



To: Viren Nasit, Senior Impact Assessment Officer, NIRB

From: Jill Byrne, Project Manager, NNC

Cc: Keith Drover, Project Director, NNC

Date: October 8, 2026

Subject: Iqaluit Nukkiksautiit Project
NIRB File No. 26UN010 | NPC File No. 151033
Response to NIRB's letter dated September 29, 2026

Nunavut Nukkiqsautiit Corporation (NNC) provides the following response to the Nunavut Impact Review Board's (NIRB) September 29, 2026 request for additional information to support completion of screening of the Iqaluit Nukkiqsautiit Project. The response follows the topics in NIRB's letter and includes Tetra Tech's response concerning reservoir operations and downstream flows, together with its project-scale comparison drawing.

Appendix A provides Tetra Tech drawing I121-002-4.3.063-SK-711, Revision A, dated October 5, 2026, “Preliminary Design - General Arrangement - Project Scale Reference.” It presents the proposed dam and the Iqaluit International Airport runway at the same scale of 1:12,500.

The drawing identifies a proposed dam length of 2,111 metres (m) and an airport runway length of 2,743 m. On this basis, the dam is approximately 77% of the runway length, or approximately 632 m shorter. The comparison provides a familiar local reference for the dam's horizontal extent.

Management and monitoring plans will be developed and refined for the appropriate stage of Project development. Preliminary frameworks will support assessment and design; construction-specific plans will be developed before the relevant construction activities; operational plans will be developed before commissioning and operation; and closure and reclamation planning will be refined as the design and closure requirements become better defined. Plans will reflect assessment findings, applicable authorizations, design information and input from Inuit and relevant regulatory authorities.

For the investigative studies, environmental management is addressed through the Environmental Protection Plan for temporary camp and drilling activities, the Spill Prevention and Response Plan, and the Abandonment and Restoration Plans, identified as **Appendices B**. These plans have also been submitted and reviewed as part of the permitting process for the investigative studies. Their scope relates to those authorized activities. Project construction, operation and closure will require plans appropriate to those stages.

2.1 FUEL MANAGEMENT & SPILL PREVENTION

Corrective actions, reporting and follow-up: Stop and isolate unsafe transfers; contain and respond to releases; investigate causes and revise procedures. Maintain inspection and incident records; report releases and follow up under applicable authorization requirements.

2.2 WASTE MANAGEMENT

Corrective actions, reporting and follow-up: Correct storage or segregation issues; address releases or wildlife attraction; revise collection arrangements. Retain disposal records and report incidents and monitor results as required.

2.3 WILDLIFE MONITORING & MITIGATION

Corrective actions, reporting and follow-up: Pause or modify activities where warranted; revise timing, buffers or operating procedures. Record observations and responses; report under applicable permits and review trends and mitigation effectiveness.

2.4 CULTURE & HERITAGE

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4.0 CLARIFICATION OF SECTION 5.2.1.1 FISH SPECIES

Yes. Section 5.2.1.1 is intended to confirm that Arctic char are the only fish species identified to date in the river system and proposed reservoir. The other species mentioned in that section are provided for awareness and have not been verified as present within this system. This clarification describes the current findings; it does not establish the absence of other species. It also does not establish whether the Arctic char remain in freshwater or migrate to the sea.

5.0 ACCESS ROAD MANAGEMENT AND INUIT HARVESTING

The following conceptual approach is proposed for NNC confirmation. The road-access policy has not been established in the materials provided for this response. Final arrangements will require further discussion with relevant Hunters and Trappers Organizations (HTOs), Inuit land users, landowners and responsible authorities, together with consideration of safety, wildlife findings and applicable authorizations.

5.1 ACCESS DURING CONSTRUCTION AND OPERATION

A controlled-access approach is proposed during construction, with access coordinated around active work zones, heavy equipment movements and other hazards. During operation, an access-management arrangement would define permitted users, coordination requirements and restrictions. A decision on unrestricted public access has not been confirmed.

5.2 INUIT LAND USERS AND HARVESTERS

The proposed approach would provide a process to discuss and accommodate Inuit land-user and harvester access where compatible with safe Project activities and applicable land-access arrangements. Consultation would identify important routes, destinations, seasonal travel patterns and practical access needs. This response does not establish new harvesting rights or change existing rights.

5.3 SEASONAL RESTRICTIONS AND WILDLIFE CONTROLS

The proposed approach would provide a process to discuss and accommodate Inuit land-user and harvester access where compatible with safe Project activities and applicable land-access arrangements. Consultation would identify important routes, destinations, seasonal travel patterns and practical access needs. This response does not establish new harvesting rights or change existing rights.

5.4 INCREASED ACCESS AND HARVESTING PRESSURE

The assessment would examine whether the road could change access and harvesting patterns. NNC proposes to work with HTOs and relevant authorities on appropriate indicators and responses. Potential measures could include traffic or access controls and targeted monitoring. Harvest-management decisions would remain with the bodies holding the relevant authority.

5.5 CARIBOU AND OTHER WILDLIFE

Monitoring would draw on wildlife studies, Inuit knowledge, road-user observations and incident records. Potential measures include speed limits, yielding to wildlife, temporary traffic pauses and changes to timing or access where monitoring identifies concerns. Species-specific thresholds and protocols require further development.

APPENDIX B: ENVIRONMENTAL MANAGEMENT PLANS



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Subsurface Exploration Program**

Version: 1.2

Date: July 2026

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Acronyms & Abbreviations

CCME	Canadian Council of Ministers of the Environment
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
dB	decibels
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
ECCC-CWS	Environment and Climate Change Canada – Canadian Wildlife Service
EPP	Environmental Protection Plan
GN	Government of Nunavut
GN CGS	Government of Nunavut Community and Government Services
GN DCH	Government of Nunavut Department of Culture and Heritage
GN EPD	Government of Nunavut Department of Environment - Environmental Protection Division
GN WMD	Government of Nunavut Department of Environment - Wildlife Management Division
h	hour
km	kilometer
m	meter
MW	megawatt
NIRB	Nunavut Impact Review Board
NNC	Nunavut Nukkiqsautiit Corporation
NPC	Nunavut Planning Commission
NT	Northwest Territories
NTU	Nephelometric Turbidity Units
NU	Nunavut
NWA	Nunavut Wildlife Act
NWB	Nunavut Water Board
RCMP	Royal Canadian Mounted Police
RCAF	Royal Canadian Air Force
SAR	Species at Risk
SARA	Species at Risk Act
SDS	Safety Data Sheets
SPRP	Spill Prevention and Response Plan
TC	Transport Canada
TSS	total suspended solids
WHMIS	Workplace Hazardous Materials Information System



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1.0 Introduction

Nunavut Nukkiksautiit Corporation (NNC) is committed to the mitigation of the environmental impacts of activities associated with the Investigative Studies for the Iqaluit Nukkiksautiit Project (the Project). The environmental and technical field programs (investigative studies) began in fall 2024 and are required to continue through 2026 (possibly 2027) to support the overall Project design. The purpose of this research is to gain an understanding of the key ecosystem and geotechnical components within the study area in order to help assess the feasibility of the Iqaluit Nukkiksautiit Project (the overall Project). The Project is permitted through Nunavut Impact Review Board (NIRB), (#25YN033) while the overall Project is currently going through the NIRB screening process (#26UN010).

The proposed overall Project is a renewable energy development that features a hydroelectric dam, powerhouse, road, and transmission line from the powerhouse to Iqaluit, with a capacity of 15-30 megawatts (MW). It is located on the Hall Peninsula, Baffin Island, approximately 60 kilometers (km) northeast of Iqaluit, Nunavut. The 2026 Subsurface Exploration Program will be conducted in this remote Project area and will be supported by helicopter access from Iqaluit and the field camp.

As part of the 2026 studies, a Subsurface Exploration Program (SEP, or the “Program”) will be completed to understand rock, soil and ground ice conditions. The Program includes geotechnical drilling, associated in-situ testing and sampling, and geohazard mapping.

This Environmental Protection Plan (EPP) has been developed specifically for the SEP associated with the Project. It documents practices and procedures that will serve to minimize or eliminate potential environmental impacts resulting from the Program. This EPP has been revised to incorporate applicable requirements from Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Class A Land Use Permit N2025N0016 and its annexed Terms and Conditions, as well as conditions of approvals and authorizations that have been, or are anticipated to be, issued by the Government of Nunavut (GN), the Nunavut Impact Review Board (NIRB), the Nunavut Water Board (NWB), Fisheries and Oceans Canada (DFO), among others.

This EPP applies to the 2026 Subsurface Exploration Program, including helicopter-supported geotechnical drilling, associated in situ testing and sampling, geohazard mapping and withdrawal, fuel and hazardous materials management, drill-waste management, and progressive clean-up. This EPP does not authorize activities outside the approved investigative



1.4 Roles and Responsibilities

NNC

NNC is responsible for overall governance and management of the Subsurface Exploration Program and will:

- Develop, approve, distribute, and maintain the EPP and subsequent revisions;
- Provide sufficient Environmental/Wildlife Monitor coverage for the duration and operating schedule of the Program, including both twelve-hour drilling shifts and each active work front, or adjust the work schedule so required monitoring and inspections can be completed;
- Confirm that every new or relocated borehole, water source, helicopter landing area, survey monument, control point, weather station, data-logger terminal, instrument anchor, laydown area, and temporary storage area has received the required environmental and archaeological review before use;
- Oversee compliance with applicable permits, licences, authorizations, Project commitments, community requirements, and social-responsibility commitments;
- Hire and manage the drilling contractor and other NNC-retained field contractors; and
- Coordinate with the Camp Operations Manager, Engineering Manager, Environmental Manager, Environmental/Wildlife Monitors, archaeological support, and contractors so that Program objectives and environmental requirements are addressed.

Camp Operations Manager (Polar Outfitting)

The Camp Operations Manager is responsible for the safe and orderly operation of the field camp and coordination of camp-based environmental controls. Responsibilities include maintaining camp housekeeping, wildlife attractant controls, waste segregation and storage, fuel storage controls, communications with field teams, and implementation of camp procedures that support this EPP.

Engineering Manager / Subsurface Exploration Program Manager (Tetra Tech)

Tetra Tech is responsible for the technical management, coordination, and execution of the 2026 Subsurface Exploration Program on behalf of NNC. Tetra Tech will provide technical supervision during both drilling shifts and will designate a Project Manager, Subsurface Exploration Program Manager, Engineer of Record or designate, and SEP Field Supervisor.



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Tetra Tech's responsibilities include:

- Providing technical supervision and coordination of diamond drilling activities during both drilling shifts;
- Coordinating Tetra Tech field personnel and maintaining continuity between shifts;
- Logging frozen and unfrozen soil and rock core;
- Conducting core orientation, field testing, on-site laboratory testing, and coordinating off-site laboratory testing;
- Conducting pneumatic packer testing and optical and acoustic downhole televiewer surveys;
- Completing geohazard mapping and coordinating survey activities;
- Installing vibrating-wire piezometers, ground-temperature cables, data loggers, telemetry terminals, and the local weather station;
- Managing sample preservation, storage, testing, shipping, and chain-of-custody requirements;
- Preparing daily and weekly technical reports and final technical deliverables;
- Reviewing proposed changes to borehole locations, depths, inclinations, purposes, testing programs, and instrumentation;
- Documenting technical changes and obtaining approval from the Engineer of Record or designate, where required;
- Coordinating with the Drilling Contractor Supervisor, Environmental/Wildlife Monitor, Environmental Manager, and other Project personnel;
- Reporting environmental non-conformances, spills, wildlife interactions, historic-resource discoveries, unexpected contamination, drilling-fluid losses, artesian flow, and unauthorized surface disturbance to NNC and the Environmental Manager without delay; and
- Reporting anomalous ground conditions or other circumstances that could affect environmental compliance, worker safety, or successful completion of the Program.

Tetra Tech's technical approval of a change to a borehole location, depth, inclination, purpose, testing program, or instrumentation does not constitute environmental or regulatory approval. No changed, added, or relocated activity will proceed until the Environmental Manager confirms that the activity remains within the authorized scope and satisfies applicable waterbody setbacks, archaeological buffers, wildlife constraints, access limitations, water-use requirements, and waste-management requirements.



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Environmental Manager (Dillon Consulting)

Dillon Consulting is responsible for overall management of conditions of permits and approvals, overseeing all aspects pertaining to compliance with respect to environmental concerns. Dillon is supported by Sikumiut Environmental Management (SEM), Ecologic EcoLogic Consultants Ltd. and Campfire Archaeology and Heritage Ltd. Dillon Consulting is responsible for:

- Managing the development and submission of environmental regulatory permitting applications, with follow-up through to approval, and associated reporting requirements;
- Monitor and report on regulatory compliance, including conditions of authorizations and permits;
- Liaise with regulatory agencies on conditions of authorizations/permits, reporting requirements and environmental incidents; and
- Support the periodic review and update of the EPP.

Dillon will collaborate with the Engineering Project Manager to ensure objectives for the Program are met and the relevant permits are obtained.

Drilling Contractor Supervisor (Rodren)

NNC is responsible to ensure that the Field Supervisor and Drilling Contractor are implementing this EPP at active drill locations and associated temporary work areas. The Drilling Contractor Supervisor is responsible for directing the drilling crew and implementing this EPP at active drill locations. Responsibilities include drill-pad setup, fluid containment, water measurement, spill prevention, waste containment, equipment inspection, borehole completion, progressive clean-up, and immediate reporting of environmental incidents or non-conformances.

Responsibilities include:

- Conducting work in accordance with approved permits, licences, authorizations, this EPP, and direction from NNC, the Engineering Manager, and the Environmental Manager;
- Confirming that drill locations, laydown areas, water withdrawal points, fuel storage areas, and waste containment areas are reviewed before use;
- Maintaining required buffers from waterbodies, wetlands, wildlife features, and known or suspected historic resources;
- Implementing spill prevention, fuel handling, water withdrawal, drill-waste containment, and progressive clean-up procedures;
- Measuring and recording daily water withdrawal and water use;

- Demonstrate capacity to perform in a manner consistent with NNC's commitments, policies and procedures;
- Immediately report concerns to the Environmental Manager (or Engineering Manager) of any spills or other accidental events or malfunctions that could adversely affect the environment;
- Perform clean-up activities as directed by the Engineering Manager, Environmental Manager or regulatory agencies; and
- Provide feedback to the Environmental Manager regarding any changes or comments they believe would improve the EPP.

The general reporting structure for Program is illustrated in Figure 1.1.

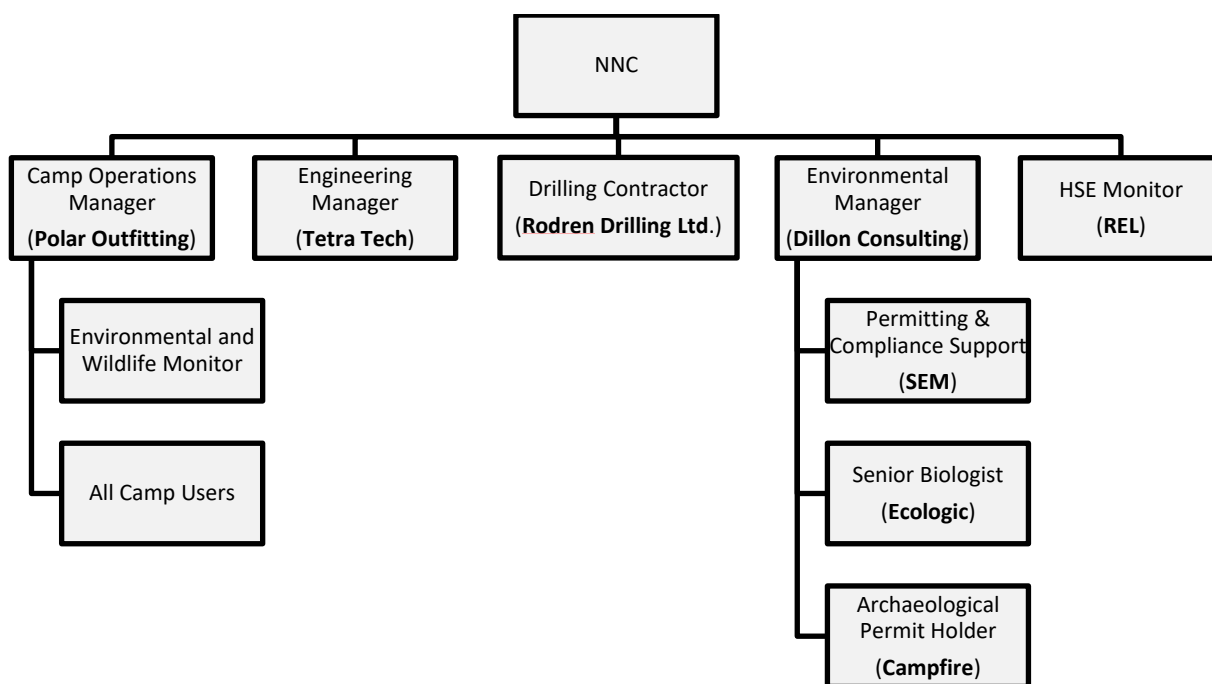


Figure 1.1 EPP Organization Chart

1.5 Environmental Orientation and Training

Through ongoing environmental orientation and awareness training, NNC will confirm that all Project personnel understand their roles and responsibilities and potential environmental effects of the Program, particularly those related to their specific work activities.



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Environmental orientation will include a presentation on environmental protection procedures to be applied to all work, including applicable Land Use Permit N2025N0016 requirements, and will be provided to:

- All new personnel arriving on site; and
- All workers prior to the start of any new activity and thereafter on an as-needed basis.

All Project personnel will also receive training for spill response measures, Land Use Permit N2025N0016 conditions applicable to their work, active nest disturbance and associated avian response behaviour, historic resources awareness and response procedures, wildlife interaction prohibitions, waste management requirements, and potentially invasive plant species identification.

Environmental orientation attendance will be documented, and personnel will sign the EPP signature page before participating in field activities. Orientation will include, at minimum, permit conditions applicable to the worker's role, no-overland-vehicle requirements, water withdrawal and fish screen requirements, spill prevention and response, fuel and hazardous materials handling, drill-waste containment, wildlife and avifauna procedures, historic resource chance-find procedures, waste management, and reporting requirements.

Daily tailgate meetings will be used during active drilling to review planned work areas, water sources, fuel handling, waste containment, weather conditions, wildlife observations, sensitive receptors, and any corrective actions from previous inspections. Because drilling may be conducted twenty-four hours per day using two twelve-hour shifts, environmental requirements and outstanding corrective actions will be included in each shift handover. The handover will identify the active borehole, approved coordinates, authorized water source, access and emergency-egress method, environmental and archaeological constraints, drill-fluid composition, waste-containment status, wildlife observations, weather conditions, planned packer or instrumentation work, and any outstanding corrective action.

Personnel involved in packer testing, instrumentation installation, on-site laboratory testing, compressed-gas handling, borehole completion, and survey-monument installation will receive task-specific orientation before beginning that activity.



2.0 Project Description Overview

The 2026 Subsurface Exploration Program is intended to characterize overburden, bedrock, groundwater, ground-ice and permafrost conditions and to support the evaluation and design of the proposed dam, powerhouse, penstock, low-level outlet, spillway, saddle dams, road alignment, borrow sources and potential rock-quarry areas.

The current program includes up to fifty (50) HQ3-diameter boreholes with planned depths of approximately twenty (20) m to one hundred and twenty (120) m and a total target drilling length of approximately 2,935 linear metres. The workplan includes both primary boreholes and secondary boreholes that may be completed if schedule and field conditions permit. The final number, depth and sequence of boreholes may change through the approved change-control process described in this EPP.

Boreholes will be advanced using heliportable diamond-drilling equipment and the minimum quantity of chilled sodium-chloride drilling fluid practicable for the encountered ground conditions. Polymer additives may be used where required to stabilize a borehole, subject to prior technical confirmation, environmental review, SDS availability, and applicable authorization. Six selected boreholes may be used for pneumatic packer testing using a five-stage Lugeon methodology. Packer testing will not proceed where frozen ground is encountered at the proposed test interval.

The Program may include optical and acoustic downhole televiewer surveys, core orientation, point-load testing, sample collection, on-site and off-site laboratory testing, and installation of long-term instrumentation. The current instrumentation program includes ground-temperature cables in up to thirty-six (36) boreholes, approximately thirty (30) vibrating-wire piezometer sensors in seven boreholes, data loggers, telemetry equipment, solar power components, and a local weather station. Actual installation locations and configurations will be confirmed through the approved field register and change-control process.

Geohazard mapping will include desktop review, helicopter reconnaissance and photography, limited ground-truthing with small hand tools, augers or permafrost probes, and handheld or drone-based survey. Survey work may include establishment of control points, permanent survey monuments, pre-drilling borehole layout, handheld GPS records, and final professional survey pickup.



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Core and selected samples will be preserved at the drill site and transported to a heated on-site laboratory at camp. Frozen samples will be stored in coolers or freezers and may be transported to Iqaluit or off-site laboratories for testing or long-term storage. Laboratory chemicals, test solutions, wastewater and sample-processing wastes will be managed in accordance with Sections 4.8 and 4.11.

The field program is planned to operate for approximately three months between July and September 2026 and may operate twenty-four hours per day using two twelve-hour shifts. The actual drilling sequence and completion date will depend on weather, camp readiness, equipment performance, wildlife, heritage constraints, and encountered ground conditions.

Access between camp and field locations will remain by helicopter and foot unless this EPP and the applicable authorizations are revised in writing. Investigation of prospective borrow and rock-quarry areas does not authorize quarrying, extraction, blasting, road construction, or bulk removal of material.



Table 3.1 List of Environmental Approvals, Authorizations and Permits for the Project

Authorization / Agency	Permit or File Number	Expiry / Reporting Requirement		Scope of Activities / Conditions to Confirm Before Work
Land Use Conformity Determination (Nunavut Planning Commission)	150981	Amended 16-Jan-2026	N/A	Conformity determination for environmental investigative studies
Screening (Nunavut Impact Review Board)	25YN033	8-Jul-2025	N/A	Screening determination
Class A Land Use Permit (Crown-Indigenous Relations and Northern Affairs)	N2025N0016	12-Aug-2025	11-Aug-2030/Annual reporting	Field camp and geotechnical drilling, subject to the Terms and Conditions annexed to Land Use Permit N2025N0016.
Type B Water Licence (Nunavut Water Board)	8BC-INP2631	Approved / active for 2026 SEP water withdrawal	Per licence	Water withdrawal for drilling and associated SEP activities from approved water sources. Total drilling water use shall not exceed 165 m ³ /day unless amended.
Wildlife Research Permit (GN Department of Environment)	2026-016	1-Jun-2026	Annual	Assessment of existing wildlife populations and habitats in and around the proposed Project area. Confirm permit conditions and reporting requirements before work.



Authorization / Agency	Permit or File Number	Expiry / Reporting Requirement		Scope of Activities / Conditions to Confirm Before Work
Class 1 Archaeology and Palaeontology Permit (GN Department of Culture and Heritage)	N/A	2026-002A	Sept 30, 2026, 60 days after field work concludes and Final Report by March 31, 2027	Assessment and management of archaeological and palaeontological findings in and around the proposed Project area. Related ground placement or disturbance will not proceed until clearance and permit requirements are confirmed.
Request for Review (Department of Fisheries and Oceans Canada)	N/A	Letter of advice	Annual	Request for Review for activities that may interact with fish and fish habitat. No instream work, bed disturbance, bank disturbance, or activity that may affect fish or fish habitat will proceed until DFO requirements are confirmed.

2.2 Environmental Monitoring

2.2.1 Site Inspections

Site inspections will be conducted by the Environmental/Wildlife Monitor or approved designate before setup at each new drill location, during active drilling and water withdrawal, following fuel or hazardous materials handling, following significant weather events, and after demobilization from each drill location. Inspection findings, non-conformances, corrective actions, and close-out status will be documented using Appendix B or an equivalent field inspection form approved by the Environmental Manager.



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2.2.2 Compliance Monitoring

Compliance monitoring is required to ensure that applicable regulatory requirements and conditions of permits/authorizations are met, and to verify the accuracy of environmental effects predictions and will be completed by Dillon and SEM. Additionally, compliance monitoring can be used to assess effectiveness of mitigation and management measures, and to identify potential effects that may require further mitigation. The following monitoring activities will be executed to satisfy compliance requirements:

- Water quality monitoring;
- Volume of water withdrawn;
- Quantity and location of waste disposed of onsite, and quantity of waste removed from site;
- Wildlife (including avifauna) monitoring;
- Waste and raw materials monitoring (including fuel and chemical); and
- Incidents and complaints monitoring.

Land Use Permit N2025N0016 condition tracking, including required notifications, location updates, spill records, waste disposal records, and cleanup/restoration records.

Effectiveness of compliance monitoring activities will be captured through regular environmental site inspections conducted by the Environmental/Wildlife Monitor or approved designate, the Environmental Site Inspection Checklist (Appendix B), the NT-NU Spill Report Form (Appendix C), water withdrawal and use tracking records (Appendix F), and applicable permit condition tracking. Compliance records will include, where applicable, pre-mobilization notifications, location updates, inspection records, water use logs, waste records, spill records, wildlife records, archaeological clearance records, and corrective action close-out documentation.

Water withdrawal and water use records will be maintained using Appendix F. Records will include approved water sources, source coordinates, daily withdrawal volumes, water used by activity, water reuse/recycling, fish screen inspections, daily reconciliation against the authorized limit, and corrective actions. Any exceedance, use of an unapproved source, missing fish screen, or incomplete water record will be treated as a non-conformance and reported to the Environmental Manager immediately.

3.0 General Environmental Protection Procedures

This section outlines general mitigation measures to be implemented during the drilling activities to avoid and/or reduce potential environmental impacts.

Table 4.1 provides a field summary of key environmental protection measures. Where Table 4.1 is less specific than the detailed procedures in Sections 4.1 to 6.4, the detailed procedure will apply. Where a permit, licence, authorization, or written regulatory direction is more restrictive than this EPP, the more restrictive requirement will apply.

Table 4.1 Environmental Protection Measures to Implement During Drilling Activities

ID #	Issue / Activity	Party Responsible	Mitigation Measures
1	Communication, Permit Awareness and Authority	NNC; Environmental Manager; Field Supervisor; Contractor	- NNC will make the EPP available to Project personnel and confirm that roles and responsibilities are understood. - Environmental requirements will be reviewed during site orientation before work begins. - The CIRNAC Land Use Inspector will be contacted at least 48 hours before commencement. - The Engineer will be notified of commencement within 10 days. - The field agent and alternates will be identified at least 48 hours before commencement. - A copy of the Land Use Permit will be kept on hand during the land use operation and displayed at the campsite. - The permit number will be displayed on equipment, where applicable.
2	Authorized Area and Scope of Activities	NNC; Engineering Manager; Field Supervisor; Contractor	The land use operation will be conducted only on lands designated in the accepted application unless otherwise authorized in writing by the



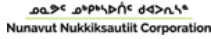
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ID #	Issue / Activity	Party Responsible	Mitigation Measures
			Engineer. - Only the type, size and number of equipment listed in the accepted application will be used unless otherwise authorized by the Land Use Inspector. - Explosives use, blasting, open burning, unapproved chemical use, ATV use, overland equipment travel, vegetation clearing, grubbing, access trail construction, and activities outside the approved drilling and sampling scope are not permitted unless written authorization is obtained and the EPP is revised, where required.
3	Location Reporting and Annual Report Inputs	Environmental Manager; Field Supervisor; Contractor	- Coordinates will be recorded in degrees, minutes and seconds using NAD 83. - Location records will be maintained for campsites, petroleum fuel storage containers, airstrip/landing locations, laydown areas, quarry locations, drilling locations, other activity locations, and active/backfilled sumps, as applicable. - The field team will support annual reporting to the Engineer by March 30 of each permitted activity year, including activity summary, maps/tables, next-year work plan, and progressive reclamation summary.
4	Camp Location and Housekeeping	Camp Operations Manager; Contractor; Environmental/Wildlife Monitor	- Camps will be located on gravel, sand, or other durable land, where practical. - The land use area will be kept clean and orderly.



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ID #	Issue / Activity	Party Responsible	Mitigation Measures
			• Garbage and debris will be stored in covered wildlife-resistant containers until removed to an approved disposal facility. • Scrap metal, discarded machinery/parts, barrels, buildings, building materials, non-combustible garbage, ash, and debris will be removed from Territorial Lands and taken to approved disposal facilities.
5	Site Access and Mobilization	Engineering Manager; Field Supervisor; Contractor; Environmental/Wildlife Monitor	• No ATVs or other overland vehicles will be used for the 2026 drilling program. • Personnel access to boreholes will be by helicopter and foot only. • Drill rigs, core shacks, fuel, generators, pumps and associated equipment will be transported by helicopter. • No access route, trail, line or right-of-way will be established unless written authorization and required regulatory approvals are obtained and the EPP is revised. • If overland vehicle movement is later authorized, additional conditions for route scouting, stream setbacks, rutting/gouging prevention, suspension of travel during poor ground conditions, and trap/snares avoidance will apply.
6	Drill Setup, Laydown and Storage Areas	Engineering Manager; Field Supervisor; Contractor; Environmental Manager	• Drill laydown areas will be located on stable, durable ground where practical. • Drill equipment will be placed on protective mats, rig mats, or equivalent protective surfaces to reduce ground disturbance.



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			• The number of laydown and storage areas will be kept to the minimum required for safe and efficient work. • New laydown or storage areas will be reviewed before use to avoid sensitive environmental or archaeological features. • Protective mats/pads will be removed following drilling, unless otherwise authorized.
7	Buffer Zones	Field Supervisor; Contractor; Camp Operations Manager; Environmental/Wildlife Monitor	• Fuel caches, hazardous waste storage, refuelling areas, sumps, and waste storage areas will be located at least 31 m from the ordinary or normal high-water mark of any adjacent waterbody. • No activities will occur within 50 m of a known archaeological or historical site. • Additional buffers may be applied for wildlife, bird nests, sensitive terrain, or other site-specific constraints identified by the Environmental/Wildlife Monitor or qualified specialist.
8	Stream Crossings, Erosion and Sediment Control	Contractor; Environmental/Wildlife Monitor; Environmental Manager	• No overland stream crossings are planned for the 2026 drilling program. • Water withdrawal points will be accessed on foot and selected to avoid bank disturbance, saturated ground, and sediment release. • If a crossing is later required, the crossing location will be selected to reduce erosion and avoid terrain obstacles. • Stream crossings will be minimized.



