles and responsibilities, as well as reporting templates. The NWT government will provide mapping and advice to land use permit operators, but the costs of site monitoring and mitigation are borne by land use permit operator. COVID-19 limiting testing of the Range Plan Mobile Measures to desktop exercises but the intent is to implement the measures in 2022 (K. Clark, GNWT, pers. comm. 2022).

5. Future application of Mobile Measures in Nunavut

Future application of Mobile Measures across Nunavut to avoid and minimize impacts of mineral exploration on caribou will draw on the existing KivIA's Mobile Measures, the GNWT framework and implementation guidelines, and NIRB's conditions applied to screening reports. The outcome will be a relatively standardized but adaptable conditions for land use permits and licenses applicable to barren-ground caribou seasonal ranges on IOL and Crown lands. The updated Mobile Measures would be applied as a condition, for example, within NPC's Conditional Use Areas.

Coordination among government, RIAs and land use operators will be essential to successfully implement Mobile Measures (Table 3). Land use operators will be provided with Mobile Measures documentation early in their planning to be aware that they will be expected follow the intent of the Mobile Measures to avoid disturbance to caribou. The land use operator is responsible for understanding the Mobile Measures as they apply to their proposed land use activity, to implement monitoring and mitigation actions, and to annually report on caribou protection.

¹¹ Government of the Northwest Territories (GNWT). 2019. Bathurst Caribou Range Plan. August 2019. Environment and Natural Resources, Government of the Northwest Territories, Yellowknife, NT. 86 + iii pp.

¹² Government of the Northwest Territories (GNWT). 2022a. An Implementation Framework for Mobile Caribou Conservation Measures on the Bathurst Caribou Range. Environment and Natural Resources, February 2022.

Government of the Northwest Territories (GNWT). 2022b. Mobile Caribou Conservation Measures – Operational Guidance. Environment and Natural Resources, February 2022.

¹³ Atkinson, S. 2016. Implementing Mobile Protection Measures for Caribou in Nunavut: Challenges, Costs and Effectiveness. Prepared for the Department of Environment, Government of Nunavut. September 2016 (draft v3). 90 pp.

Table 3. Suggested progression of activities for a land use operation using Mobile Caribou Conservation Measures within Nunavut caribou range.

	Task	Land Agency and NIRB	Land Use Operator
1	Planning	CIRNAC (Crown lands) and RIAs (on IOL) publicizes the need for Mobile Measures through Chamber of Mines, Mining Recorders Office, NIRB website, RIAs, etc.	Land use operator is made aware of requirements for Mobile Measures through Chamber of Mines, Mining Recorders Office, NIRB website, RIAs, etc.
2	Planning	CIRNAC/RIAs has point of contact for Mobile Measures oversight.	Land use operator contacts CIRNAC (or RIA on IOL).
3	Planning	CIRNAC/RIAs provides and discusses Operational Guidance document and clarifies expectations/requirements.	Discusses Operational Guidance document and clarifies expectations/requirements.
4	Planning	Discusses and determines location relative to range assessment area and season of proposed operation.	Discusses and determines location relative to range assessment area and season of proposed operation.
5	Planning	Summary of expected seasonal caribou abundance and residency provided in Operational Guidance document.	Reviews caribou information and responds with proposed schedule of operations.
6	Planning	Size of Early Warning Zone and trigger levels of caribou are discussed and understood.	Size of Early Warning Zone and trigger levels of caribou are discussed and understood.
7	Planning	Reviews and agrees upon suggested list of tiered mitigations.	Provides potential list of tiered mitigations based on mineral cycle stage and type of activity.
8	Planning	Ensures project site contact information is received for information sharing.	Provides project site contact information to CIRNAC/RIAs for information sharing (e.g., emailing collar location maps).
9	Operations	CIRNAC/RIAs provides timely emails with maps of collar locations relative to Early Warning Zone, Zone of Influence and project site.	Receives emails with maps of collar locations relative to Early Warning Zone, Zone of Influence and project site.
10	Operations	CIRNAC/RIAs available to respond to any questions or concerns during operations.	Monitors collar locations in the Early Warning Zone; ground or aerial observations.
11	Operations	CIRNAC/RIAs expects the operator to implement mitigation, and is available to respond to any questions and concerns during operations.	If caribou threshold exceeded, the land use operator will implement mitigation; monitoring within the Zone of Influence is advised.
12	Operations	CIRNAC/RIAs available to respond to any questions concerns during operations.	Continued monitoring and mitigation until caribou move out of the Early Warning Zone.
13	Reporting	CIRNAC/RIAs to provide an annual report on Mobile Measures-related activities within caribou ranges.	Land user to provide an annual report on Mobile Measures-related activities.
14	Review	Assess the effectiveness of the Mobile Measures including consideration of costs,	Assess the effectiveness of the Mobile Measures including actions taken, costs,

	Task	Land Agency and NIRB	Land Use Operator
		personnel requirements and achievement of desired outcomes.	personnel requirements and consequences to operations.

The current experience of NIRB’s screening recommendations and KivIA’s Mobile Measures have not revealed problems (although COVID-19 reduced activities over the past 2 years). However, overall review of terms and their effectiveness would increase confidence in the applicability of Mobile Measures. Questions about monitoring requirements and capacity are addressed through reliance on the land use proponent rather than needing to establish costly herd level monitoring programs including an expansion of existing, government-led GPS collaring programs. Mobile Measures are already part of existing land use regulatory systems with their existing enforcement potential, which addresses concerns about compliance. In summary, Mobile Measures are a flexible tool to reduce the potential impacts to caribou of industrial activity associated with exploration sites. Mobile Measures are a component of a regulatory system that also has provisions to protect caribou habitat.

