

Bayridge Resources Corp.

Response to NIRB Public and Technical Comments

Baker Lake Uranium Project (NIRB 26EN014)

Date: April 25, 2026

1. Introduction

Bayridge Resources Corp. (“Bayridge”) appreciates the time and input provided by reviewers and members of the public regarding the proposed Baker Lake Uranium Project.

The following document provides Bayridge’s responses to all comments received through the Nunavut Impact Review Board (NIRB) public review process. Comments have been reproduced in full, and responses are provided directly below each comment.

Where applicable, project documents have been revised to reflect feedback received, including updates to project timing, mitigation measures, and operational approach.

2. Responses to Comments

A. Transport Canada

Comment:

Transport Canada has reviewed the project proposal and notes the project includes water withdrawals from unnamed lakes. Given this activity, Transport Canada is bringing the following information about the Canadian Navigable Waters Act (CNWA) that is particularly relevant for this project to the attention of the Board and the proponent.

Canadian Navigable Waters Act

Works, such as water intakes for water withdrawals, in navigable waterways are subject to the Canadian Navigable Waters Act (CNWA). To determine the applicability of the CNWA to the project:

- The proponent will need to complete self-assessments of the navigability of all waterways where water intakes will be placed.
- If a waterway is navigable, the water intake that will be used for water withdrawal may be a “minor work” under the CNWA.

The proponent is to complete the navigability self-assessment using Transport Canada Navigation Protection Program's (NPP) Project Review Tool for each waterway. The project review tool will assist the proponent in determining whether (1) any of the waterways are navigable, and (2) if the water intake may be a minor work.

For any water intake in a navigable waterway that is a minor work, the proponent will need to file a notification of a minor work on the Navigation Protection Program's External Submission Site.

If the proponent cannot meet all the criteria outlined in the Minor Works Order for scientific equipment, they have two options under the CNWA:

- Voluntarily apply to the Minister of Transport for approval of the works; or
- Seek authorization for the works using the public resolution process set out in the CNWA.

The public resolution process requires proponents to post a notification of work on a non-scheduled waterway and publish a notice inviting public comments. The notice gives the public 30 days to comment on the project. If no concerns are raised, the proponent can proceed with the work. If there are concerns, the proponent and the commenter have 45 days to resolve any navigation-related concerns. If concerns are not resolved, a decision may be requested from the Navigation Protection Program.

The proponent is advised to contact Transport Canada's Navigation Protection Program if they have questions about the applicability of the CNWA to the project or the Project Review Tool.

Response:

Bayridge acknowledges this comment and the information provided regarding the applicability of the Canadian Navigable Waters Act (CNWA) to proposed water withdrawal activities.

As part of project planning and permitting, Bayridge will assess the navigability of any waterbodies proposed for water withdrawal using Transport Canada's Navigation Protection Program (NPP) Project Review Tool. Where applicable, Bayridge will comply with all relevant requirements under the CNWA, including determining whether proposed water intake structures qualify as minor works and completing any required notifications or approvals.

Bayridge will also engage with Transport Canada's Navigation Protection Program as needed to confirm regulatory requirements and ensure compliance prior to the placement or use of any water intake structures.

B. Ghotelnene K'odtineh Dene

Comment:

Ghotelnene K'odtineh Dene have, and continue to, harvest Beverly/Qamanirjuaq caribou throughout our traditional territory in what is now Nunavut, Manitoba, Saskatchewan, and the Northwest Territories. Ghotelnene K'odtineh Dene have Section 35 rights throughout our traditional territory. The existence, culture, way of life and rights of our people are deeply connected to the caribou and its habitat – any harm to the caribou is a harm to the Dene.

Ghotelnene K'odtineh Dene submit that the activities described in the Baker Basin Project may result in significant adverse impacts on the ecosystem, wildlife, wildlife habitat, and harvesting activities of Ghotelnene K'odtineh Dene and other Indigenous peoples, as well as other potential socio-economic effects.

Ghotelnene K'odtineh Dene have significant concerns related to the proposed activities, particularly on the potential impacts to caribou and their habitat. The project is located in the calving and post-calving grounds of the Qamanirjuaq herd, which is critical to the health of the herd. Further, the Qamanirjuaq herd is known to be in this area during the summer season. The proposed dates for the exploration program overlap with the calving, post-calving and summer seasons. Ghotelnene K'odtineh Dene do not have confidence in the effectiveness of the proponent's proposed adaptive measures for caribou protection.

Also of concern is the need for greater assessment of the cumulative impacts to wildlife and wildlife habitat, particularly caribou, from this project proposal. There is potential for cumulative effects on disturbance to caribou from other projects or proposed projects in the Beverly/Qamanirjuaq herd's range.

