Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board
P.O Box 1360
Cambridge Bay, NU X0B 0C0

September 25, 2026

Sent VIA Email: info@nirb.ca

NIRB File #: 26EN037

Re: Notice of Screening and Comment Request for Honey Badger Silver Inc.'s "Nanisivik" project proposal

Hello Mia,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to review Honey Badger Silver Inc.'s "Nanisivik" project proposal, NIRB File #: 26EN037.

The GN has reviewed the proposed project and related documents and is pleased to provide the attached comments for the Board's consideration. These comments relate to an inconsistency in the description of the project location; a range of missing information within various plans and protocols, including the Spill Prevention and Response Plan, Waste Management Plan, and Environmental Management Plan; and the protection of archaeological and palaeontological resources during project activities. The GN requests that the Proponent take steps to revise and update project materials with the requested information and post them to the NIRB registry before any project activities begin.

The GN appreciates participating in the screening of this project through the NIRB review process. Should there be any concerns or need for follow-up, please feel free to contact me at jfbuller@gov.nu.ca.

Thank you,

Justin Buller
Interim Avatiliriniq Coordinator
Government of Nunavut

GN-01	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Proposed Project Location and Activities
References	• APEX Geoscience. Nanisivik Project, Nunavut, Qikiqtani Region: Project Targets (August 2026). • Honey Badger Silver Inc. NIRB Application for Screening #126488 (September 2026).

IDENTIFICATION OF ISSUE

The Government of Nunavut (GN) has identified inconsistencies in the Proponent's revised NIRB application regarding where the Project's exploration activities will occur. It is unclear if activities will take place on Crown lands or Commissioner's lands, or both.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The 'Activities' section of the Proponent's revised NIRB application suggests that all activities would occur on Crown lands. However, the Project Targets figure suggests that the general mineral claim area and at least one of the exploration target areas are at least partially on Commissioner's land. Furthermore, the 'Description of Existing Environment: Physical Environment' section of the Proponent's revised NIRB application has contradictory statements as to whether part of the Project would occur on Commissioner's Land. This section first states:

> *"...there are localized areas of legacy environmental impact, specifically related to historic fuel handling, unmanaged equipment storage, and legacy waste barrels, which are subject to ongoing oversight and assessment by territorial authorities. The proposed exploration activities will be distinct from, and will not interfere with, these localized legacy areas or any associated monitoring initiatives."*

However, the section then states that:

> *"By focusing exploration efforts within and adjacent to this pre-existing industrial zone, the Project activities aim to maximize the utilization of historical disturbances, thereby significantly mitigating potential impacts on undisturbed areas."*

If activities would be occurring within the pre-existing industrial zone, then there is potential for exploration activities to impact the localized legacy areas (which are on Commissioner's land). The Proponent's statements appear to contradict one another.

It is important for the GN to know whether Project activities would be occurring on Commissioner's lands, particularly on or in significant proximity to pre-existing localized legacy areas, so the GN can sufficiently consider potential impacts to GN's management of the contaminated site.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent clarify:

1. Whether the Project would be occurring on any Commissioner's lands generally, and particularly, whether it would be occurring on or in significant proximity to any localized legacy areas.
    a. If so, what activities from the Project (e.g., drilling, fuel caches, fuel utilization, fuel movement, camp establishment, lay down area) would be carried out, particularly on or in significant proximity to any localized legacy areas.

GN-02	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Spill Prevention and Response Plan
References	• APEX Geoscience. Spill Prevention and Response Plan for the Nanisivik Property, Nunavut, Canada (August 2026). • APEX Geoscience. Nanisivik Project, Nunavut, Qikiqtani Region: Project Targets (August 2026). • Environmental Protection Act, Spill Contingency Planning and Reporting Regulations, R-068-93 • Government of Nunavut, Department of Environment, Environmental Guideline: Spill Contingency Planning and Reporting Regulations (March 2023)

IDENTIFICATION OF ISSUE

The GN has identified several gaps and inconsistencies in the Proponent's Spill Prevention and Response Plan (Spill Plan) related to required plan information, spill-reporting thresholds, response equipment, and implementation of spill-response measures. Addressing these items would improve alignment with the *Spill Contingency Planning and Reporting Regulations, R-068-93*, and applicable GN guideline.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The GN has identified the following:

1. Required spill contingency plan information: Several pieces of information required under R-068-93 are incomplete or unclear in the Spill Plan:

- The Spill Plan does not provide the complete name, address and job title of the owner or person in charge, management or control, as required by s.4(2)(a) (Spill Prevention and Response Plan, Sections 1 and 5.3).
- The "Nanisivik Project Field Supervisor" is identified as "TBD," and the Spill Plan does not provide the name, job title and 24-hour telephone number of the person(s) responsible for activating the plan, as required by s.4(2)(b) (Spill Prevention and Response Plan, Sections 5.2 and 5.3).

