

Ferguson Lake Project, NU, Environmental Baseline Studies

NIRB File No: 24YN037

NIRB APPLICATION No: 126014

NPC File No: 150445

Date: February 27, 2025

RE: Response to February 12, 2025 email “Opportunity to Address Comments Regarding CNRIs “Ferguson Lake, Nunavut Environmental Baseline Studies” Project Proposal.

Canadian North Resources Inc. (CNRI) has proposed to begin baseline studies on site and begin assessing the feasibility of transportation and logistics infrastructure to connect the Ferguson Lake Project to a transportation hub, potentially either in Baker Lake, NU, or Arviat, NU. This includes consultation, engagement and environmental studies when considering winter road routes, All-Weather Road (AWR) routes, and potential SeaLink facility locations. Additionally, we are evaluating alternative shipping, energy and logistical strategies.

On August 1st, 2024, NIRB received a referral from NPC to screen CNRI’s “Ferguson Lake, NU, Environmental Baseline Studies” (the project). On December 20th, 2024, following CNRI led community consultation and engagement activities in September and December, NIRB received CNRIs complete application, including a consultation and engagement report. A public notice of screening was issued on January 14, 2025. The NIRB requested comments be provided by February 4th, 2025. NIRB received comments from:

- Government of Nunavut (GN);
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC);
- Fisheries and Oceans Canada (DFO);
- Transport Canada; and
- Hugh Ikoe.

NIRB also requested additional information.

CNRI appreciates the thoroughness and time dedicated to reviewing our application and will continue to work with the NIRB, intervenors and public representatives through the application of scientific and data collection permits and execution of baseline studies. The following is a summary of the intervenor and public representative comments, and as needed, responses by CNRI, to the comments and recommendations.

Government of Nunavut (GN) Comments:

The GN has reviewed the proposed project and related documents and has no comments or concerns to raise with the Board at this time.

CNRI Response - CNRI appreciates the review completed by GN.

Crown Indigenous Relations and Northern Affairs Canada (CIRNAC) Comments:

CIRNAC 1: Potential for Cumulative Effects:

CIRNAC recommends that the Proponent, in its research efforts, continue to gather information as to how its development project may create additional negative pressures on terrestrial wildlife in the region while interacting with stakeholders to consult and engage on its planned environmental studies.

CNRI Response - Thank you for providing your comments.

CIRNAC 2: Consultation with Interest Parties:

CIRNAC recommends that the Proponent consult with the Hunters and Trappers Associations and Hamlet Councils of the communities of Baker Lake and Arviat, the Kivalliq Wildlife Board, and any other relevant organizations and individuals regarding its project proposal. As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to wildlife, particularly caribou and muskoxen, and the environment;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- Mitigation measures designed to prevent disturbance to sites with cultural, archaeological, and/or environmental significance;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CNRI Response - Thank you for your recommendations regarding consultation. As stated in our application the entire baseline study and evaluation of potential routings and logistics for an AWR or Winter Road will be guided by a multi-year engagement and consultation process with Inuit and stakeholders to ensure the integration of Inuit Qaujimajatuqangit (IQ), as well as by scientific data collection and engineering assessments.

CIRNAC 3: Management Practices Designed to Prevent Disturbance to Wildlife:

CIRNAC recommends that the Proponent adhere to applicable regulatory requirements and accepted practices to prevent and/or mitigate any potential disturbances to wildlife that may result project activities. Meaningful efforts should be made to work with interested stakeholders, including the Kivalliq Inuit Association, Government of Nunavut's Department of Environment, the Kivalliq Wildlife Board, and the Hunters and Trappers Associations of Baker Lake and Arviat to ensure acceptable management practices are applied. In particular, efforts should be made to develop an acceptable approach for the operation of a helicopter to prevent any negative impacts to caribou and muskoxen from sensory disturbances (visual and sound).

CNRI Response - Thank you for providing your comments. We will work with interested and relevant stakeholders to collect data and inform acceptable approaches to prevent negative impacts to caribou and muskoxen.

