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Andrew Nakashuk  
Chairperson  
Nunavut Planning Commission  
P.O. Box 1797  
Iqaluit, NU X0A 0H0  
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Dear Chairperson Nakashuk,

**Re. Blue Star Gold Corp. Written Submission: 2021 Draft Nunavut Land Use Plan**

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**INTRODUCTION**

Blue Star Gold Corp. (Blue Star) is a mineral exploration and development company focused solely on projects within Nunavut, Canada. Blue Star and its wholly-owned subsidiaries Inukshuk Exploration Incorporated and Ulu Mining Inc. (collectively referred to herein as Blue Star) operate in 17,421 hectares (ha) of mineral properties in the Kitikmeot Region. Blue Star's surface and subsurface tenure predominantly occur on Inuit Owned Land (IOL) and include: the Ulu Gold Project, a Crown mining lease; the Hood River Gold Project, an area delineated by a Mineral Exploration Agreement (MEA), located contiguous to the Ulu mining lease; and the Roma Project, composed of nine Crown mineral claims. Blue Star is the largest mineral titleholder on the High Lake Greenstone Belt; this geological formation runs the length of the northern half of the proposed Grays Bay Road.

Blue Star's projects have been screened by the Nunavut Impact Review Board (NIRB) and licenced by the Kitikmeot Inuit Association (KitIA) and the Nunavut Water Board (NWB), with multiple applications for the acquisition of long-term exclusive IOL tenure in process. Table 1 summarizes the tenure held by Blue Star the time of filing this submission and a breakdown of these areas related to the various applicable land use designations proposed in the 2021 Draft Nunavut Land Use Plan (DNLUP).

Blue Star has been working diligently and in good faith towards progressing its investments in Nunavut, including reclamation of legacy mine site infrastructure and mine waste in addition to exploration and development planning, securing access to a 2,956,530 ha study area, 134,944 ha IOL surface land and 17,421 ha IOL subsurface and Crown minerals. Based on the 2021 DNLUP Blue Star's areas of interest are located in proposed Limited Use and Mixed Use designated areas, with Limited Use restrictions imposed due to possible *Caribou Calving*, possible *Post-Calving* and possible *Key Access* corridors. Blue Star's assets are also located in *Areas with Evidence for Mineral Potential*. Should the 2021 DNLUP be approved the Limited Use designations, at a minimum, restrict Blue Star's activity within some assets and it is unclear how future development within Blue Star's study area will work within the DNLUP. The lack of clarity in the 2021 DNLUP creates uncertainty for Blue Star's investments within Nunavut.

In Blue Star's view, the 2021 DNLUP has not changed materially from the 2016 DNLUP and is unresponsive to party comments submitted previously. For example, the NPC acknowledges that "there

*is a considerable number of propositions for using mobile protection measures as mitigation measures for habitat management....and while recognizing the potential value of using mobile [Caribou Protection Measures]” caribou protection measures (CPM) require investment and resources that “are yet to be guaranteed to ensure it is possible to implement CPMs in the NLUP”<sup>1</sup>. Blue Star notes that the public record for this proceeding shows multiple parties have indicated their support for mobile protection measures, including Inuit landowners, with mobile protection measures already in place in the Northwest Territories to manage a transboundary herd.*

While signatory parties requested change and consultation<sup>2</sup> to inform a redrafted plan, Blue Star finds limited new content in the 2021 DNLUP that has not already been commented on in the review of previous draft plans. Accordingly, Blue Star offers limited comments on the following:

- Caribou protection;
- Grays Bay Road;
- Existing rights;
- Annual reporting.

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<sup>1</sup> 2021 DNLUP Sec 2.2.7 Considerations

<sup>2</sup> 16-136E - 2018-06-21 Joint Signatory Party Ltr re NLUP Next Steps

Table 1. Summary of Blue Star Gold Corp.'s currently held tenure, related land uses and land use designations; areas are approximate.

Authorization	Land Use	Total area (ha)	2021 DNLUP Land Use Designations					
			Limited Use Area		Conditional Use Area		Mixed Use Area	
			Ha	%	Ha	%	Ha	%
<i>STUDY AREA</i>								
NIRB Screenings 20EN001, 19EA019	Exploration, bulk sampling, camp operation, winter trail, progressive reclamation, baseline data collection	2,956,530	1,290,072	44	0	0	1,666,458	56
<i>SURFACE TENURE</i>								
KitIA Land Use Licence KTLC113CO13 & KTCA20Q004 (IOL)	Exploration, camp operation, progressive reclamation baseline data collection, quarrying	134,944	117,181	87	0	0	17,762	13
<i>SUBSURFACE TENURE</i>								
Mining Lease L3563 (Crown)	Exploration and mining	947.37	0	0	0	0	947.37	100
Mineral Exploration Agreement HOODRIVER-001 (IOL)	Exploration	8,791	5,326	61	0	0	3,465	39
Mineral claims 102477, 102478, 102479, 102490, 102491, 102504, 102510, 102511, 102520 (Crown)	Exploration	7,683	0	0	0	0	7,683	100