- The location, size and storage capacity of individual facilities/storage locations covered by the Spill Plan are not clearly identified, as required by s.4(2)(c). The Spill Plan provides container sizes and property-wide quantities for diesel and propane and indicates that fuel caches may be established at camp and drill sites but does not clearly identify the size or storage capacity of these individual locations (Spill Prevention and Response Plan, Sections 2, 2.1 and 4.4; Table 2.1).
- The Spill Plan identifies quantities for diesel and propane but also identifies other materials that may be used or stored onsite, including motor/hydraulic oils, calcium chloride, batteries and cleaning products, without clearly identifying which are normally stored onsite or their quantities, as required by s.4(2)(d) (Spill Prevention and Response Plan, Section 2.2).
- A facility-level site map is not included or clearly incorporated into the Spill Plan, as required by s.4(2)(e). The Project Targets Figure provides regional context; however, proposed camp and fuel-cache locations have not yet been identified or shown. The GN's Environmental Guideline: Spill Contingency Planning and Reporting Regulations also identifies additional facility-level information that should be shown on the map, where applicable (GN, 2023).

2. **Spill-reporting thresholds:** Spill Plan Table 5.1 incorrectly includes corrosive compressed gas in the category where releases are reportable only when the container capacity exceeds 100 L. Under Schedule B of R-068-93, that >100 L category applies to flammable compressed gas and non-corrosive, non-flammable compressed gas. Toxic or corrosive compressed gas is reportable at any amount (Spill Prevention and Response Plan, Table 5.1; R-068-93, Schedule B).

3. **Spill-response equipment**: The on-water response procedure directs responders to use a containment boom and, for larger spills, pumps/skimmers (Spill Prevention and Response Plan, Section 6.1.2). Section 4.3 identifies oil-sorbent booms within spill kits, but it is unclear whether these provide the containment capability described in Section 6.1.2. Pumps are identified elsewhere for fuel-transfer activities, but are not clearly identified as spill-recovery equipment, and skimmers are not identified in the response-equipment inventory. R-068-93 s.4(2)(i) requires an inventory and location of response and clean-up equipment available to implement the spill contingency plan (Spill Prevention and Response Plan, Sections 4.3, 4.5 and 6.1.2).

4. **Spill-response preparedness and implementation**: The Spill Plan could provide additional clarity regarding several implementation measures:

- The Spill Plan does not identify whether an external spill-response contractor or other external response resource will be available where onsite capabilities are exceeded. The GN's spill contingency planning guideline provides for identification of external spill-response resources and notes that professional response support may be required for larger spills entering water (GN, 2023).

- Section 4.1 describes orientation, certifications and annual refresher training but does not identify practical or simulated spill exercises. The GN guideline identifies mock-spill exercises as a component that may be incorporated into spill-response training (Spill Prevention and Response Plan, Section 4.1; GN, 2023).
- Section 4.2 establishes weekly inspections of hazardous-material storage areas, secondary containment, containers and spill-response equipment and requires deficiencies to be corrected; however, the Spill Plan does not describe how completed inspections, deficiencies or corrective actions will be documented or tracked (Spill Prevention and Response Plan, Section 4.2).

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent revise the Spill Plan to:

1. Provide the information required under R-068-93 s.4(2)(a)-(e), including complete owner/person-in-charge information; the name, job title and 24-hour telephone number of the person(s) responsible for activating the Spill Plan; the location, size and storage capacity of applicable facilities/storage locations; the types and quantities of contaminants normally stored onsite, and, where applicable, the maximum quantities expected onsite; and an applicable facility-level site map.

2. Revise Table 5.1 so that the compressed-gas reporting thresholds are consistent with Schedule B of R-068-93, including replacing “corrosive” with “non-corrosive” in the >100 L compressed-gas category.

The GN recommends that the Proponent revise the Spill Plan to:

3. Ensure that the spill-response equipment inventory reflects the equipment available to implement the procedures described in the Spill Plan, including applicable containment and recovery capability for on-water spills, and clarify whether the identified booms and pumps are intended for spill response and whether skimmer capability will be available. Otherwise, revise the procedure to reflect the response capability that will actually be available.