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			Erosion and sediment control measures will be installed to the satisfaction of the Land Use Inspector, where required.
9	Water Withdrawal and Fish Protection	Environmental Manager; Contractor; Environmental/Wildlife Monitor	- Water use will follow the applicable Water Licence and approved water source requirements. - Fish movement will not be obstructed. - Water will not be extracted from fish-bearing waterbodies unless the water intake hose is equipped with an appropriate fish screen to avoid fish entrapment. - Water source coordinates will be recorded. - Approved water sources and volumes will be used. - The 31 m buffer and any additional Water Licence or EPP requirements will be maintained.
10	Sumps, Sewage and Waste Disposal Areas	Camp Operations Manager; Contractor; Environmental Manager	- Sumps will not be located within 31 m of the normal high-water mark of any waterbody. - Sumps and designated waste disposal areas will be bermed or otherwise contained so substances do not enter waterways, unless otherwise authorized. - Sewage will be deposited into an approved sump. - Sumps will be backfilled and restored immediately following completion of activities or before permit expiry. - Backfilled sumps will include sufficient material to prevent hollows



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			or cavities and will overlap replaced material at least 1 m beyond the sump wall.
11	Fuel Storage and Petroleum Containment	Contractor; Field Supervisor; Camp Operations Manager; Environmental/Wildlife Monitor	• Petroleum fuel storage containers will not be placed within 31 m of the normal high-water mark of any waterbody or environmentally sensitive area. • Mobile fuel storage facilities will be located on land when stationary for more than 12 hours. • Petroleum products will be managed to prevent spreading to surrounding land or waterbodies. • A watchman will be maintained when fuel is stored on site. • Stationary fuel storage facilities will be flagged or marked. • Fuel container outlets will be sealed except for the outlet in use. • Containers will be marked with the Permittee name and Land Use Permit number. • Secondary containment or surface liners will be used for fuel and chemicals, with containment volume at least 10% greater than the largest container. • During winter closure or periods without daily monitoring, fuel storage will be flagged, and containers will be kept in covered secondary containment.



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12	Refuelling and Hazardous Substance Transfer	Contractor; Field Supervisor; Environmental/Wildlife Monitor	• Appropriate spill response equipment will be readily available during transfer of fuel or hazardous substances and at petroleum fuel storage facilities. • Refuelling will occur at least 31 m from the high-water mark of any waterbody. • Refuelling will occur in designated areas and over a drip tray or secondary containment. • A copy of the approved Spill Contingency Plan will be available at approved refuelling and fuel storage locations.
13	Chemicals and Hazardous Waste	Contractor; Environmental Manager; Field Supervisor	• Chemicals will not be used in connection with the land use operation without prior approval of the Engineer. • Chemical storage containers will not be placed within 31 m of the normal high-water mark of any waterbody or environmentally sensitive area. • Hazardous chemicals will be stored to prevent wildlife access. • Petroleum products and chemicals will be managed to prevent spreading to surrounding lands or into waterbodies. • Hazardous wastes and materials will be transported to an approved waste disposal facility.
14	Spill Prevention, Contingency Planning and Reporting	NNC; Environmental Manager; Contractor; Field Supervisor	• All practical precautions will be taken to prevent and reduce spills, misplacement, or loss of fuels and hazardous materials. • The Spill Contingency Plan will be submitted to the Land Use Inspector



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			and Engineer at least 10 days before commencement. • The approved Spill Contingency Plan will be implemented and updated if requested by the Engineer. • Spill kits will be available at fuel and hazardous material storage and transfer locations. • Spill kits will provide adequate containment and recovery capacity for the products stored or handled at that location. • All spills will be reported without delay to the NT-NU 24-Hour Spill Line at 867-920-8130 using the NT-NU Spill Report form. • The Inspector On-Call will be notified as required by the EPP and Spill Prevention and Response Plan.
15	Waste Management	Camp Operations Manager; Contractor; Environmental Manager	• Wastes generated by drilling activities will be collected, segregated, labelled, and temporarily stored until transported for reuse, recycling, or disposal. • Waste will be managed so it does not create an environmental, wildlife, or health hazard. • Waste will be transported to an approved waste disposal facility. • Authorization will be obtained from communities in Nunavut receiving Project waste, where required. • The drilling area and camp area will be kept free of food scraps, garbage, and loose debris.



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			Waste will be stored in appropriate containers and transferred to an approved location on a regular basis.

3.1 Sensitive Timing Windows

Environmentally sensitive timing windows include:

- Avifauna (Breeding Migratory Birds – Nesting Zone N10) between May 15 and August 15 ([Environment and Climate Change Canada, 2018](#)); and
- Fish and Fish Habitat (Zone 1; Fall Spawning Fish): September 1 to June 30 ([Fisheries and Oceans Canada, 2013](#)). Fall spawning fish include arctic char, lake trout and whitefish (includes broad, lake and round whitefish).

Potential Environmental Concerns

Drilling activities and other field work related to the Program may exacerbate adverse effects on avifauna and fish and fish habitat during sensitive timing windows and are to be avoided where practicable.

Environmental Protection Procedures

Sensitive time periods will be considered during Program planning, where practicable. When drilling and other field work activities are to be carried out during the sensitive timing window(s), the following additional mitigations shall be implemented, where applicable:

- Prior to the commencement of the Program, a complete schedule of activities will be developed to include restrictions that account for sensitive timing windows;
- Drilling activities will be planned, where possible, to avoid locations associated with avifauna use during the sensitive timing window;
- No vegetation clearing or grubbing is planned for the 2026 drilling Program. During the breeding bird season, work areas will be inspected by experienced personnel (i.e., biologist, scientist, Environmental/Wildlife Monitor) and/or, where available, a member of the Hunters and Trappers Association (HTA) before drill setup to assess occupancy and avoid active nests or nesting behaviour;
- If a bird nests, eggs or birds are encountered or identified avoid further interaction or disturbance, including a 100 m buffer around nests. If active nests are discovered, such as nests with eggs or young, avoid the area until nesting is complete and the young have left the nest, or the nest has been deemed inactive by a qualified individual;

5. Activities will be conducted such that the amount of time spent working in or around a stream or waterbody is reduced;
6. Withdrawal of water for drilling purposes will follow DFO's interim code of practice for end-of-pipe fish protection screens for small water intakes to determine fish screen design criteria, screen installation for water in-take pipes, and the cleaning, maintenance and monitoring of fish screens; and
7. No instream work, bed disturbance, bank disturbance, or obstruction of fish passage is planned for the 2026 drilling Program. If work below the normal high-water mark, work that may disturb bed or banks, or any activity that may affect fish or fish habitat is proposed during the September 1 to June 30 sensitive timing window for fall-spawning fish, NNC will consult DFO and obtain any required authorization before the activity proceeds. Routine terrestrial drilling, helicopter access, and water withdrawal from approved sources using screened intakes are not considered instream work unless they disturb bed or banks, obstruct fish movement, or otherwise affect fish or fish habitat.

Refer to Section 4.1, Avifauna Management, and Section 4.2, Fish and Fish Habitat, for additional details and mitigation measures that may apply.

3.2 Buffer Zones

Potential Environmental Concerns

Buffer zones are boundaries of undisturbed areas or natural vegetation maintained along waterbodies and environmentally sensitive and/or rare receptors (e.g., nesting sites, historic resources). Without adequate buffer zone allowances, waterbodies and environmentally sensitive and/or rare receptors could be adversely affected by field work activities. Additionally, waterbodies can become laden with silt from run-off without adequate buffer zone vegetation. Buffer zone vegetation also provides cover for fish, where present, in various aquatic environments. Additionally, buffer zones help reduce sensitive disturbance to wildlife and may also provide wildlife habitat and/or travel corridors near work areas.

Environmental Protection Procedures

Sensitive areas (e.g., wetlands, roosts, etc.) will be identified before drilling begins and appropriate buffers will be flagged and maintained around these areas, where feasible. The intended buffer zones (provided in metres (m)) for various activities and receptors are outlined in Table 4.2.

The buffer distances in Table 4.2 are minimum setbacks. Larger buffers may be applied where site conditions, wildlife activity, nesting behaviour, terrain sensitivity, hydrological conditions, or specialist advice indicate that additional protection is warranted. Any reduction to a buffer must be documented by the Environmental Manager and supported by applicable permit conditions, specialist advice, or written regulatory direction.

Table 4.2 Recommended Minimum Buffer Zones for Program Activities

Activity	Environmental Receptor	Recommended Buffer Width	Reference
Hazardous materials / chemical storage	Normal high-water mark of any waterbody and/or environmentally sensitive areas	31 m minimum	Land Use Permit N2025N0016, Conditions 7.2 and 7.8
Petroleum fuel storage containers	Normal high-water mark of any waterbody and/or environmentally sensitive areas	31 m minimum	Land Use Permit N2025N0016, Condition 11.1
Refuelling and bulk fuel transfer	Normal high-water mark of any waterbody	31 m minimum; designated refuelling area only	Land Use Permit N2025N0016, Condition 11.9 for refueling and condition 5.1 for sumps
Sumps and waste disposal areas	Normal high-water mark of any waterbody	31 m minimum	
Lines, trails, and rights-of-way parallel to streams (only if later authorized)	Streams	31 m minimum, except at crossings	Land Use Permit N2025N0016, Condition 1.5
Drilling and ground disturbance	Wetlands, watercourses, and waterbodies	31 m minimum unless otherwise authorized	Land Use Permit N2025N0016 and EPP Sections 4.2, 4.5 and 4.6
Known or suspected archaeological / historical sites	Archaeological, historical, and/or paleontological resources	50 m buffer	Land Use Permit N2025N0016, Conditions 17.2 and 17.3



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Activity	Environmental Receptor	Recommended Buffer Width	Reference
Active bird nests	Nest or eggs of any bird	100 m buffer, or as directed by a qualified biologist / regulator	Land Use Permit N2025N0016, Condition 8.6
Wildlife present at landing areas	Wildlife	Avoid touchdown where wildlife are present, except for emergency	Land Use Permit N2025N0016, Condition 8.10

Recommended minimum buffer zones for migratory birds are activity and species dependent. Any occupied nest found during the Program should be protected with a buffer zone until the nest is no longer active (e.g., failed; young birds have left the area. As such, a qualified biologist (or alternate, such as Environmental/Wildlife Monitor designated by the Environmental Manager) will develop buffer zones, which are determined by setback distances that vary on a case-by-case basis as recommended by ECCC's Guidelines to avoid harm to migratory birds. Key considerations when establishing buffer zones/setback distances include:

1. Degree of tolerance of the species;
2. Previous exposure of birds to disturbance;
3. Level of disturbance:
 - i. Adjustments to setback distances for activities causing greater amounts of disturbance, such as helicopter landings, drill setup, routine approach by personnel, noise exceeding 10 decibels (dB) above ambient noise levels in the natural environment, and noise greater than approximately 50 dB.
4. Landscape context; and
5. Distance at which nesting birds react to human disturbance.

It is recommended that flagging tape or similar material not be used to mark nests and documented with a GPS point to mitigate the risk of predators finding the nest. Boundaries of the buffer zone can be marked with flagging tape, if necessary.

3.3 Laydown and Storage Areas

Potential Environmental Concerns

A storage area will be established to temporarily store and maintain drilling equipment and supplies during the Program. Potential environmental concerns for laydown and storage areas include erosion and run-off of sediment and other hazardous substances into nearby waterbodies or wetlands.

Environmental Protection Procedures

The following procedures shall be implemented with respect to laydown and storage areas:

1. The number of new laydown and storage areas will be kept to a minimum;
2. Procedures for surface disturbance and vegetation protection (Section 4.4) and erosion prevention (Section 4.5) will be followed when establishing a temporary laydown or storage area;
3. Temporary laydown and storage areas will be sited on level, durable terrain such as exposed rock, gravel, sand, or other stable ground where practicable, kept free of ponding and run-off, and placed on protective mats or equivalent protective pads where needed to avoid tundra disturbance;
4. Laydown and storage areas no longer required for any Project related activities will be rehabilitated;
5. Fuel and other hazardous materials will be stored, handled, and transported according to Section 4.8 (Storage and Management of Fuel and Other Hazardous Materials);
6. Coordinates for campsites, petroleum fuel storage containers, airstrip or landing locations, laydown areas, and quarry locations, if established, will be recorded in NAD 83 degree/minute/second format and provided to the Land Use Inspector and Engineer of Lands within ten (10) days of establishment; and
7. Laydown and storage areas will be kept clean and tidy at all times, and garbage or debris will be stored in covered wildlife-resistant containers until removed to an approved facility.

Each temporary laydown or storage area will be documented before use, including location coordinates, photographs, environmental constraints, archaeological constraints where applicable, materials to be stored, required containment, and applicable buffers. Following use, the area will be inspected, photographed, cleaned, and documented to confirm that equipment, waste, debris, fuel, hazardous materials, and temporary controls have been removed or otherwise managed as authorized.



3.4 Surface Disturbance and Vegetation Protection

Potential Environmental Concerns

Vegetation clearing and grubbing are not required for the 2026 drilling Program. Work will be conducted in a remote tundra and bedrock setting approximately 60 km northeast of Iqaluit, Nunavut, and will be supported by helicopter and foot access only. No vegetation clearing, grubbing, stripping of the organic mat, grading, excavation of access routes, or construction of ATV trails will be undertaken unless this EPP is revised and required written authorizations are obtained before the activity begins.

Primary environmental concerns associated with the Program are localized ground compression, rutting or gouging, disturbance to the tundra/organic surface layer, permafrost disturbance, sediment release, and disturbance to nesting birds, wetlands, wildlife habitat, or historic resources. These risks will be managed through careful siting, use of protective mats/pads, maintenance of setbacks, and monitoring before, during, and after drill setup.

Environmental Protection Procedures

The following procedures shall be implemented with respect to surface disturbance and vegetation protection:

1. No vegetation clearing or grubbing will be conducted for the 2026 drilling Program. The organic vegetation mat and surface organic layer will remain intact, except where minor localized disturbance is unavoidable for drilling, borehole completion, or safety and is approved by NNC;
2. The boundaries of each drill pad, helicopter landing area, temporary laydown area, and work area will be identified before setup, reviewed by archaeological support where required, and limited to the minimum footprint required for safe operation;
3. Drill rigs, core shacks, generators, pumps, and temporary equipment will be set up on protective mats, rig mats, tundra mats, or equivalent protective pads where practicable to distribute weight and prevent rutting, gouging, and avoidable vegetation disturbance. Temporary drill pads and work areas will be sited on durable surfaces such as exposed rock, gravel, sand, or previously disturbed/stable ground where practicable, and outside required buffers;
4. No ATV routes, access trails, overland vehicle routes, new lines, or rights-of-way will be established for the 2026 drilling Program;
5. Work areas will be inspected before setup for active nests, wetlands, waterbodies, sensitive habitat, visible ice-rich soils/permafrost indicators, and historic resources;

6. Protective mats/pads will be removed following completion at each borehole location, and the underlying ground surface will be inspected and photographed;
7. If unanticipated vegetation or tundra disturbance occurs, the Environmental/Wildlife Monitor will document the area, notify the Environmental Manager, and identify stabilization or restoration measures suitable for tundra conditions; and
8. Discovery of historic resources will be managed according to procedures outlined in Sections 4.3 and 5.4 Historic Resources.

3.5 Erosion Control and Sediment Prevention Plan

Potential Environmental Concerns

Eroded material could potentially cause siltation in water bodies and, subsequently, adversely affecting suitable habitat for aquatic and terrestrial animals. Drilling methods will utilize water from nearby waterbodies. In situ tests such as the pneumatic packer test will require additional water injection and removal, which could lead to erosion or sedimentation.

Environmental Protection Procedures

This section outlines general measures to be implemented with respect to erosion control and sediment prevention during drilling activities.

Erosion Control

The following erosion control measures will be implemented during drilling:

1. The disturbance of new areas (i.e., drill pads, laydown areas, etc.) will be limited to the minimum required;
2. Drilling water and fluids will be recycled in a closed loop system to avoid water discharge for as long as practicable;
3. Protective mats/pads and any required erosion prevention or drainage control measures will be installed before placement of drilling equipment where site conditions indicate a risk of rutting, gouging, runoff concentration, or sediment transport;
4. Routine monitoring will be conducted during drilling activities to identify areas of potential erosion and to implement appropriate mitigation measures. Progressive erosion and sediment control measures will be implemented as required;

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3.6 Water Withdrawal

Potential Environmental Concerns

Water withdrawal from local waterbodies is required to support drilling operations. Potential environmental concerns associated with water use and withdrawal from freshwater streams, rivers, ponds, lakes, etc. include impacts to ecosystems by reduced water levels, and impacts to fish such as direct mortality, disturbances, and loss of fish habitat.

Environmental Protection Procedures

Water use will be governed by Water Licence No. 8BC-INP2631, including approved water sources, limits, monitoring, and reporting requirements. Total water use for drilling shall not exceed one hundred and sixty-five (165) cubic metres per day unless a revised authorization is confirmed in writing by the Environmental Manager. No drilling, refuelling, fuel or chemical storage, sump construction, ground disturbance, or other intrusive work will occur below the high-water mark of any surface water feature unless the Environmental Manager confirms that the required territorial, federal, and regulatory approvals are in place.

The following procedures shall be implemented with respect to water withdrawal:

1. The withdrawal of water from any stream shall not exceed ten (10) percent of the low flow of that stream;
2. A minimum buffer of undisturbed tundra/vegetation must be maintained between the work area and the bank of any watercourse that it parallels. The buffer width will be at least thirty-one (31) m wide;
3. Where water use could result in measurable drawdown of a source waterbody, additional hydrological assessment will be completed, and the appropriate mitigation measures will be identified. The assessment will be provided to NNC and applicable regulators for review or approval where required;
4. Withdrawal of water will follow DFO's interim code of practice for end-of-pipe fish protection screens for small water intakes to determine fish screen design criteria, screen installation for water in-take pipes, and the cleaning, maintenance and monitoring of fish screens;
5. For water withdrawal from waterbodies with identified fish habitat the following measures will be used:
 - i. Limit access to banks or areas adjacent to waterbodies;

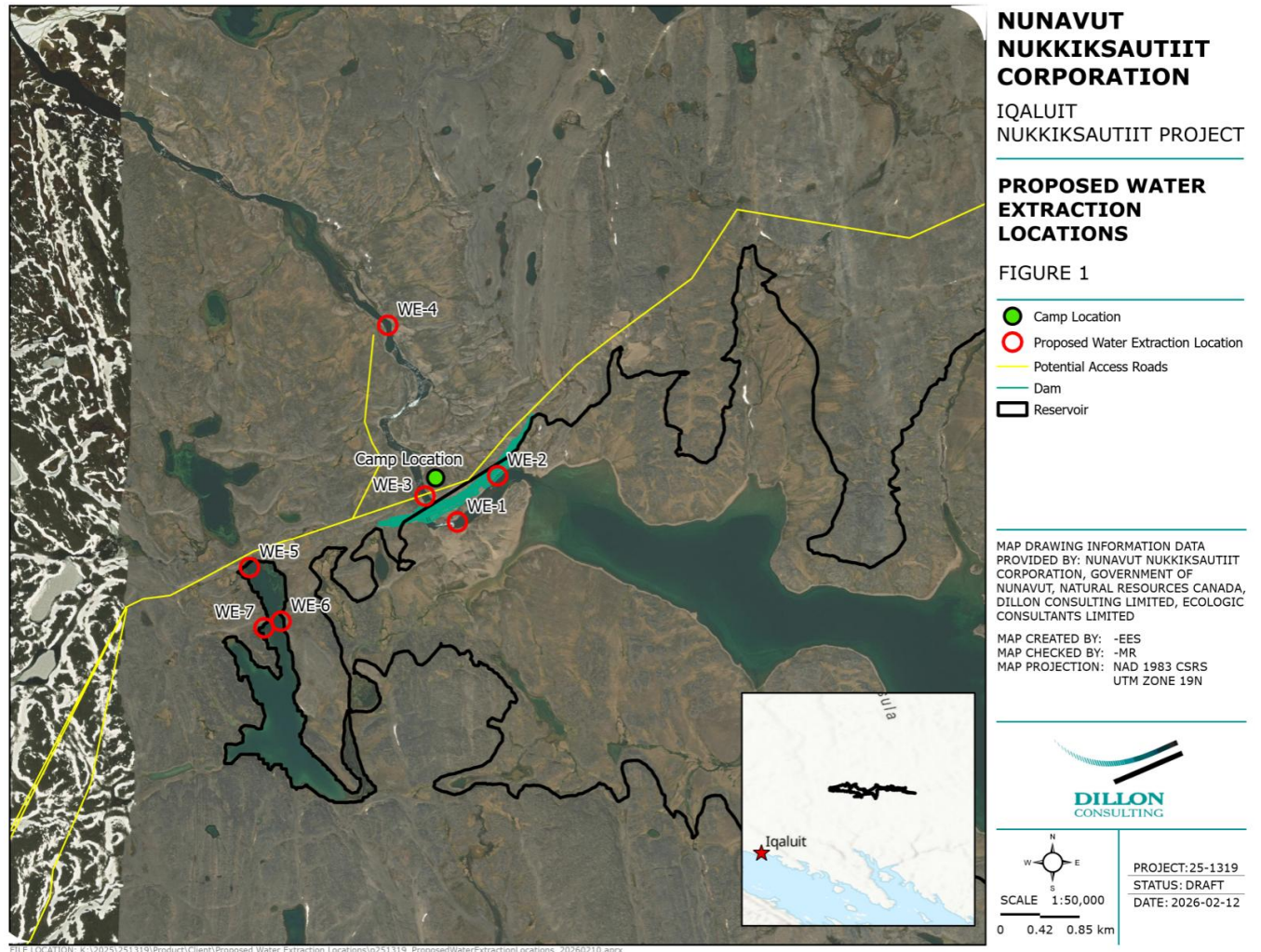


Figure 3.1 Water Extraction Locations for SEP



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3.7 Site Access and No Overland Vehicle Use

Potential Environmental Concerns

Potential environmental concerns associated with site access include tundra disturbance, rutting or gouging, erosion and sediment release, spills, wildlife disturbance, and noise associated with helicopter-supported access. The Program will not use ATVs, trucks, tracked vehicles, or other overland vehicles for access between camp and borehole locations.

Environmental Protection Procedures

The procedures outlined below shall be implemented for helicopter-supported access and foot travel. In addition to the mitigation of potential environmental concerns, environmental protection procedures will also support public, employee, and contractor safety.

1. No ATVs, trucks, tracked vehicles, snowmobiles, or other overland vehicles will be used for the 2026 drilling Program unless this EPP is revised and required written authorization/permits are obtained from applicable regulators and NNC before use;
2. Personnel access to borehole locations will be by helicopter and foot only. Foot travel will be kept to the minimum required for safe work and will avoid wetlands, saturated ground, sensitive habitat, wildlife, and historic resources;
3. Drill rigs, core shack(s), fuel, water pumps, generators, and associated equipment will be transported by helicopter and will not be moved along access routes, ATV trails, or other overland trails;
4. No ATV route, access trail, access road, new line, or right-of-way will be established for the 2026 drilling Program;
5. Helicopter landing areas will be selected to avoid wetlands, saturated ground, active nests, wildlife, known or suspected historic resources, and required waterbody buffers where practicable;
6. Maintenance and refuelling of equipment will be conducted in designated areas only and according to Sections 4.8 and 4.9;
7. Protective mats, rig mats, tundra mats, or equivalent protective pads will be used where practicable under the drill, core shack, generators, pumps, and temporary equipment to distribute loads and reduce direct contact with tundra surfaces;
8. Fugitive dust generation is expected to be minimal due to the absence of overland vehicle travel. If dust suppression is required at a temporary work area, water will be used only from approved water use sources;
9. Equipment will remain stationary while in use and will not be driven across tundra surfaces;



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10. Pilots, equipment operators, and personnel will yield to wildlife (see procedures in Section 6.3, Wildlife Encounters). Chasing and/or harassing wildlife by helicopter, equipment, vehicle, or on foot is prohibited;
11. Any proposed use of ATVs, trucks, tracked vehicles, snowmobiles, overland equipment travel, access trails, access roads, new lines, or rights-of-way would constitute a scope change for the 2026 drilling Program. Such use will not occur unless NNC revises this EPP, obtains required written authorizations, communicates the change to field personnel, and confirms any additional environmental protection measures before the activity begins;
12. Stream beds will not be used as access routes, and no overland stream crossings are planned for the 2026 drilling Program; and
13. Helicopter landing areas, foot travel, and work areas will be selected in a manner that avoids covering or destroying traps or snares that may be encountered.

3.8 Storage and Management of Fuel and Other Hazardous Materials

Potential Environmental Concerns

Hazardous substances used during the Program include, but may not be limited to petroleum, oil and lubricants, hydraulic fluid, glycol (e.g., antifreeze) and drilling fluids/muds. The primary concern associated with hazardous substance use is the potential for uncontrolled release to the environment as a result of spillage. Uncontrolled releases of hazardous substances may adversely affect terrestrial and aquatic habitat and species, as well as soil, groundwater quality, and human health and safety.

Environmental Protection Procedures

NNC has developed a Spill Prevention and Response Plan (SPRP). The SPRP provides an inventory of the amounts and types of hazardous materials onsite and outlines detailed steps for environmental protection and emergency spill response. The procedures outlined below will be followed to prevent and mitigate environmental incidents, and shall be implemented with respect to the storage, handling and transfer of fuel and other hazardous materials:

1. All hazardous materials will be handled and stored in accordance with applicable WHMIS requirements, occupational health and safety requirements, Safety Data Sheets, permit conditions, this EPP, and the Spill Prevention and Response Plan. Current SDSs will be available to personnel handling or working near hazardous materials;

2. All spills, leaks, losses, or releases, regardless of quantity, will be reported internally to the Field Supervisor and Environmental Manager. Reportable spills on land, and any spill to a waterbody, wetland, sensitive habitat, or other environmentally sensitive area, will be reported externally in accordance with Appendix C and the Spill Prevention and Response Plan;
3. Fuelling will be done at least thirty-one (31) m from the normal high-water mark of any wetland or waterbody, in a designated area, and over a drip tray or secondary containment;
4. Servicing of mobile equipment will not occur within thirty-one (31) m of a wetland, watercourse, or drainage ditch; a one hundred (100) m setback should be maintained where practicable;
5. A copy of the SPRP (summarized in Section 5.1, Fuels and Hazardous Materials Spills) for fuel and hazardous materials spills will be readily available;
6. Only personnel who are qualified and properly trained in handling fuel and hazardous materials will do so;
7. Mobile equipment will be equipped with fire and spill response materials, ensuring that there are always adequate supplies on site;
8. Spill kits will be located at each storage location where fuels and/or hazardous materials are being stored. Spill kits will have an adequate means of providing containment and recovery for the product(s) stored in that location;
9. Fuel storage containers and chemical containers will be placed on land when stationary for more than twelve (12) hours and will be located at least thirty-one (31) m from the normal high-water mark of any waterbody and/or environmentally sensitive area;
10. Fuel storage containers will be marked with NNC's name and Land Use Permit number N2025N0016, flagged or posted so they remain plainly visible, and all outlets will be sealed except the outlet currently in use;
11. Fuel storage and chemical storage areas, including refuelling stations, will use secondary containment or a surface liner with a capacity at least ten percent (10%) greater than the largest container within the containment area;
12. A watchman will be maintained at the site at all times when fuel is stored on site; and during winter site closure or periods when daily monitoring is not possible, fuel storage containers will be flagged and contained in covered secondary containment;
13. Secondary containment, drip trays, fuel storage areas, and hazardous materials storage areas will be inspected routinely and after significant weather events. Deficiencies such as damaged containment, pooled precipitation, unsecured containers, missing labels, or evidence of staining will be corrected and documented;



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14. Compressed nitrogen cylinders used for packer testing will be transported, handled and stored in accordance with applicable transportation, occupational health and safety, WHMIS and SDS requirements. Cylinders will be secured upright where practicable, protected from impact, fitted with valve protection when not in use, and stored away from heat, ignition sources, traffic areas, wildlife access and the normal high-water mark of waterbodies; and
15. Before on-site laboratory testing begins, Tetra Tech will provide the Environmental Manager with a laboratory chemical and test-solution inventory, current SDSs, proposed storage quantities, secondary-containment requirements, spill-response requirements, wastewater-management method and final waste-disposal route. Laboratory chemicals or test solutions will not be discharged to the camp wastewater system, tundra, drainage features, watercourses or waterbodies unless the receiving system and applicable approvals expressly allow the discharge.

3.9 Equipment Use and Maintenance

Potential Environmental Concerns

Equipment used for the Program includes helicopters, heliportable diamond drill rigs, core shacks, generators, light plants, outboard boat motors, water pumps, and associated drilling equipment. No ATVs or other overland vehicles will be used for the 2026 drilling Program. Potential environmental concerns associated with the operation and use of equipment include air emissions, accidental spills, fuel leaks, localized tundra disturbance, and contamination of onsite waterbodies. Wetlands and plant communities may also be adversely affected by the introduction of non-native and/or invasive plant species via soil and vegetative debris on equipment brought to site.

Environmental Protection Procedures

The following procedures shall be implemented with respect to equipment use and maintenance:

1. Equipment brought to site will be clean and free of soil and vegetative debris to reduce the risk of introducing or spreading non-native and/or invasive species. Equipment inspections will be conducted by the onsite Environmental/Wildlife Monitor or appropriate designate and, if deemed to be in appropriate condition, will be approved for use. If it is determined that equipment is not in appropriate condition, it will not be allowed on site until it has been cleaned and deemed suitable for use following reinspection;



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2. Equipment maintenance and fuelling activities will be conducted at a designated location, where possible;
3. Drip pans will be placed under generators and other equipment that could leak or spill fuel or other hazardous materials;
4. Hoses and connections on equipment will be inspected routinely for leaks and drips;
5. Boat motors, pumps, generators, hydraulic systems, hoses, fittings, and fuel connections will be inspected before use and routinely during operation. Leaks, damaged hoses, loose fittings, or other deficiencies will be corrected before continued use where they could result in a release to land or water;
6. All leaks will be repaired and reported immediately to the field supervision, who will relay details to the Engineering Manager and the Environmental Manager, as required;
7. All fuel and other hazardous materials will be handled according to procedures outlined in Section 4.8, Storage and Management of Fuel and Other Hazardous Materials;
8. Equipment will be supplied with spill kits, and personnel who handle fuel-containing equipment will be trained in the use of spill kits and spill response procedures;
9. Engines and exhaust system of mobile equipment will be subject to a preventative maintenance program to maintain fuel efficiency and performance;
10. Equipment idling times will be minimized, where practicable, to reduce emissions;
11. Mobile equipment will be maintained in good working order and equipped with appropriate noise-reducing mufflers; and
12. Operation of equipment will be conducted in a manner such that fugitive dust emissions are reduced. Measures to reduce fugitive dust emissions may include using water as a dust suppressant.

3.10 Grout Handling and Placement

Potential Environmental Concerns

Grout will be required during the Program for completing boreholes and installing borehole monitoring equipment such as piezometers. Grout is typically comprised of cement, water, fine sands and additives. No concrete production is planned as part of the Program.

The primary potential environmental concern associated with grouting activities is the effect of wash water released to the environment. While cured grout has little effect on water quality, fresh grout and grout products may raise the pH in receiving waters to potentially toxic levels (i.e., pH level exceeding 9). Since cement is alkaline, wash water from spoiled



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grout or from cleaning of grouting equipment is expected to have a very high pH that may exceed applicable regulatory guidelines, even after dilution.