Potential long-term adverse irreversible cumulative effects are possible from increased stress to caribou and impacts to caribou habitat. There does not appear to be an effective framework for the identification and assessment of cumulative impacts.

On this basis, Ghotelnene K'odtineh Dene do not support the Baker Basin project proposal.

Response:

Bayridge acknowledges the concerns raised by Ghotelnene K'odtineh Dene and recognizes the importance of the Beverly/Qamanirjuaq caribou herd to the exercise of Section 35 rights, cultural continuity, and traditional harvesting practices.

Bayridge understands that the project area overlaps with important caribou calving and post-calving habitat and that timing of activities is a key concern. In response to feedback received during the review process, the 2026 exploration program has been revised such that higher-impact activities, including diamond drilling, are planned to occur after mid-July to reduce potential interactions during calving and early post-calving periods.

The proposed program has also been designed as a low-impact, helicopter-supported exploration program with no overland access, no permanent camp, and a limited duration. Additional mitigation measures include real-time monitoring, wildlife observers, defined buffer distances, and stop-work protocols where caribou are present, as outlined in the Wildlife Management Plan.

With respect to cumulative effects, Bayridge acknowledges the importance of understanding broader regional pressures on the Beverly/Qamanirjuaq herd. As an early-stage, temporary exploration program, the Project is limited in scope and duration. Bayridge will comply with all applicable regulatory requirements and will continue to engage with regulators and rights holders regarding cumulative effects considerations as part of the review process.

Bayridge remains committed to ongoing engagement with Ghotelnene K'odtineh Dene and other Indigenous groups, and to adjusting activities where feasible in response to concerns raised.

C. Kivalliq Inuit Association

Comment:

The proponent needs to make sure caribou protection measures are in place from May 15 to July 15. After that date, mobile protection measures apply.

Response:

Bayridge acknowledges this comment and the importance of implementing caribou protection measures during the May 15 to July 15 sensitivity period.

In response to feedback received, the 2026 exploration program has been revised such that higher-impact activities, including diamond drilling, are planned to occur after mid-July to align with this timing and reduce potential interactions during calving and early post-calving periods.

Project activities will be planned and implemented to align with applicable Nunavut Land Use Plan requirements, permit conditions, and caribou protection measures, including the application of mobile protection measures and stop-work protocols where caribou are present.

D. Public Comment (Anne Andreassen)

Comment:

The commenter expresses opposition to the proposed uranium exploration project based on concerns related to environmental impacts, wildlife (particularly caribou migration and habitat), water quality, food security, and potential long-term effects on the ecosystem.

Concerns are raised regarding the potential for aircraft activity and exploration-related disturbance to affect caribou movement and access to country food, which is important for community well-being and cultural practices in Baker Lake.

The commenter questions whether uranium exploration may lead to future drilling and mining activities and raises broader concerns regarding environmental risk and downstream uses of uranium.

Additional concerns are raised regarding the adequacy of consultation and the need for more extensive research and engagement related to traditional land use, archaeological resources, and Inuit Heritage Trust.

The commenter also references historical opposition to uranium exploration in the region and expresses concern about cumulative and long-term impacts on caribou and their habitat.

The commenter recommends that the project not proceed.

Response:

Bayridge acknowledges the concerns raised through public comments and appreciates the time taken to provide input on the proposed project.

Bayridge recognizes the importance of caribou to the Baker Lake community and the role of country food in supporting food security, culture, and traditional practices. The 2026 program has been designed as a low-impact, helicopter-supported exploration program with no overland access, no permanent camp, and a limited duration.

In response to feedback received during engagement and the review process, the program has been revised such that higher-impact activities, including diamond drilling, are planned to occur after mid-July to reduce potential interactions during caribou calving and early post-calving periods. Additional mitigation measures, including monitoring, defined buffer distances, and stop-work protocols, are outlined in the Wildlife Management Plan.

The proposed activities are early-stage exploration only and do not include mining, processing, or development of permanent infrastructure. Any future phases of development would be subject to separate regulatory review and assessment.

Bayridge acknowledges the importance of cultural and archaeological protection and will comply with all applicable requirements, including engagement with appropriate authorities such as Inuit Heritage Trust, where required.

Bayridge remains committed to ongoing engagement with the Baker Lake community and to incorporating feedback into project planning and implementation where feasible.

E. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

Comment 1:

CIRNAC raised concerns regarding whether secondary containment and spill response capacity are sufficient to address credible worst-case spill scenarios, particularly given multiple fuel storage locations and sub-Arctic conditions.