Department of Fisheries and Oceans (DFO) Comments

DFO Recommendation:

Based on the scientific assessments of fish and fish capture methods a LFSP and AUP may be needed for the project. DFO recommends the project review the Guidelines for a Licence to Fish for Scientific Purposes Application and send the application to Arctic Region Permitting (DFO.NTNUPermit- PermisNUNT.MPO@dfo-mpo.gc.ca)

CNRI Response - Thank you for describing your concerns and providing your recommendations. CNRI will apply for the necessary LFSP and AUP permits and report to DFO in accordance with the Guidelines for a Licence to Fish for Scientific Purposes Application.

Transport Canada (TC) Comment

Transport Canada has reviewed the project proposal and does not have any comments to submit, as none of the project components fall within Transport Canada's mandate.

CNRI Response - CNRI appreciates the review completed by TC.

Hugh Ikoë (Baker Lake Community Member and Ferguson Lake descendant) Comment.

Hugh's recommendation - It is imperative that my extended family (the descendants of Basil Scottie) be included in all consultations and land use surveys. My siblings and I were raised in the Ferguson Lake area. We have a responsibility to be stewards of our traditional lands. What's more, we continue to use the Ferguson Lake area to exercise our inherent and treaty rights to hunt, fish, camp, and travel on the land.

CNRI Response - Consultation, engagement and land use studies will be conducted for the duration of this work to ensure an integration of Inuit Qaujimajatuqangit (IQ) into the environmental planning and environmental monitoring, including while the project is active, visits to the area in particular by elders and descendants of those raised in Ferguson Lake area from Baker Lake, Arviat and Rankin Inlet. Thank you for expressing your rights, commitment to stewardship and we look forward to continuing to work with and consulting with you and your family and extended family (descendants of Basil Scottie) as the project moves forward.

NIRB Request – Licences or permits for baseline studies

NIRB requested: a list of licenses or permits that would be required to conduct the project proposal.

Depending on the areas of baseline study, CNRI may require the following licenses to conduct the baseline studies, traditional land use studies and engineering assessments.

Nunavut Research Institute – Scientific Research License (when partnering with academics or KIA on winter road surveys or environmental studies).

Department of Fisheries and Oceans – License to Fish for Scientific Purposes and animal use protocol approval (when conducting fisheries studies).

Government of Nunavut - Department of Culture and Heritage – Archaeological and Palaeontology permit (when conducting archaeological and traditional land use studies).

Government of Nunavut – Department of Wildlife - Wildlife Research Permit (when conducting wildlife studies)

Government of Nunavut – Department of Wildlife - Wildlife Observation Licence (when conducting passive camera and vegetation or terrestrial studies).

Environmental baseline studies are low to no impact and have the benefit of providing valuable information to CNRI, KIA, Inuit land users and authorizing agencies.

NIRB Request – Area of Baseline Studies

NIRB requires a map of the Baseline Study Areas.

CNRI is beginning to assess the feasibility of transportation and logistics infrastructure to connect the Ferguson Lake Project to a transportation hub, potentially either in Baker Lake, NU, or Arviat, NU.

Figure 1 below is a starting point for environmental baseline study areas. To conduct environmental studies, trade-offs with stakeholders and an options analysis we require approximately 25km width for our study area. Ultimately baseline studies will be guided by a multi-year engagement and consultation process with KIA, Inuit stakeholders, government agencies and communities. This will ensure the integration of Inuit Qaujimajatuqangit (IQ) into the scientific data collection and engineering assessments and future decisions on logistics infrastructure.

Exact research sites have not been identified at this stage, however an approximate bordered geometry of the environmental baseline study area is provided. We are requesting an area of 25 km width for environmental studies in the Ferguson Lake Project Area and Baseline Study Areas 1 to 5 illustrated in Figure 1. We do not propose any environmental studies in territorial or national parks, nor in migratory bird sanctuaries. We plan to narrow down the options, develop environmental baseline study designs and identify exact research sites within the study areas over the next few years through assessment, engagement and consultation.

Figure 1: Ferguson Lake Environmental Baseline Study Areas (25km width proposed along these areas).

The “transportation corridor” in the NPC Draft Use Land Use plan is provided for reference. Ferguson Lake baseline studies will be conducted and designed, within the below areas, in collaboration with Inuit stakeholders and permit authorizing agencies.