**COMMENTS**

**CARIBOU PROTECTION MEASURES**

Blue Star's most advanced project, its existing infrastructure and the main hub for its operations (static activities), the Ulu Mine Site, is located in a proposed Mixed Use Area, while the focus of its exploration interest (mobile activities) pursuant to its MEA with is NTI located in a proposed Limited Use Area characterized by Caribou Post-calving Areas and Caribou Key Access Corridors, and abuts Caribou Calving Grounds. Through its *Wildlife Protection Plan*, which was subject to public review through the NIRB screening process and approval by the KitIA through its land use licencing process, Blue Star's

authorizations prohibit any activity from May 15 – July 15, unless localized monitoring of caribou activity on the land indicates conditions are acceptable to the KitlA<sup>3</sup>.

Following consultation with the KitlA, Hunters and Trappers Organizations and the public, Blue Star understands that caribou calving areas can change in location over time. Accordingly, Blue Star has implemented mobile protection measures to undertake works in and adjacent to caribou habitat in a manner that allows work to be undertaken on IOL yet is responsive to caribou protection. Mobile protection measures enable us to continue working when the land is not used for migration or calving, yet be prepared to stop working if those activities occur. The measures are suitably applicable to both static (mine site) and mobile (exploration) activities.

The Limited Use designation imposes permanent land use restrictions regardless of the presence of caribou. Blue Star finds this approach to be inadequate for caribou protection and does not reflect the dynamics of the arctic ecosystem.

***Blue Star recommends that the NPC consider existing caribou protection measures and project-specific caribou protection measures (i.e. wildlife protection plans) in its area designations. Mobile protection measures should be considered in place of Limited Use exclusion.***

#### **GRAY'S BAY ROAD AND PORT**

Blue Star's projects are all co-located along the proposed Gray's Bay Road Corridor. The success of Blue Star's future development may rely substantially on this transportation corridor as either a primary or alternative means of access. In May 2021, the KitlA indicated to the NIRB its desire to resume the Gray's Bay Road and Port Project (GBRP) review. Blue Star notes that the GBRP is absent from Section 5.3 of the 2021 DNLUP.

***Blue Star recommends the DNLUP be revised to acknowledge the potential for the GBRP transportation corridor.***

#### **EXISTING RIGHTS**

Blue Star has a study area of 2,956,530 ha within which its existing rights of Crown claims, licences, an MEA and a mining lease are located. While the 2021 DNLUP indicates that existing rights holders will be exempt from Limited Use prohibitions should a project undergo a significant modification, Blue Star is uncertain how related components of its future activities located within its current study area (as screened by the NIRB) will be considered by the NPC as or in relation to existing rights, as some screened activities and areas are not yet held in a licence or lease. Blue Star is uncertain whether these areas would be accessible and activities permissible in Limited Use Areas following implementation of the 2021 DNLUP. Similarly, Blue Star has multiple applications underway for exclusive tenure and is uncertain whether these agreements, once executed, will be considered by the NPC to be existing rights.

***Blue Star requests the DNLUP provide clarity on: whether areas and activities screened by the NIRB but not yet licenced are considered Existing Rights; whether applications for rights in process are considered Existing Rights.***

Further, Appendix A in the 2021 DNLUP is titled Existing Rights. Blue Star understands that Appendix A is not a complete list of existing rights holders but a list of those with tenure in Limited Use Areas only. Limiting the list of Existing Rights holders in Limited Use Areas provides an incomplete understanding of

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<sup>3</sup> 20EN001 para.47, 19EA019 para.35

the existing mineral-related activity in Nunavut. Further, this selective approach provides an incomplete understanding of a project footprint that is relevant to consideration of significant modification during future conformity determinations.

***Blue Star recommends that the list of Existing Rights holders in Appendix A be expanded to include all existing rights holders, or otherwise revised and clarified to reflect rights holders at the time of DNLUP approval.***

#### **ANNUAL REPORTING**

Section 6.3.2 of the 2021 DNLUP indicates annual reporting on VCs and mitigation measures will be required by January 30. Blue Star considers this a duplication of reporting that is already undertaken by other Institutes of Public Government (IPGs), whose annual reporting due date is March 31.

***Blue Star recommends harmonizing the reporting mechanism and due date with other IPGs to reduce duplication and utilize existing resources such as the NPC Lupit and NIRB web portals.***

#### **CLOSING**

In addition to comments above, Blue Star echoes those provided by the NWT and Nunavut Chamber of Mines and supports a collaborative planning process, strategic use of multiple planning tools to facilitate informed decision making, and a less prescriptive approach to land use planning. Blue Star firmly believes that conservation, cultural and economic interests are not mutually exclusive.

Regards,



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