4. Clarify spill-response preparedness and implementation measures, including arrangements and appropriate emergency contacts for external response support where onsite capabilities may be exceeded. The GN also recommends considering periodic practical or tabletop mock-spill exercises and maintaining an inspection record or log documenting completed inspections, identified deficiencies and corrective actions.

The GN requests that once all updates have been made to the Spill Plan, the Proponent provide a revised copy of the Spill Plan to NIRB to be posted on their registry before any activities begin.

GN-03	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Waste Management Plan
References	• APEX Geoscience. Waste Management Plan for the Nanisivik Property, Nunavut, Canada (August 2026). • Government of Nunavut, Department of Environment, Environmental Guideline: General Management of Special and Hazardous Waste (March 2023)

IDENTIFICATION OF ISSUE

The Government of Nunavut (GN) has identified several provisions in the Proponent's Waste Management Plan that should be revised or clarified to better align with the GN *Environmental Guideline: General Management of Special and Hazardous Waste*.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The GN has identified the following concerns with the Waste Management Plan:

1. **Waste-battery storage**: Waste Management Plan Section 4.1.8 states that waste lead-acid and rechargeable batteries may be temporarily stored in quantities of up to 1,000 kg. Current GN guidelines states that anyone storing more than 500 kg of waste batteries should register as a Hazardous Waste Management Facility (Waste Management Plan, Section 4.1.8; GN, 2023).

2. **Waste-fuel combustion**: Waste Management Plan Sections 3.3, 4.1.3 and 4.1.7 provide for waste fuel to be burned in tent stoves. GN guidelines states that waste fuel should only be burned in boilers or furnaces certified and approved for that purpose, with combustion gases vented outside. The Waste Management Plan does not indicate that the proposed tent stoves meet these criteria (Waste Management Plan, Sections 3.3, 4.1.3 and 4.1.7; GN, 2023, Section 10.4).

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent revise the Waste Management Plan to:

1. Reflect current GN guidelines for waste-battery storage, including registration as a Hazardous Waste Management Facility where more than 500 kg may be stored.

2. Confirm that equipment proposed for burning waste fuel meets the requirements of Section 10.4 of the current GN guideline or identify an appropriate alternative management method.

The GN requests that once all updates have been made to the Waste Management Plan, the Proponent provide a revised copy of the Waste Management Plan to NIRB to be posted on their registry before any activities begin.

GN-04	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Environmental Management Plan: Wildlife Monitor Presence, Role and Authority
References	• APEX Geoscience. Environmental Management Plan for the Nanisivik Property, Nunavut, Canada (August 2026).

IDENTIFICATION OF ISSUE

In Section 3.1.1, the Environmental Management Plan (Environmental Plan) identifies that wildlife monitors will be hired from local communities and be present with sampling crews 'where appropriate' or be stationed at active sites, such as camp and drill locations (Environmental Management Plan, Section 3.1.1). This statement insufficiently covers the necessity for wildlife monitors during project activities.

Additionally, there is no description of the wildlife monitor's authority, or the decision pathways, documentation and verification, or adaptive management actions through which they may influence operational mitigation.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The phrase "where appropriate" in the context of wildlife monitor presence should be removed from the Environmental Plan, as wildlife monitors should be present during all Project activities to ensure staff and wildlife safety. The word "or" in the statement discussed above should also be replaced with the word "and", as wildlife monitors should be simultaneously present with sampling crews and be stationed at active sites, such as camp and drill locations. Wildlife monitors should be present wherever staff are to ensure staff and wildlife safety. This means the Project will require multiple wildlife monitors if staff are to be split between multiple locations at the same time.

Many of the mitigation requirements in the Environmental Plan largely depend on the abilities of the wildlife monitors. Consequently, it is important to have a clear and sufficient description of the wildlife monitors' authority, and the decision pathways, documentation and verification, or adaptive management actions through which they may influence operational mitigation, so that their ability and authority to meet the requirements of the Environmental Plan can be adequately assessed.