Prepared for Kivalliq Inuit Association

Anne Gunn and Kim Poole

3 January 2023

APPENDIX A.

Schedule B is part of <https://www.kivalliqinuit.ca/wp-content/uploads/2022/02/KIA-Land-Use-License-Terms-Conditions.pdf>

Schedule “B”

MOBILE CONSERVATION MEASURES GUIDELINES

Introduction

The Tenant shall comply with the measures set out herein. The Tenant shall immediately report to the Landlord any deviation from these measures, including the reason for the deviation.

The Landlord reserves the right, based on the presence of caribou within the area of the Land in any year, to vary the dates set out herein and shall provide notice to the Tenant of any such variation.

Wildlife Monitoring Personnel

The Tenant shall have wildlife monitoring personnel present at the Property during any season when caribou are reasonably expected to be present. The names of such personnel shall be sent to the Landlord and they shall maintain communication at all reasonable times. The Tenant shall monitor and immediately report the presence of caribou to the Landlord in accordance with the following directives. The report shall specify the location and estimated numbers.

A. IOL within designated calving grounds

Section 1. On IOL within designated calving grounds (as designated by the Government of Nunavut) between May 1st and July 31st (the closure period):

- 1) No activities shall occur except as authorized by the Landlord.

Section 2. On IOL within designated calving grounds between August 1st and September 30th, the Tenant shall conduct monitoring and mitigation as follows:

- 2i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within the thirty (30) km early warning zone from the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).

2ii) If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the Property boundary, then the Tenant shall monitor within a five (5) km buffer zone around the Property on a daily basis, and shall immediately suspend work that has the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone.

Section 3. On IOL within designated calving grounds between October 1st and April 15th, the Tenant shall conduct monitoring and mitigation as follows:

- (3i) If collar data or observations indicate that there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).
- (3ii) If monitoring indicates that there are fifty (50) or more caribou within two and a half (2.5) km of the Property, then the Tenant shall immediately reduce above-ground activities that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), until caribou numbers are below the threshold within the buffer zone.

Section 4. On IOL within designated calving grounds between April 16th and April 30th, the Tenant shall conduct monitoring and mitigation as follows:

(4i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou within fifty (50) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(4ii) If monitoring indicates that there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations, and camp closure, until caribou numbers are below the threshold within the buffer zone.

B. IOL within other seasonal caribou ranges

Section 5. On IOL between June 1st and July 15th outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(5i) If collar data or observations indicate that there are one (1) or more collared caribou or ten (10) or more caribou observed within the fifty (50) km early warning zone for the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land, road surveys, snow track counts (if appropriate), remote camera surveys).

(5ii) If monitoring indicates that there are an estimated ten (10) or more caribou within the five (5) km buffer zone for the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure until caribou numbers are below the threshold within the buffer zone.

Section 6. On IOL between July 16th and September 30th outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(6i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within thirty (30) km of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(6ii) If monitoring indicates that there are twenty-five (25) or more caribou within five (5) km of the boundary of the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities, non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), and camp closure until caribou numbers are below the threshold within the buffer zone.

Section 7. On IOL between October 1st and April 15th outside of designated calving grounds, the Tenant shall conduct monitoring and mitigation as follows:

(7i) If collar data or observations indicate that there are one (1) or more collared caribou or fifty (50) or more caribou observed within thirty (30) km of the boundary of the Property, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, remote camera surveys).

(7ii) If monitoring indicates that there are fifty (50) or more caribou within 2.5 km of the boundary of the Property, then the Tenant shall immediately reduce aboveground operations that have the potential to disturb caribou, including non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for

emergency purposes), and suspension of above ground operations, until caribou numbers are below the threshold within the buffer zone.

Section 8. On IOL between April 16th and May 31st, the Tenant shall conduct monitoring and mitigation as follows:

(8i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within fifty (50) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone shall be conducted every second day (e.g., height of land surveys, road surveys, snow track counts (if appropriate), remote camera surveys).

(8ii) If monitoring indicates that there are an estimated twenty-five (25) or more caribou within the five (5) km buffer zone for the Property, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations and camp closure, until caribou numbers are below the threshold within the buffer zone.

C. Freshwater crossings

Section 9. On IOL between May 15th and September 30th, the Tenant will not construct camps or other permanent structures or conduct blasting within ten (10) km of designated caribou freshwater water crossings. Exploration activities will not be permitted within five (5) km of water-crossings between May 15th and September 30th. Between May 15th and September 30th, the Tenant shall conduct monitoring and mitigation as follows:

(9i) If collar data or observations indicate that there are one (1) or more collared caribou or twenty-five (25) or more caribou observed within twenty-five (25) km of the boundary of the Property that appear to be moving in the direction of the activities, then monitoring within a five (5) km buffer zone around the water crossing shall be conducted every second day (e.g., height of land surveys, remote camera surveys).

(9ii) If monitoring indicates that there are fifty (50) or more caribou within five (5) km of the boundary of the Property that appear to be moving in the direction of the water crossing, then the Tenant shall conduct monitoring within a five (5) km buffer zone on a daily basis, and shall immediately suspend any activities that have the potential to disturb caribou, including suspension of drill operations, blasting activities and non-essential ground movements and aircraft traffic below 300 m above ground level (except as necessary for emergency purposes), suspension of all ground operations,

camp closure, and removal of all non-essential personnel, until caribou numbers are below the threshold within the buffer zone.

D. Aircraft

Section 10. The Tenant shall ensure that aircraft (fixed-wing and helicopter) flights over occupied calving and post-calving areas shall be at least 610 m above ground level and avoid areas of known caribou concentrations (subject to pilot discretion regarding aircraft and human safety). In other seasons aircraft shall be at least 300 m above ground level.