Response to Comment 1:

Bayridge acknowledges this comment. The Spill Contingency Plan has been updated to clarify that fuel storage will be conducted within appropriate secondary containment systems designed to meet or exceed 110% of the largest container volume, with additional allowance for precipitation and snowmelt.

Spill response capacity has been developed to align with credible worst-case scenarios, including the potential for multi-drum releases at both the outpost and drill sites. The plan includes procedures for containment, recovery, and management of contaminated materials under site conditions. Further details are provided in the updated Spill Contingency Plan.

Comment 2:

CIRNAC raised concerns regarding the effectiveness of sump and trench systems for managing drill returns and wastewater, including potential risks to nearby waterbodies and the need for water quality verification and monitoring.

Response to Comment 2:

Bayridge acknowledges this comment. Waste management and sump design are described in the Waste Management Plan, including procedures for siting, construction, inspection, and closure of sumps to maintain containment under field conditions.

The Project will implement inspection and maintenance procedures during operations and prior to seasonal shutdown. Where appropriate, water quality monitoring and verification measures will be implemented to assess potential changes in receiving environments. Closure procedures, including backfilling and stabilization of sumps, are described in the Abandonment and Restoration Plan.

Comment 3:

CIRNAC noted that it is unclear whether acid rock drainage (ARD) or metal leaching potential has been assessed, and recommended identifying how potentially reactive materials would be identified and managed if encountered.

Response to Comment 3:

Bayridge acknowledges this comment. Based on available geological information and the early-stage nature of the program, significant acid rock drainage or metal leaching potential is not anticipated; however, the Project will apply a precautionary approach.

Field observations, including visual assessment of mineralization and radiometric response, will be used to identify materials that may require additional handling. Any materials requiring special management will be handled in accordance with the Waste Management Plan and Radiation Hazard Control Plan.

Comment 4:

CIRNAC recommends engagement with relevant organizations and communities, including incorporation of Indigenous knowledge, mitigation of impacts, and communication of project activities and opportunities.

Response to Comment 4:

Bayridge acknowledges this comment and recognizes the importance of engagement with interested parties. The Proponent has undertaken early engagement with the Hamlet of Baker Lake, Kivalliq Inuit Association, and community members, and has held public information sessions to present the proposed program and receive feedback.

Bayridge is committed to ongoing engagement and to incorporating Inuit Qaujimajatuqangit, Indigenous knowledge, and local knowledge into project planning and implementation where feasible. The Project will continue to consider mitigation measures, community input, and opportunities for local participation throughout the exploration program.

Comment 5:

CIRNAC recommends ensuring consultation with Ghotelnene K'odtjneh Dene given their traditional land use and potential interest in the project area.

Response to Comment 5:

Bayridge acknowledges this comment and recognizes that the Ghotelnene K'odtjneh Dene have a connection to lands within the broader region and may have an interest in the project.

To date, engagement has focused on the Baker Lake community and local Inuit organizations. Bayridge is committed to engaging with Ghotelnene K'odtjneh Dene and other potentially

interested parties as appropriate as the project advances and in coordination with regulatory processes.

F. Beverly and Qamanirjuaq Caribou Management Board (BQCMB)

Comment:

The Beverly and Qamanirjuaq Caribou Management Board (BQCMB) expressed concerns regarding the overlap of the proposed project with sensitive Qamanirjuaq caribou calving, post-calving, and summer habitat.

Concerns were raised regarding the timing of proposed activities during sensitive periods, the scale and type of exploration activities (including drilling and aircraft use), and the potential for disturbance to caribou and impacts to harvesting.

Additional concerns were raised regarding the clarity and effectiveness of monitoring and mitigation measures, including roles, responsibilities, and thresholds for stop-work decisions.

BQCMB also raised concerns regarding aircraft disturbance, cumulative effects across the herd range, and ongoing community concerns related to caribou and harvesting.

BQCMB does not support the project proceeding due to these concerns.

Response:

Bayridge acknowledges the concerns raised by the Beverly and Qamanirjuaq Caribou Management Board and recognizes the importance of the Qamanirjuaq herd and its calving and post-calving habitat to Indigenous communities and long-term herd sustainability.

Bayridge understands that timing and location of activities are critical considerations. In response to feedback received during the review process, the 2026 exploration program has been revised such that higher-impact activities, including diamond drilling, are planned to occur after mid-July to reduce potential interactions during calving and early post-calving periods. This change reflects a precautionary approach to reduce potential overlap with the most sensitive periods for the Qamanirjuaq herd.