Aquatic species may also be impacted by releases of spoiled grout or wash water as some additives and agents are toxic to aquatic species. Additionally, fine sands, can be expected to be washed from spoiled grout or in wash water discharges. Aquatic life and habitat can be adversely impacted by uncontrolled releases of wash water, chemicals, and sediments.

Environmental Protection Procedures

The following procedures shall be implemented to minimize the potential impacts from grout production or placement:

1. Strict adherence to procedures outlined in Section 4.8, Storage and Management of Fuel and Other Hazardous Materials, is required for all chemical additives, agents and other potential hazardous materials associated with concrete handling and placement;
2. Grout materials will be stored in bags or totes and not in open stockpiles that could create fugitive dust emissions;
3. Grout will be mixed locally at the drill pad in small batch quantities sufficient for only the drilling location;
4. Cement or fresh grout shall not enter any watercourse or waterbody;
5. Dumping of grout or washing of tools and equipment in any body of water is strictly prohibited;
6. No chemicals will be used in the washing of grouting equipment or tools onsite;
7. Water to be used for grout mixing shall be sourced from approved water use sources. The volume of water used, and extent of washing of tools and equipment will be kept to a minimum;
8. Grout mixing, washout, and tool cleaning will occur at a designated location that is at least thirty-one (31) m from the normal high-water mark of any waterbody and, where practicable, at least one hundred (100) m from water. Wash water, spoiled grout, cement residues, and grout-contaminated materials will be contained, reused, treated, or backhauled to an approved facility. Fresh grout, cement, wash water, and grout residues will not be discharged to tundra, wetlands, drainage features, watercourses, or waterbodies;
9. Ensure no seepage or spillage of grout or grout residues occurs outside of the work site;
10. Instrumentation and borehole-completion grout is expected to consist of a cement-bentonite mixture placed through a sacrificial PVC tremie pipe. Grout materials, mixing tubs, pumps, fittings, mud balance, tremie pipe and associated equipment will be

- inspected before use. Grout will be prepared in controlled batches, and the borehole identifier, grout formulation, estimated volume mixed, estimated volume placed, unused quantity, wash-water quantity and waste destination will be documented; and
11. Drill cuttings, chilled brine, additive-impacted material or contaminated soil will not be used as borehole backfill.

3.11 Waste Management

Potential Environmental Concerns

Drilling activities may generate drill cuttings, rock chips, drill muds, drilling fluids, chilled brine, sediment-laden water, drilling additives, used absorbents, empty product containers, worn drilling consumables, petroleum-contaminated materials, and small quantities of solid waste associated with drill-site operations.

Drill cuttings generated during the Program are expected to contain residual drilling fluids and chilled brine. If these materials are not properly contained, stored, transported, or disposed of, they may result in localized contamination of soil, tundra, surface water, or groundwater. Improper management of drill waste may also affect drainage features, fish-bearing waters, permafrost conditions, and wildlife if waste or contaminated materials are left unsecured at drill locations.

Sumps and low-permeability sump liners are not applicable to the Program. Drill cuttings, drilling fluids, chilled brine, brine-impacted materials, and other drilling residuals will not be placed in sumps, buried, spread on land, discharged to land or water, or otherwise disposed of on site.

Environmental Protection Procedures

The following procedures shall be followed to manage solid, liquid, drilling-related, and hazardous waste generated during the drilling program:

1. Drill waste, including drill cuttings, rock chips, drill muds, drilling fluids, chilled brine, sediment-laden water, drilling additives, and other drilling residuals, shall be managed to prevent release to tundra, wetlands, drainage features, watercourses, or waterbodies;
2. Drilling fluids and chilled brine will be contained in tanks for reuse during drilling activities. Tanks will be operated as contained or recirculating systems to reduce waste generation and prevent release to the ground surface;

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14. NNC will identify the appropriate receiving facility and disposal requirements for drill cuttings before off-site disposal. Waste handling, transport, and disposal shall comply with applicable regulatory requirements and receiving facility requirements;
15. Drill cuttings or drilling residuals that contain fuel, oil, hydraulic fluid, grout, excessive salinity, drilling additives, or other potentially deleterious substances shall be segregated and managed as contaminated or special waste, as applicable;
16. Drilling additives, sodium chloride, polymers, empty additive containers, and other drill-related chemical materials shall be stored securely and in a manner that prevents wildlife access, spills, and releases to land or water. Chemical storage associated with drilling shall not occur within thirty-one (31) metres of the normal high-water mark of any waterbody or within environmentally sensitive areas unless otherwise authorized;
17. Used absorbents, contaminated snow or soil, oily rags, petroleum-contaminated materials, waste chemical containers, and unused drilling additives requiring disposal shall be treated as hazardous or special waste and backhauled to an appropriate disposal facility;
18. Empty containers, packaging, worn parts, drill consumables, and non-contaminated solid waste generated at drill locations shall be collected, secured, and removed from the drill site regularly;
19. Drill-site waste shall be stored in covered containers or otherwise secured to prevent wind dispersal and wildlife access until it is transported to camp, a designated temporary storage area, or an appropriate disposal facility;
20. Waste storage, transfer, or handling associated with drilling shall not occur within thirty-one (31) metres of the normal high-water mark of any waterbody unless otherwise authorized;
21. Spill response materials, including absorbents, drip trays, shovels, containers, and other appropriate equipment, shall be available at active drill sites and locations where drilling fluids, chilled brine, additives, fuels, or other regulated materials are handled;
22. Any spill or release of drilling fluids, chilled brine, drilling additives, petroleum products, contaminated drill cuttings, or contaminated materials shall be reported and managed in accordance with the approved Spill Contingency Plan and applicable reporting requirements;
23. Petroleum products, chemicals, chilled brine, drilling fluids, drilling additives, drill cuttings, and drill waste shall not be allowed to spread to surrounding land, tundra, wetlands, drainage features, watercourses, or waterbodies;
24. Active drill sites shall be kept clean and orderly. Drill waste and drilling-related materials shall be removed progressively during the drilling program and during final clean-up of each drill location;



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25. No on-site landfilling, burial, spreading, sump disposal, discharge to land or water, or open burning of drilling waste, containers, absorbents, packaging, or other drill-related waste is permitted unless specifically authorized in writing by the applicable regulator; and
26. Records shall be maintained for drill waste removed from drill sites, including waste type, estimated quantity, containment method, drill site location, temporary storage location, transport date, receiving facility, disposal or recycling method, and any applicable manifests or receiver documentation.

Temporary sample and overburden storage areas identified in the technical workplan are storage areas only and do not constitute approval for on-site disposal. Soil, core residue, sample-processing waste, drilling residuals and laboratory waste will remain in secure containment until reused for an approved technical purpose or transported to an approved receiving facility.

Laboratory wastes, including test solutions, wash water, broken sample containers, contaminated gloves, absorbents and test residues, will be segregated, labelled and stored in compatible secondary containment. Tetra Tech will identify the waste classification and coordinate with NNC and the Environmental Manager to identify the receiving facility before the waste leaves the site.

Drill cuttings from potential rock-quarry or geochemical-characterization boreholes will be segregated where field observations or test objectives indicate possible sulphide mineralization, metal leaching, acid-generating potential, unusual staining, odour, pH or conductivity. Suspect material will be managed as special waste pending characterization and direction from the Environmental Manager.

If a televiewer, probe, casing, drill string or other tool becomes stuck in a borehole, reasonable recovery attempts will be made without causing additional environmental harm. The Field Supervisor will notify NNC and the Environmental Manager before cutting a cable or intentionally leaving equipment in a borehole. The borehole identifier, equipment description, material composition, depth, recovery attempts and proposed closure method will be documented. Equipment will not be intentionally abandoned until NNC confirms the required technical, environmental and regulatory direction.



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3.12 Noise Control

Potential Environmental Concerns

Program activities will generate a variety of noises, which can cause adverse effects on wildlife distribution and abundance. Noise associated with the drill rig, generators, pumps, and helicopter-supported access will be temporary in nature.

Environmental Protection Procedures

The following procedures shall be implemented with respect to noise control:

1. Noise-generating activities, including drilling, generator use, pump use, and helicopter-supported access will be limited to the duration required for safe and efficient Program activities. Equipment will be maintained with functioning mufflers or equivalent noise-reduction components. Where wildlife are observed near an active work area, the Environmental/Wildlife Monitor will assess whether work should pause, be modified, or proceed with additional controls;
2. Noise and lighting controls apply throughout the full operating period, including twenty-four-hour drilling and shift changes. Lighting will be limited to the active work footprint and directed downward, and unnecessary equipment operation, idling and lighting will be reduced during night operations; and
3. Exhaust systems of the drill rig, generators, and other motorized equipment will be inspected regularly, and mufflers will be operating properly.

3.13 Lighting

Potential Environmental Concerns

Artificial lighting can result in light trespass and glare, affecting visual aesthetics of the area and creating a nuisance for nearby land uses. It may also cause sensory disturbance to wildlife, particularly avifauna. Mobile artificial lighting may be required during the Program to provide a secure and safe work environment for all personnel. Lighting associated with Program activities is temporary in nature.



Environmental Protection Procedures

The following procedures shall be implemented with respect to Program-related lighting:

1. Project lighting will be limited to what is necessary for safe and efficient Program activities. During the Program execution (i.e., July to September) it is expected that daylight will be between eleven (11) to twenty (20) hours per day, reducing the need for artificial lighting;
2. The minimum allowable amount of lighting (e.g., minimum intensity and number of flashes per minute) will be used;
3. Strong exterior lights (e.g., sodium vapour lights) will be avoided or shielded;
4. Lighting will be located such that unavoidable light spill off the working area is not directed toward receptors outside of the immediate area, where practicable;
5. To the extent feasible without affecting safety, lighting will be reduced and/or have limited time of operations during sensitive wildlife periods (e.g., migration); and
6. Where artificial lighting is required, lighting will be directed downward and toward the immediate work area to the extent practicable. Lighting will not be directed toward waterbodies, active nests, wildlife concentration areas, or areas outside the active work footprint unless required for safety.

3.14 Progressive Rehabilitation

Potential Environmental Concerns

Rehabilitation involves the implementation of measures to restore disturbed areas to as close to its former condition or use as practicable, or to an alternate use or condition as deemed appropriate and acceptable by applicable regulatory agencies. Progressive rehabilitation, whereby measures are implemented throughout the lifetime of the Project, ensures that rehabilitation is completed in advance of closure, where practicable.

During the Program, progressive rehabilitation measures may include the removal and rehabilitation of temporary works such as drill pads and laydown areas.

Environmental Protection Procedures

Progressive rehabilitation measures will be considered throughout the Program period, rather than waiting for the end of the Project construction period to implement rehabilitation measures. The following procedures shall be implemented with respect to progressive rehabilitation:

1. Any solid wastes, hazardous wastes, drill cuttings, drilling residuals, fuel containers, absorbents, packaging, and other Program-related materials will be removed or managed according to Section 4.11, Waste Management;
2. Project components will be progressively removed, and work areas will be stabilized or restored as soon as practicable following completion of drilling activities;
3. Protective mats/pads will be removed from each drill site after use, and the underlying tundra/ground surface will be inspected, photographed, and documented;
4. Where localized disturbance occurs, stabilization or restoration measures appropriate for tundra conditions will be implemented in consultation with the Environmental Manager and applicable regulators, where required;
5. Seasonal clean-up of lands used will be completed before the end of each field season, and NNC will notify the Engineer within ten (10) days of seasonal closure of the land use area;
6. All clean-up and restoration of lands used will be completed before the expiry date of Land Use Permit N2025N0016; and
7. Progressive rehabilitation will be documented using pre-use and post-use photographs, coordinates, description of remaining disturbance, corrective actions completed, and Environmental Manager or designate review. Documentation will be retained for annual reporting and permit compliance records.

Boreholes not retained for instrumentation will be sealed or backfilled promptly after completion of the technical work, in accordance with:

- Applicable permit conditions;
- The borehole-closure procedure approved by NNC and Tetra Tech; and
- ASTM D5299/D5299M-18 and other referenced closure guidance, where consistent with Nunavut permits and written regulatory direction.

Borehole closure methods will be designed to prevent:

- Vertical hydraulic connection between groundwater-bearing zones;
- Artesian discharge;
- Entry of surface water;
- Contaminant migration; and
- Trip, entanglement, or other wildlife hazards.

Chilled brine, drill cuttings, polymer-impacted material, petroleum-contaminated material, and other drill waste will not be used as borehole backfill.



Instrumented boreholes will be completed with stable, secure, and clearly identifiable surface completions.

Casings, caps, cables, and monuments will be configured to reduce:

- Trip and collision hazards;
- Wildlife entanglement; and
- Damage to the instrumentation.

Loose cable, wire, packaging, and other debris will not remain at an instrument location. Weather stations, data-logger terminals, antennas, batteries, solar panels, instrument monuments, and survey monuments may remain after completion of the drilling program only where their continued use is authorized.

Retained installations will be entered into a long-term installation register that includes:

- Coordinates;
- Photographs;
- Owner;
- Purpose;
- Inspection frequency;
- Expected service period; and
- Decommissioning responsibility.

A closure record will be completed for each borehole and will include:

- Borehole identification number;
- Actual coordinates;
- Final depth;
- Instrumentation status;
- Closure materials and quantities;
- Artesian-flow observations;
- Remaining surface components;
- Photographs;
- Date of closure; and
- Responsible personnel.

Before permit expiry or final abandonment, NNC will confirm whether each retained installation:

- Will remain in place under another applicable authorization; or



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- Will be decommissioned and removed.

3.15 Permafrost Degradation

Potential Environmental Concerns

Permafrost is soil, rock or sediment that stays frozen for at least two (2) consecutive years. It often contains ice and organic matter (i.e., plants and animals frozen for centuries). Degradation of permafrost refers to thawing and deterioration of these permanently frozen areas. This can cause severe implications for climate and ecosystems. The loss of permafrost can also impact the structural integrity of the material, which can lead to a collapse of ground, sinkholes or slope failure. During the Program, geotechnical drilling is likely to encounter permafrost.

Environmental Protection Procedures

The following procedures shall be implemented to reduce the thermal disturbance to the ground and prevent the loss or degradation of permafrost:

1. Drill rigs and associated equipment will be placed on protective mats/pads where practicable to distribute loads, reduce compaction, and reduce thermal and mechanical disturbance to permafrost. Diamond drilling will advance the drill at a rate using the minimum amount of chilled drilling fluid needed to maximize frozen core recovery for accurate permafrost mapping;
2. Drilling fluids or muds will be water mixed with salt (i.e., NaCl) to suppress the freezing point of water;
3. Technical means such as a chiller will be used to consistently maintain the temperature of the drilling fluid below the freezing point;
4. The salinity and temperature of the drilling fluid (i.e., drilling brine) will be monitored throughout drilling activities;
5. Brine systems will be operated as contained or recirculating systems to the extent practicable. Brine, sodium chloride, and brine-contaminated water or drill cuttings will not be released to tundra, wetlands, drainage features, watercourses, or waterbodies. Any loss of brine or drilling fluid to the ground surface will be reported, contained, recovered where practicable, and managed in accordance with the Spill Prevention and Response Plan and Waste Management procedures;
6. Instrumentation will be installed in most boreholes and connected to data loggers to record temperature that will aid in the determination of the presence of permafrost;

7. If artesian flow is encountered, drill holes will be immediately sealed and permanently capped to prevent induced contamination of groundwater or salinization of surface waters. All artesian flows occurrences will be documented for annual reporting;
8. Pneumatic packer testing requires the injection of water into a borehole. Boreholes where permafrost is encountered will not be used for packer testing to avoid thawing of permafrost; and
9. All instances of encountered permafrost will be documented and communicated to NNC immediately and recorded in the final report.



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4.0 Resource-Specific Protection Procedures

4.1 Avifauna Management

Potential Environmental Issues

Program activities can negatively impact avifauna by alteration, degradation or loss of habitat and sensory disturbances, as well as injuries and mortality from collisions with equipment and infrastructure.

Avifauna species at risk (SAR) may be particularly vulnerable to potential adverse effects. Avifauna SAR include those listed under Schedule 1 of the federal Species at Risk Act (SARA). SAR are also assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). A list of avifauna SAR that may occur in the project area and could be affected by Program activities is provided in Table 5.1. Birds of prey (i.e., hawks, owls, eagles, falcons, harriers and ospreys) and their nests and eggs are protected under the Nunavut Wildlife Act (NWA).

Table 5.1 Avifauna Species at Risk and Birds of Prey with potential to occur at project.

Species	COSEWIC Status	SARA Status (Schedule 1)	NWA	Likelihood
Buff-breasted Sandpiper (<i>Tryngites subruficollis</i>)	Special Concern	Special Concern	No	Unlikely
Harlequin Duck (<i>Histrionicus histrionicus</i>)	Special Concern	Special Concern	No	Possible
Ivory Gull (<i>Tringa flavipes</i>)	Endangered	Endangered	No	Unlikely
Peregrine Falcon (<i>Falco peregrinus</i>)	Not at Risk	Not at Risk	Yes	Present
Red-Necked Phalarope (<i>Phalaropus lobatus</i>)	Special Concern	Special Concern	No	Unlikely

Table 5.1 Avifauna Species at Risk and Birds of Prey (cont'd).

Species	COSEWIC Status	SARA Status (Schedule 1)	NWA	Likelihood
Ross's Gull (<i>Rhodostethia rosea</i>)	Endangered	Threatened	No	Unlikely
Snowy Owl (<i>Bubo scandiacus</i>)	Not at Risk	Not listed	Yes	Present
COSEWIC – Committee on the Status of Endangered Wildlife in Canada SARA – <i>Species at Risk Act</i> NWA – <i>Nunavut Wildlife Act</i>				

Environmental Protection Procedures

The Program will implement measures to reduce potential impacts to birds, including scheduling activities that could cause potential harm, implementing mitigation measures if activities are required during breeding bird season, and applying appropriate buffer/set-back distances from active nesting areas.

The following procedures shall be implemented to protect avifauna during the Program:

1. No vegetation clearing or grubbing is planned as part of the 2026 drilling Program;
2. During the breeding bird season, typically between May 15 and August 15 (Environment and Climate Change Canada, 2018), work areas will be inspected before setup to identify active nests or nesting behaviour. The breeding season dates are only meant as a guide. Active bird nests are protected regardless of calendar date. If birds are actively nesting in the vicinity of the Project after August 15, work areas will require inspection. Work areas will require 2 days of sweeps prior to the initiation of mobilization of material and personnel to site. Sweeps will cover a 100m buffer around the drill location as nests outside of the work area may have buffers that encroach upon the work area;
3. Work in the area of a migratory bird nest discovery will be ceased immediately. The Environmental/Wildlife Monitor will assess the nest and contact the Environmental Manager for further guidance, if necessary. A buffer of appropriate size may be required if the nest contains a live bird or viable egg (with some exceptions depending on the species of bird, as per the federal Migratory Bird Regulations 2022 and the Nunavut *Wildlife Act* 2003). Should a buffer be required, it must be maintained until fledging occurs or the nest is deemed inactive;

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Environmental Protection Procedures

The following procedures shall be implemented to protect fish and fish habitat during the Program:

1. Before commencing work below the normal high-water mark, within the required waterbody buffer, or at a water withdrawal point, qualified personnel or the Environmental/Wildlife Monitor will review the location for fish habitat, bank disturbance risk, sediment release risk, and fish screen requirements;
2. DFO's measures to protect fish and fish habitat and applicable standards and codes of practice will be followed. This includes:
 - i. Preventing the death of fish (see Section 3.1);
 - ii. Maintaining riparian vegetation (see Section 3.2);
 - iii. Carrying out works, undertakings and activities on land (see Section 3.2, 3.7 and 3.8);
 - iv. Maintaining fish passage (see Section 3.7 and 3.8);
 - v. Ensuring proper sediment control (see Section 4.5); and
 - vi. Preventing the entry of deleterious substances in water (see Sections 4.8, 4.9, 4.10 and 4.11).
3. Buffer zones will be established as per Table 4.2 in Section 4.2, Buffer Zones; and
4. Environmental protection procedures in the following EPP sections will be implemented to help protect fish and fish habitat:
 - i. Section 4.1, Sensitive Timing Windows;
 - ii. Section 4.2, Buffer Zones;
 - iii. Section 4.5, Erosion Control and Sediment Prevention Plan;
 - iv. Section 4.6, Water Withdrawal;
 - v. Section 4.8, Storage and Management of Fuel and Other Hazardous Materials;
 - vi. Section 4.10, Grout Handling and Placement; and
 - vii. Section 4.11, Waste Management.

In the event of an incident that causes, or is about to cause, the death of fish by means other than fishing and/or the harmful alteration, disruption, or the destruction of fish habitat, NNC has a duty to notify DFO at: DFO.ARCENTriage-TriageGEARC.MPO@dfo-mpo.gc.ca



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4.3 Historic Resources

Potential Environmental Issues

Nunavut is a territory deep with tradition and history, and with the passing of time, many of these traditions have changed or disappeared (Griebel, 2014). Archaeological resources are finite resources and are of value not only to local communities, but to Nunavummiut and all Canadians. They are important sources of historical knowledge and cultural identity and must be respected and preserved.

Archaeological sites can be disturbed by any activity that causes ground disturbance and are often not readily identifiable by the untrained eye. Archaeological sites are very common throughout Nunavut, mostly consisting of stone structures that usually represent tent rings and shelters, caches, traps, hunting blinds, cairns, *inukshuks*, and stone tools. Archaeological sites can be directly affected by such activities as geotechnical drilling and general travel or increased presence of people on the land.

Environmental Protection Procedures

Known or suspected archaeological, palaeontological, burial, or historic resources will be protected by a minimum fifty (50) m buffer unless otherwise directed by the Territorial Archaeologist, the permit holder, or applicable regulator. Work will not resume within the affected area until NNC has received appropriate direction and authorization.

The following procedures have been developed in close communication with the office of the Nunavut Territorial Archaeologist, and will be put in place to protect known archaeological sites:

1. A protective buffer of thirty (30) m may be erected only by the Archeological Permit Holder using stakes, flagging and/or brightly coloured rope around each identified site. All personnel will be instructed to avoid the demarcated area. Barriers will remain in place throughout field work activities;
2. 50 m buffers must be applied if Archeological Permit Holder has not erected the protective buffer;
3. Existing inukshuks shall not be modified or disturbed. New inukshuks or rock piles shall not be constructed since building new rock piles may clutter the archaeological record and/or result in unknowingly using rocks from existing archaeology sites;

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7. Aircraft and helicopters will not alter flight paths to approach wildlife, will avoid flying directly over animals, and will not touch down in areas where wildlife are present except in an emergency;
8. If bird nests are encountered, a precautionary one hundred (100) m buffer will be applied unless otherwise directed by a qualified biologist or regulator, and the area will be avoided until nesting is complete and young have left the nest;
9. If discovered, the presence of roosts, hibernacula or dens in the area will be reported to the onsite Environmental/Wildlife Monitor, and appropriate action or follow-up will be conducted in consultation with NNC, a qualified biologist, the on-call Wildlife Officer in Iqaluit ((867) 975-7780) and/or applicable federal/territorial regulators;
10. Wildlife interactions, near misses, observations of wildlife mortality in the Project area, and/or incidents involving Project equipment, aircraft, or personnel are to be reported to the Environmental/Wildlife Monitor, who will report to NNC, the on-call Wildlife Officer in Iqaluit ((867) 975-7780) and/or ECCC-CWS, as appropriate. Adaptive management measures will be implemented should recurring wildlife interaction locations or behaviours be identified;
11. Wildlife sightings will be recorded in the Wildlife Sightings Log once per day (can have multiple sightings/ different species per log. If no interactions are observed the log does not need to be filled out and submitted. Wildlife incidents, dangerous wildlife encounters, species-at-risk observations, den or nest discoveries, mortalities, injuries, or recurring wildlife interactions will be reported to the Environmental/Wildlife Monitor and Environmental Manager without delay; and
12. A Wildlife Incident Form (Appendix E) should be completed and submitted to NNC immediately following each wildlife incident (e.g., encounters, nuisances, mortalities, injuries, etc.).

4.4.1 Caribou Response Plan

The following caribou Trigger-Action-Response Plan will be implemented during the SEP to reduce sensory disturbance, prevent displacement from preferred movement areas where practicable, and provide clear field direction when caribou are observed near work areas. Caribou may approach or move through active work areas during the Program. Field personnel will treat these events as expected field conditions and will respond using the triggers and actions below.

Caribou will not be approached, chased, herded, hazed, fed, photographed at close range, or otherwise harassed. Project personnel will allow caribou to move through or away from the area of their own accord. The Environmental Monitor under the direction of NNC has authority



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to recommend work modification, work pause, aircraft delay, or relocation of personnel or equipment where caribou behaviour indicates potential disturbance or where caribou may be blocked from moving through the area.

Trigger Level	Field Trigger	Required Action
Level 1 – Caribou observed in the broader area	One or more caribou observed within 500 m in the Project area but not moving toward an active work area, camp, fuel storage area, laydown area, water withdrawal area, or helicopter landing area.	Continue work with heightened awareness. Notify the Environmental/Wildlife Monitor. Avoid unnecessary noise, movement, and aircraft activity near the observed animal(s).
Level 2 – Caribou approaching work area	Caribou observed within 100 m moving toward an active work area, helicopter landing area, water withdrawal area, fuel storage area, laydown area, or other active Program area.	The Environmental Monitor will notify the work crew. Non-essential movement, loud activity, and equipment start-up will be reduced where safe to do so. Personnel will remain together, avoid approaching the animal(s), and maintain a clear movement path for caribou. Helicopter landings, take-offs, slinging, and low-level movements in the immediate area will be delayed where safe and practicable. Environmental Monitor will maintain visual contact with the caribou. If caribou start to exhibit signs of disturbance (e.g., changes in body posture, interrupted foraging), the Environmental Monitor will move to the Level 3 response pattern.
Level 3 – Caribou within or immediately adjacent to	Caribou enter an active work area (within 50 m of drill) or are close enough that the work activity is influencing movement	Environmental Monitor with the direction of NNC will pause active drilling, water withdrawal, slinging, refuelling, and other non-essential



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Trigger Level	Field Trigger	Required Action
active work area	patterns, causing stress behaviours, or create a safety concern (for caribou or humans).	field activities in the immediate area where safe to do so. Personnel will remain calm and stationary or move slowly away if directed by the Field Supervisor or Environmental/Wildlife Monitor. Do not attempt to move the animal(s). Maintain an open travel corridor.
Level 4 – Sensitive caribou situation	Cow-calf group, injured or distressed caribou, repeated approach to camp or work areas, caribou showing stress behaviour, caribou unable to move freely because of personnel/equipment, or any caribou injury or mortality.	Environmental Monitor with direction from NNC will stop or modify work in the immediate area. Notify the NNC, Environmental Manager and Senior Biologist. Do not approach the animal(s), except where required by trained and authorized personnel for human safety. Consult the Government of Nunavut Wildlife Officer or other applicable regulator, as required.

Daily tailgate meetings will include a review of recent caribou observations, anticipated work locations, helicopter movements, and any areas where caribou movement may overlap with planned activities. Where caribou are observed repeatedly in or near a work area, the Field Supervisor and Environmental/Wildlife Monitor will consider additional mitigation, which may include delaying work, adjusting work sequencing, relocating temporary activities where feasible, reducing aircraft movements, increasing monitoring frequency, or establishing a temporary avoidance area.

All caribou observations will be reported to the Environmental Monitor and documented in the Wildlife Sightings Log. Wildlife incidents, close interactions, work stoppages, behavioural concerns, injury, mortality, or regulator-notifiable events will be documented using the Wildlife Incident Form and reported to NNC and the Environmental Manager without delay.

5.0 Contingency and Monitoring

5.1 Fuels and Hazardous Materials Spills

Potential Environmental Concerns

Fuel and hazardous materials can damage or harm vegetation, soil, surface water, groundwater, wildlife, aquatic species and habitat, historic resources, and human health and safety.

Environmental Protection and Response Procedures

NNC has implemented a SPRP under a separate cover that outlines the procedures to be followed in the event of a fuel or hazardous materials spill. Spill response procedures are outlined below.

1. In the event of a spill, the person discovering the spill will stop work, warn nearby personnel, assess immediate safety hazards, shut down ignition sources where safe, stop the source where safe, prevent the spill from reaching water or sensitive areas, and notify the Field Supervisor and Environmental Manager without delay.
 - i. The hazard to persons in the area shall be assessed and injured or contaminated persons shall be assisted if safe to do so.
2. When the spill is discovered, the individual shall find and identify the spill substance and its source;
3. The individual shall make reasonable attempts to immediately stop the leakage and contain the flow, if safe to do so;
4. Information about the status of the situation should be gathered and reported to the Engineering Manager and Environmental Manager so they may take appropriate action;
5. NNC will report without delay all reportable spills on land, and any spill to a waterbody regardless of size, to the NT-NU 24-Hour Spill Report Line (1-867-920-8130) using the NT-NU Spill Report Form, and to the Inspector On-Call at (867) 975-4284. Refer to Appendix C for the NT-NU Spill Report Form and immediately reportable quantities.
 - i. Name, employer, location and contact number of reporter;
 - ii. Location of spill or leak;
 - iii. Time of spill or leak;
 - iv. Type of product spilled;
 - v. Quantity of spilled substance;
 - vi. Source and cause of spill or leak;

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5.3 Wildlife Encounters

Potential Environmental Concerns

The primary environmental concern associated with wildlife (including avifauna) encounters is the potential risk of stress or injury to both wildlife and site personnel. Control measures and environmental protection procedures have been implemented to mitigate this potential risk to wildlife and humans.

Environmental Protection and Response Procedures

The following procedures shall be implemented with respect to wildlife encounters:

1. All work areas will be kept clean of food scraps and garbage;
2. Waste generated at the site will be collected for disposal in appropriate containers and transferred to an approved location on a regular basis;
3. Wildlife deterrence or active wildlife management will be conducted only by trained and authorized personnel, such as the Wildlife Monitor, and only where required for safety or as directed by applicable wildlife response procedures. Project personnel will not approach, chase, feed, photograph at close range, or otherwise harass wildlife;
4. Helicopters, stationary equipment, boat operations, and personnel will yield to wildlife and avoid creating conditions that block wildlife movement where practicable;
5. All personnel will be aware of the potential for encounters with wildlife, such as polar bears, caribou and foxes. Wildlife sightings will be reported to the Environmental/Wildlife Monitor, who will assess actions for follow-up, if required. Routine wildlife sightings will be recorded in Appendix D and submitted daily; wildlife incidents or dangerous wildlife encounters will be reported without delay;
6. Wildlife observations of wildlife mortalities on site will be reported to the Environmental Manager;
7. A Wildlife Incident Form (Appendix E) should be completed and submitted to NNC immediately following each wildlife incident (e.g., encounters, nuisances, mortalities, injuries, etc.); and
8. Instances of nuisance wildlife in the area should be handled on a by-case basis, in consultation with the Engineering Manager and/or Environmental Manager, the Environmental/Wildlife Monitor, the on-call Wildlife Officer in Iqaluit and regulatory agencies, as required.



