



## COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

<b>Project Proposal Title:</b> Nut Lake Project	
<b>Proponent:</b> Greenridge Exploration Inc.	
<b>Location:</b> Kivalliq	
<b>Comments Due By:</b> July 16, 2025	<b>NIRB #:</b> 25EN025

**Indicate your concerns about the project proposal below:**

<input type="checkbox"/> no concerns	<input type="checkbox"/> traditional uses of land
<input type="checkbox"/> water quality	<input type="checkbox"/> Inuit harvesting activities
<input type="checkbox"/> terrain	<input type="checkbox"/> community involvement and consultation
<input type="checkbox"/> air quality	<input type="checkbox"/> local development in the area
<input type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input type="checkbox"/> birds and their habitat	<input type="checkbox"/> other: Cumulative Effects; Uranium exploration
<input type="checkbox"/> fish and their habitat	
<input type="checkbox"/> heritage resources in area	

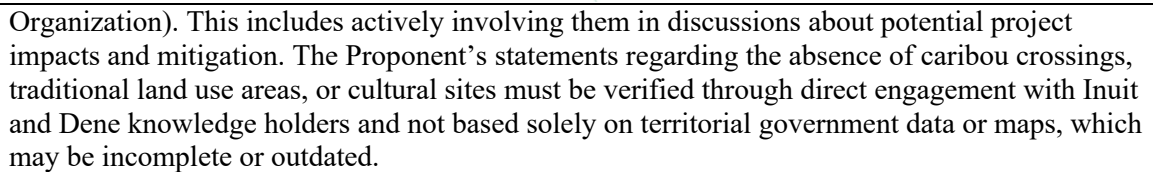
**Please describe the concerns indicated above:**

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 proposed Nut Lake Project (NIRB File 25EN025). 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 Beverly and Qamanirjuaq Caribou Management Board (BQCMB) is concerned about the potential for adverse effects to caribou, caribou habitat, cumulative effects, community involvement and consultation, and Indigenous harvesting activities related to the proposed Nut Lake Project. Specifically:

1. Caribou Habitat Overlap: The proposed project area overlaps with known spring migration and post-calving habitat of the Qamanirjuaq caribou herd, as identified through long-term collar data. It is also in proximity to calving areas for the Qamanirjuaq herd and areas used during their fall migration. Spring migration, calving and post-calving habitats are essential for cows and calves, and disturbances during this life stage (e.g., from drilling or helicopter use) can result in displacement, increased stress, and negative effects on calf survival and herd recruitment.
2. Monitoring and Mitigation Gaps: While the Proponent states that wildlife awareness training will be provided, the application does not specify:


<ol style="list-style-type: none"> <li>a. Whether dedicated wildlife monitors will be hired,</li> <li>b. Who will monitor for caribou presence,</li> <li>c. Who has the authority to initiate mitigation actions when caribou are nearby, or</li> <li>d. How communities will be informed of interactions with caribou.</li> </ol> <ol style="list-style-type: none"> <li>3. Lack of Indigenous Engagement: The application reflects minimal engagement with Indigenous communities whose members rely on caribou in the project area. Notably:               <ol style="list-style-type: none"> <li>a. There is no evidence of consultation with Ghotelnene K'odtjneh Dene (GKD) despite the project partially overlapping with GKD settlement lands.</li> <li>b. Engagement with the community of Baker Lake which is located downstream of the project and within the Qamanirjuaq range, appears limited or absent. Caribou are critical to the well-being of Inuit and other Indigenous peoples who depend upon them.</li> </ol> </li> <li>4. Cumulative Effects: The project would add to an expanding number of developments that overlap with Beverly and Qamanirjuaq caribou ranges. There has been no regional cumulative effects assessment, and caribou are increasingly affected by habitat fragmentation, disturbance, and climate change.</li> <li>5. Uranium Exploration: If uranium is a target mineral, this raises additional concerns given the radioactive nature of exploration and the well-documented and long-standing public opposition to uranium development in the Baker Lake region.</li> </ol>
<p><b>Do you have any suggestions or recommendations for this application?</b></p> <p>To address the above concerns, the BQCMB recommends the following:</p> <ol style="list-style-type: none"> <li>1. At minimum, avoid the Spring Migration, Calving and Post-Calving Seasons: In consultation with wildlife experts and Indigenous land users and knowledge holders, adjust the schedule of drilling and helicopter activities to avoid disturbances to caribou.</li> <li>2. Hire Indigenous Wildlife Monitors: Collaborate with the community of Baker Lake and relevant Inuit organizations within Baker Lake (e.g., Hunters and Trappers Organization), and Ghotelnene K'odtjneh Dene to hire local Indigenous wildlife monitors who can:               <ul style="list-style-type: none"> <li>○ Observe and record caribou presence and movements,</li> <li>○ Inform on-the-ground decision-making,</li> <li>○ Ensure timely implementation of mitigation measures,</li> <li>○ Provide an additional layer of accountability to communities.</li> </ul> </li> <li>3. Clarify Mitigation Protocols: Clearly define who within the project team has the authority to pause or adjust operations when caribou are observed nearby. A well-communicated chain of command is essential for effective mitigation. Caribou interactions should be reported back to Baker Lake and Ghotelnene K'odtjneh Dene and a communication plan for how this will be implemented should be provided.</li> <li>4. Engage GKD and Baker Lake: The Proponent must conduct meaningful consultation with Ghotelnene K'odtjneh Dene leadership and land users, as well as with the community of Baker Lake and relevant Inuit organizations within Baker Lake (e.g., Hunters and Trappers</li> </ol>



- Do you support the project proposal? Yes ☐ No ☒ Any additional comments?**

As other commentors have stated, no new exploration projects should proceed in critical caribou habitat without:

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

**Name of person commenting:** Gilly McNaughton **of** Beverly and Qamanirjuaq Caribou Management Board  
**Position:** Biologist **Organization:** Beverly and Qamanirjuaq Caribou Management Board  
**Signature:**  **Date:** July 24, 2025