The proposed program has also been designed to minimize disturbance through a helicopter-supported, low-impact approach with no overland access, no permanent camp, and a limited duration. Aircraft activity will be managed to avoid wildlife where possible, and operations will be adjusted or suspended where caribou are present, in accordance with the Wildlife Management Plan.

The Wildlife Management Plan includes defined monitoring protocols, roles and responsibilities (including authority to suspend work), buffer distances, and stop-work triggers. Bayridge will continue to refine and implement these measures to ensure they are effective in practice.

Bayridge acknowledges the importance of cumulative effects and broader regional pressures on the Qamanirjuaq herd. As an early-stage, temporary exploration program, the Project is limited in scope and duration. Bayridge will comply with applicable regulatory requirements and continue to engage with regulators and rights holders regarding these considerations.

Bayridge remains committed to ongoing engagement with affected communities, Indigenous organizations, and rights holders, and to adjusting project activities where feasible in response to concerns raised.

G. Government of Nunavut (GN)

Comment 1:

GN noted that the application referenced overland hauling but did not provide sufficient details regarding routes, materials, or mitigation measures.

Response to Comment 1:

Bayridge acknowledges this comment. The 2026 exploration program has been revised such that no overland hauling, ATV use, or snowmobile access is proposed. All project access and logistics will be helicopter-supported. Updated project descriptions reflecting this change are provided in the revised submission materials.

Comment 2:

GN noted insufficient detail regarding mitigation measures for raptor and non-migratory bird nests.

Response to Comment 2:

Bayridge acknowledges this comment. The Wildlife Management Plan has been updated to provide additional detail regarding the identification and protection of nests, including buffer distances, duration of protection measures, and roles and responsibilities for implementation and decision-making.

Comment 3:

GN noted insufficient detail regarding protection of terrestrial mammals and dens.

Response to Comment 3:

Bayridge acknowledges this comment. The Wildlife Management Plan has been updated to clarify mitigation measures for terrestrial mammals and dens, including protocols for encounters, application of buffer zones, duration of restrictions, and roles and responsibilities for decision-making and reporting.

Comment 4:

GN noted lack of clarity on roles and responsibilities for implementing mitigation measures.

Response to Comment 4:

Bayridge acknowledges this comment. The Wildlife Management Plan has been revised to clearly define the roles and responsibilities of the Project Manager, Wildlife Monitor, and other personnel, including authority to implement buffer zones, suspend or resume activities, and report wildlife interactions to regulatory authorities.

Comment 5:

GN raised concerns regarding missing plans, outdated references, and alignment with GN guidelines.

Response to Comment 5:

Bayridge acknowledges this comment. The Waste Management Plan has been updated to align with the Government of Nunavut's Environmental Guideline: General Management of Special and Hazardous Waste (March 2023). Supporting plans, including the Spill Contingency Plan and Radiation Hazard Control Plan, are included in the revised submission materials.

Bayridge confirms that all waste will be managed, transported, and disposed of in accordance with applicable GN guidelines, and that records will be maintained and made available to regulators as required.

Comment 6:

GN noted that the spill plan does not reference GN regulations.

Response to Comment 6:

Bayridge acknowledges this comment. The Spill Contingency Plan has been updated to reference the applicable GN Spill Contingency Planning and Reporting Regulations and to ensure alignment with regulatory requirements, including reporting thresholds and required information.

Comment 7:

GN requested clarification on inspection procedures and response to contamination.

Response to Comment 7:

Bayridge acknowledges this comment. The Abandonment and Restoration Plan has been updated to clarify inspection procedures, documentation of results, and response measures in the event that contamination or residual waste is identified, including assessment and remediation actions.

Comment 8:

GN raised concerns regarding potential impacts to archaeological resources and the need for assessment prior to disturbance.

Response to Comment 8:

Bayridge acknowledges this comment and recognizes the importance of protecting archaeological and palaeontological resources.

Bayridge will comply with all applicable requirements under the Nunavut Archaeological and Palaeontological Sites Regulations and will engage with the Government of Nunavut Department of Culture and Heritage to confirm requirements for archaeological assessment, permitting, and site protection prior to any ground disturbance. Where required, archaeological assessments will be completed in advance of ground-disturbing activities in accordance with applicable permitting requirements.

3. Closing Statement

Bayridge appreciates the input received through the review process and remains committed to ongoing engagement with regulators, rights holders, and the Baker Lake community.

The 2026 program has been designed as a low-impact, helicopter-supported exploration program, and incorporates adaptive mitigation measures and feedback received during early engagement and the review process.

Bayridge looks forward to continuing to work collaboratively with all parties as the project advances.