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5.4 Discovery of Historic Resources

Potential Environmental Concerns

All physical groundwork and equipment placement must be cleared by Campfire Archaeology prior to commencing work. Historic resources are defined as, but not limited to, archaeological and historical sites, burial grounds, palaeontological sites, historic buildings, and cairns that may be discovered, disturbed or improperly removed during Project related activities. These features represent a valuable cultural resource, and disturbance could result in loss or damage to these resources and the information represented by them.

If a suspected archaeological object, fossil, cairn, burial feature, historic resource, or other cultural resource is identified, work will stop immediately within fifty (50) m of the find. The find will not be touched, moved, collected, covered, flagged directly, or otherwise disturbed unless directed by Campfire Archaeology, the Territorial Archaeologist, the RCMP, or another appropriate authority. The area will be protected from further disturbance, and NNC, Campfire Archaeology, the Environmental Manager, and the Engineering Manager will be notified without delay.

Environmental Protection and Response Procedures

The following procedures shall be implemented in the event of the discovery of historic resources:

1. All personnel will be informed of their responsibility to report any unusual findings, and to leave such findings undisturbed;
2. If the presence of historic resources is known, work boundaries may be moved to ensure resources are protected;
3. If an archaeological object or fossil is encountered, all work within fifty (50) m of the find will be stopped immediately. The archaeological object or fossil shall not be touched, moved, or removed from the location where it was found. Campfire Archaeology must be notified immediately;
4. The find should be reported immediately to NNC and Campfire Archaeology, who will contact the CIRNAC Engineer at (867) 975-4283 and the Government of Nunavut Department of Culture and Heritage at 1-866-934-2035 before work resumes. The Territorial Archaeologist may also be contacted for technical guidance, as required. Reporting information will include:
 - i. Name and contact information of the person who made the discovery;
 - ii. Date of the discovery;



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6.0 Contact List

The Contact List will be verified before field mobilization and updated when personnel, regulators, emergency contacts, aircraft providers, camp communications, or field agent assignments change. The current version will be kept with the EPP at camp and made available to field personnel during orientation.

Organization	Contact	Location	Telephone / Email
NNC	Heather Shilton, Director	Iqaluit	(867) 979-8400
Polar Outfitting	Alex Flaherty, Field Camp Operations	Iqaluit	(867) 975-1600
Tetra Tech	Jason Gaul, Senior Project Engineer	Calgary, AB	(403) 508-1560
Dillon Consulting Limited	Michelle Roche, Project Manager	St. John's, NL	(709) 754-2374
SEM	Shelly Brown, Project Coordinator	St. John's, NL	(709) 754-0499
EcoLogic Consultants Ltd.	Natasha Bush, Project Coordinator	Lillooet, BC	(604) 803-7146
Campfire Archaeology Heritage and Culture Ltd.	Kaylee Baxter, Director	Vancouver, BC	(604) 414-6320
NT-NU Spill Centre	24-Hour Spill Report Line	Yellowknife, NT	(867) 920-8130
CIRNAC	Inspector On-Call	Iqaluit, NU	(867) 975-4284
	Joseph Monteith, Water Resource Officer	Iqaluit, NU	(867) 975-1787
Canadian Coast Guard – Arctic Region	Marine Pollution Emergencies Environmental Response Duty Officer	Yellowknife, NT	(867) 979-5269



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7.0 References

References will be updated before final issue to include the current versions of all permits, licences, authorizations, screening decisions, conformity determinations, codes of practice, and guidance documents relied upon by this EPP.

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8.0 Signature Page

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By signing below, the worker confirms that they have received environmental orientation for the 2026 Subsurface Exploration Program, have reviewed the applicable requirements of this EPP, understand the reporting procedures for spills, wildlife incidents, historic resource discoveries, water withdrawal, waste management, and environmental non-conformances, and understand their authority to pause work where environmental or permit compliance concerns are observed.

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Printed Name | Employer | Role

Signature | Orientation Date

Trainer / NNC Representative | Employer

Trainer Signature | Date



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APPENDIX A

EPP DISTRIBUTION LIST



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The EPP Distribution List will record the document version, date distributed, recipient, organization, and method of distribution. Updated EPP versions will be redistributed to the listed parties where revisions affect field procedures, permit compliance, reporting, or emergency response.

EPP DISTRIBUTION LIST

Organization	Contact	Phone Number	Email
NPC	Manager Planning and Implementation	(867) 979-3444	gdjalogue@nunavut.ca
NIRB	Manager Impact Assessment	(866) 233-3033	info@nirb.ca / kmorrison@nirb.ca
NWB	Licensing Administrator	(877) 521-3745 / (867) 360-6338	licensing@nwb-oen.ca / robert.hunter@nwb-oen.ca
CIRNAC	Inspector, Water Resource Officer	(867) 975-1787 / (867) 975-4284	Joseph.monteith@rcaanccirnac.gc.ca
NNC	Director	(867)-979-8400	nnc@qcorp.ca
Tetra Tech	Engineering Manager	(403) 508-1560	jason.gaul@tetrattech.com
Polar Outfitting	Camp Operations Manager	(867) 975-1600	polaroutfitting@gmail.com
SEM	Environmental Scientist	(709) 754-0499	shelly.brown@sem ltd.ca
Dillon Consulting Limited	Environmental Manager	(709) 754-2374	mroche@dillon.ca
Ecologic Consultants Ltd.	Environmental Field Support	(604) 803-7146	natasha.bush@ecologicconsultants.ca
CampFire	Archaeologist	(604) 414-6320	kayleebaxter@campfire.ca
Rodren Drilling Ltd.	Kyle Pim Operations Manager	(204)-339-1668	kyle@rodrendrilling.com

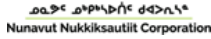


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APPENDIX B

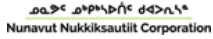
ENVIRONMENTAL SITE INSPECTION CHECKLIST



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ENVIRONMENTAL SITE INSPECTION CHECKLIST

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2.3	Are ATVs and other overland vehicles absent from the work area, consistent with the no-ATV/no-overland-vehicle requirement?				
NC	Item	Yes	No*	N/A	Remarks (i.e., location, good practices, problems/issues/risks observed, possible cause(s) and/or proposed corrective actions)
2.4	Are temporary work areas being managed to minimize dust or loose material, with water used only from approved sources where required?				
2.5	Are helicopter landing areas and foot travel routes being managed to avoid wetlands, active nests, wildlife, historic resources, and required buffers?				
2.6	Others (please specify)				
3.0	Waste Management				
3.1	Are active drill sites, laydown areas, and water withdrawal points clean and tidy, with litter and unsecured materials removed or contained?				
3.2	Are separated labelled containers / areas provided for recycling or waste segregation?				
3.3	Are drip trays free of oil and water?				
3.4	Are hazardous wastes, used absorbents, empty chemical containers, brine-contaminated materials, and contaminated waste stored in labelled, secure containers pending backhaul or disposal?				



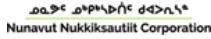
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3.5	Others (please specify)				
4.0	Noise Control				
4.1	Is idle equipment turned off or throttled down?				
4.2	Are noise-generating activities limited to the duration required for safe and efficient Program activities?				
NC	Item	Yes	No*	N/A	Remarks (i.e., location, good practices, problems/issues/risks observed, possible cause(s) and/or proposed corrective actions)
4.3	Others (please specify)				
5.0	Protection of Flora and Fauna				
5.1	Is the area free of wildlife (or signs of wildlife)?				
5.2	Have any active nests been marked with the appropriate buffer until fledging (i.e., young leave the nest) occurs?				
5.3	Is the area free of invasive plant species?				
5.4	Has protection of fish and fish habitat been considered before work near water, water withdrawal, or any activity below the normal high-water mark?				
5.5	Others (please specify)				



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*Any "No" recorded represents potential non-compliance or improvement needed. Details of non-conformity (NC) shall be recorded in the **Remarks** section.

Any non-conformities (NC) shall be reported immediately to the Environmental Manager and recorded on the following page. Each NC should refer to the checklist as coded. Responsible personnel shall identify the root cause of the NC and adopt appropriate corrective actions (CA) for mitigation within an agreed timeframe. The effectiveness of implemented CA(s) shall



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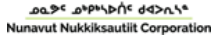
be verified by the Environmental/Wildlife Monitor in collaboration with the Environmental Manager.

Site Inspector:_____

Date:_____

Environmental Manager:_____

Date:_____



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ENVIRONMENTAL NON-CONFORMITY ROOT CAUSE ANALYSIS AND CORRECTIVE ACTIONS

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APPENDIX C

NT-NU SPILL REPORT FORM & SPILL QUANTITIES



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TDG Class	Substance for NT-NU 24 Hour Spill Line	Immediately Reportable Quantities
1 2.3 2.4 6.2 7 None	Explosives Compressed gas (toxic) Compressed gas (corrosive) Infectious substances Radioactive Unknown substance	Any Amount
2.1 2.2	Compressed gas (flammable) Compressed gas (non-corrosive, non-flammable)	Any amount of gas from containers with a capacity greater than 100 L
3.1/3.2/3.3	Flammable liquids	> 100 L
4.1 4.2 4.3	Flammable solids Spontaneously combustible solids Water reactant	> 25 L
5.1 9.1	Oxidizing substances Miscellaneous products or substances excluding PCB mixtures	> 50 L or 50 kg
5.2 9.2	Organic peroxides Environmentally hazardous	> 1 L or 1 kg
6.1 8 9.3	Poisonous substances Corrosive substances Dangerous wastes	> 5 L or 5 kg
9.1	PCB mixtures of 5 or more parts per million	> 0.5 L or 0.5 kg
None	Other contaminants (e.g., crude oil, drilling fluid, produced water, waste or spent chemicals, used or waste oil, vehicle fluids, wastewater, etc.)	> 100 L or 100 kg
None	Sour natural gas (i.e., contains hydrogen sulfide, H ₂ S) Sweet natural gas	Uncontrolled release or sustained flow of 10 minutes or more

Additionally, all released harmful substances, regardless of quantity, are to be reported to the NT-NU 24-Hour Spill Line if the release is near or into a waterbody, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable.



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All spills will be reported internally to the Field Supervisor and Environmental Manager. External reporting to the NT-NU 24-Hour Spill Line and Inspector On-Call will follow the reportable quantities and sensitive-receptor triggers identified in this appendix and the Spill Prevention and Response Plan.



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NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE

TEL: (867) 920-8130

FAX: (867) 873-6924

EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

A	REPORT DATE: MONTH – DAY – YEAR		REPORT TIME		☐ ORIGINAL SPILL REPORT, OR ☐ UPDATE # _____ TO THE ORIGINAL SPILL REPORT	REPORT NUMBER
	OCCURRENCE DATE: MONTH – DAY – YEAR		OCCURRENCE TIME			
B						
C	LAND USE PERMIT NUMBER (IF APPLICABLE)		WATER LICENCE NUMBER (IF APPLICABLE)			
D	GEOGRAPHIC PLACE NAME OR DISTANCE AND DIRECTION FROM NAMED LOCATION			REGION		
				☐ NWT ☐ NUNAVUT ☐ ADJACENT JURISDICTION OR OCEAN		
E	LATITUDE		LONGITUDE			
	DEGREES	MINUTES	SECONDS	DEGREES	MINUTES	SECONDS
F	RESPONSIBLE PARTY OR VESSEL NAME		RESPONSIBLE PARTY ADDRESS OR OFFICE LOCATION			
G	ANY CONTRACTOR INVOLVED		CONTRACTOR ADDRESS OR OFFICE LOCATION			
H	PRODUCT SPILLED		QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES		U.N. NUMBER	
	SECOND PRODUCT SPILLED (IF APPLICABLE)		QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES		U.N. NUMBER	
I	SPILL SOURCE		SPILL CAUSE		AREA OF CONTAMINATION IN SQUARE METRES	
J	FACTORS AFFECTING SPILL OR RECOVERY		DESCRIBE ANY ASSISTANCE REQUIRED		HAZARDS TO PERSONS, PROPERTY OR ENVIRONMENT	
K	ADDITIONAL INFORMATION, COMMENTS, ACTIONS PROPOSED OR TAKEN TO CONTAIN, RECOVER OR DISPOSE OF SPILLED PRODUCT AND CONTAMINATED MATERIALS					
L	REPORTED TO SPILL LINE BY	POSITION	EMPLOYER	LOCATION CALLING FROM	TELEPHONE	
M	ANY ALTERNATE CONTACT	POSITION	EMPLOYER	ALTERNATE CONTACT	ALTERNATE TELEPHONE	
				LOCATION		
REPORT LINE USE ONLY						
N	RECEIVED AT SPILL LINE BY	POSITION	EMPLOYER	LOCATION CALLED	REPORT LINE NUMBER	
		STATION OPERATOR		YELLOWKNIFE, NT	(867) 920-8130	
	LEAD AGENCY ☐ EC ☐ CCG ☐ GNWT ☐ GN ☐ LA ☐ IAC ☐ NEB ☐ TC			SIGNIFICANCE ☐ MINOR ☐ MAJOR ☐ UNKNOWN		FILE STATUS ☐ OPEN ☐ CLOSED
	AGENCY	CONTACT NAME	CONTACT TIME	REMARKS		
	LEAD AGENCY					
	FIRST SUPPORT AGENCY					
	SECOND SUPPORT AGENCY					
	THIRD SUPPORT AGENCY					

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APPENDIX D

WILDLIFE SIGHTINGS/ NEST SWEEP

LOG



Version: 1.2

Date: July 2026

WILDLIFE OBSERVED ☐
(please proceed to all sections)

NO WILDLIFE OBSERVED
(no further action required)

ANIMAL SPECIES:

NUMBER SEEN:
(exact or estimated)

LOCATION:
(If possible, provide GPS coordinates or mark on map)

DATE AND TIME:

BEHAVIOR WHEN OBSERVED:
(e.g., what was it doing when you saw it)

OTHER COMMENTS/INTERESTING MARKINGS:
(e.g., anything interesting about the sighting – feeding, signs of injury, etc.)

OBSERVED BY (NAME/COMPANY/PHONE NUMBER):

Please submit sighting log to the Environmental/Wildlife Monitor.



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Note: Wildlife sightings will be recorded in the Wildlife Sightings Log once per day (can have multiple sightings/ different species per log). If no interactions are observed the log does not need to be filled out and submitted. Wildlife incidents, dangerous wildlife encounters, species-at-risk observations, den or nest discoveries, mortalities, injuries, or recurring wildlife interactions will be reported to the Environmental/Wildlife Monitor and Environmental Manager without delay.



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NEST SWEEP LOG

ACTIVE NEST FOUND ☐ (please proceed to all sections)	NO NEST ENCOUNTERS ☐ (no further action required)
BIRD SPECIES:	
NUMBER SEEN: (specify if the species is mature, juvenile or egg) (exact or estimated)	
LOCATION: (if possible, give GPS coordinates or mark on map)	
DATE AND TIME:	
BEHAVIOUR WHEN OBSERVED: (e.g., what was it doing when you saw it)	
OTHER COMMENTS/INTERESTING MARKINGS: (e.g., anything interesting about the sighting – feeding, signs of injury, etc.)	
OBSERVED BY (NAME/COMPANY/PHONE NUMBER):	
Please submit sighting log to the Environmental/Wildlife Monitor or Environmental Manager.	

Note:

Nest sweeps must be conducted for each location prior to moving onto the sight by an experienced wildlife monitor. Record findings without delay, if an active nest is found remove yourself from the area leaving it undisturbed. Create a 100m buffer zone and contact your Environmental Monitor for further information regarding buffer zone requirements and steps moving forward.



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APPENDIX E

WILDLIFE INCIDENT FORM



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WILDLIFE INCIDENT FORM

Occurrence Date/Time:		Date Reported:	
MAIN CONTACT INFORMATION			
Name:			
Company:			
Phone Number:			
INCIDENT DETAILS			
Location of incident (provide GPS coordinates or mark on map, if possible)			
Type of Incident ☐ Encounter ☐ Nuisance ☐ Wildlife Mortality ☐ Wildlife Injured ☐ Defensive ☐ Other:		Species ☐ Polar Bear ☐ Bird ☐ Bat ☐ Fox ☐ Caribou ☐ Other:	
		Sex ☐ Female ☐ Male ☐ Unknown Age Class ☐ Adult ☐ Juvenile ☐ Cub ☐ Unknown	
Details of Incident (movement, behaviour, reason for attraction, property damage, etc.)			
Details of Action Taken (reporting, deterrence type, disposal, removal of attractant, etc.)			



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Was the incident resolved?

Has the Wildlife Management Division in Iqaluit been contacted?
(If yes, include contact name and date/time reported)

Please submit incident form to the Environmental/Wildlife Monitor.



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APPENDIX F

WATER WITHDRAWAL AND WATER USE TRACKING



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F.1 Purpose

This appendix establishes water withdrawal and water use tracking requirements for the 2026 Subsurface Exploration Program. It applies to water withdrawn or used for drilling, packer testing, grout mixing, drill fluid or brine preparation, equipment or tool washing and other approved Program activities. Water withdrawal will occur only from approved sources and within the limits of the applicable Water Licence or written authorization.

Where the EPP, Water Licence, or other authorization identifies different water limits, the field team will apply the most restrictive currently authorized limit unless NNC's Environmental Manager confirms in writing that a revised authorization is in effect.

F.2 Responsibilities

Role	Water Tracking Responsibility
Environmental Manager	Confirm applicable water authorization, approved sources, daily limits, reporting requirements, and corrective actions.
Field Supervisor / Contractor	Measure and record daily withdrawal, water use by activity, reuse/recycling, and residuals management.
Environmental/Wildlife Monitor	Inspect water withdrawal points, fish screens, access conditions, sediment release risk, and buffer compliance.
NNC	Retain water records for compliance reporting and annual reporting.

F.3 Water Tracking Requirements

Water will be withdrawn only from sources approved in the applicable Water Licence or written authorization.

Water withdrawal will not exceed the approved daily Program limit or any source-specific limit.

For streams, withdrawal will not exceed ten percent (10%) of low flow unless otherwise authorized.

All water source coordinates will be recorded in degrees, minutes, and seconds using NAD 83. Water intakes used in fish-bearing or potentially fish-bearing waterbodies will be fitted with an appropriate fish screen before pumping begins.



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Daily water volumes will be measured using a flow meter where practicable. Where a flow meter is used, the meter identification number, units, and calibration or verification status will be recorded. Where a flow meter is not available, the field team will document the alternate measurement method, assumptions, pump rate, pumping duration, and calculation used to estimate the water volume.

Water used to prepare drilling brine, grout, or other mixtures will be recorded separately from raw water withdrawn. Reused or recycled water will be tracked separately to avoid double-counting water withdrawn from the environment.

Water-related non-conformances, including exceedances, unapproved source use, missing fish screen, sediment release, or incomplete records, will be reported to the Environmental Manager and tracked to closure.

F.4 Forms and Logs

The following forms will be completed during active water withdrawal and retained with the Project compliance records.

Table F-1: Authorized Water Source Register

Source ID	Source Name / Description	Source Type	Coordinates (NAD 83 DMS)	Authorization Reference	Approved Daily Limit	Fish Screen / Notes

Table F-2: Daily Water Withdrawal Log

Date	Source ID	Borehole / Activity	Start Time	End Time	Meter Start	Meter End	Volume Withdrawn (m ³)	Measurement Method	Initials / Notes

Table F-3: Drill Location Water Use and Reuse Summary



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Date	Borehole ID	Source ID	Raw Water Withdrawn (m³)	Reused / Recycled Water (m³)	Use Category	Residuals Destination	Contained / No Release?	Notes

Table F-4: Water Intake and Fish Screen Inspection Log

Date / Time	Source ID	Screen Type / Mesh	Installed Before Pumping?	Clean / Undamaged?	Cleaned During Use?	Water / Sediment Conditions	Corrective Action / Initials

Table F-5: Daily Water Use Reconciliation

Date	Total Raw Water Withdrawn (m³)	Total Reused / Recycled (m³)	Total Program Water Use (m³)	Approved Daily Limit (m³/day)	% of Limit Used	Exceedance?	Corrective Action / Comments

Table F-6: Water-Related Non-Conformance and Corrective Action Log

NC ID	Date	Non-Conformance / Trigger	Location / Source	Notification	Immediate Control	Corrective Action	Responsible Person	Closed? / Notes



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F.5 Daily Review and Reporting

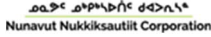
The Field Supervisor or Contractor will submit completed daily water use logs to the Environmental Manager or designate at the end of each workday.

The Environmental/Wildlife Monitor will review water source, fish screen, access, buffer, and sediment observations during routine site inspections.

The Environmental Manager will review daily totals against the authorized limit and identify corrective actions before water withdrawal resumes the next day.

Water withdrawal records, source coordinates, fish screen inspection records, water-related non-conformances, and corrective action records will be retained for the annual report and permit compliance file.

The end-of-season summary will include total volume withdrawn by source, maximum daily withdrawal, total water reused or recycled, water used by activity, incidents or exceedances, and recommended changes for the following field season.



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Date: July 2026

Prepared by:

Nunavut Nukkiksautiit Corporation
5300 Qulliq Court, 1st Floor
Iqaluit, NU X0A 2H0

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Acronyms & Abbreviations

CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
dB	decibels
DFO	Fisheries and Oceans Canada
ECCC	Environment and Climate Change Canada
ECCC-CWS	Environment and Climate Change Canada – Canadian Wildlife Service
EPP	Environmental Protection Plan
GN	Government of Nunavut
h	hour
HTA	Hunters and Trappers Association
km	kilometer
m	meter
MW	megawatt
NIRB	Nunavut Impact Review Board
NNC	Nunavut Nukkiqsautiit Corporation
NPC	Nunavut Planning Commission
NT	Northwest Territories
NTU	Nephelometric Turbidity Units
NU	Nunavut
NWA	Nunavut Wildlife Act
NWB	Nunavut Water Board
RCMP	Royal Canadian Mounted Police
REL	Rogers Enterprises Ltd.
SAR	Species at Risk
SARA	Species at Risk Act
SDS	Safety Data Sheets
SPRP	Spill Prevention and Response Plan
TSS	total suspended solids
WHMIS	Workplace Hazardous Materials Information System

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1.0 Introduction

Nunavut Nukkiqsautiit Corporation (NNC) is committed to mitigating the environmental effects of activities associated with the Investigative Studies for the Iqaluit Nukkiqsautiit Project (INP, or the Project). The environmental and technical field programs (investigative studies) began in fall 2024 and are required to continue through 2026 (possibly 2027) to support the overall Project design. The purpose of this research is to gain an understanding of the key ecosystem and geotechnical components within the study area in order to help assess the feasibility of the Iqaluit Nukkiqsautiit Project (the overall Project). The Project is permitted through Nunavut Impact Review Board (NIRB), (#25YN033) while the overall Project is currently going through the NIRB screening process (#26UN010).

The proposed overall Project is a renewable energy development that features a hydroelectric dam, powerhouse, road, and transmission line from the powerhouse to Iqaluit, with a capacity of 15-30 megawatts (MW). It is located on the Hall Peninsula, Baffin Island, approximately 60 kilometers (km) northeast of Iqaluit, Nunavut.

To support the execution of Investigative Studies in 2026 and 2027, a thirty (30) person temporary base camp (Temporary Camp, or Camp) will be established near the head of the unnamed lake. It will be active beginning in June until mid-October supported by helicopter access from Iqaluit. This Environmental Protection Plan (EPP) has been developed specifically for the Temporary Camp to document practices and procedures that will serve to minimize or eliminate potential environmental effects resulting from Camp construction, operations and decommissioning. This EPP has been written to satisfy conditions of approvals and authorizations that have been, or are anticipated to be, issued by the Government of Nunavut (GN), the Nunavut Impact Review Board (NIRB), the Nunavut Water Board (NWB), Fisheries and Oceans Canada (DFO), and Environment and Climate Change Canada (ECCC), among others.

1.1 Purpose

Environmental protection is a key consideration throughout the lifetime the Project. This EPP demonstrates a practical understanding of environmental regulations as well as practices and procedures required to eliminate or minimize potential environmental effects of the Camp. This plan was developed to serve as a reference document, and is to be used as a tool to achieve environmental management objectives and ensure environmental regulatory compliance. The EPP also describes practical procedures required of all personnel (i.e.,

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Environmental Manager (Dillon Consulting)

Dillon Consulting Limited (Dillon) is responsible for overall management of conditions of permits and approvals, overseeing all aspects pertaining to compliance with respect to environmental concerns. Dillon is supported by Sikumiut Environmental Management (SEM), EcoLogic Consultants Ltd. and Campfire Archaeology and Heritage Ltd. Dillon Consulting is responsible. Dillon is responsible for:

- Managing the development and submission of environmental regulatory permitting applications, with follow-up through to approval, and associated reporting requirements;
- Monitoring and reporting on regulatory compliance, including conditions of authorizations and permits;
- Liaising with regulatory agencies on conditions of authorizations/permits, reporting requirements and environmental incidents;
- Supporting the periodic review and update of the EPP; and
- Authorizing or issuing stop-work orders for environmental non-compliances.

Dillon will collaborate with NNC and the Camp Operations Manager to ensure objectives for the Camp are met and the relevant permits are obtained.

Camp Operations Manager (Polar Outfitting)

Polar Outfitting is responsible for the overall management and operation of the Camp and associated facilities and reports directly to NNC. Specific roles and responsibilities include:

- Managing the day-to-day operation and maintenance of the Camp and associated infrastructure;
- Overseeing accommodations and kitchen services for all Investigative Studies personnel onsite;
- Ensuring camp accommodations are conducted in accordance with applicable environmental, health and safety, and regulatory requirements;
- Coordinating camp personnel to maintain safe, sanitary, and efficient camp operations;
- Implementing and overseeing waste management, housekeeping, and facility maintenance programs within the camp including the removal and documentation of waste offsite;
- Conducting wildlife monitoring in and around the camp and implementing wildlife interaction prevention measures, as required;
- Reporting wildlife sightings, encounters, and other environmental concerns to NNC in accordance with Investigative Studies and Project procedures;

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- Maintaining records related to camp operations and environmental monitoring activities, including the completion of daily fuel and water consumption logs; and
- Exercising the authority to issue stop-work orders when environmental non-compliances are observed or when activities present an unacceptable risk to the environment.

Wildlife Monitor

The Wildlife Monitor is responsible for monitoring for wildlife activity and protecting Investigative Studies personnel from potential wildlife interactions. The Wildlife Monitor is provided by and will report to the Camp Operations Manager. The roles and responsibilities of the wildlife monitor include:

- Conducting routine wildlife monitoring and observations within and adjacent to the camp area;
- Identifying wildlife species and documenting wildlife sightings, interactions, and signs of activity;
- Maintaining records of wildlife observations, incidents, and monitoring activities;
- Implementing and supporting wildlife mitigation measures, including exclusion, deterrence, and encounter management procedures; and
- Advising Camp personnel of wildlife presence and recommending appropriate precautions or mitigation measures.

REL HSE Monitor

The HSE Monitor, contracted through Rogers Enterprises Ltd. (REL), is responsible for providing independent oversight of health, safety, and environmental (HSE) performance during Camp activities. The HSE Monitor reports directly to NNC. The HSE Monitor will:

- Monitor day-to-day Camp activities to verify compliance with applicable health, safety, environmental, and regulatory requirements;
- Authorize stop-work orders where activities present an unacceptable risk to personnel, the environment, or are not being conducted in accordance with Camp or Project requirements;
- Maintain records of inspections, observations, incidents, and corrective actions related to Camp operations and environmental monitoring activities, as applicable;
- Communicate environmental requirements and expectations to Camp staff and service providers;
- Report directly to NNC on matters related to Camp operations and environmental performance; and

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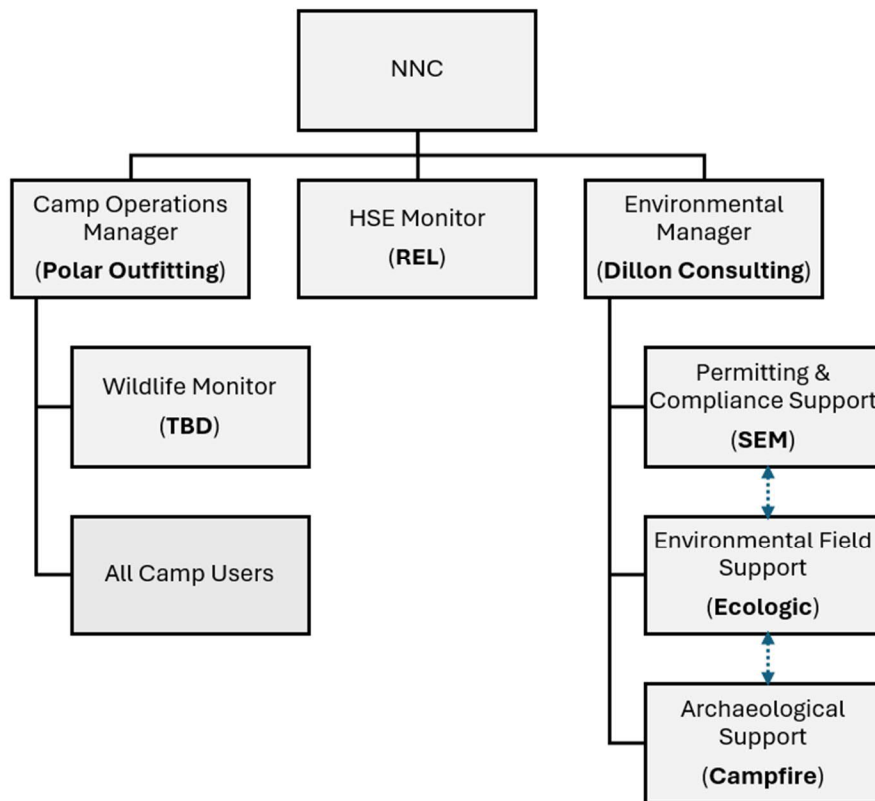


Figure 1.1 EPP Organization Chart

1.5 Environmental Orientation and Training

Through ongoing environmental orientation and awareness training, NNC will confirm that all Camp personnel understand their roles and responsibilities and potential environmental effects of the camp, particularly those related to their specific work activities.

Environmental orientation will include a presentation on environmental protection procedures to be applied to all work, and will be provided to:

- All new personnel arriving at the Camp facility; and
- All workers prior to the start of any new activity and thereafter on an as-needed basis.

All Camp personnel will also receive training for spill response measures, Land Use Permit N2025N0016 conditions applicable to their work, active nest disturbance and associated avian response behaviour, historic resources awareness and response procedures, wildlife

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interaction prohibitions, waste management requirements, and potentially invasive plant species identification.

Environmental orientation will cover:

- Spill prevention and response;
- Fuel transfer and fuel drum handling;
- Water withdrawal and fish screen inspection;
- Greywater and blackwater management;
- Wildlife encounters and wildlife safety;
- Archaeological chance finds;
- Waste segregation and backhauling;
- Non-conformance reporting; and
- Helicopter environmental controls.

