



NIRB File #: 25EN025

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<b>GN-01: Caribou Protection Measures</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut (GN)
<b>Subject/Topic</b>	Environment and Wildlife Management Plan – Caribou Protection Measures
<b>References</b>	<ul style="list-style-type: none"> <li>• Agnico Eagle Mines Limited – Meliadine Division. Terrestrial Environment Management and Monitoring Plan, Version 5 (March 2025)</li> <li>• Greenridge Exploration. Environmental and Wildlife Management Plan, Nut Lake Project (June 2025a)</li> <li>• Greenridge Exploration. NIRB Application for Screening #126165 Nut Lake Project (April 2025b)</li> </ul>
<b>CONCERNS</b>	
<p>The Government of Nunavut (GN) has identified concerns with Greenridge Exploration (Greenridge or the Proponent) application materials for the Nut Lake Project (the Project), specifically related to caribou protection measures. Based on the application, the Project will take place over a 30 to 60-day period from April to September (Greenridge Exploration, 2025b); This window encompasses several sensitive seasons for the region's caribou, including part of the spring migration, the calving period and post-calving period. Caribou sensitivity and vulnerability to disturbance vary by season, group size and other factors</p> <p>The GN notes that the Project's Environmental and Wildlife Management Plan (EWMP; Greenridge Exploration, 2025a) includes caribou protection measures that are contradictory, lack sufficient detail, fail to consider seasonal variations in caribou sensitivity to disturbance, and are inconsistent with other projects operating in the territory. Below, the GN has provided several examples of these concerns.</p> <p><u>Distance Buffers for Suspension of Operations</u></p> <p>Section 3.2 of the EWMP states:</p> <p style="padding-left: 40px;">“If caribou and/or muskoxen are spotted within the survey area, geophysical survey flights and drilling operations must be postponed until they are at least 1km away.” (Greenridge Exploration, 2025, p. 4)</p> <p>In contrast, section 4.1.1 of the EWMP states:</p> <p style="padding-left: 40px;">“If a concentration of 50 or more caribou comes within 2 kilometers of active drilling, operations will be suspended and will only resume once the caribou have left the area.” (Greenridge Exploration, 2025, p.7)</p>	

The GN notes that these conflicting statements in the Project's EWMP create uncertainty about which distance buffer will apply to drilling operations. Moreover, the GN notes that a 1- or 2-km buffer for suspending drilling or survey flights is inconsistent with other projects in the territory and is unlikely to provide sufficient protection for caribou from sensory disturbance. For instance, at the Meliadine Project near Rankin Inlet, drilling operations and helicopter flights are suspended when caribou are within 5 km of the activity (AEM, 2025, p.24).

#### Flight Altitudes

Section 1.1 of the EWMP states:

"The proposed work will be helicopter-supported and require the occasional landing of the aircraft. To mitigate any potential impact on wildlife, the helicopter will always maintain a minimum altitude of 610 m (2,100 ft) above ground level except during landing, take-off or if there is a specific requirement for low level flying (e.g. airborne surveys). Wildlife will be avoided, and the helicopter will not land in the presence of wildlife except in an emergency." (Greenridge Exploration, p. 2)

However, elsewhere in the EWMP, the Proponent states:

"Helicopters must maintain a minimum altitude of 610 meters when wildlife is observed." (Greenridge Exploration, 2025, p. 4)

And

"In wildlife areas, helicopters must fly at a minimum altitude of 610 meters." (Greenridge Exploration, 2025, p.6)

The GN notes it is unclear whether the 610-m minimum flight altitude applies: a) in all situations; b) only when wildlife are present, although the number animals is not clearly defined in the EWMP; or c) specifically in "wildlife areas," which are also not clearly defined in the EWMP.

#### Group Sizes

The GN notes that the majority of caribou protection measures in the Project's EWMP do not specify how many caribou must be observed before work suspensions are implemented. For example, Section 4.1.1 states:

"If a concentration of 50 or more caribou comes within 2 kilometers of active drilling, operations will be suspended and will only resume once the caribou have left the area." (Greenridge Exploration, 2025, p. 7)

However, section 3.2 states that

"If caribou and/or muskoxen are spotted within the survey area, geophysical survey flights and drilling operations must be postponed until they are at least 1km away." (Greenridge Exploration, 2025a, p. 4).

The GN notes it is unclear whether drilling is due to: a) the presence of a single caribou; b) a specific number of caribou; or c) varying caribou group size thresholds depending on the season.

### Seasons

Section 4.1.1 of the Project's EWMP states that:

"When migrating caribou are present, a one-kilometer buffer is maintained around work areas as a safety measure. If migrating caribou, including cows and calves, come within this buffer, work activities must halt until they have safely moved beyond it. Outside of migration periods, if caribou approach a work site, workers must avoid drawing attention or causing them to flee." (Greenridge Exploration, 2025b, p.2)

This statement implies that suspending activities like drilling, helicopter flights, or aerial surveys applies only during migratory periods, suggesting that outside these times, operations may continue uninterrupted. Additionally, the GN notes that, generally, other caribou protection measures referenced in the EWMP do not specify the seasons when they are enforced.

## **REQUESTS / RECOMMENDATIONS**

The GN recommends that the Proponent update the EWMP to:

1. Ensure consistency throughout the document
2. Specify thresholds—such as caribou numbers, group composition, and proximity to project activities—that would trigger suspension of operations (i.e., drilling, minimum flight altitudes).
3. Address the vulnerabilities of caribou during different seasons, including calving, post-calving, and summer.
4. At a minimum, align with or exceed current caribou protection measures utilized by operating projects in Nunavut.

## **ADDITIONAL COMMENTS**

N/A