REQUEST(S)/RECOMMENDATION(S)
The GN recommends that the Proponent: 1. Remove the phrase “where appropriate” from the Environmental Plan and overall update the phrasing in the Environmental Plan to ensure it reflects that wildlife monitors will be present during all activities to ensure staff and wildlife safety. 2. Clarify wildlife monitor roles and authority in meeting the requirements of the Environmental Plan. The GN requests that once all updates have been made to the Environmental Plan, the Proponent provide a revised copy of the Environmental Plan to NIRB to be posted on their registry before any activities begin.

GN-05	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Environmental Management Plan: Raptor and Non-migratory Bird Mitigation Measures
References	• APEX Geoscience. Environmental Management Plan for the Nanisivik Property, Nunavut, Canada (August 2026).

IDENTIFICATION OF ISSUE

The mitigation measures for breeding and nesting birds identified in the Proponent's Environmental Plan lack sufficient detail about the how presence of nests of raptors and non-migratory birds will be assessed prior to ground or vegetation disturbing work.

The GN needs this information to assess the potential effects of the Project on wildlife, particularly raptors and non-migratory birds, and to determine if the mitigation measures are suitable.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

Section 3 of the Environmental Plan focuses on Potential Wildlife Impacts and Mitigation Measures, including Section 3.2.1 which states that pre-disturbance sweeps will be conducted within a 100m radius of the proposed drill site if a nest is identified. However, the sweep activity should be completed prior to any drilling or ground disturbance activity that occurs within the identified nesting period, regardless of whether or not a nest has already been identified. The nest sweep should also be completed by an experienced person possessing Inuit Qaujimatuqangit and/or scientific knowledge.

REQUEST(S)/RECOMMENDATION(S)

The Government of Nunavut recommends that the Proponent:

1. Clarify any actions (e.g., sweeps) that will be taken to prevent disturbance to nests of raptors and non-migratory birds in advance of any ground or vegetation disturbing work that is planned to occur during the identified nesting period for Zone N10.

2. Define qualifications of personnel completing or supervising nest sweep activities and the clarify the timing related to the sweeps (i.e., how many days in advance of the work and the period of time that may elapse between the sweep and the work activities).

The GN requests that once all updates have been made to the Environmental Plan, the Proponent provide a revised copy of the Environmental Plan to NIRB to be posted on their registry before any activities begin.

GN-06	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Environmental Management Plan: Caribou Mitigation Measures
References	• APEX Geoscience. Environmental Management Plan for the Nanisivik Property, Nunavut, Canada (August 2026). • Nunavut Planning Commission. North Baffin Regional Land Use Plan (2000).

IDENTIFICATION OF ISSUE

Section 3.2.4 of the Environmental Plan pertains to barren-ground caribou and notes that the stop work threshold will be initiated outside of the calving window (June to July), if a group of 10 or more caribou come within 5 km of an active worksite. It is not clear in the Environmental Plan how this threshold was derived.

Clarification of what activities are stopped when the stop work threshold is reached is also needed, as it is not clear what activities fall under the category of work/operations. Particularly, although the Environmental Plan addresses mobile equipment generally in Section 3.1.2, it does not clearly address the caribou-specific restrictions on snowmobile and all-terrain vehicle use identified in the North Baffin Regional Land Use Plan (2000, Appendix I).

Section 3.2.4 of the Environmental Plan also makes reference to a ‘caribou alert system’, but there are few details describing this system or the scope of ‘dedicated monitoring’ when more than 10 caribou are observed within 25 km of work activities, especially given the proximity of caribou calving and post-calving areas across Strathcona Sound.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The GN requires this information to assess potential effects from the Project on wildlife, particularly caribou, and to determine if the mitigation measures are sufficient.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent:

1. Clarify how the stop work threshold for outside the calving window was derived.

2. Clarify what activities are stopped when the stop work threshold is reached, particularly in the context of the caribou-specific restrictions on snowmobile and all-terrain vehicle use identified in the North Baffin Regional Land Use Plan (2000, Appendix I).

3. Provide additional details that describe the scope of the 'caribou alert system' and 'dedicated monitoring' for caribou observations in the vicinity of project activities.

The GN requests that once all updates have been made to the Environmental Plan, the Proponent provide a revised copy of the Environmental Plan to NIRB to be posted on their registry before any activities begin.