2.0 Project Description Overview

A thirty (30) person temporary base camp (Temporary Camp, or Camp) will be established near the head of the unnamed lake to support the completion of seasonal environmental and technical field studies (Investigative Studies) in 2026 and 2027 (Figure 2.1). The Camp will be active between June and mid-October. A rotational team of up to thirty (30) people during peak operations will be involved in the field work season. Field staff will be taken to the study area via helicopter or float plane. All research teams will be accompanied by a locally hired bear monitor and field assistant.

Components of this Camp will include:

- Fifteen (15) sleeping tents (seven (7) single occupancy and eight (8) double occupancy);
- One (1) large tent for kitchen and dining;
- Four (4) shower and sanitation facilities;
- One (1) storage tent;
- Diesel generators, solar power systems, propane or diesel stoves;
- Communication devices (e.g., satellite phones, radios, Starlink);
- Emergency supplies (e.g., first aid kit, firearms, fire extinguisher and spill kits);
- Camp fuel: Diesel 3 x 205 L and Gasoline 3 x 205 L caches (~1,230 L). Portable propane cylinders (20-100 lbs);

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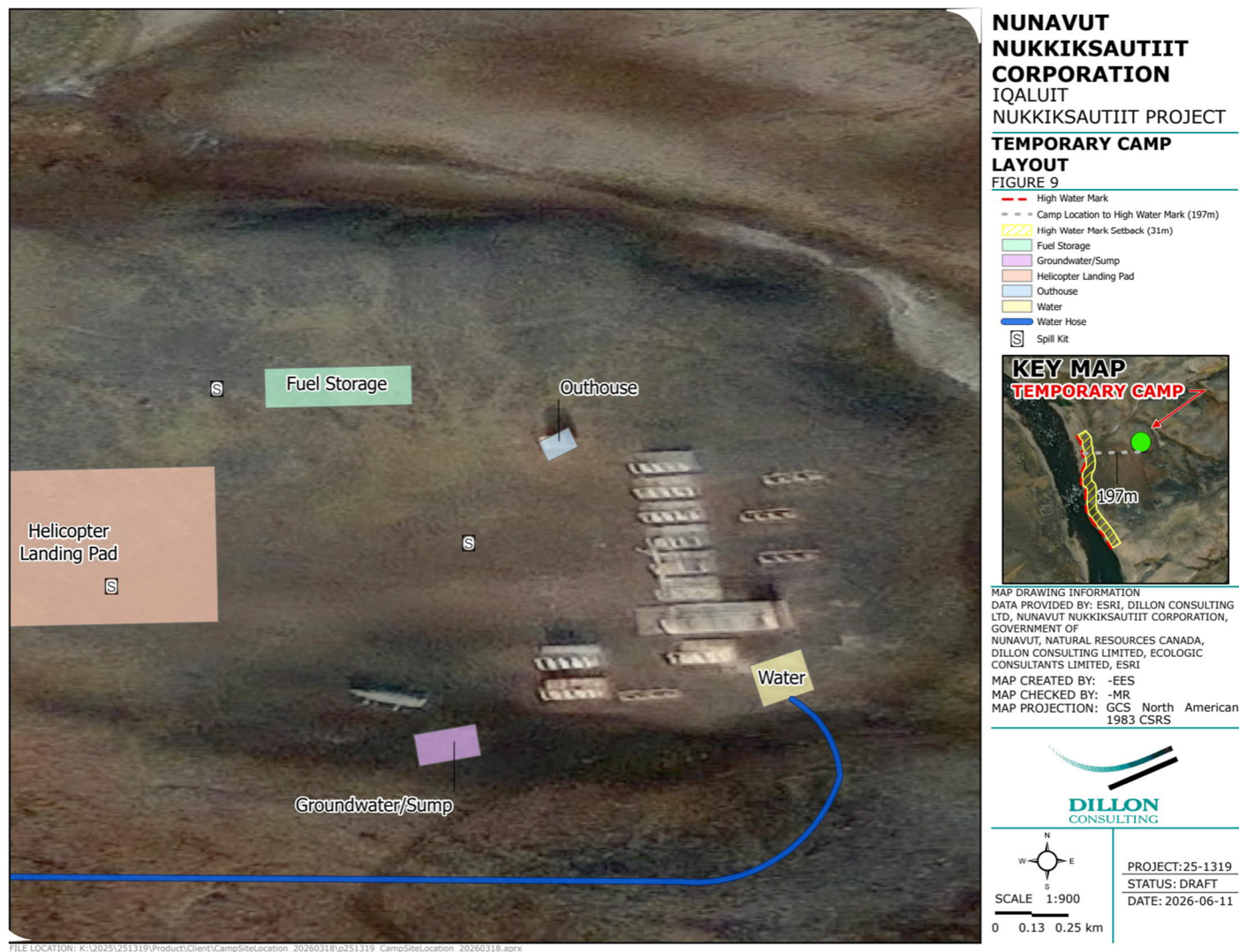


Figure 2.1 Project Layout.

3.0 Regulatory Requirements

3.1 Potential Approvals, Authorizations and Permits

Regulatory approvals, authorizations and permits are required for the Camp. Prior to initiating any new work/activity, NNC will confirm that the applicable permits are in place, and that all parties understand environmental and regulatory requirements and conditions of authorization.

Conditions and expiry/renewal dates should be considered elements of this EPP, and all personnel should familiarize themselves and adhere to all relevant permits and approvals. Where a permit, licence, authorization, or regulatory requirement is more stringent or more specific than this EPP, the more stringent or more specific requirement shall apply. A list of approvals, authorizations and permits that may be required for the Investigative Studies and the Camp is outlined in Table 3.1. Additional approvals, authorizations and permits will be required for other aspects of environmental baseline studies and prior to the operations phase of the Project. A comprehensive Permitting Registry has been developed for the Project under a separate cover. The Permitting Registry includes details regarding approval(s) status, copies of approvals as received, and conditions of approvals.

Table 3.1 List of Environmental Approvals, Authorizations and Permits for the Investigative Studies and Camp.

Authorization (Agency)	Permit Number	Status		Scope of Activities
		Issued	Expiry	
Land Use Conformity Determination (Nunavut Planning Commission)	150981	Amended 16-Jan-2026	N/A	Conformity determination for environmental investigative studies
Screening (Nunavut Impact Review Board)	25YN033	8-Jul-2025	N/A	Screening determination
Class A Land Use Permit (Crown Indigenous Relations and Northern Affairs)	N2025N0016	12-Aug-2025	11-Aug-2030	Field camp and Geotechnical Drilling
Type B Water License (Nunavut Water Board)	8BC-INP2631	03-Jun-2026	02-Jun-2031	Total drilling water use shall not exceed 165 m ³ /day unless amended. Refer to Section 4.5.



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Authorization (Agency)	Permit Number	Status		Scope of Activities
		Issued	Expiry	
Wildlife Research Permit (GN Department of Environment)	2026-016	1-June-2026	Annual	Assessment of existing wildlife populations and habitats in and around the proposed Project area
Class 2 Archaeology and Palaeontology Permit (GN Department of Culture and Heritage)	2026-002A	09-Jun-2026	31-Oct-2026	Assessment of archaeology and palaeontology findings in and around the proposed Project area
Licence to Fish for Scientific Purposes (Department of Fisheries and Oceans Canada)	N/A	In Progress	N/A	

The permits and authorizations listed in Table 3.1 apply only to the Investigative Studies and Camp facility that will be used during the 2026 field season. They do not authorize construction of the proposed hydropower facility.

3.2 Environmental Monitoring

3.2.1 Site Inspections

Site inspections will be conducted by the Environmental Monitor before, during, and after any site disturbances related to the Camp occur at the site. Following the camp construction activities, the Environmental Manager will conduct a site inspection will record site details such as fuel storage requirements, waste management and water intake. Photographs will be collected to accompany site inspection records. The required frequency of site inspections during camp activities will be determined by NNC or designate and will depend on the duration and type of activity. The site inspections will be recorded using the Environmental Site Inspection Checklist (Appendix B).

3.2.2 Compliance Monitoring

Compliance monitoring is required to ensure that applicable regulatory requirements and conditions of permits/authorizations are met, and to verify the accuracy of environmental effects predictions. Additionally, compliance monitoring can be used to assess the



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effectiveness of mitigation and management measures, and to identify potential environmental effects that may require further mitigation. The following monitoring activities will be executed to satisfy compliance requirements:

- Volume of water withdrawn (Total camp water use shall not exceed five (5) cubic meters per day);
- Quantity of waste disposed of on site and quantity of waste removed from site;
- Records of waste disposal from the final disposal sites;
- Wildlife monitoring;
- Waste and raw materials monitoring (including fuel and chemical);
- Incidents and complaints monitoring; and
- Land Use Permit N2025N0016 condition tracking, including required notifications, location updates, spill records, waste disposal records, and cleanup/restoration records.

Regular environmental site inspections will be conducted by the Environmental Monitor using the Environmental Site Inspection Checklist (Appendix B), the Wildlife Sightings Log (Appendix D), the Wildlife Incident Form (Appendix E), and if necessary, the NT-NU Spill Report Form & Spill Quantities (Appendix C). Daily water withdrawal and use will be recorded using Appendix G, Water Withdrawal and Water Use Tracking.

Water withdrawal and water use records will be maintained using Appendix F. Records will include approved water sources, source coordinates, daily withdrawal volumes, water used by activity, water reuse/recycling, fish screen inspections, daily reconciliation against the authorized limit, and corrective actions. Any exceedance, use of an unapproved source, missing fish screen, or incomplete water record will be treated as a non-conformance and reported to the Environmental Manager immediately.



4.0 General Environmental Protection Procedures

This section outlines general mitigation measures to be implemented during Camp activities to avoid and/or reduce potential environmental effects.

Table 4.1 Environmental Protection Measures to Implement During Camp Activities.

ID #	Issue/Activity	Party Responsible	Mitigation Measures
1	Communication	NNC; Camp Operations Manager	- NNC will ensure the EPP is available to Camp personnel and confirm that their roles and responsibilities are understood; - On-site orientation will include a presentation of the environmental protection procedures to be applied to all work activities; and - Environmental incidents will be reported immediately.
2	Sensitive Timing Windows	Camp Operations Manager	- Fish and Fish Habitat (Zone 1; Fall Spawning Fish): September 1 to June 30 (Fisheries and Oceans Canada, 2013). Fall spawning fish include arctic char, lake trout and whitefish (includes broad, lake and round whitefish); and - A Request for Review will be submitted to DFO should any work fall within this timeframe.
3	Buffer Zones	Camp Operations Manager	- All fuel caches, hazardous waste storage, refueling, sumps, waste storage, shall be located at a distance of at least 31 m from the ordinary high-water mark of any adjacent water body; - No activities shall be conducted in the vicinity of a 50-metre buffer zone of a known archaeological/historical site; and - Additional buffers may be applied for wildlife, bird nests, sensitive terrain, or other site-



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ID #	Issue/Activity	Party Responsible	Mitigation Measures
			specific constraints identified by the Environmental Monitor or other designated personal.
4	Laydown and Storage Areas	Environmental Manager	- Establish laydown area(s) for equipment and materials on flat, stable ground, and away from watercourses or waterbodies; - Any new laydown areas will be approved by an archaeologist before use; - The number of new laydown and storage areas will be kept to a minimum; and - All work and laydown and storage areas will be monitored for erosion and appropriate remediation action taken as necessary.
5	Erosion and Sediment Control	Camp Operations Manager	- Greywater from kitchen and washing areas will be directed to a constructed settling and filtration area designed to handle daily Camp volumes. The settling and filtration area will be at least thirty-one (31) m above the ordinary high-water mark of any water body at a site where direct flow into a water body is not possible; - If required, drainage ditches will be stabilized to reduce soil erosion. Stabilization methods may include lining with vegetation or rock, terracing, interceptor swales, or installation of rock check dams. Measures to reduce soil erosion will be properly inspected and maintained following installation.
6	Water Withdrawal	Camp Operations Manager	Water use will be governed by the approved Water Licence (No. 8BC-INP2631) including the various waterbodies specified in that approval;



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ID #	Issue/Activity	Party Responsible	Mitigation Measures
			- Total camp water use shall not exceed five (5) cubic meters per day; - No work will be conducted below the high-water mark of any surface water feature without prior notification and assessment by the Camp Operations Manager and Environmental Manager; and - The 31 m buffer and any additional Water Licence or EPP requirements will be maintained.
7	Site Access & Mobilization	Camp Operations Manager	- ATV use is restricted to designated work areas at the Camp; and - All areas where ATVs are operating at the Camp site will be maintained in good condition and monitored for proper drainage and signs of erosion.
8	Storage and Management of Fuel and Other Hazardous Waste	Camp Operations Manager	- The <i>Workplace Hazardous Materials Information System (WHMIS) Regulations</i> under the federal <i>Occupational Health and Safety Act</i> will apply to all handling and storage of hazardous materials. All relevant, up-to-date Safety Data Sheets (SDS) will be readily available for the site; and - All fuel caches, hazardous waste storage, and refueling, shall be located at a distance of at least 31 m from the ordinary high-water mark of any adjacent water body.
9	Spill Prevention and Response		- All necessary precautions will be taken to prevent and reduce spillage, misplacement or loss of fuels and other hazardous materials; - A copy of the Spill Prevention and Response Plan (summarized



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ID #	Issue/Activity	Party Responsible	Mitigation Measures
			in Section 6.1, Fuels and Hazardous Materials Spills) for fuel and hazardous materials spills will be readily available; and Spill kits will be located at each storage location where fuels and/or hazardous materials are being stored. Spill kits will have an adequate means of providing containment and recovery for the product(s) stored in that location.
10	Waste Management	Camp Operations Manager	- Wastes generated at the project site will be collected, segregated, labeled, and temporarily stored until transported for reuse, recycling or disposal so that it does not pose an environmental or health hazard; - Collected wastes will be transported to an approved waste disposal facility on a regular basis. Authorization will be required from communities in Nunavut receiving wastes from the Project; and - The Camp area will be kept clean of food scraps and garbage. - Quantity of waste disposed of on site and quantity of waste removed from site will be recorded; and - Records of waste disposal from the final disposal sites will be kept on file.
11	Noise Control	Camp Operations Manager	Exhaust equipment such as generators and ATVs will have be operating properly and only when necessary.
12	Lighting	Camp Operations Manager	Camp lighting will be limited to what is necessary for safe and efficient activities. The Camp will be operating during the

ID #	Issue/Activity	Party Responsible	Mitigation Measures
			period of June to October, when daylight is between eleven (11) to twenty (20) hours per day.
13	Fire Prevention and Suppression	Camp Operations Manager	- Smoke only in designated smoking areas. Keep designated smoking areas clean and equipped with a proper waste container and fire extinguisher. Do not dispose of cigarette butts on the ground; and - Fire extinguishers will be available at designated areas.
14	Wildlife Management	Camp Operations Manager	- Work in the area of a migratory bird nest discovery will be ceased immediately. The Wildlife Monitor will assess the nest and contact the Construction Site Manager and/or the Environmental Manager for further guidance, if necessary. A buffer of appropriate size may be required if the nest contains a live bird or viable egg (with some exceptions depending on the species of bird, as per the federal Migratory Bird Regulations, 2022 and the Nunavut Wildlife Act, 2003). Should a buffer be required, it must be maintained until fledging occurs; and - All personnel will be aware of the potential for encounters with wildlife through daily meeting updates.
15	Discovery of Historic Resources	Environmental Manager/Archologist	No activities shall be conducted in the vicinity of a 50-metre buffer zone of a known archaeological/historical site.
16	Extreme Weather	Camp Operations Manager	Weather forecasts will be regularly monitored, particularly for extreme weather events, to ensure that appropriate preventative measures are implemented; and



ID #	Issue/Activity	Party Responsible	Mitigation Measures
			Preventative measures, implemented to reduce risk of damage to infrastructure, will include site inspections to identify and secure loose items, materials and equipment that could be susceptible to wind events, and inspection and maintenance of sediment and erosion control measures prior to and following precipitation events.

4.1 Sensitive Timing Windows

Environmentally sensitive timing windows include:

- Avifauna (Breeding Migratory Birds – Nesting Zone N10) between May 15 and August 15 ([Environment and Climate Change Canada, 2018](#)); and
- Fish and Fish Habitat (Zone 1; Fall Spawning Fish): September 1 to June 30 ([Fisheries and Oceans Canada, 2013](#)). Fall spawning fish include arctic char, lake trout and whitefish (includes broad, lake and round whitefish).

Potential Environmental Concerns

Camp activities may exacerbate adverse effects on avifauna and fish and fish habitat during sensitive timing windows and are to be avoided where practicable.

Environmental Protection Procedures

Sensitive time periods will be considered during planning, where practicable. When activities are to be carried out during the sensitive timing window(s), the following additional mitigations shall be implemented, where applicable:

- Camp facilities will be planned, where possible, to avoid locations associated with avifauna use during the sensitive timing window;
- Where/if vegetation clearing is required during breeding bird season, the area will be inspected by experienced personnel (i.e., biologist, scientist, Environmental/Wildlife



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- Monitor) and a member of the Hunters and Trappers Association (HTA) to assess occupancy prior to clearing vegetation;
3. If a bird nests, eggs or birds are encountered or identified avoid further interaction or disturbance, including a 100 m buffer around nests. If active nests are discovered, such as nests with eggs or young, avoid the area until nesting is complete and the young have left the nest, or the nest has been deemed inactive by a qualified individual;
 4. Activities will be conducted such that the amount of time spent working in or around a stream of waterbody is reduced;
 5. Efforts will be made to avoid instream works between September 1 and June 30. Consultation and approval will be required from DFO prior to executing work between September 1 and June 30. If instream works occur during the sensitive timing window, efforts will be made to reduce the instream footprint and duration of instream work.
 6. Withdrawal of water for Camp use will follow DFO's interim standard water intake end-of-pipe fish screens to determine fish screen design criteria, screen installation for water in-take pipes, and the cleaning, maintenance and monitoring of fish screens.

Refer to Section 5.1, Avifauna Management, and Section 5.2, Fish and Fish Habitat, for additional details and mitigation measures that may apply.

4.2 Buffer Zones

Potential Environmental Concerns

Buffer zones are boundaries of undisturbed areas or natural vegetation maintained along waterbodies and environmentally sensitive and/or rare receptors (e.g., nesting sites, historic resources). Without adequate buffer zone allowances, waterbodies and environmentally sensitive and/or rare receptors could be adversely affected by Camp activities. Additionally, waterbodies can become laden with silt from run-off without adequate buffer zone vegetation. Buffer zone vegetation also provides cover for fish, where present, in various aquatic environments. Additionally, buffer zones help reduce sensitive disturbance to wildlife and may also provide wildlife habitat and/or travel corridors near work areas.

Environmental Protection Procedures

Sensitive areas (e.g., wetlands, roosts, etc.) will be identified before Camp construction begins and appropriate buffers will be flagged and maintained around these areas, where feasible. The intended buffer zones (provided in meters (m)) for various activities and receptors are outlined in Table 4.1.

The buffer distances in Table 4.1 are minimum setbacks. Larger buffers may be applied where site conditions, wildlife activity, nesting behaviour, terrain sensitivity, hydrological conditions, or specialist advice indicate that additional protection is warranted. Any reduction to a buffer must be documented by the Environmental Manager and supported by applicable permit conditions, specialist advice, or written regulatory direction.

Table 4.1 Recommended Minimum Buffer Zones for Camp Activities.

Activity	Environmental Receptor	Recommended Buffer Width	Reference
Hazardous Materials Storage	Normal high-water mark of any waterbody and/or environmentally sensitive areas	31 m minimum	NWB License 8WLC-INP2526. Land Use Permit N2025N0016, Conditions 7.2 and 7.8
Petroleum fuel storage containers	Normal high-water mark of any waterbody and/or environmentally sensitive areas	31 m minimum (on level terrain)	NWB License 8BC-INP2631. Land Use Permit N2025N0016, Condition 11.1
Equipment Fueling	Normal high-water mark of any waterbody	31 m minimum; designated refuelling area only	NWB License 8BC-INP2631, Land Use Permit N2025N0016, Condition 11.9 for refueling
Equipment Servicing	Normal high-water mark of any waterbody	31 m minimum	
Sumps and Waste Disposal Areas	Normal high-water mark of any waterbody	31 m minimum	NWB License 8BC-INP2631 Land Use Permit N2025N0016, Condition 5.1
Known or suspected archaeological / historical sites	Archaeological, historical, and/or paleontological resources	50 m buffer	Land Use Permit N2025N0016, Conditions 17.2 and 17.3
Active bird nests	Nest or eggs of any bird	100 m buffer, or as directed by a qualified biologist / regulator	Land Use Permit N2025N0016, Condition 8.6



Recommended minimum buffer zones for migratory birds are activity and species dependent. Any occupied nest found during Camp construction or use should be protected with a buffer zone until the young avifauna species have permanently left the vicinity of the nest. As such, a qualified biologist (or alternate, such as Environmental/Wildlife Monitor designated by the Environmental Manager) will develop buffer zones, which are determined by setback distances that vary on a case-by-case basis as recommended by ECCC's Guidelines to avoid harm to migratory birds. Key considerations when establishing buffer zones/setback distances include:

1. Degree of tolerance of the species;
2. Previous exposure of birds to disturbance;
3. Level of disturbance;
 - i. Adjustments to setback distances for activities causing greater amounts of disturbance, such as clearing and grubbing, routine approach by humans and vehicles, noise exceeding 10 decibels (dB) above ambient noise levels in the natural environment, and noise greater than approximately 50 dB.
4. Landscape context; and
5. Distance at which nesting birds react to human disturbance.

It is recommended that flagging tape or similar material not be used to mark nests to mitigate the risk of predators finding the nest. Boundaries of the buffer zone can be marked with flagging tape, if necessary.

4.3 Laydown and Storage Areas

Potential Environmental Concerns

Areas will be needed to temporarily store and maintain equipment and supplies at the Camp site. Potential environmental concerns for laydown and storage areas include erosion and run-off of sediment and other hazardous substances into nearby waterbodies or wetlands. Archaeological chance sites are also considered for the selection of laydown and storage areas.

Environmental Protection Procedures

The following procedures shall be implemented with respect to laydown and storage areas:

1. The Environmental Manager along with the archaeologist will approve new laydown areas before use.



The primary mechanism for erosion control is the avoidance of activities that may contribute to erosion. The following erosion control measures will be implemented for the Camp:

1. The disturbance of new areas will be limited to the minimum required;
2. Installation or implementation of erosion prevention and drainage control measures will be conducted prior to land disturbance;
3. If required, drainage ditches will be stabilized to reduce soil erosion. Stabilization methods may include lining with vegetation or rock, terracing, interceptor swales, or installation of rock check dams. Measures to reduce soil erosion will be properly inspected and maintained following installation;
4. All work and laydown and storage areas will be monitored for erosion and appropriate remediation action taken as necessary;
5. Erosion control measures will be inspected on a regular basis by a designated on-site Environmental/Wildlife Monitor, and after a significant storm; and
6. Erosion control measures will be kept in good working order. If a repair is necessary, it will be initiated within 24 hours.

Sediment Prevention

Sediment barriers are temporary sediment control devices, used to protect water quality of receiving environments (i.e., down gradient rivers, streams and other water bodies) from sediment in water runoff. The most common sediment barriers are silt fences, which are often used in combination with other water control measures such as sediment traps and basins. Other sediment barrier options include straw bales and berms of erosion control mix. These barrier options may have limited effectiveness in the tundra environment and may be used accordingly. Engineering requirements may vary depending on the locations of sediment barriers. Factors including drainage/surface area of exposed soils and time of year will be considered when placing sediment barriers.

The following sediment prevention measures will be implemented during construction:

1. Greywater from kitchen and washing areas will be directed to a constructed settling and filtration area designed to handle daily Camp volumes. The settling and filtration area will be at least thirty-one (31) m above the ordinary high water mark of any water body at a site where direct flow into a water body is not possible;
2. Greywater will not be discharged directly to the receiving environment;
3. If an inspection reveals that silt is entering any waterbody, further mitigative measures will be implemented, such as temporary drainage ditches, ditch blocks/check dams, siltation control (silt fencing/silt curtain/geotextile/spring berms) or sediment dam traps, to intercept run-off. The necessary or appropriate measures will be determined in the field;



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4. Withdrawal of water will follow DFO's interim standard water intake end-of-pipe fish screens to determine fish screen design criteria, screen installation for water in-take pipes, and the cleaning, maintenance and monitoring of fish screens;
5. GPS co-ordinates (in degrees, minutes and seconds of latitude and longitude) of all locations where sources of water are utilized will be recorded; and
6. Daily water withdrawal and use will be recorded using Appendix F, Water Withdrawal and Water Use Tracking. The log will identify the approved water source, coordinates, activity, start and end time, measurement method, volume withdrawn, volume reused or recycled, fish screen status, and any corrective actions. Daily totals will be reconciled against the applicable Water Licence or other authorization before additional withdrawal occurs. Water withdrawal will not proceed from an unapproved source or above the authorized limit unless written authorization has been confirmed by the Environmental Manager.

4.6 Vehicle Traffic and Site Access

Potential Environmental Concerns

Potential environmental concerns associated with vehicular traffic and site access relate to tundra disturbance, rutting or gouging, erosion and sediment release, spills, wildlife disturbance, and noise. The Camp will utilize two (2) all terrain vehicles (ATVs) to assist with camp assembly and for limited on site mobility. There are no planned roads or trails to be used outside of the Camp boundaries, and site access from camp will only be via helicopter.

Environmental Protection Procedures

The procedures outlined below shall be implemented with respect to ATV and helicopter use at the camp site. In addition to the mitigation of potential environmental concerns, environmental protection procedures will also enhance public, employee, and contractor safety.

1. ATV use is restricted to designated work areas at the camp;
2. All areas where ATVs are operating at the Camp site will be maintained in good condition and monitored for proper drainage and signs of erosion. Appropriate action (e.g., ditching, grading, managing vegetation growth) will be taken to address deficiencies, as necessary;
3. All vehicles and equipment will yield to wildlife (see procedures in Section 6.4, Wildlife Encounters) and people, where present, and speed will be reduced accordingly; and
4. Chasing and/or harassing wildlife with vehicles and equipment will not be permitted.



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6. Only personnel who are qualified and properly trained in handling fuel and hazardous materials will do so;
7. Mobile equipment will be equipped with fire and spill response materials, ensuring that there are always adequate supplies on site; and
8. Spill kits will be located at each storage location where fuels and/or hazardous materials are being stored. Spill kits will have an adequate means of providing containment and recovery for the product(s) stored in that location.

4.8 Equipment Use and Maintenance

Potential Environmental Concerns

A variety of vehicles and equipment will be employed during Camp construction and use. Potential environmental concerns associated with the operation and use of such equipment include air emissions, accidental spills and fuel leaks that could contaminate on-site waterbodies. The tundra and plant communities may also be adversely affected by the introduction of non-native and/or invasive plant species via soil and vegetative debris on equipment brought to site.

Environmental Protection Procedures

The following procedures shall be implemented with respect to equipment use and maintenance:

1. Equipment brought to site should be clean and free of soil and vegetative debris to reduce the risk of introducing or spreading non-native and/or invasive species. Equipment inspections will be conducted by the on-site Environmental Monitor or appropriate designate and, if deemed to be in appropriate condition, will be approved for use. If it is determined that equipment is not in appropriate condition, it will not be allowed on site until it has been cleaned and deemed suitable for use following reinspection;
2. Equipment maintenance and fuelling activities will be conducted at a location outside of the project area, where possible;
3. Drip pans will be placed under generators and other equipment that could leak or spill fuel or other hazardous materials;
4. Hoses and connection on equipment will be inspected routinely for leaks and drips;



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4. Collected wastes will be transported to an approved waste disposal facility. Authorization will be required from communities in Nunavut receiving wastes from the Project;
5. Burning of waste is not permitted without appropriate permits;
6. Toilet waste will be contained in latrine pits or use incineration, chemical, portable or composting toilets. Latrine pits shall be located at a distance of at least thirty-one (31) m above the ordinary high-water mark of any water body, treated with lime and covered with native material. The location of any pits will be recorded and reported in the annual report;
7. Waste collection, storage or handling will not take place within thirty-one (31) metres from the ordinary high-water mark of any water body; and
8. No onsite landfilling or burning of waste is permitted.

4.10 Noise Control

Potential Environmental Concerns

Construction and the use of the Camp will generate a variety of noises, which can cause adverse effects on wildlife distribution and abundance. The Camp is intended only for seasonal use and not year-round occupancy, limiting the noise associated with it to the months of June to October.

Environmental Protection Procedures

The following procedures shall be implemented with respect to noise control:

1. Adherence to all permits, approvals and/or authorizations;
2. Exhaust systems of equipment and generators will be inspected regularly, and mufflers will be operating properly; and
3. Equipment use will be limited to daylight hours, where possible, to minimize nighttime disturbance.

4.11 Lighting

Potential Environmental Concerns

Artificial lighting can result in light trespass and glare, affecting visual aesthetics of the area and creating a nuisance for nearby land uses. It may also cause sensory disturbance to



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wildlife, particularly avifauna. Mobile artificial lighting may be required during construction to provide a secure and safe work environment for all personnel. Fixed lighting will be required at the Camp in some locations for safety purposes. Lighting associated with the Camp is temporary in nature.

Environmental Protection Procedures

The following procedures shall be implemented with respect to Project-related lighting:

1. Camp lighting will be limited to what is necessary for safe and efficient construction activities. The Camp will be operating during the period of June to October, when daylight is between eleven (11) to twenty (20) hours per day;
2. The minimum allowable amount of lighting (e.g., minimum intensity and number of flashes per minute) will be used;
3. Strong exterior lights (e.g., sodium vapour lights) will be avoided or shielded;
4. Lighting will be located such that unavoidable light spill off the working area is not directed toward receptors outside of the immediate area, where practicable; and
5. To the extent feasible without affecting safe construction activities, lighting will be reduced and/or have limited time of operations during sensitive wildlife periods (e.g., migration).

5.0 Resource-Specific Protection Procedures

5.1 Avifauna Management

Potential Environmental Issues

Program activities can negatively impact avifauna by alteration, degradation or loss of habitat and sensory disturbances, as well as injuries and mortality from collisions with equipment and infrastructure.

Avifauna species at risk (SAR) may be particularly vulnerable to potential adverse effects. Avifauna SAR include those listed under Schedule 1 of the federal Species at Risk Act (SARA). SAR are also assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). A list of avifauna SAR that may occur in the project area and could be affected by Program activities is provided in Table 5.1. Birds of prey (i.e., hawks, owls, eagles, falcons, harriers and ospreys), their nests and eggs are protected under the Nunavut Wildlife Act (NWA).

Table 5.1 Avifauna Species at Risk and Birds of Prey with potential to occur at project.

