



## **RAE COPPER PROJECT**

# **Wildlife Management and Monitoring Plan**

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## Wildlife Management and Monitoring Plan

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# 1. Introduction

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White Cliff Minerals Ltd. (WCM) is a publicly traded Australian-based (WCM on the Australian Stock Exchange) and Canadian-registered mineral exploration company that owns a 100% interest in Rae Copper Exploration Project (the Project). The Project consists of mineral claims in the West Kitikmeot Region of Nunavut on a combination of Inuit Owned Lands and Crown Lands (Figure 1). The Project area is about 60 kilometres from the community of Kugluktuk in an area with a long history of mineral exploration. WCM is applying for authorizations to allow a drill-based exploration program and associated exploration camp within the boundaries of WCM's mineral claims and has developed this plan as a part of these applications.

## 2. Objectives

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This Wildlife Management and Monitoring Plan (the Plan or WMMP) outlines the management, mitigation, and monitoring measures which will be implemented to reduce or eliminate the potential impacts of this exploration project on wildlife and wildlife habitat. A draft version of this Plan was provided to the Kugluktuk Hunters and Trappers Organization (HTO) for comment, and WCM will continue to work with the HTO, the Kitikmeot Inuit Association, and community of Kugluktuk over the life of Project activities to ensure management, mitigation, and monitoring measures protective of wildlife and wildlife habitat are appropriate for the nature, scale, and location of the Project.

## 3. Project Description

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The Rae Copper Project is proposed to be a seasonal drilling-based exploration program based out of a temporary tent-based exploration camp (Figure 1).

The Project will be accessed by plane using the existing all-weather Hope Lake Airstrip or a winter ice strip and/or by helicopter. Supplies may also be brought in by winter trail from Kugluktuk using low pressure vehicles (e.g. those on tracks or skids such as snowmobiles, snow cats, and sloops) as is done for other projects in the region. Within the Project area, access would primarily be by helicopter and foot, although winter trails or roads may be used when ground and snow/ice conditions permit. No all-weather roads are proposed.

The exploration camp will be comprised of temporary tent structures used for accommodations, food preparation, dining, office space, core cutting, and ablutions. Smaller structures will also be erected to house toilets (i.e., pit [outhouse], porta, or incinerating toilets), pump house, and generators. Portable fly camps may also be seasonally used to support activities at remote locations. A full description of proposed structures and equipment is provided in WCM's application.

The camp will typically house around 25 people during seasonal drilling activities but could host up to 45 people when at peak activity. Camp water needs, including kitchen, showers, sinks, and core cutting, will be sourced from a nearby lake. Project wastes would include general camp wastes, greywater, toilet blackwater, core cutting and drill wastes, and ash from incineration and open burning. No landfill is proposed. A dual chambered forced air incinerator may be used to incinerate suitable wastes. Untreated wood, cardboard, and paper may also be open burnt but open burning will be minimized to the extent

practical. Except for incinerated/open burnt wastes and wastes deposited in sumps, all wastes will be backhauled to an approved waste management facility outside of Nunavut.

Exploration will primarily be undertaken using diamond drills, although similarly sized reverse circulation (RC) drills may be utilized. The RC drill, like a Hornet, does not require water. Other activities typically associated with exploration would also be undertaken, such as aerial or ground-based surveys and sampling, staking, environmental monitoring and baseline studies, and archaeological assessment. Drill support and movement will be by helicopter or overland by winter trail or road. Drill water will be sourced from waterbodies proximal to drill targets and drill waste will be discharged to sumps, typically nearby natural depressions.

All sumps and fuel storage will be located at least 31 m from the Ordinary High Water Mark (OHWM) and a Spill Contingency Plan will be implemented.

Exploration activities will be undertaken seasonally, typically in summer and late winter but this may vary by activity. Each year, all activities will be seasonally shut down during the calving (May 28 to July 3) and post calving (June 21 to July 3) periods of the Blue Nose East Caribou herd. Outside of these periods, exploration activities would usually extend from a few weeks to a few months in duration each season.