GN-07	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Environmental Management Plan: Accuracy of Polar Bear Denning Period
References	• APEX Geoscience. Environmental Management Plan for the Nanisivik Property, Nunavut, Canada (August 2026). • Escajeda, E., Laidre, K.L., Born, E.W. et al. Identifying shifts in maternity den phenology and habitat characteristics of polar bears (Ursus maritimus) in Baffin Bay and Kane Basin. Polar Biol 41, 87–100 (2018). https://doi.org/10.1007/s00300-017-2172-6 • Government of the Northwest Territories. Northern Land Use Guidelines: Seismic Operations (2015). • Roberto-Charron, A., Boulanger, J., Bohart, A., Ware, J.V., Regehr, E.V., Laidre, K., Richardson, E.S., Atkinson, S., Davies, L., Campbell, M., Akeeagok, R., Mutch, C., and Dyck, M., 2025. Distribution and population estimate of polar bears in the Lancaster Sound subpopulation in Nunavut, Canada, determined by aerial abundance survey March 2023. Final Report, Government of Nunavut, Department of Environment, Kugluktuk, 170 pp.

IDENTIFICATION OF ISSUE

Section 3.2.5 of the EMP states that the Proponent will implement carnivore habitat buffers pursuant to the Government of the Northwest Territories' *Northern Land Use Guidelines: Seismic Operations (2015)* and that they will apply for active dens of 'all species' of bears from September 30 to March 30. However, this is inconsistent with research which suggests that there is a high probability that pregnant polar bears in Landcaster Sound are relying on maternity dens between mid-August until mid to late April (Roberto-Charron et al. 2025; Escajeda et al. 2018).

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

An accurate polar bear denning period is important in the Environmental Plan to ensure polar bear protection measures are being implemented at the correct times to ensure staff and wildlife safety. Den buffers should be applied to active polar bear dens throughout the

polar bear denning season for the Landcaster Sound population, not just between September 30 to March 30. Den buffers should also be applied outside of the denning season period if dens are observed as active, which is possible given that these dates are subject to natural variation.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the Proponent update the period for which den buffers are applied in the Environmental Plan to reflect the most recent research on the subject, recognizing that these dates are subject to natural variation and the Proponent should always be prepared to ensure staff and wildlife safety.

The GN requests that once all updates have been made to the Environmental Plan, the Proponent provide a revised copy of the Environmental Plan to NIRB to be posted on their registry before any activities begin.

GN-08	
Department	Environment
Organization	Government of Nunavut (GN)
Subject/Topic	Environmental Management Plan: Polar Bear Safety Measures
References	• APEX Geoscience. Environmental Management Plan for the Nanisivik Property, Nunavut, Canada (August 2026). • Government of Nunavut. Bear Safety: Reducing Bear-People Conflicts in Nunavut (n.d.).

IDENTIFICATION OF ISSUE

Section 3.2.5 of the Environmental Plan states that a 'polar bear safety management protocol' will be developed for implementation during the 2026 field season to mitigate the risk of polar bear encounters. However, this document was not available for review at the time of writing (Environmental Management Plan, Section 3.2.5).

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The GN cannot adequately comment on the sufficiency of polar bear safety measures without the polar bear safety management protocol.

The GN emphasizes the need for clear, appropriate safety measures that minimize the potential for human-wildlife conflict and the loss of human life during polar bear encounters. Information on this topic can be found in the GN's 'Bear Safety: Reducing Bear-People Conflicts in Nunavut' document. The GN also notes that the proponent of a project to be carried out during the polar bear denning period must have a polar bear monitor on site to mitigate bear presence.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent provide the polar bear safety management protocol to NIRB for review by the GN and other intervenors. This should be done immediately or with sufficient time before activities begin.

GN-09	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeology
References	• APEX Geoscience. Nanisivik Project, Nunavut, Qikiqtani Region: Project Targets (August 2026). • Honey Badger Silver Inc. NIRB Application for Screening #126488 (September 2026).

IDENTIFICATION OF ISSUE

Honey Badger Silver Inc. proposes to conduct a multi-year mineral exploration program at the Nanisivik Project, located approximately 20 km east of Arctic Bay. Proposed activities include geological mapping, prospecting, till, soil and rock sampling, airborne and ground geophysical surveys, stripping and trenching, and diamond and/or reverse-circulation drilling, with heavy equipment proposed for some exploration activities. Project activities are proposed to occur annually between March and October from 2027 to 2032, and the specific locations of the camp, drill sites, trenches, water sources, and remote fuel caches have not yet been identified.