Species	COSEWIC Status	SARA Status (Schedule 1)	NWA	Likelihood
Buff-breasted Sandpiper (<i>Tryngites subruficollis</i>)	Special Concern	Special Concern	No	Unlikely
Harlequin Duck (<i>Histrionicus histrionicus</i>)	Special Concern	Special Concern	No	Possible
Ivory Gull (<i>Tringa flavipes</i>)	Endangered	Endangered	No	Unlikely
Peregrine Falcon (<i>Falco peregrinus</i>)	Not at Risk	Not at Risk	Yes	Present
Red-Necked Phalarope (<i>Phalaropus lobatus</i>)	Special Concern	Special Concern	No	Unlikely

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Table 5.1 Avifauna Species at Risk and Birds of Prey (cont'd).

Species	COSEWIC Status	SARA Status (Schedule 1)	NWA	Likelihood
Ross's Gull (<i>Rhodostethia rosea</i>)	Endangered	Threatened	No	Unlikely
Snowy Owl (<i>Bubo scandiacus</i>)	Not at Risk	Not listed	Yes	Present
COSEWIC – Committee on the Status of Endangered Wildlife in Canada SARA – <i>Species at Risk Act</i> NWA – <i>Nunavut Wildlife Act</i>				

Environmental Protection Procedures

The Program will implement measures to reduce potential impacts to birds, including scheduling activities that could cause potential harm, implementing mitigation measures if activities are required during breeding bird season, and applying appropriate buffer/set-back distances from active nesting areas.

The following procedures shall be implemented to protect avifauna during the Program:

1. No vegetation clearing or grubbing is planned as part of the temporary camp;
2. During the breeding bird season, typically between May 15 and August 15 (Environment and Climate Change Canada, 2018), work areas will be inspected before setup to identify active nests or nesting behaviour. The breeding season dates are only meant as a guide. Active bird nests are protected regardless of calendar date. If birds are actively nesting in the vicinity of the Project after August 15, work areas will require inspection. Work areas will require 2 days of sweeps prior to the initiation of mobilization of material and personnel to site. Sweeps will cover a 100m buffer around the camp location as nests outside of the work area may have buffers that encroach upon the work area;
3. Work in the area of a migratory bird nest discovery will be ceased immediately. The Environmental/Wildlife Monitor will assess the nest and contact the Environmental Manager for further guidance, if necessary. A buffer of appropriate size may be required if the nest contains a live bird or viable egg (with some exceptions depending on the species of bird, as per the federal Migratory Bird Regulations 2022 and the *Nunavut Wildlife Act* 2003). Should a buffer be required, it must be maintained until fledging occurs or the nest is deemed inactive;

4. Active work areas will be kept free of food waste and other wildlife attractants. Vegetation will not be removed solely to discourage nesting; and
5. Discoveries of injured or dead birds on site, as well as observations of bird collisions with Project infrastructure or equipment, are to be reported to the Environmental/Wildlife Monitor, who will contact the on-call Wildlife Officer in Iqaluit at (867) 975-7780 and the Environment and Climate Change Canada – Canadian Wildlife Service (ECCC-CWS), as applicable.
 - i. Handling of bird carcasses will be conducted by qualified personnel (i.e., Environmental/Wildlife Monitor under the direction of the Wildlife Officer in Iqaluit). Precautions will be taken to avoid exposure to potential disease, including wearing gloves or using a doubled plastic bag and avoid contact with blood, body fluids and feces. You should then wash your hands thoroughly with soap and warm water or use hand sanitizer;
 - ii. Under the guidance of the Wildlife Officer in Iqaluit, bird carcasses will be disposed of or delivered to a lab for analysis as applicable; and
 - iii. If found, carcasses of SARA-listed species will be sent to the ECCC-CWS office with suitable permitting, as advised by CWS.
6. Routine avifauna observations will be recorded in the Wildlife Sightings Log and submitted daily during active field work. Active nests, injured or dead birds, bird collisions, species-at-risk observations, or behaviour indicating distress will be reported to the Environmental/Wildlife Monitor and Environmental Manager without delay; and
7. A Wildlife Incident Form (Appendix E) should be completed and submitted to NNC immediately following each incident with avifauna (e.g., encounters, nuisances, mortalities, injuries, etc.).

Active Nest Management Procedures

Nest sweeps are to be conducted for each location prior to moving onto the site and findings recorded in the nest sweep log (Appendix D). If a potential or active nest is found the following procedures will be implemented:

1. Stop all work immediately and move away from the area leaving it undisturbed, identify the bird from a distance. Note this encounter in the nest sweep log;
2. Do not disturb or destroy the nest or eggs or any bird;
3. Create a minimum buffer of 100m and contact the Environmental/Wildlife Monitor or Environmental Manager for further guidance and buffer zone requirements before



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5.3 Historic Resources

Potential Environmental Issues

Nunavut is a territory deep with tradition and history, and with the passing of time, many of these traditions have changed or disappeared (Griebel, 2014). Archaeological resources are finite resources and are of value not only to local communities, but to Nunavummiut and all Canadians. They are important sources of historical knowledge and cultural identity and must be respected and preserved.

Archaeological sites can be disturbed by any activity that causes ground disturbance and are often not readily identifiable by the untrained eye. Archaeological sites are very common throughout Nunavut, mostly consisting of stone structures that usually represent tent rings and shelters, caches, traps, hunting blinds, cairns, inukshuks, and stone tools. Archaeological sites can be directly affected by such activities as general travel or increased presence of people on the land.

Environmental Protection Procedures

Known or suspected archaeological, palaeontological, burial, or historic resources will be protected by a minimum fifty (50) m buffer unless otherwise directed by the Territorial Archaeologist, the permit holder, or applicable regulator. Work will not resume within the affected area until NNC has received appropriate direction and authorization.

The following procedures have been developed in close communication with the office of the Nunavut Territorial Archaeologist, and will be put in place to protect known archaeological sites:

1. A protective buffer of thirty (30) m may be erected only by the Archeological Permit Holder using stakes, flagging and/or brightly coloured rope around each identified site. All personnel will be instructed to avoid the demarcated area. Barriers will remain in place throughout field work activities;
2. 50 m buffers must be applied if Archeological Permit Holder has not erected the protective buffer;
3. Existing inukshuks shall not be modified or disturbed. New inukshuks or rock piles shall not be constructed since building new rock piles may clutter the archaeological record and/or result in unknowingly using rocks from existing archaeology sites;

4. Archaeological site location coordinates / maps will be held in confidence and will not be shared with anyone — other than those who require it to complete their work — and will never be put on the Internet;
5. If a suspected archaeological, paleontological, or burial site is discovered, work will immediately cease in the area, the activity will be moved away from the location, and NNC will contact the CIRNAC Engineer and the Government of Nunavut Department of Culture and Heritage before work resumes; and
6. Permission to resume land use operations in the affected area will be obtained from the Engineer before activities recommence.

5.4 Wildlife Management

Potential Environmental Issues

Potential environmental issues associated with the Program with respect to wildlife include sensory disturbance, localized habitat disturbance, attraction to food or waste, and mortality risk associated with aircraft, stationary equipment, or human-wildlife interactions. No vegetation clearing, grubbing, or access road construction is planned for the camp area, which reduces the risk of habitat loss, rutting, and wildlife-vehicle collisions.

Environmental Protection Procedures

The following procedures shall be implemented to protect wildlife during the Program:

1. The project Senior Biologist and Environmental Manager will observe changes to species' status prior to and/or during Program activities and review activities in consideration of applicable species/habitat restrictions and SAR recovery strategies;
2. The onsite Environmental/Wildlife Monitor will be trained to recognize species of conservation concern that may be present in the project area;
3. Project personnel will not hunt, fish, trap, harvest, feed, harass, touch, chase, or intentionally disturb wildlife while conducting Project work, while using Project aircraft or equipment, or while present at active Project work areas;
4. Personnel will not harass, touch, feed, entice, chase, or otherwise disturb wildlife, including by holding out or setting out food, bait, decoys, or similar devices;
5. Any harvesting activity outside Project work must comply with applicable Nunavut requirements and NNC site rules;

6. Aircraft and helicopters will not alter flight paths to approach wildlife, will avoid flying directly over animals, and will not touch down in areas where wildlife are present except in an emergency;
7. If bird nests are encountered, a precautionary one hundred (100) m buffer will be applied unless otherwise directed by a qualified biologist or regulator, and the area will be avoided until nesting is complete and young have left the nest;
8. If discovered, the presence of roosts, hibernacula or dens in the area will be reported to the onsite Environmental/Wildlife Monitor, and appropriate action or follow-up will be conducted in consultation with NNC, a qualified biologist, the on-call Wildlife Officer in Iqaluit ((867) 975-7780) and/or applicable federal/territorial regulators;
9. Wildlife interactions, near misses, observations of wildlife mortality in the Project area, and/or incidents involving Project equipment, aircraft, or personnel are to be reported to the Environmental/Wildlife Monitor, who will report to NNC, the on-call Wildlife Officer in Iqaluit ((867) 975-7780) and/or ECCC-CWS, as appropriate. Adaptive management measures will be implemented should recurring wildlife interaction locations or behaviours be identified;
10. Wildlife sightings will be recorded in the Wildlife Sightings Log once per day (can have multiple sightings/ different species per log. If no interactions are observed the log does not need to be filled out and submitted. Wildlife incidents, dangerous wildlife encounters, species-at-risk observations, den or nest discoveries, mortalities, injuries, or recurring wildlife interactions will be reported to the Environmental/Wildlife Monitor and Environmental Manager without delay; and
11. A Wildlife Incident Form (Appendix E) should be completed and submitted to NNC immediately following each wildlife incident (e.g., encounters, nuisances, mortalities, injuries, etc.).

5.4.1 Caribou Response Plan

The following caribou Trigger-Action-Response Plan will be implemented during the Program to reduce sensory disturbance, prevent displacement from preferred movement areas where practicable, and provide clear field direction when caribou are observed near work areas. Caribou may approach or move through active work areas during the Program. Field personnel will treat these events as expected field conditions and will respond using the triggers and actions below.

Caribou will not be approached, chased, herded, hazed, fed, photographed at close range, or otherwise harassed. Project personnel will allow caribou to move through or away from the



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area of their own accord. The Environmental/Wildlife Monitor has authority to recommend work modification, work pause, aircraft delay, or relocation of personnel or equipment where caribou behaviour indicates potential disturbance or where caribou may be blocked from moving through the area.

Trigger Level	Field Trigger	Required Action
Level 1 – Caribou observed in the broader area	One or more caribou observed within 500 m of the Project area but not moving toward an active work area, camp, fuel storage area, laydown area, water withdrawal area, or helicopter landing area.	Continue work with heightened awareness. Notify the Environmental/Wildlife Monitor. Avoid unnecessary noise, movement, and aircraft activity near the observed animal(s).
Level 2 – Caribou approaching work area	Caribou observed within 100 m moving toward an active work area, helicopter landing area, water withdrawal area, fuel storage area, laydown area, or other active Program area.	The Field Supervisor will notify the work crew and Environmental/Wildlife Monitor. Non-essential movement, loud activity, and equipment start-up will be reduced where safe to do so. Personnel will remain together, avoid approaching the animal(s), and maintain a clear movement path for caribou. Helicopter landings, take-offs, slinging, and low-level movements in the immediate area will be delayed where safe and practicable. Environmental Monitor will maintain visual contact with the caribou. If caribou start to exhibit signs of disturbance (e.g., changes in body posture, interrupted foraging), the Environmental Monitor will move to the Level 3 response pattern.

Trigger Level	Field Trigger	Required Action
Level 3 – Caribou within or immediately adjacent to active work area	Caribou enter an active work area (within 50 m of drill) or are close enough that the work activity is influencing movement patterns, causing stress behaviors, or create a safety concern (for caribou or humans).	Environmental Monitor with the direction of NNC will pause active drilling, water withdrawal, slinging, refuelling, and other non-essential field activities in the immediate area where safe to do so. Personnel will remain calm and stationary or move slowly away if directed by the Field Supervisor or Environmental/Wildlife Monitor. Do not attempt to move the animal(s). Maintain an open travel corridor.
Level 4 – Sensitive caribou situation	Cow-calf group, injured or distressed caribou, repeated approach to camp or work areas, caribou showing stress behaviour, caribou unable to move freely because of personnel/equipment, or any caribou injury or mortality.	Environmental Monitor with direction from NNC will stop or modify work in the immediate area. Notify the NNC, Environmental Manager, Engineering Manager, Camp Operations Manager, Senior Biologist and Environmental/Wildlife Monitor. Do not approach the animal(s), except where required by trained and authorized personnel for human safety. Consult the Government of Nunavut Wildlife Officer or other applicable regulator, as required.

Daily tailgate meetings will include a review of recent caribou observations, anticipated work locations, helicopter movements, and any areas where caribou movement may overlap with planned activities. Where caribou are observed repeatedly in or near a work area, the Field Supervisor and Environmental/Wildlife Monitor will consider additional mitigation, which may include delaying work, adjusting work sequencing, relocating temporary activities where feasible, reducing aircraft movements, increasing monitoring frequency, or establishing a temporary avoidance area.

All caribou observations will be reported to the Environmental/Wildlife Monitor and documented in the Wildlife Sightings Log. Wildlife incidents, close interactions, work

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stoppages, behavioural concerns, injury, mortality, or regulator-notifiable events will be documented using the Wildlife Incident Form and reported to NNC without delay.

6.0 Contingency and Monitoring

6.1 Fuels and Hazardous Materials Spills

Potential Environmental Concerns

Fuel and hazardous materials can damage or harm vegetation, soil, surface water, groundwater, wildlife, aquatic species and habitat, historic resources, and human health and safety.

Environmental Protection and Response Procedures

NNC has implemented a SPRP under a separate cover that outlines the procedures to be followed in the event of a fuel or hazardous materials spill. Spill response procedures are outlined below.

1. In the event of a spill, the person discovering the spill will stop work, warn nearby personnel, assess immediate safety hazards, shut down ignition sources where safe, stop the source where safe, prevent the spill from reaching water or sensitive areas, and notify the Field Supervisor and Environmental Manager without delay.
 - i. The hazard to persons in the area shall be assessed and injured or contaminated persons shall be assisted if safe to do so.
2. When the spill is discovered, the individual shall find and identify the spill substance and its source;
3. The individual shall make reasonable attempts to immediately stop the leakage and contain the flow, if safe to do so;
4. Information about the status of the situation should be gathered and reported to the Engineering Manager and Environmental Manager so they may take appropriate action;
5. NNC will report without delay all reportable spills on land, and any spill to a waterbody regardless of size, to the NT-NU 24-Hour Spill Report Line (1-867-920-8130) using the NT-NU Spill Report Form, and to the Inspector On-Call at (867) 975-4284. Refer to Appendix C for the NT-NU Spill Report Form and immediately reportable quantities.
 - i. Name, employer, location and contact number of reporter;
 - ii. Location of spill or leak;
 - iii. Time of spill or leak;
 - iv. Type of product spilled;
 - v. Quantity of spilled substance;
 - vi. Source and cause of spill or leak;



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- vii. Responsible party and phone number;
 - viii. Hazards to persons, property or environment; and
 - ix. Factors affecting spill recovery, and if assistance is required.
6. All personnel working onsite will receive onsite training for spill prevention, response, clean up and disposal measures. Spill response measures are to be implemented without undue delay;
 7. Coordinating a clean-up and adapting response procedures to changing conditions and circumstances will be the responsibility of the Engineering Manager in collaboration with the Environmental Manager, as required;
 8. The SPRP includes a complete list of spill response equipment and locations of spill kits. The spill response equipment inventory will be reviewed and restocked following spill response efforts;
 9. Recovered product, contaminated absorbents, contaminated soil or snow, oily rags, damaged containers, and other spill response materials will be contained, labelled, stored securely, and transported to an approved facility in accordance with the Spill Prevention and Response Plan and Waste Management procedures; and
 10. The following criteria will be applied to all spill response scenarios:
 - i. Minimize dangers to all persons (including the general public);
 - ii. Protect water supplies;
 - iii. Minimize pollution of water supplies;
 - iv. Minimize area affected by spill; and
 - v. Minimize the degree of disturbance to the environment.

6.2 Extreme Weather

Potential Environmental Concerns

Extreme weather events, specifically severe storms, can bring heavy precipitation (rain/early snow) and strong winds. Severe storms during winter months can bring heavy precipitation in the form of snow, ice and freezing rain, while severe summer storms bring heavy rain. Other forms of severe weather include extreme temperature, thunder, and lightning.

Extreme weather events can create unsafe working conditions, causing delays in planned activities and transport of resources (i.e., materials, supplies and workers), and can also affect the environment. Extreme precipitation, as well as associated surface water runoff from snowmelt, rainfall and freezing rain events, may cause flooding, erosion, or localized sediment movement around temporary work areas. These events could cause erosion and



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6.3 Wildlife Encounters

Potential Environmental Concerns

The primary environmental concern associated with wildlife (including avifauna) encounters is the potential risk of stress or injury to both wildlife and site personnel. Control measures and environmental protection procedures will be implemented to mitigate this potential risk.

Environmental Protection and Response Procedures

The following procedures shall be implemented with respect to wildlife encounters:

1. The Camp area will be kept clean of food scraps and garbage;
2. Waste generated at the site will be collected for disposal in appropriate containers and transferred to an approved location on a regular basis;
3. Wildlife deterrence or active wildlife management will be conducted only by trained and authorized personnel, such as the Wildlife Monitor, and only where required for safety or as directed by applicable wildlife response procedures. No attempt will be made by any individual at the Camp, except for the Wildlife Monitor, to chase, catch, divert, follow, or otherwise harass wildlife by vehicle or on foot;
4. All personnel will be aware of the potential for encounters with wildlife, such as polar bears, caribou, and foxes. Wildlife sightings will be reported to Wildlife Monitor, who will assess actions for follow-up, if required. A Wildlife Sightings Log (Appendix D) should be completed and submitted to the Environmental Manager immediately following each wildlife sighting;
5. Observations of wildlife mortalities will be reported to the Environmental Manager;
6. A Wildlife Incident Form (Appendix E) should be completed and submitted to NNC immediately following each wildlife incident (e.g., encounters, nuisances, mortalities, injuries, etc.); and
7. Instances of nuisance wildlife in the project area should be handled on a case-by-case basis, in consultation with NNC, the Environmental Manager, the Wildlife Monitor, the on-call Wildlife Officer in Iqaluit and regulatory agencies, as required.

6.4 Discovery of Historic Resources

Potential Environmental Concerns

Historic resources are defined as, but not limited to, archaeological and historical sites, burial grounds, palaeontological sites, historic buildings, and cairns that may be discovered, disturbed or improperly removed during Project related activities. These features represent a valuable cultural resource, and disturbance could result in loss or damage to these resources and the information represented by them.

If a suspected archaeological object, fossil, cairn, burial feature, historic resource, or other cultural resource is identified, work will stop immediately within fifty (50) m of the find. The find will not be touched, moved, collected, covered, flagged directly, or otherwise disturbed unless directed by Campfire Archaeology, the Territorial Archaeologist, the RCMP, or another appropriate authority. The area will be protected from further disturbance, and NNC, Campfire Archaeology, the Environmental Manager, and the Engineering Manager will be notified without delay.

Environmental Protection and Response Procedures

The following procedures shall be implemented in the event of the discovery of historic resources:

1. All personnel will be informed of their responsibility to report any unusual findings, and to leave such findings undisturbed;
2. If the presence of historic resources is known, Camp boundaries may be moved to ensure resources are protected;
3. If an archeological object or fossil is encountered, all work in the area of the find will be stopped immediately. The archeological object/fossil shall not be touched or removed from the location where it was found; and
4. The find should be reported immediately to NNC, who will contact the **Territorial Archaeologist, GN Department of Culture and Heritage, at (867) 934-2040** as soon as possible. Reporting information will include:
 - i. Name and contact information of the person who made the discovery;
 - ii. Date of the discovery;
 - iii. Nature of the archeological object or fossil;
 - iv. A description of the site and any artifacts/fossils noted;
 - v. Photographs of the artifact/fossil and/or site;
 - vi. GPS coordinates of the location, if possible; and
 - vii. Any other relevant information.

5. The find area will be cordoned off for the duration of the Camp or until the find is deemed not significant by the Territorial Archaeologist. Under no circumstances will work be carried out at the location of the find, nor will anyone remove material unless authorized by the Territorial Archaeologist via an Archaeology and Palaeontology permit.
6. In the event of the discovery of suspected human remains or a burial site, the following procedures will apply:
 - i. Work in the immediate area will be suspended; the Environmental Manager will be notified immediately;
 - ii. If remains are discovered during heavy equipment operations, the equipment will not be moved by the operator as physical evidence may be destroyed;
 - iii. The site, including heavy equipment, if necessary, will be secured by the operator with flagging tape or some other appropriate means. The suspected remains will be covered with a tarp;
 - iv. NNC will contact the **Royal Canadian Mounted Police (RCMP) detachment in Iqaluit at (867) 979-0123**; and
 - v. If the RCMP determines that the remains are associated with a historical burial, NNC will contact the Territorial Archaeologist to obtain guidance on further actions.

6.5 Abandonment and Restoration Plan

Prior to the commencement of Camp activities, NNC has prepared an Abandonment and Restoration Plan (ARP). The ARP was submitted and approved by the Nunavut Water Board as a supplementary document to the Type B Water Licence (8BC-INP2631).

The ARP has been developed to describe the procedures and commitments that will be implemented to decommission and restores all disturbed areas associated with the camp following seasonal closure and final closure of the Project.



7.0 Contact List

A comprehensive contact list for the Investigative Studies and Camp operations, including site personnel, regulatory authorities, and emergency numbers, is provided in Table 7.1.

Table 7.1 Contact List.

Organization	Contact	Location	Telephone / Email
Camp Personnel			
NNC	Heather Shilton, Director	Iqaluit	(867) 979-8400
Polar Outfitting	Alex Flaherty, Field Camp Operations	Iqaluit	(867) 975-1600
Tetra Tech	Jason Gaul, Senior Project Engineer	Calgary, AB	(403) 508-1560
Dillon Consulting Limited	Michelle Roche, Project Manager	St. John's, NL	(709) 764-6863
SEM Ltd.	Shelly Brown, Project Coordinator	St. John's, NL	(709) 754-0499
Ecologic Consultants Ltd.	Natasha Bush, Project Coordinator	Lillooet, BC	(604) 803-7146
Campfire Archaeology Heritage and Culture Ltd.	Kaylee Baxter, Director	Vancouver, BC	(604) 414-6320
Emergency Numbers			
RCMP		Iqaluit, NU	(867) 979-1111 (Emergencies) (867) 979-0123 (Detachment)
Fire Emergency		Iqaluit, NU	(867) 979-4422
Qikiqtani General Hospital	Open 24 hours	Iqaluit, NU	(867) 975-8600
Keewanti Air LP	Baffin Region Medevac	Iqaluit/Rankin Inlet/Churchill	(800) 913-4268 (204) 784-6569
NT-NU Spill Centre	24-Hour Spill Report Line	Yellowknife, NT	(867) 920-8130
CIRNAC	Inspector On-Call	Iqaluit, NU	(867) 975-4284
	Joseph Monteith, Water Resource Officer	Iqaluit, NU	(867) 975-1787
Canadian Coast Guard – Arctic Region	Marine Pollution Emergencies Environmental Response Duty Officer	Yellowknife, NT	(867) 979-5269
Department of Fisheries and Oceans (DFO)	Incident Notification	Ottawa, ON	DFO.ARCENTriage-TriageGEARC.MPO@dfo-mpo.gc.ca
Regulatory Authorities			
NWB	Executive Director	Gjoa Haven, NU	(867) 360-6338
GN Department of Environment	Wildlife Officer	Iqaluit, NU	(867) 975-7780



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GN Department of Environment	Jon Neely, Acting Director Wildlife Operations	Iqaluit, NU	(867) 975-7700
GN Department of Sustainable Development	Environmental Protection Service	Iqaluit, NU	(867) 975-5900
GN Department of Culture and Heritage	Sylvie Leblanc, Territorial Archaeologist	Igloolik, NU	(867) 934-2040

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9.0 Signature Page

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By signing below, the worker confirms that they have received environmental orientation for the 2026 Temporary Camp Facility, have reviewed the applicable requirements of this EPP, understand the reporting procedures for spills, wildlife incidents, historic resource discoveries, water withdrawal, waste management, and environmental non-conformances, and understand their authority to pause work where environmental or permit compliance concerns are observed.

Iqaluit Nukkiqsautiit Project, Investigative Studies

Temporary Camp Facility Environmental Protection Plan

Printed Name | Employer | Role

Signature | Orientation Date

Trainer / NNC Representative | Employer

Trainer Signature | Date



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APPENDIX A

CAMP EPP DISTRIBUTION LIST



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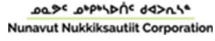
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CAMP EPP DISTRIBUTION LIST

Organization	Contact	Phone Number	Email
NPC	Manager Planning and Implementation	(867) 979-3444	gdjalogue@nunavut.ca
NIRB	Manager Impact Assessment	(866) 233-3033	info@nirb.ca / kmorrison@nirb.ca
NWB	Licensing Administrator	(877) 521-3745 / (867) 360-6338	licensing@nwb-oen.ca / robert.hunter@nwb-oen.ca
CIRNAC	Inspector, Water Resource Officer	(867) 975-1787 / (867) 975-4284	Joseph.monteith@rcaanccirnac.gc.ca
NNC	Director	(867)-979-8400	nnc@qcorp.ca
Tetra Tech	Engineering Manager	(403) 508-1560	jason.gaul@tetrattech.com
Polar Outfitting	Camp Operations Manager	(867) 975-1600	
SEM Ltd.	Environmental Scientist	(709) 754-0499	shelly.brown@sem ltd.ca
Dillon Consulting Limited	Environmental Manager	(709) 754-2374	mroche@dillon.ca
Ecologic Consultants Ltd.	Environmental Field Support	(604) 803-7146	natasha.bush@ecologicconsultants.ca
CampFire	Archaeologist	(604) 414-6320	kayleebaxter@campfire.ca
Drilling Contract Company	TBD	TBD	TBD



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APPENDIX B

ENVIRONMENTAL SITE INSPECTION CHECKLIST



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ENVIRONMENTAL SITE INSPECTION CHECKLIST

Activity:		Inspection Time:			
Location:		Inspection Date:			
Weather:					
INSPECTOR DETAILS					
Name:					
Company:					
Phone Number:					
INSPECTION DETAILS					
NC	Item	Yes	No*	N/A	Remarks (i.e., location, good practices, problems/issues/risks observed, possible cause(s) and/or proposed corrective actions)
1.0	Water Management				
1.1	Is greywater (e.g., from kitchen) contained at least 31 m away from any waterbody?				
1.2	Is the greywater settling basin and sand filtration zones (x2) functioning as designed?				
1.3	Are erosion control structures working as intended?				
1.4	Do laydown and storage areas show any signs of pooled or ponding water? Is runoff being directed away from nearby water bodies?				
1.5	Are undisturbed vegetative buffers being maintained between all camp facilities and natural waterbodies?				



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NC	Item	Yes	No*	N/A	Remarks (i.e., location, good practices, problems/issues/risks observed, possible cause(s) and/or proposed corrective actions)
1.6	Do waterbodies adjacent to camp activities appear free from sediment/silt or other visual indicators of contamination?				
1.7	Are there any temporary crossing of streams (i.e., fording) taking place?				
1.8	Are appropriate buffers being maintained for fueling activities and maintenance? (31 m)				
1.9	Has any evidence of a spill been observed in any waterbodies (e.g., oily sheen, notable hydrocarbon odour)?				
1.11	Others (please specify)				
2.0	Air Quality/Dust Management				
2.1	Is dust visible leaving the project area?				
2.2	Is equipment well maintained (e.g., no black smoke coming from exhaust)?				
2.3	Others (please specify)				



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3.0	Waste Management				
3.1	Is the construction area clean and tidy (i.e., litter free, good housekeeping)?				
3.2	Are separated labelled containers / areas provided for recycling or waste segregation?				
3.3	Are drip trays free of oil and water?				
3.4	Are hazardous wastes (e.g., used oil) being stored properly offsite?				
3.5	Others (please specify)				
4.0	Noise Control				
4.1	Is idle equipment turned off or throttled down?				
4.2	Are noisy camp activities carried out during normal working hours?				
4.3	Others (please specify)				
5.0	Protection of Flora and Fauna				
5.1	Is the area free of wildlife (or signs of wildlife)?				
5.2	Have any active nests been identified with the appropriate buffer until fledging (i.e., young leave the nest) occurs?				



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5.3	Is the area free of invasive plant species?				
5.4	Has the protection of fish and fish habitat been considered prior to instream work?				
5.5	Others (please specify)				
6.0	Emergency Preparedness and Response				
6.1	Are all vehicles and equipment equipped with spill kits? Are the spill kits fully stocked?				
6.2	Any evidence of staining or leaks onsite?				
6.3	Others (please specify)				
7.0	Compliance Monitoring				
7.1	Are conditions of environmental approvals being met?				
7.2	Have all non-conformities from the previous inspection been actioned and resolved?				
7.3	Have any complaints been received from concerned citizens? Have they been addressed?				
7.4	Was there a Turbidity Exceedance Event today?				
7.5	Others (please specify)				



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*Any “No” recorded represents potential non-compliance or improvement needed. Details of non-conformity (NC) shall be recorded in the **Remarks** section.

Any non-conformities (NC) shall be reported immediately to the Construction Site Manager and recorded on the following page. Each NC should refer to the checklist as coded. Responsible personnel shall identify the root cause of the NC and adopt appropriate corrective actions (CA) for mitigation within an agreed timeframe. The effectiveness of implemented CA(s) shall be verified by the Environmental/Wildlife Monitor in collaboration with the Construction Site Manager (CSM), Construction Project Manager (CPM) and/or the Environmental Manager.

Site Inspector: _____

Date: _____

CSM/CPM: _____
(CA Implementor)

Date: _____

Environmental Manager: _____

Date: _____

ENVIRONMENTAL NON-CONFORMITY ROOT CAUSE ANALYSIS AND CORRECTIVE ACTIONS

NC Reference (#)	
Description of NC	
Root Cause of NC	
Corrective Actions Recommended	



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Environmental Protection Plan
Temporary Camp Facility**

Version: 1.1

Date: July 2026

Target Completion Date	
Persons Contacted (if applicable)	
Follow-Up Actions Recommended	
Closeout Date	
VERIFICATION	
Name:	Date:



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Environmental Protection Plan
Temporary Camp Facility

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APPENDIX C

NT-NU SPILL REPORT FORM & SPILL QUANTITIES



Nunavut Nukkiqsautiit Corporation

**Iqaluit Nukkiqsautiit Project:
Environmental Protection Plan
Temporary Camp Facility**

Version: 1.0

Date: July 2026

TDG Class	Substance for NT-NU 24 Hour Spill Line	Immediately Reportable Quantities
1 2.3 2.4 6.2 7 None	Explosives Compressed gas (toxic) Compressed gas (corrosive) Infectious substances Radioactive Unknown substance	Any Amount
2.1 2.2	Compressed gas (flammable) Compressed gas (non-corrosive, non-flammable)	Any amount of gas from containers with a capacity greater than 100 L
3.1/3.2/3.3	Flammable liquids	> 100 L
4.1 4.2 4.3	Flammable solids Spontaneously combustible solids Water reactant	> 25 L
5.1 9.1	Oxidizing substances Miscellaneous products or substances excluding PCB mixtures	> 50 L or 50 kg
5.2 9.2	Organic peroxides Environmentally hazardous	> 1 L or 1 kg
6.1 8 9.3	Poisonous substances Corrosive substances Dangerous wastes	> 5 L or 5 kg
9.1	PCB mixtures of 5 or more parts per million	> 0.5 L or 0.5 kg
None	Other contaminants (e.g., crude oil, drilling fluid, produced water, waste or spent chemicals, used or waste oil, vehicle fluids, wastewater, etc.)	> 100 L or 100 kg
None	Sour natural gas (i.e., contains hydrogen sulfide, H ₂ S) Sweet natural gas	Uncontrolled release or sustained flow of 10 minutes or more



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Additionally, all released harmful substances, regardless of quantity, are to be reported to the NT-NU 24-Hour Spill Line if the release is near or into a waterbody, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable.



