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Impact Assessment Officer
Nunavut Impact Review Board

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

The Qikiqtani Inuit Association (QIA) has reviewed the Notice of Screening Comment Request for Honey Badger Silver Inc's (the Proponent) "Nanisivik" Project Proposal (*NIRB 126488/26EN037*) (the Project) provided by the Nunavut Impact Review Board (NIRB) on September 4, 2026. We engaged with the Arctic Bay Community Lands and Resources Committee (CLARC) prior to developing this response.

Based on the feedback of the CLARC, it is our understanding that the Proponent has not yet meaningfully engaged with Ikpiarjukmiut regarding the proposed activities. Given the proximity of proposed activities to Arctic Bay and the lack of awareness of the proposed activities, QIA strongly recommends that the comment request deadline of September 25, 2026 be extended so that the Ikajutit Hunters and Trapper Organization (Ikajutit HTO) and the Hamlet of Arctic Bay are provided an opportunity to consult with Ikpiarjukmiut and submit feedback to the NIRB. This is necessary to ensure Ikpiarjukmiut can inform the proposed project alternatives, design, studies, and initial impact identification at the earliest stage of the process.

QIA recommends the NIRB engage with the Ikajutit HTO and Hamlet of Arctic Bay before selecting a new deadline.

This letter provides QIA comments on the “Nanisivik” Project proposal for NIRB's consideration. QIA notes these comments should not be interpreted as QIA supporting or



1. Whether the Project proposal is likely to arouse significant public concern; and if so, why.

The Project is proposed 20km east of the Hamlet of Arctic Bay. This area is known to be a 5 hour walk from the community. The Proposal includes hauling materials and heavy equipment and hazardous and combustible waste through the community to site, while potentially introducing outside workers. Construction, camp, and drilling activities will generate noise, dust, air emissions, and will require disposal of grey water. Potential for waste or ash to enter Arctic Bay within the community's water supply catchment area is identified by the Proponent (Revised NIRB Application for Screening #126488, Sep 2026, p. 8–9) and has the potential to rouse significant public concern.

The Proponent has not completed engagement with QIA or the most affected community and yet proposes to begin the Project in March 2027. The Proponent indicates that planning is underway for engagement, but they do not set out clear commitments for doing this work (Ibid. p. 2,5). However, initial QIA-led engagement with the CLARC on Sept 16, 2026, indicates serious concerns about:

- Absence of Inuit engagement and limited time to inform the Project before the March 2027 project start
- Likely impacts to wildlife and Inuit harvesting



2. Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why.

QIA is not confident in the Proponent's conclusions about impacts due to their reliance on desktop studies and without community consultation or consideration of Inuit Qaujimajatuqangit (IQ). The Proponent concludes that impacts on wildlife, archaeology, and socio-economic impacts will be unlikely or negligible.

the Proponents states that they “are not aware of any known archaeological or paleontological sites” (Ibid. p. 13) but does not explain what information / database this conclusion is based on. No completed archaeological desktop or field survey is provided in the package.

The Proponent suggests that socio-economic impacts will be negligible or fully addressed through mitigation measures. As noted above, socioeconomic impacts appear likely because they are proposing a work camp up to 20 people only if accommodation cannot be identified in Arctic Bay, as well as annual seasonal work up to 5 years between May 2027 and September 2032 (Ibid.p.2) and use of the existing road to haul materials back and forth between Arctic Bay and the Project site. The Proponent has not provided information on emergency response needs, an analysis of community capacity to house workers, local housing options, associated pressures on local health and other services, potential for leveraging local labour, and capacity to address waste streams generated from the work activities. The Proponent does identify potential benefits for wildlife monitoring, camp set up, kitchen support, water usage, and core cutting.



3. Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; if so, why.

The Proponent relies on desktop studies and provides no information on any primary data collection or community engagement to understand wildlife habitat and Inuit harvesting. While the Proponent indicates they will consider available Inuit Qaujimagatuqangit, this has not happened yet (Ibid. p.13, 14). The Proponent's Environmental Management Plan does not provide a clear process for notifying Inuit harvesters, or how information from Inuit will be considered (Environmental Management Plan for the Nanisivik Property, Aug 2026, v.1, p. 4).

The Proponent mentions several species but does not indicate if these are historic or current (Ibid. p.12-15). Importantly, the Proponent indicates that caribou were historically in the area prior to the 1950's but are "extremely rare today" without providing source information to support this statement (Revised NIRB Application for Screening #126488, Sep 2026, p.12). The Proponent also states that "local community members have also indicated that Polar Bears have occasionally passed through the mine area en-route to feeding locations" without providing a source of information about how and whether consultation took place (Ibid. p. 12).



4. Whether the Project is of a type where potential adverse effects are highly predictable and mitigable with known technology, (and recommended mitigation measures)

Evaluating adverse effects and potential mitigations for the Project is not possible with the current information provided by the Proponent.

The Proponent has proposed several mitigations that are designed around known impacts and interactions, even though impacts to archaeology, socioeconomics, wildlife, and Inuit harvesting are not identified (see answers to questions 2 and 3 above). These measures include pre-drilling wildlife habitat reconnaissance, wildlife and bird buffers, a stop-work plan for caribou, chance discovery of archaeological or cultural sites, source goods and services from local businesses, when possible, local employment, and in-person consultation prior to operations. Given the potential for significant impacts, it's not clear whether or how these measures may effectively address these impacts.

5. Any matter of importance to QIA related to the Project proposal

A key matter of importance for QIA is that the proposed Project is very close to the Hamlet of Arctic Bay with likely socioeconomic and Inuit harvesting impacts, but the Proponent has no information from the community as they have not been consulted on the Project.

The Proponent has submitted these screening materials prior to meaningful consultation with Inuit. The community of Arctic Bay is 20km from the Project site, and the Proponent's



Closing

Regards,

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