A review of Government of Nunavut (GN) records identified one previous archaeological assessment having been completed within a portion of the mineral claims associated with the Nanisivik Project. That assessment was undertaken in 1975 and was limited in scope, including work in the vicinity of the Nanisivik port after construction activities had already occurred, and does not provide systematic archaeological coverage of the current project area. Additional archaeological assessments have been completed in the broader vicinity of Arctic Bay and Strathcona Sound, resulting in the identification of approximately a dozen archaeological sites in the surrounding area. While no archaeological sites are currently known from within the mineral claim boundaries, much of the proposed project area does not appear to have been subject to archaeological field assessment and the presence or absence of archaeological sites within those areas has therefore not been established.

Based on landscape-level considerations, including the project's coastal setting along Strathcona Sound, the presence of lakes and waterways, raised beach and other elevated landforms, and regional travel and land use patterns demonstrated by previously recorded archaeological sites in the surrounding area, CH considers that there are reasonable grounds to believe there could be sites of archaeological significance on lands proposed for project-related impacts, pursuant to Article 33.5.12 of the *Nunavut Agreement*. While the application states that the Proponent is not aware of any known archaeological or palaeontological sites on the Property, as mentioned above, much of the mineral claim area has not been subject to systematic archaeological field assessment. The absence of registered archaeological sites within the mineral claims therefore does not establish that archaeological sites are absent.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

GN notes that the proposed project includes activities involving ground disturbance, which constitute potential impacts to archaeological resources. These include, but are not limited to:

- stripping and trenching, including excavation using heavy equipment, and associated temporary work areas;
- drill site preparation, drilling, sumps for drill-water disposal, and associated temporary work areas;
- establishment, operation, servicing and removal of any temporary camp, including structures, fuel storage, sewage and greywater facilities, laydown, staging, storage and support areas;
- remote fuel caches, hazardous-material storage areas, waste storage areas, and associated staging or support areas;
- planned, designated, or established helicopter landing and staging areas;
- terrestrial access associated with pick-up trucks, ATVs, heavy equipment, drill mobilization, servicing, resupply or demobilization where travel extends beyond existing constructed road surfaces; and,
- demobilization, cleanup, reclamation, removal and closure activities associated with drill sites, trenches, camps, fuel caches, sumps, storage areas, helicopter landing areas and other Project components where terrestrial ground disturbance may occur.

GN notes that the application commits to archaeological field surveys where ground disturbance is proposed in "historically undisturbed" areas, while the Environmental Management Plan more broadly states that areas where ground disturbance may occur will be surveyed before work begins. GN does not consider the characterization of an area as brownfield or previously disturbed sufficient to establish its archaeological condition. The extent of previous disturbance and whether archaeological resources may remain should be confirmed in the field by a qualified archaeologist working under a CH-issued permit.

GN further notes that Project activities may begin as early as March. Any archaeological field assessment should be completed under snow-free conditions before ground disturbance so that any archaeological sites present can be identified and appropriate protection and conservation measures established.

RECOMMENDATIONS

To ensure compliance with the *Nunavut Act* and the NAPSR, GN recommends that the Proponent consult directly with CH on archaeological requirements for specific project components through CH's archaeological permitting and regulatory review processes prior to any ground disturbance, including any requirements for archaeological assessment, avoidance, buffering, monitoring, mitigation, and chance-find response.

GN further recommends the following:

- **Site protection:** All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. The Proponent must understand that it is their responsibility to

ensure that no heritage sites are disturbed during the course of project activities. GN recommends that known or newly recorded archaeological sites are avoided using a minimum 50 metre buffer, or greater where directed by CH.

- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the protective buffer area. The site shall be documented (including coordinates, description, and photographs) and reported to CH, and work shall not resume within the buffer area until direction is provided by CH.
- **General protections:** No alteration, disturbance, artifact removal, littering, or defacement of archaeological sites is permitted. No collection or disturbance shall occur unless authorized through the appropriate permitting process. The Proponent shall ensure that all staff and contractors are informed of these legal obligations. The construction of inuksuit is not supported.

ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *Nunavut Archaeological and Palaeontological Sites Regulations* provide for the protection, care, and preservation of archaeological and palaeontological resources. CH is the Designated Agency responsible for the administration of the archaeological and palaeontological permitting system, in close coordination with Inuit land claim partners, including the Inuit Heritage Trust (IHT), which serves as the Designated Organization under Article 33 of the Nunavut Agreement. All archaeological and palaeontological sites in Nunavut are protected by law. It is illegal to search for, survey, excavate, alter, or otherwise disturb any archaeological or palaeontological site without a valid permit issued by the Government of Nunavut.