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Canada

NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE

TEL: (867) 920-8130

FAX: (867) 873-6924

EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

A	REPORT DATE: MONTH - DAY - YEAR		REPORT TIME		☐ ORIGINAL SPILL REPORT, OR ☐ UPDATE # _____ TO THE ORIGINAL SPILL REPORT	REPORT NUMBER _____
	OCCURRENCE DATE: MONTH - DAY - YEAR		OCCURRENCE TIME			
C	LAND USE PERMIT NUMBER (IF APPLICABLE)			WATER LICENCE NUMBER (IF APPLICABLE)		
D	GEOGRAPHIC PLACE NAME OR DISTANCE AND DIRECTION FROM NAMED LOCATION				REGION ☐ NWT ☐ NUNAVUT ☐ ADJACENT JURISDICTION OR OCEAN	
E	LATITUDE DEGREES _____ MINUTES _____ SECONDS _____		LONGITUDE DEGREES _____ MINUTES _____ SECONDS _____			
F	RESPONSIBLE PARTY OR VESSEL NAME		RESPONSIBLE PARTY ADDRESS OR OFFICE LOCATION			
G	ANY CONTRACTOR INVOLVED		CONTRACTOR ADDRESS OR OFFICE LOCATION			
H	PRODUCT SPILLED		QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES		U.N. NUMBER	
	SECOND PRODUCT SPILLED (IF APPLICABLE)		QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES		U.N. NUMBER	
I	SPILL SOURCE		SPILL CAUSE		AREA OF CONTAMINATION IN SQUARE METRES	
J	FACTORS AFFECTING SPILL OR RECOVERY		DESCRIBE ANY ASSISTANCE REQUIRED		HAZARDS TO PERSONS, PROPERTY OR ENVIRONMENT	
K	ADDITIONAL INFORMATION, COMMENTS, ACTIONS PROPOSED OR TAKEN TO CONTAIN, RECOVER OR DISPOSE OF SPILLED PRODUCT AND CONTAMINATED MATERIALS					
L	REPORTED TO SPILL LINE BY	POSITION	EMPLOYER	LOCATION CALLING FROM	TELEPHONE	
M	ANY ALTERNATE CONTACT	POSITION	EMPLOYER	ALTERNATE CONTACT LOCATION	ALTERNATE TELEPHONE	
REPORT LINE USE ONLY						
N	RECEIVED AT SPILL LINE BY	POSITION STATION OPERATOR	EMPLOYER	LOCATION CALLED YELLOWKNIFE, NT	REPORT LINE NUMBER (867) 920-8130	
LEAD AGENCY ☐ EC ☐ CCG ☐ GNWT ☐ GN ☐ LA ☐ INAC ☐ NEB ☐ TC			SIGNIFICANCE ☐ MINOR ☐ MAJOR ☐ UNKNOWN		FILE STATUS ☐ OPEN ☐ CLOSED	
AGENCY		CONTACT NAME	CONTACT TIME	REMARKS		
LEAD AGENCY						
FIRST SUPPORT AGENCY						
SECOND SUPPORT AGENCY						
THIRD SUPPORT AGENCY						



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APPENDIX D

WILDLIFE SIGHTINGS LOG



Nunavut Nukkiqsautiit Corporation

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Environmental Protection Plan
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Version: 1.0

Date: July 2026

WILDLIFE SIGHTINGS LOG

ANIMAL SPECIES:

NUMBER SEEN:

(exact or estimated)

LOCATION:

(If possible, provide GPS coordinates or mark on map)

DATE AND TIME:

BEHAVIOR WHEN OBSERVED:

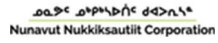
(e.g., what was it doing when you saw it)

OTHER COMMENTS/INTERESTING MARKINGS:

(e.g., anything interesting about the sighting – feeding, signs of injury, etc.)

OBSERVED BY (NAME/COMPANY/PHONE NUMBER):

Please submit sighting log to the Environmental/Wildlife Monitor.



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APPENDIX E

WILDLIFE INCIDENT FORM



Nunavut Nukkiqsautiit Corporation

Iqaluit Nukkiqsautiit Project:
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Version: 1.0

Date: July 2026

WILDLIFE INCIDENT FORM

Occurrence Date/Time:		Date Reported:	
MAIN CONTACT INFORMATION			
Name:			
Company:			
Phone Number:			
INCIDENT DETAILS			
Location of incident (provide GPS coordinates or mark on map, if possible)			
Type of Incident ☐ Encounter ☐ Nuisance ☐ Wildlife Mortality ☐ Wildlife Injured ☐ Defensive ☐ Other:		Species ☐ Polar Bear ☐ Bird ☐ Bat ☐ Fox ☐ Reindeer ☐ Other:	
		Sex ☐ Female ☐ Male ☐ Unknown	
		Age Class ☐ Adult ☐ Juvenile ☐ Cub ☐ Unknown	
Details of Incident (movement, behaviour, reason for attraction, property damage, etc.)			
Details of Action Taken (reporting, deterrence type, disposal, removal of attractant, etc.)			



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APPENDIX F

WATER WITHDRAWAL TRACKING FORM

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G.1 Purpose

This appendix establishes the water withdrawal and water use tracking requirements for the Temporary Camp.

Where the EPP, Water Licence, or other authorization identifies different water limits, the field team will apply the most restrictive currently authorized limit unless NNC's Environmental Manager confirms in writing that a revised authorization is in effect.

G.2 Responsibilities

Role	Water Tracking Responsibility
Environmental Manager	Confirm applicable water authorization, approved sources, daily limits, reporting requirements, and corrective actions.
Field Supervisor / Contractor	Measure and record daily withdrawal, water use by activity, reuse/recycling, and residuals management.
Environmental/Wildlife Monitor	Inspect water withdrawal points, fish screens, access conditions, sediment release risk, and buffer compliance.
NNC	Retain water records for compliance reporting and annual reporting.

G.3 Water Tracking Requirements

Water will be withdrawn only from sources approved in the applicable Water Licence or written authorization.

Water withdrawal will not exceed the approved daily Program limit or any source-specific limit.

For streams, withdrawal will not exceed ten percent (10%) of low flow unless otherwise authorized.

All water source coordinates will be recorded in degrees, minutes, and seconds using NAD 83.

Water intakes used in fish-bearing or potentially fish-bearing waterbodies will be fitted with an appropriate fish screen before pumping begins.

Daily water volumes will be measured using a flow meter where practicable. If a flow meter is not available, the alternate measurement method and assumptions will be recorded.

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Reused or recycled water will be tracked separately to avoid double-counting water withdrawn from the environment.

Water-related non-conformances, including exceedances, unapproved source use, missing fish screen, sediment release, or incomplete records, will be reported to the Environmental Manager and tracked to closure.



Date: July 2026

Date	Source ID	Raw Water Withdrawn (m³)	Reused / Recycled Water (m³)	Use Category	Residuals Destination	Contained / No Release?	Notes



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Table G-4: Water Intake and Fish Screen Inspection Log

Date / Time	Source ID	Screen Type / Mesh	Installed Before Pumping?	Clean / Undamaged?	Cleaned During Use?	Water / Sediment Conditions	Corrective Action / Initials

Table G-5: Daily Water Use Reconciliation

Date	Total Raw Water Withdrawn (m³)	Total Reused / Recycled (m³)	Total Program Water Use (m³)	Approved Daily Limit (m³/day)	% of Limit Used	Exceedance?	Corrective Action / Comments

Table G-6: Water-Related Non-Conformance and Corrective Action Log

NC ID	Date	Non-Conformance / Trigger	Location / Source	Notification	Immediate Control	Corrective Action	Responsible Person	Closed? / Notes

G.5 Daily Review and Reporting

The Field Supervisor or Contractor will submit completed daily water logs to the Environmental Manager or designate at the end of each workday.

The Environmental/Wildlife Monitor will review water source, fish screen, access, buffer, and sediment observations during routine site inspections.

The Environmental Manager will review daily totals against the authorized limit and identify corrective actions before water withdrawal resumes the next day.

Water withdrawal records, source coordinates, fish screen inspection records, water-related non-conformances, and corrective action records will be retained for the annual report and permit compliance file.

The end-of-season summary will include total volume withdrawn by source, maximum daily withdrawal, total water reused or recycled, water used by activity, incidents or exceedances, and recommended changes for the following field season.



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Iqaluit Nukkiksautiit Project:
Spill Prevention & Response Plan

Version: 2.0

Date: June 2026

Iqaluit Nukkiksautiit Project - Investigative Studies Program

Spill Prevention & Response Plan

Prepared for:

Nunavut Water Board
PO Box 119
Gjoa Haven, NU Z0B 1J0

Prepared by:

Nunavut Nukkiksautiit Corporation
5300 Qulliq Court, 1st Floor
Iqaluit, NU X0A 2H0



Nunavut Nukkiqsautiit Corporation

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Plan Maintenance and Control

Nunavut Nukkiqsautiit Corporation (NNC) is responsible for the distribution, maintenance and updating of the Spill Prevention & Response Plan (SPRP). The SPRP will be reviewed and revised, as required:

- As needed, but annually at minimum, accounting for changes in laws, regulations, environmental factors, Government of Nunavut (GN) and NNC policies, and any other applicable site-specific changes; and/or
- Following a major spill incident.

Minor changes (e.g., phone numbers, names of individuals, etc.) that do not affect the purpose of the SPRP are to be made on a regular basis. Plan updates will be issued as per the SPRP distribution list. The SPRP plan holder is responsible for adding new and/or removing obsolete pages upon receipt of updates. Additional copies of the SPRP can be obtained from NNC. Contact information is provided in Section 1.2.

Spill Contingency Plan Document History

Version #	Section(s) Revised	Prepared By	Approved By	Date Issued
1	--	S. Brown	H. Shilton	Jul 18, 2025
2	1.7, 4.0, 6.2.1	S. Brown		Jun 2026

Index of Major Changes/Modifications in Latest Revision

Item #	Description of Change	Relevant Section
1	Added the buffer for fuel, hazardous materials, refueling, waste storage, and waste handling activities will be located at least 31 m from the ordinary high-water Mark of any water body.	1.7
2	Added description of spill kit locations for camp operations (including a map), and drilling program.	5.2.1
3	Revised the reporting procedures to include the online Spill Report Webform.	4.2
4	Removed	Appendix C
5	Addressing NIRB approval conditions: • Added Section 4.0 Fuel Management Plan	4.0



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Acronyms & Abbreviations

ATV	All-Terrain Vehicle
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
cm	centimeter
ft	feet
GN	Government of Nunavut
GNWT	Government of Northwest Territories
in	inch
kg	kilogram
kWh	kilowatt-hour
L	liter
m	meter
NIRB	Nunavut Impact Review Board
NNC	Nunavut Nukkiksautiit Corporation
NT	Northwest Territories
NU	Nunavut
NWB	Nunavut Water Board
RCMP	Royal Canadian Mounted Police
SDS	Safety Data Sheet
SPRP	Spill Prevention & Response Plan
TDG	Transportation of Dangerous Goods
WHMIS	Workplace Hazardous Materials Information System
MW	megawatt



1.0 Introduction

This Spill Prevention & Response Plan (SPRP or the Plan) has been developed for use by Nunavut Nukkiksautiit Corporation (NNC) for the Investigative Studies Program of the Iqaluit Nukkiksautiit Project (the Project). This investigative program will gain an understanding of the key ecosystem components within the study area to assess the feasibility of the Project. Environmental studies will cover the terrestrial wildlife, avian, vegetation, aquatic, and archaeological components of the study area. NNC expects to hire several Nunavummiut (preferably Inuit) to assist with these studies. It is expected that the studies will consist of the following:

- Soil and vegetation surveys
- Bird and terrestrial mammal (caribou) wildlife programs
- Water and sediment quality studies
- Fish, fish movement, and fish habitat studies
- Archaeological surveying program

To support the Investigative Studies Program, A temporary base camp will be established near the head of the proposed reservoir lake. It will be an 18-person camp, housing 6-10 people at a time. It will be active from August to mid-October of 2025.

Components of this camp will include:

- Bathroom, sleeping, kitchen, and storage tents
- Collection of surface water for domestic/camp purposes
- Emergency supplies (e.g., first aid kit, firearm)
- Fuel caches

The SPRP demonstrates that NNC has appropriate response capabilities and measures in place to effectively address potential spills at the Project site.

1.1 Purpose and Scope

The purpose of the SPRP is to provide guidance to Project personnel in the event of an accidental release of fuel or other waste during the Project. The Plan outlines protocols for personnel to follow in response to a spill of any size. As such, all persons involved with the Project should be familiar with the Plan, as well as their responsibilities and steps to take in the event of a spill, prior to engaging in Project work. To be effective, the Plan should not be reviewed for the first time during an emergency.



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The SPRP has been developed for the Project in accordance with the Guidelines for Spill Contingency Planning and Reporting Regulations for Nunavut issued under the Northwest Territories (NT) *Environmental Protection Act* as well as Guidelines for Spill Contingency Planning prepared by the Water Resources Division of Indian and Northern Affairs Canada (now Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC); 2007). This plan is effective for the investigative studies or until the temporary camp is closed. The SPRP will be reviewed on an annual basis and updated and distributed as needed. A copy of the SPRP will be maintained in NNC's office in Iqaluit and on the camp site.

1.2 Company Information

NNC is responsible for activities associated with the Project, including implementation and management of the SPRP. Contact information for NNC is provided below.

Nunavut Nukkiqsautiit Corporation

Contact: Heather Shilton, Director, NNC

Mailing Address: PO Box 1228
Iqaluit, Nunavut
X0A 0H0

Physical Address: Igluvut Building, 2nd floor
922 Niaqungusiaruaq Road
Iqaluit, Nunavut

Telephone: (867) 979-8400

Fax: (867) 979-8433

Email: nnc@qcorp.ca

1.3 SPRP Distribution List

The SPRP and most recent revisions will be distributed to those listed in Table 1.1. Copies will also be provided to local emergency services, including the Qikiqtani General Hospital, Royal Canadian Mounted Police (RCMP) and Fire Emergency Services. Emergency contact information is provided in Appendix A.



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Date: June 2026

Table 1.1 SPRP Distribution List.

Government of Nunavut (GN) Department of Environment – Environmental Protection Division PO Box 1000 Station 200 Iqaluit, NU X0A 0H0 Tel: (877) 212-6438 / (867) 975-6000 Fax: (867) 975-6099	Nunavut Impact Review Board (NIRB) 29 Mitik Street, PO Box 1360 Cambridge Bay, NU X0B 0C0 Tel: (866) 233-3033 Fax: (867) 983-2594
Nunavut Water Board (NWB) PO Box 119 Gjoa Haven, NU X0B 1J0 Tel: (877) 521-3745 / (867) 360-6338 Fax: (867) 360-6369	Town of Iqaluit PO Box 460 Iqaluit, NU X0A 0H0 Tel: (867) 979-5600 Fax: (867) 979-0228
CIRNAC Impact Assessment Manager PO Box 2200 Iqaluit, NU X0A 0H0 Tel: (867) 975-4549 Felexce.Ngwa@rcaanc-cirnac.gc.ca	CIRNAC Water Resources Division Manager PO Box 2200 Iqaluit, NU X0A 0H0 Tel: (867) 975-4550 Andrew.Keim@rcaanc-cirnac.gc.ca
Environment and Climate Change Canada Environmental and Protection Branch – Prairie and Northern Region Stephinie Mallon, Acting Senior Environmental Assessment Officer Tel: (587) 401-0553 stephinie.mallon@ec.gc.ca	Fisheries and Oceans Canada, Arctic Region 18-4 Sivulliq Avenue, Inukshuk Building PO Box 888 Tel: (867) 645-4621 Fax: (867) 645-4629
Iqaluit Airport Darrin Nichol, Director, Nunavut Airports	Qikiqtani Inuit Association PO Box 1340 Iqaluit, NU, X0A 0H0 Tel: (800) 667-2743 / (867) 975-8400 Fax: (867) 979-3238

1.4 Project Description

The Project represents the beginnings of a broader transition to cleaner energy and a lower carbon future for Northern and remote communities across Canada. The NNC has contracted a team of consultants including Dillon Consulting Limited (Dillon), EcoLogic Consultants Ltd.



(EcoLogic), Sikumiut Environmental Management Limited (SEM), and Kinickinick Heritage Consulting (Archaeologist) whose combined expertise in environment, regulation, and community engagement will support the NNC in delivering this Project, beginning with environmental baseline studies in the Kuugaluk South study area. Year 1 investigative studies are expected to commence in August and conclude in September of 2025.

This investigative program will gain an understanding of the key ecosystem components within the study area to assess the feasibility of the Project. Environmental studies will cover the terrestrial wildlife, avian, vegetation, aquatic, and archaeological components of the study area. NNC expects to hire several Nunavummiut (preferably Inuit) to assist with these studies. It is expected that the studies will consist of the following:

- Soil and vegetation surveys
- Bird and terrestrial mammal (caribou) wildlife programs
- Water and sediment quality studies
- Fish, fish movement, and fish habitat studies
- Archaeological surveying program

To support the Investigative Studies Program, A temporary base camp will be established near the head of the proposed reservoir lake. It will be an 18-person camp, housing 6-10 people at a time. It will be active from August to mid-October of 2025.

Components of this camp will include:

- Bathroom, sleeping, kitchen, and storage tents
- Collection of surface water for domestic/camp purposes
- Emergency supplies (e.g., first aid kit, firearm)
- Fuel caches

1.5 Site Description

The Project is located at an unnamed lake approximately 60 km northeast of Iqaluit, as well as areas between the unnamed lake and the transmission line. The project is located in a remote area on the Hall Peninsula of Baffin Island in the Qikiqtaaluk Region of Nunavut Territory in Canada. A map of the Project area, including key features, is provided in Figure 1.1.





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2.0 Roles and Responsibilities

NNC is responsible for activities associated with the Project, including implementation and management of the SPRP. Role-specific responsibilities are outlined in the subsequent sections. A list of emergency contacts is provided in Appendix A.

2.1 Staff, Contractors, Suppliers and Visitors

All personnel conducting activities in the Project area, including staff, contractors, suppliers and visitors, are required to implement the SPRP as it pertains to their activities in the Project area. Specific responsibilities include:

- Taking necessary precautions to minimize chances of spills when working with materials that may pose a risk to worker health and/or the environment;
- Cooperating with managers, supervisors and/or NNC to implement a spill prevention program;
- Performing those duties and tasks you are experienced with and trained to perform;
- Asking questions when there is uncertainty, and bringing concerns to the attention of your supervisor and/or manager when working with materials that pose potential environmental and health risks;
- Responding to spills that you are responsible for or discover, and for which you have the appropriate training and equipment; and
- Reporting all spills, regardless of size, to your supervisor, manager, or NNC in a timely manner.

2.2 Managers and Supervisors

Managers and supervisors are responsible for ensuring that staff, contractors, suppliers and visitors have been properly trained in NNC spill response expectations and procedures. Additional responsibilities include:

- Maintaining a non-punitive environment during spill response and related follow-up actions;
- Ensuring that all departments and staff are provided with site- and material-specific training;
- Maintaining an appropriate and sufficient spill response supply inventory for the hazard characteristics and quantities of materials within the Project area;



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- Assisting chemical spill response efforts including the coordination of additional response personnel or equipment; and
- Ensuring records regarding inspections, personnel training, emergency equipment testing and spill kit maintenance are kept up to date.



3.0 Response Organization

NNC is responsible for preparing and implementing the SPRP for the duration of Project activities. When a spill is identified, the NNC representative will be contacted as soon as possible. Contact information for NNC is provided in Section 1.1. The flowchart in Figure 3.1 outlines response organization and the chain of command to follow during spill response. Details of each step are provided in Section 4.1. Guideline levels in Figure 3.1 refer to those listed for immediately reportable spills in Appendix B. An immediately reportable spill is defined as release of a substance that is likely to be an imminent environmental or human health hazard or meets or exceeds quantities outlined in Appendix B.

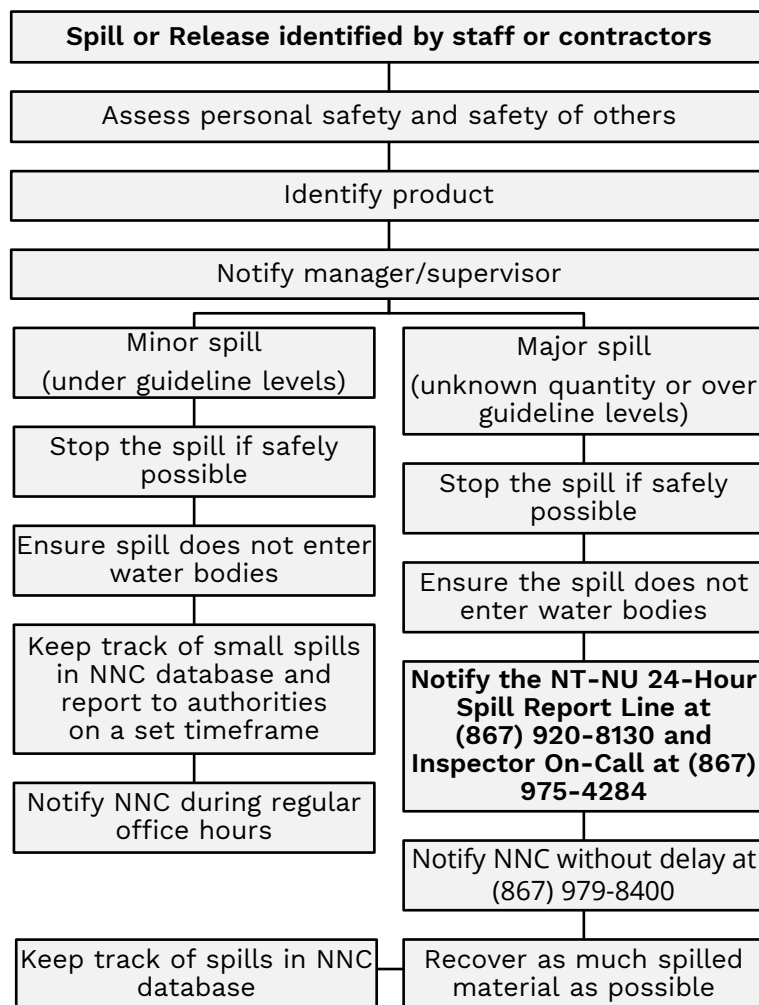


Figure 3.1 Spill Response Organization Communication Flowchart.



4.0 Fuel Management Plan

Fuel and other hazardous materials will be used throughout the life of the Project for equipment and camp operations. The volume of fuel and hazardous materials will be kept to the minimum amount required to run the Project. To prevent spills or releases of fuel and hazardous materials, the following environmental protection measures will be implemented:

1. The *Workplace Hazardous Materials Information System (WHMIS) Regulations* under the federal *Occupational Health and Safety Act* will apply to all handling and storage of hazardous materials, including petroleum products.
2. All relevant, up-to-date Safety Data Sheets (SDS) will be readily available for the site.
3. All fuel caches, hazardous waste storage, and refueling, shall be located at a distance of at least 31 m from the ordinary high-water mark of any adjacent water body.
4. Re-fuelling will be done at least 31 m from a wetland or waterbody in designated areas.
5. Servicing of mobile equipment is not anticipated to be required during the Project. However, should minor service repairs be required, they will occur in a designated area, more than 31 m from a wetland, watercourse, or drainage ditch. Secondary containment (i.e., drip pans, etc.) will be utilized to prevent any material from entering the environment.
6. Only personnel who are qualified and properly trained in handling fuel and hazardous materials will do so.
7. Mobile equipment will be equipped with fire and spill response materials, ensuring that there are always adequate supplies on site (refer to Section 6.2.1 and 6.2.2 for additional information).
8. Spill kits will be located at each storage location where fuels and/or hazardous materials are being stored. Spill kits will have an adequate means of providing containment and recovery for the product(s) stored in that location (refer to Section 6.2.1 and 6.2.2 for additional information).
9. All material associated with fuel and other hazardous materials (e.g., fuel caches, drums, barrels, etc.) will be removed from the site and disposed of properly at the end of the Project.
10. A copy of this SPRP will be readily available to personnel onsite.



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The following procedure will be followed to report a spill:

1. Fill out the NT-NU Spill Report Form via the online Spill Report Webform: https://www.gov.nt.ca/spills/en/node/add/public_spill_report or by calling the **NWT-NU 24-Hour Spill Report Line** at **(867) 920-8130** and contact the **Inspector On-Call** at **(867) 975-4284**.
 - a. As per the regulations, spill reporting cannot be delayed because you do not have all of the required information.
2. For each spill occurrence, submit to the Inspector, no later than thirty (30) days after initially reporting the event, a detailed report that will include the amount and type of spilled product, the GPS location of the spill, and the measures taken to contain and clean up the spill site.

Members of the public who may be affected by the incident, regardless of if the spill is reportable or not, should also be notified. The general policy on public relations is provided in Section 7.0.

Any unauthorized discharge(s), along with a summary of follow up actions, will be submitted to the NIRB as part of the Annual Report required by March 31st each year.

5.3 Procedures for Spill Containment and Control

5.3.1 Spills on Land

1. Once a spill has been identified, all ignition sources should be turned off (e.g., no smoking, shut off engines).
2. The spilled material (e.g., diesel, gasoline, hydraulic fluid, etc.) should be identified, if possible.
3. Access to the affected area should be secured to ensure it is safe for entry and does not threaten health and safety of spill responders. Public access to the area should be restricted.
 - a. The source of the spill should be identified to determine where it is coming from, if possible. Determine if the spill is still occurring or if it has stopped. If the spill has not stopped, determine if it is safe to stop, control or contain the spill (e.g., plug hole, close valve, upright container).



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4. In the event of large spills that cannot be controlled with spill response materials on hand, contact the NNC site representative to report the spill immediately and request assistance (contact information is provided in Section 1.2). Materials on hand should be used to attempt to control the spill.
5. In the event of a small spill (i.e., controllable), implement control measures to prevent the spill from spreading further or entering waterways. If fluid is flowing:
 - a. A trench/ditch should be constructed to intercept or contain the fluid, where feasible, or a berm/barrier should be constructed down slope from the spill, ensuring that contaminant flow is directed towards the berm;
 - b. Plastic tarps and absorbent sheeting can be used at the foot of the berm to facilitate contaminant collection and removal;
 - c. Contained contaminant can be removed by mechanical means (i.e., shovels, pumps) as well as with sorbent materials; and
 - d. If contaminant has entered a waterway, procedures in Section 4.3.2 should be followed to contain and clean up the contaminant in water.
6. Once the spill has been controlled and further spreading prevented, the NNC site representative should be contacted to report the spill (see Section 1.2 for contact information). The NNC site representative is responsible to report the spill to the 24-Hour Emergency Spill Report Line and the Inspector On-Call.
7. If possible, with spill response materials on hand, the remaining spilled contaminant should be cleaned up and contaminated materials (including rock, vegetation, and soil) should be stored in a sealed and labelled container for proper disposal. The affected area should not be flushed with water.

5.3.2 Spills to Water

1. Once a spill has been identified, all ignition sources should be turned off (e.g., no smoking, shut off engines).
2. The spilled material (e.g., diesel, gasoline, hydraulic fluid, etc.) should be identified, if possible.
3. Access to the affected area should be secured to ensure it is safe for entry and does not threaten health and safety of spill responders. Public access to the area should be restricted.
4. The source of the spill should be identified to determine where it is coming from, if possible. Determine if the spill is still occurring or if it has stopped. If the spill has not stopped, determine if it is safe to stop, control or contain the spill (e.g., plug hole, close valve, upright container).



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- a. If fluid is not flowing, or if the spill is not liquid, contaminated snow should be shoveled or scraped and deposited into an appropriate container (e.g., empty drum); and
 - b. If fluid is flowing, a snow/soil dyke should be constructed down slope from the spill, ensuring that contaminant flow is directed towards the dyke. Sorbent materials can be used to further contain the spill.
7. Once the spill has been controlled and further spreading prevented, the NNC site representative should be contacted to report the spill (see Section 1.2 for contact information). The NNC site representative is responsible to report the spill to the 24-Hour Emergency Spill Report Line and the Inspector On-Call.
8. If possible, with spill response materials on hand, the remaining spilled contaminant should be cleaned up and contaminated materials should be stored in a secure container for proper disposal.

5.4 Procedures for Managing Spill Related Wastes

In the majority of cases, spill clean-ups are initiated at the far end of the spill and contained moving toward the center of the spill. For small spills, sorbent socks and pads are typically used for clean up. A pump with attached fuel transfer hose can be used to suction spills from leaking containers or large accumulations on land or ice, and direct larger quantities into empty drums. Hand tools (e.g., shovels, rakes, etc.) and heavy equipment can also be used if deemed necessary, and given space and time constraints.

Used sorbent materials should be placed in plastic bags and sealed for future disposal. Tools and equipment used for clean-up activities will be properly washed and decontaminated, or replaced if this is not possible. For most of the procedures outlined in Section 4.3, spilled contaminant and containment materials will be placed in empty drums and sealed for proper disposal at an approved disposal facility.



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6.0 Spill Response Resource Inventory

6.1 Personnel

All personnel working in the Project area will be trained on-site in spill prevention, response, clean up and disposal measures (see Section 7.0).

6.2 Spill Kits

6.2.1 Spill Kit Locations

Spill kits will be clearly marked and stored in on-site equipment (i.e., mobile equipment will store their own spill kits). The size of spill kits for each piece of equipment will be selected based on the capacity of the fuel drum to ensure containment is possible in the event of a worst-case scenario spill (i.e., fuel drum empties). Where fuel, hydraulic fluid and oil/grease, or other hazardous materials are stored in the Project area, spill kits will be clearly marked and strategically located adjacent to these storage areas.

Spill kit locations will be established and identified relative to fuel storage areas, hazardous materials storage areas, refueling location, camp infrastructure, and drill sites to ensure that spill response materials are readily accessible throughout the Project area. Spill kits will be maintained at all active drill areas and within camp facilities where fuels or hazardous materials are handled or stored.



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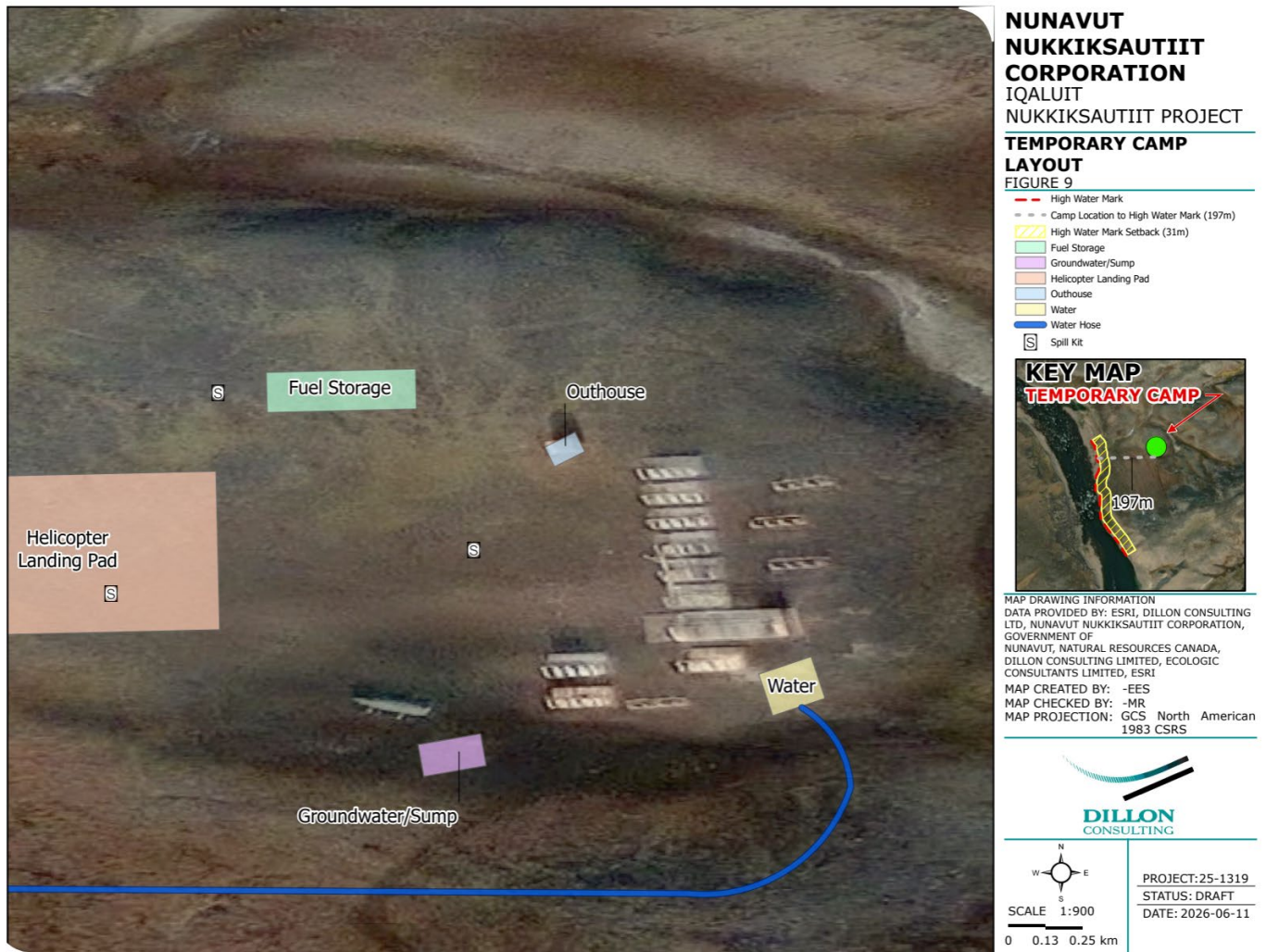


Figure 1.2 Camp Layout Map with Spill kit Locations

At each drill site, a dedicated spill kit will accompany the active drill and associated support equipment throughout the duration of drilling activities. As only one drill will be operating at any given site at a time, spill response materials will be maintained in close proximity to the drill and readily accessible to personnel in the event of a release. Upon completion of drilling activities at a location, the spill kit will be relocated with the drill to the next drill site, ensuring that appropriate spill response capability is continuously available at the active work area. This approach provides immediate access to spill response equipment and minimizes the potential for environmental impacts associated with fuel or hydraulic fluid releases.



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6.2.2 Spill Kit Contents

NNC is responsible for supplying the spill kits used during the Project. Each spill kit will be inspected on a regular basis to ensure it meets the recommended minimum requirements for contents, as follows:

- One (1) spill kit container (overpack drum, steel salvage drum, or spill kit locker);
- Ten (10) disposable large 5 mil polyethylene bags with ties (dimensions 65 cm x 100 cm);
- Four (4) sorbent booms (12.5 cm x 3 m / 5 in x 10 ft);
- 10 kg bag of sorbent particulate;
- 100 sheets (1 bail) or 50 cm x 50 cm sorbent sheets for both universal and oil only;
- Two (2) large plastic tarps (5 m x 5 m);
- One (1) roll duct tape;
- One (1) utility knife;
- One (1) field notebook and pencil;
- One (1) rake;
- One (1) pickaxe;
- Three (3) aluminum (spark proof) shovels;
- Four (4) flame-retardant Tyvek splash suits;
- Four (4) pairs chemical resistant gloves; and
- One (1) instruction binder (including SPRP, Safety Data Sheets (SDS) and Spill Reporting Form).

Each spill kit only has enough suits and gloves for four people responding to a spill. Should there be a need for additional manpower to help with spill response, ten (10) additional flame-retardant Tyvek splash suits and ten (10) additional chemical resistant gloves will be kept in inventory at the project site.

Additionally, the following equipment will be available for spill response within the Project area: one loader; two excavators; one pickup truck; one side by side ATV; and a tool kit (containing hack saw, hammer, screwdrivers, etc.).



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7.0 Training

NNC is responsible for providing spill response training to those conducting work in the Project area (i.e., staff, contractors, visitors, managers, supervisors). All individuals are required to have environmental awareness and site safety training, as well as certifications in Emergency First Aid and Workplace Hazardous Materials Information System (WHMIS) before commencing work within the Project area. Those involved with handling and shipping hazardous materials will be provided with Transportation of Dangerous Goods (TDG) training and will maintain a valid TDG certificate.

A spill prevention and response training session will be held for all individuals prior to the start of Project activities. Follow-up sessions will be held for new and current employees on a suitably recurring schedule, allowing new employees to become familiar with spill prevention and response measures and serving as a refresher for current employees. Each training session will review the SPRP and include information on:

- Individuals' roles and responsibilities regarding spill prevention, detection, response and clean up;
- Location(s) of hard copies of the SPRP, maps and spill kits;
- Available spill response equipment;
- Contents of spill kits;
- Initial actions and spill reporting procedures; and
- Spill response procedures, including clean-up and disposal actions.

Training exercises will be held to allow individuals to develop practical spill response skills, follow spill response procedures, and acquaint themselves with spill response equipment. Training exercises will also teach individuals how to properly use a spill kit. Training exercises may be held during the training session for all individuals or at another time, depending on individuals' involvement with handling hazardous materials or operating equipment containing hazardous materials.



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8.0 Media and Public Enquiries

All enquiries will be directed to the NNC representative.

Environmental incidents such as spills often attract local interest and media attention. Employees will not make statements on behalf of NNC to the media or to the public, regardless of the level of involvement of the employee(s).

Employees will respond to any request from local authorities or emergency personnel that will help control the spill and its damage. All other requests for information will be referred to the main representatives. This may include, but is not limited to, questions from reporters, environmental agencies, or people and property owners affected by the spill.

It is important that responses to probing questions are polite and professional. The following example prompt can be used when fielding probing questions:

“I’m sorry; I don’t have the authority to answer that question. Please contact _____. Their phone number is _____.”

It is important that employees avoid guessing or making promises that are out of their control, as this can cause future problems. No speculation should be made regarding the party at fault, the cause of the spill, spill volume, when clean up will be completed, or any other issue.

Details from NT-NU Spill Response Forms are publicly available for viewing via the online spills database compiled by the Government of Northwest Territories (GNWT) Department of Environment and Natural Resources at <https://www.enr.gov.nt.ca/en/spills>.



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EMERGENCY CONTACTS



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Organization	Contact	Location	Telephone
NNC	Heather Shilton, Director	Iqaluit	(867) 979-8400
NT-NU Spill Centre	24-Hour Spill Report Line	Yellowknife	(867) 920-8130
CIRNAC	Inspector On-Call	Iqaluit	(867) 975-4284
	Joseph Monteith, Water Resource Officer	Iqaluit	(867) 975-1787
Canadian Coast Guard – Arctic Region	Marine Pollution Emergencies Environmental Response Duty Officer	Yellowknife	(867) 979-5269
NWB	Executive Director	Gjoa Haven	(867) 360-6338
GN Department of Environment		Iqaluit	(867) 975-7700
GN Department of Sustainable Development	Environmental Protection Service	Iqaluit	(867) 975-5900
Qikiqtani General Hospital		Iqaluit	(867) 975-2476
Keewanti Air LP	Baffin Region Medevac	Iqaluit/Rankin Inlet/Churchill	(800) 913-4268 (204) 784-6569
RCMP		Iqaluit	(867) 979-1111
Fire Emergency		Iqaluit	(867) 979-4422



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APPENDIX B

IMMEDIATELY REPORTABLE SPILLS



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TDG Class	Substance for NT-NU 24 Hour Spill Line	Immediately Reportable Quantities
1 2.3 2.4 6.2 7 None	Explosives Compressed gas (toxic) Compressed gas (corrosive) Infectious substances Radioactive Unknown substance	Any Amount
2.1 2.2	Compressed gas (flammable) Compressed gas (non-corrosive, non-flammable)	Any amount of gas from containers with a capacity greater than 100 L
3.1/3.2/3.3	Flammable liquids	> 100 L
4.1 4.2 4.3	Flammable solids Spontaneously combustible solids Water reactant	> 25 L
5.1 9.1	Oxidizing substances Miscellaneous products or substances excluding PCB mixtures	> 50 L or 50 kg
5.2 9.2	Organic peroxides Environmentally hazardous	> 1 L or 1 kg
6.1 8 9.3	Poisonous substances Corrosive substances Dangerous wastes	> 5 L or 5 kg
9.1	PCB mixtures of 5 or more parts per million	> 0.5 L or 0.5 kg
None	Other contaminants (e.g., crude oil, drilling fluid, produced water, waste or spent chemicals, used or waste oil, vehicle fluids, wastewater, etc.)	> 100 L or 100 kg
None	Sour natural gas (i.e., contains hydrogen sulfide, H ₂ S) Sweet natural gas	Uncontrolled release or sustained flow of 10 minutes or more

Additionally, all released harmful substances, regardless of quantity, are to be reported to the NT-NU 24-Hour Spill Line and the Inspector On-Call **if the release is near or into a waterbody**, is near or into a designated sensitive environment or sensitive wildlife habitat, poses imminent threat to human health or safety, poses imminent threat to a listed species at risk or its critical habitat, or is uncontrollable.



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APPENDIX C

NT-NU SPILL REPORT FORM

[LINK](#)

NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND
OTHER HAZARDOUS MATERIALS



Canada



Inuvialuit Land Administration



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

NT-NU 24-HOUR
SPILL REPORT LINE

Tel: (867) 920-8130

Email: spills@gov.nt.ca

A	Report Date: MM DD YY	Report Time:	☐ Original Spill Report OR ☐ Update # _____ to the Original Spill Report		Report Number:
B	Occurrence Date: MM DD YY	Occurrence Time:			
C	Land Use Permit Number (if applicable):	Water Licence Number (if applicable):			
D	Geographic Place Name or Distance and Direction from the Named Location:			Region: ☐ NT ☐ Nunavut ☐ Trans-boundary or Ocean	
E	Latitude: _____ Degrees _____ Minutes _____ Seconds		Longitude: _____ Degrees _____ Minutes _____ Seconds		
F	Responsible Party or Vessel Name:		Responsible Party Address or Office Location:		
G	Any Contractor Involved:		Contractor Address or Office Location:		
H	Product Spilled: ☐ Potential Spill	Quantity in Litres, Kilograms or Cubic Metres:		U.N. Number:	
I	Spill Source:	Spill Cause:		Area of Contamination in Square Metres:	
J	Factors Affecting Spill or Recovery:	Describe Any Assistance Required:		Hazards to Persons, Property or Environment:	
K	Summary of the spill incident and efforts / description of the incident:				
L	Reported to Spill Line by:	Position:	Employer:	Location Calling From:	Telephone:
M	Any Alternate Contact:	Position:	Employer:	Alternate Contact Location:	Alternate Telephone:

REPORT LINE USE ONLY

N	Received at Spill Line by:	Position:	Employer:	Location Called:	Report Line Number:
Lead Agency: ☐ ECCC ☐ CCG/TCMSS ☐ GNWT ☐ GN ☐ ILA ☐ CIRNAC ☐ CER ☐ Other: _____				File Status: ☐ Open ☐ Closed	
Agency:		Contact Name:	Contact Time:	Remarks:	
Lead Agency:					
First Support Agency:					
Second Support Agency:					
Third Support Agency:					



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Investigative Studies for the Iqaluit Nukkiqsautiit Project

Abandonment & Restoration Plan

Prepared for:

Nunavut Water Board
PO Box 119
Gjoa Haven, NU Z0B 1J0

Prepared by:

Nunavut Nukkiqsautiit Corporation
5300 Qulliq Court, 1st Floor
Iqaluit, NU X0A 2H0



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Plan Maintenance and Control

Nunavut Nukkiqsautiit Corporation (NNC) is responsible for the distribution, maintenance and updating of the Abandonment and Restoration Plan (ARP). The ARP will be reviewed and revised, as required:

- As needed, but annually at minimum, accounting for changes in laws, regulations, environmental factors, Government of Nunavut (GN) and NNC policies, and any other applicable site-specific changes; and/or
- Following any Project changes.

Minor changes (e.g., phone numbers, names of individuals, etc.) that do not affect the purpose of the ARP are to be made on a regular basis. Plan updates will be issued as per the ARP distribution list. The ARP plan holder is responsible for adding new and/or removing obsolete pages upon receipt of updates.

Abandonment & Restoration Plan Document History

Version #	Section(s) Revised	Prepared By	Approved By	Date Issued
1	--	S. Brown	J. Byrne	April 2025
2	3.1.9, 3.2, and Appendix A	S. Brown		

Index of Major Changes/Modifications in Latest Revision

Item #	Description of Change	Relevant Section
1	Included that progressive and final reclamation and closure activities will be submitted with annual reports	3.1.9
2	Included a sentence that final restoration work will be completed prior to expiry of the NWB Water Licence No: 8BC-INP2631.	3.2
3	Replaced Temporary Camp Layout with an updated image.	Appendix A



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APPENDIX A Temporary Campsite Layout



the overall footprint of field activities. Upon completion of the investigative studies, the temporary camp and all associated infrastructure will be decommissioned and removed in accordance with the commitments outlined in this Abandonment and Restoration Plan.

The results of the investigative studies will contribute to the overall understanding of environmental and geotechnical conditions within the Project area and will inform the design, assessment, and regulatory review of the INP.

2.1 Location and Access

The temporary field camp is located within the Kuugaaluk South study area, near the head of an unnamed lake.

Table 1 Coordinates of Temporary Camp and Support Facilities

Label	X	Y	Coordinates
Helicopter Landing Pad	068° 01' 9.62" W	64° 11' 32.66" N	64° 11' 32.66" N, 068° 01' 9.62" W
Fuel Storage Cache	068° 01' 7.38" W	64° 11' 33.68" N	64° 11' 33.68" N, 068° 01' 7.38" W
Water Intake	068° 01' 4.53" W	64° 11' 31.72" N	64° 11' 31.72" N, 068° 01' 4.53" W
Camp Location	068° 01' 6.96" W	64° 11' 32.76" N	64° 11' 32.76" N, 068° 01' 6.96" W

A map of the area, based on imagery from the 2025 study year, is located in Appendix A.

2.2 Camp Description

To support the continued investigative field programs, NNC will re-establish a 30-person temporary base camp near the head of the unnamed lake. It will be active beginning in June 2026 to mid-October 2026 and June 2027 to mid-October 2027. All materials required for the camp set-up will be slung in by helicopter. Table 2 to Table 4 lists the planned infrastructure and equipment for the site, and the fuel storage capacity.



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Table 2 Camp Infrastructure

Quantity	Description
7	Single occupancy accommodation tents
8	Double occupancy accommodation tents
1	Large tent to house kitchen and dining
4	Shower and sanitation facilities
1	Storage tent
1	Drill equipment room
1	Mini lab
1	Core logging and storage facility
1	Chiller facility (to chill brine and cores)

Table 3 List of Support Equipment

Type and Number	Size	Proposed Use
2 x Honda water pump	3hp	Water use
2 x Honda water pump	4hp	Water use
2 x Yamaha generator (gas)	6000isd	Heat and light for the camp facility
1x Champs generator (diesel)	30kw	Heat and light for the camp facility
1 x Honda generator (gas)	1000w	Heat and light for the camp facility
1 x Honda ATV (gas)	350cc	Camp assembly assistance, limited on site mobility
1 x CanAm ATV (gas)	1000cc	Camp assembly assistance, limited on site mobility
1 x Suzuki outboard motor (gas)	4hp	Boat motor for aquatic field work
8 x Solar panels	100W	To supplement the use of diesel and gas generators providing power to the camp facility
4 x Batteries	120Amp	To supplement the use of diesel and gas generators providing power to the camp facility
16 x Inverters	1000W	To supplement the use of diesel and gas generators providing power to the camp facility
Canoe (1 unit)	22 ft	Aquatic assessments



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Type and Number	Size	Proposed Use
Helicopter (1 unit)	Not specified	Transport personnel and equipment
Outboard motor (1 unit)	Suzuki 4hp (Gas)	Boat motor for aquatic field work
GPS units	Not specified	Terrestrial, Avian, Archaeological surveying
Trail cameras	Motion-activated	Assess caribou and other terrestrial wildlife presence and movement
Digital cameras	Not specified	Wildlife, habitat, archaeological surveying
Water quality meters, sampling kits, nets	Not specified	Aquatic surveys
Binoculars	Not specified	Avian surveys
Firearms (Rifle/Shotgun)	Not specified	Bear deterrence and safety (handled by trained personnel)
Radios/Phones/Starlink	Satellite phones, VHF handheld radios, Starlink system	Emergency communications, project coordination
Cordless drills (4 units)	Milwaukee	Camp construction and operation
Hand tools (e.g., trowels, flagging tape)	Not specified	Archaeological surveys
Spill Kits, First Aid Kits, Fire Extinguishers	Not specified	Containment and response for emergencies
1 x Chiller (Camp Site)	72x44x42'	Chill brine and cores
1 x Drill (Rig Site)	12x4x28'	Drilling
2 x Chiller (Rig Site)	72x44x42'	Chill brine and cores
2 x Mixing Tank (Rig Site)	7.5x3.3x3.3'	Mixing bentonite and chilled brine
2 x Generator (Rig Site)	26x18x22'	Power for core shacks

Table 4 Fuel Storage Capacity

Type	Max Quantity	Description
Diesel	3 x 205 L drums	A cache of diesel for site equipment
Gasoline	3 x 205 L drums	A cache of gasoline for site equipment
Propane	2 x 100 lbs. tank	A cache of propane for heating and cooking purposes
Diesel	6 x 205 L drums	A separate cache of diesel for the drills
Aviation Fuel	21 x 205 L drums	A cache of jet fuel for helicopter. Weekly supply on hand



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3.0 Abandonment and Restoration Approach

The following subsections outline the procedures that will be implemented to decommission Project components and restore all disturbed areas following seasonal closure, and final closure of the investigative studies. All restoration activities will be completed at the end of the Project, ensuring that the site is returned to a stable condition with no long-term environmental impacts, including those related to water quality and waste.

3.1 Seasonal Closure

Following the investigative studies, seasonal closure typically occurs between November to May. Typical activities associated with season closure are provided below.

3.1.1 Progressive Reclamation

Where feasible, progressive reclamation will be undertaken throughout the field program to minimize the overall disturbance footprint. This may include the removal of waste materials, dismantling of unused equipment, and stabilization of disturbed areas as work is completed. Progressive reclamation will reduce the scope of end-of-season closure activities and support timely restoration of the site.

3.1.2 Buildings and Content

All infrastructure not required for approved reuse in a subsequent field season will be dismantled and removed from the site at the end of the field season. All contents, including furnishings, equipment, and supplies, will be inventoried and removed. Inert materials such as tent frames and platforms, metal anchors, and ropes may remain on site for reuse in subsequent field seasons. These materials will be securely stored and maintained in a manner that prevents environmental impact or site disturbance. No materials will be left on site unless otherwise approved. The camp area will be inspected following removal to ensure no debris or materials remain.

3.1.3 Electrical System

All electrical systems, including generators, fuel-powered units, temporary wiring, lighting, and associated equipment, will be disconnected, dismantled, and removed from the site. Any



generator pads or temporary supports will also be removed. Areas disturbed by electrical installations will be recontoured as required to match surrounding conditions.

3.1.4 Water System

All water management infrastructure will be decommissioned and removed at the end of the field season.

Greywater generated from camp activities (e.g., washing and cooking) will be directed to designated greywater sumps located at appropriate setbacks from water bodies during operations. At closure, greywater sumps will be inspected to confirm no standing water or contamination remains and will be backfilled with native materials and contoured to blend with surrounding terrain.

Blackwater (sewage) will be managed using portable systems (e.g., sealed containers) and will be removed from site for disposal at an approved facility in Iqaluit. No sewage will be disposed of on-site. Any temporary storage areas will be cleaned and inspected to confirm no residual contamination.

3.1.5 Waste Management

All solid and hazardous waste generated during the program will be collected, segregated, and stored in appropriate containers during operations. At the end of the field season, all waste will be removed from the site and transported to approved disposal or recycling facilities in Iqaluit.

Waste streams will include domestic waste, construction debris, and hazardous materials such as used oil, fuel containers, and batteries. A final inspection will be conducted to confirm that all waste has been removed.

An authorization from Iqaluit receiving wastes from the Project will be obtained and provided to the regulator prior to any backhauling and disposal of wastes. Hazardous material will be disposed of at licensed facilities in accordance with the Cross-Border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations. The Project will maintain records of all waste backhauled to confirm proper disposal.



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3.1.6 Fuel and Hazardous Materials

All fuel and hazardous materials, including petroleum products, lubricants, and chemicals, will be removed from the site at the end of the field season. Fuel storage areas will be inspected for evidence of spills or staining.

In the event that contamination is identified, impacted soils will be excavated and removed for appropriate disposal as determined in the Spill Prevention and Response Plan (NNC, 2025). Spill response materials will be used as necessary to address any residual impacts. All secondary containment systems will be dismantled and removed.

3.1.7 Drilling Areas Restoration

All drill sites will be decommissioned upon completion of drilling activities. Each site will be inspected for soil contamination. Any contaminated soil will be collected as outlined in the NNC Spill Prevention and Response Plan (NNC, 2025) and removed from site for proper disposal. Drill holes will be properly abandoned by cutting off drill collars as close to the ground surface as possible, and capped. Drill casings will be removed within two (2) years after drilling.

Drill pads, sumps, and any associated materials will be removed. Disturbed areas will be recontoured to match surrounding terrain and inspected to ensure stability and absence of debris or contamination. It is currently planned to leave behind bedrock cores during seasonal closure. Drill cores will be stored at least thirty-one (31) m above the ordinary high water mark of any water body.

Any drill holes with artesian flow encountered will be immediately sealed and permanently capped to prevent induced contamination of groundwater or salinization of surface waters.

3.1.8 Site Restoration

Following the removal of all Project components, the site will be restored to a condition consistent with the surrounding environment. All equipment, materials, fuels, and wastes will be removed from the site, and the area will be inspected to identify any remaining debris or evidence of contamination. Any disturbed ground will be recontoured to approximate natural grade and stabilized as needed to prevent erosion or sediment transport. Where required, appropriate erosion control measures will be implemented. Restoration efforts will aim to



return the site to pre-disturbance conditions in accordance with applicable land use agreements, with natural regeneration relied upon for vegetation recovery.

3.1.9 Documentation

Upon completion of abandonment and restoration activities, a final inspection of the site will be conducted to verify that all Project components have been removed and that no environmental hazards remain. This inspection will be carried out by the Project team and will include confirmation that closure objectives have been achieved. Photo documentation of site conditions will be collected to support verification of restoration activities.

A summary of progressive and final demobilization and restoration activities will be submitted in the annual report. Supporting documentation will be compiled and retained, including waste manifests, disposal records, spill/incident reports, and any corrective actions undertaken. These records will be maintained to demonstrate compliance with approved procedures and to support regulatory review if requested.

3.2 Final Closure

During final closure, the conditions are almost identical to the seasonal closure (Section 3.1). The only exceptions are as follows.

- All remaining camp infrastructure and materials, including any previously retained inert components (e.g., tent frames, tent platforms, metal anchors, and ropes), will be fully dismantled and removed from the site. All materials will be transported off-site for appropriate reuse, recycling, or disposal at approved facilities.
- All bedrock drill cores will be removed from the site.

All restoration work will be completed prior to the expiry of the NWB Water Licence No: 8BC-INP2631, June 2, 2031.



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4.0 Monitoring and Follow-Up

A post-closure inspection will be conducted within 30 days of demobilization to confirm successful restoration. Photo documentation and a summary report of site conditions will be prepared and provided to regulators if required.

5.0 Plan Management and Implementation

This Plan is intended to fulfill requirements associated with the water licence. As required, this Plan will be reviewed based on changes in operation and/or technology and modified as required, and at the re-commencement of additional investigative study years.

This Plan will be effective upon approval and will be valid throughout the investigative study field season. NNC is responsible for the implementation of the Plan. The following table lists the primary contacts and their roles that assist NNC with operational support of the Project.

Table 5 Project Management Team Contact Information

Company	Contact	Telephone	Email
NNC	Heather Shilton, Director	(867) 979-8400	hshilton@qcorp.ca
NNC	Jill Byrne, INP Project Manager	(867) 979-8400	jbyrne@qcorp.ca
NNC	Keith Drover, INP Project Director	(867) 979-8400	kdrover@qcorp.ca
Polar Outfitting	Alexander Flaherty	(867)975-1600	polaroutfitting@gmail.com

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6.0 References

NNC, 2025. NNC Spill Prevention and Response Plan, Investigative Studies for the Iqaluit Nukkiqsautiit Project, July 2025.



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7.0 Signature Page

Nunavut Nukkiqsautiit Corporation

The undersigned Certify that, as part of their Environmental Orientation, they have reviewed and understand their roles and responsibilities regarding:

Investigative Studies for the Iqaluit Nukkiqsautiit Project Abandonment & Restoration Plan

Name of Employee (PRINT)

Company

Name of Employee (SIGN)

Date

Name of Manager/Supervisor (PRINT)

Company

Name of Manager/Supervisor (SIGN)

Date



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APPENDIX A

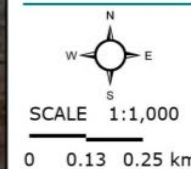
Temporary Camp Site Layout

**NUNAVUT
NUKIKSAUTIIT
CORPORATION**
IQALUIT
NUKIKSAUTIIT PROJECT
**TEMPORARY CAMP
LAYOUT**
FIGURE 9

- High Water Mark
- - - Camp Location to High Water Mark (197m)
- High Water Mark Setback (31m)
- Fuel Storage
- Groundwater/Sump
- Helicopter Landing Pad
- Outhouse
- Water
- Water Hose



MAP DRAWING INFORMATION
DATA PROVIDED BY: ESRI, DILLON CONSULTING LTD, NUNAVUT NUKIKSAUTIIT CORPORATION, GOVERNMENT OF NUNAVUT, NATURAL RESOURCES CANADA, DILLON CONSULTING LIMITED, ECOLOGIC CONSULTANTS LIMITED, ESRI
MAP CREATED BY: -EES
MAP CHECKED BY: -MR
MAP PROJECTION: GCS North American 1983 CSRS



PROJECT: 25-1319
STATUS: DRAFT
DATE: 2026-05-14



APPENDIX C: RESERVOIR OPERATION & DOWNSTREAM FLOWS

October 1, 2026

To Whom it may concern,

**Re: NIRB File No. 26UN010 – Additional Information Request
Reservoir Operation and Downstream Flows**

Nunavut Nukkiksautiit Corporation (NNC) provides the following response to the Nunavut Impact Review Board's (NIRB) September 29, 2026 letter, *Additional Information Required for Nunavut Nukkiksautiit Corporation's "Iqaluit Nukkiksautiit Project" Project Proposal*. The letter requests additional information to support completion of NIRB's screening of the Project.

Under Clarification on Project Components – Reservoir Operation and Downstream Flows, NIRB requested:

"Provide the preliminary approach for monitoring downstream conditions and adjusting reservoir operations or flow releases where monitoring identifies effects on fish, fish habitat, downstream aquatic conditions or Inuit harvesting."

Response

The Project will incorporate monitoring and adaptive management of reservoir operations and downstream flow releases to address potential Project-related effects on fish, fish habitat, downstream aquatic conditions, and Inuit harvesting.

During operation, reservoir water level, turbine flow, and minimum instream flow release and/or bypass flows will be measured and recorded. This operational data, together with the results of the aquatic monitoring program, will be used to assess downstream conditions and identify whether changes to Project operations or flow releases are warranted. Low flow in the river will generally only occur when the facility is shut down, or during transitions in operation from stop and start.

The Project will include dedicated infrastructure for maintaining minimum instream flow releases downstream of the dam. The required operating principle, capacity and operating range of this infrastructure will be established as the Project advances through environmental assessment, and detailed design, considering environmental requirements and the anticipated range of required downstream flows to support fish habitat.

If post-construction monitoring identifies a Project-related effect requiring mitigation, adaptive management measures may include:

- adjusting the magnitude of minimum instream flow releases within the available capacity of the installed flow-release infrastructure;
- implementing temporary or seasonal changes to flow-release schedules where monitoring identifies a sensitive period or downstream condition;

- adjusting turbine operations where practicable, recognizing that generation and reservoir operations are primarily responsive to Iqaluit electrical demand; and;
- evaluating additional operational or physical mitigation measures during shut down or transition periods where monitoring demonstrates that adjustments available through the installed facilities are insufficient.

The specific monitoring parameters, response thresholds, and associated adaptive-management measures will be further developed as the Project advances through environmental assessment, permitting, and detailed design, with consideration of regulatory requirements and input from relevant parties.

The ability to modify downstream flows will be subject to the physical and operational constraints of the facility. Controlled instream flow releases will be limited by the capacity of the installed flow-release infrastructure. The Project spillway is uncontrolled and will pass water when the reservoir reaches the full supply level; therefore, spillway releases cannot be independently regulated. These constraints will be considered in establishing the final flow-release infrastructure, operating procedures, and adaptive-management framework.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Gaul', with a large, stylized loop at the end.

Jason Gaul, P. Eng.
Tetra Tech Canada