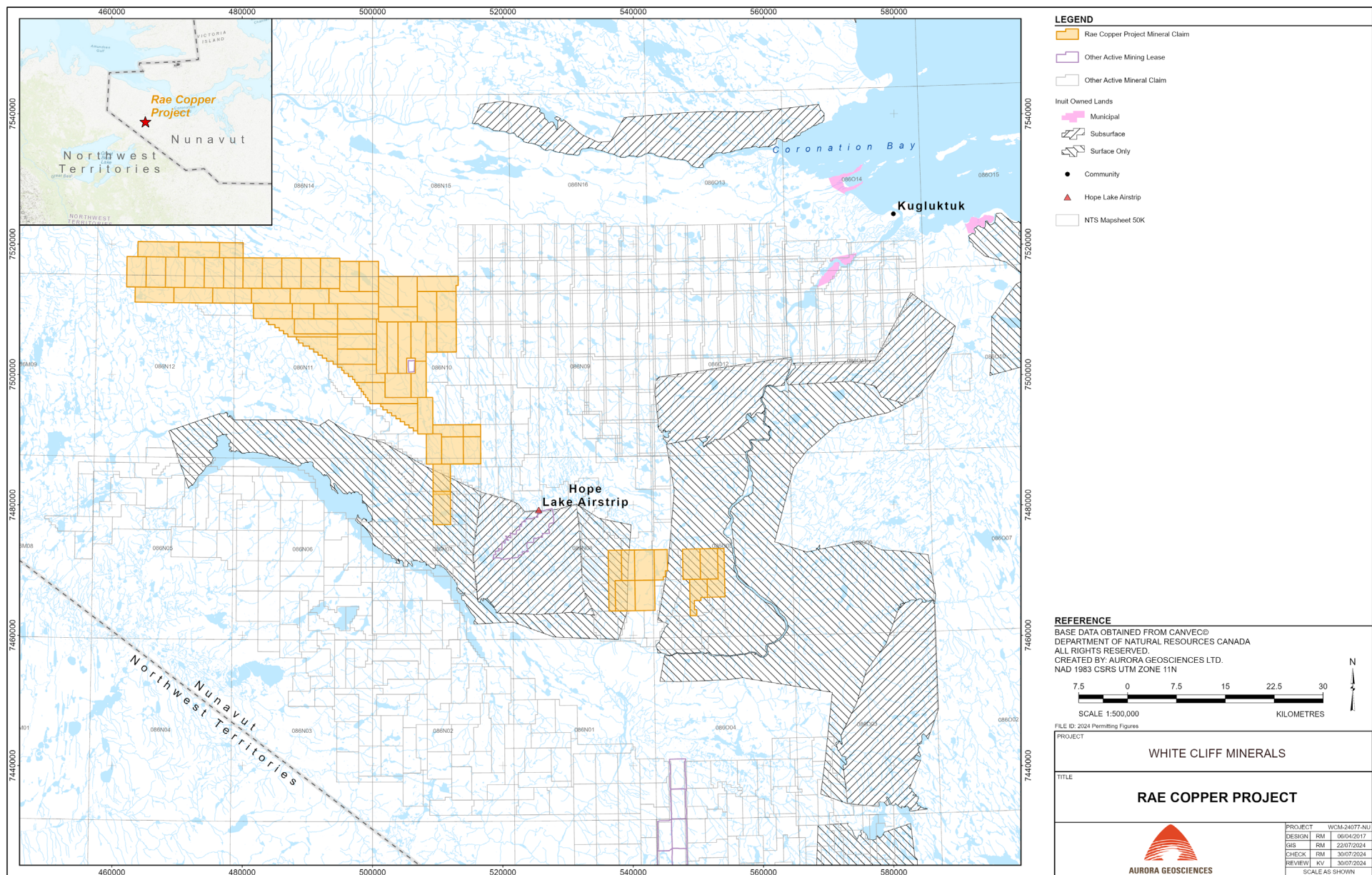


Figure 1. Rae Copper Project Location

## 4. Management and Mitigation Measures

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WCM will implement a wide range of management and mitigation measures to ensure that impacts on wildlife as well as wildlife habitat are eliminated or minimized. Measures which will be implemented are outlined below.

### 4.1 MITIGATION OF HABITAT LOSS OR ALTERATION

Direct impacts on habitat related to camp and drill footprints will be minimized through the following measures:

1. Minimizing Project footprint through consolidation of materials and camp structures
2. Establishment of camp locations on dry durable ground to minimize ground impacts and erosion
3. Placement of heated camp structures, as well as drills, on cribbing (i.e. raised above ground) or placement of a mat beneath heated structures to minimize vegetation impacts and prevent permafrost degradation
4. No overland off-road transit by vehicles except in winter when no rutting or gouging of the ground will occur
5. Minimizing and winter road development by keeping widths to those necessary and using existing roads and corridors where available and practical
6. Use of natural depressions or dug sumps to constrain liquid wastes (e.g. greywater, pit/outhouse blackwater, core cuttings, drill wastes) and filling any dug sumps on cessation of use
7. Implementation of a spill contingency plan focused on minimization of spills and spill impacts
8. Preferential use of biodegradable drilling additives
9. Minimize the use of salt during drilling to reduce potential for vegetation impacts
10. Prevent introduction of non-native species by cleaning debris and soil from mobile heavy equipment brought to site
11. V-notching of any winter stream ice crossings prior to melt to prevent unnatural ponding
12. Locating sumps, fuel storage, and infrastructure > 31 m of a waterbody ordinary high water level to protect waterbodies from contamination
13. Conduct on-ice drilling using closed drill circuit and without the use of salt to protect water quality
14. Avoid conducting activity in areas overlapping identified sensitive features
15. Progressively close drill sites and fly camps as work is completed to reduce cumulative Project footprint
16. Stabilizing any impacted areas potentially subject to erosion or sediment loss

### 4.2 MITIGATION OF DISTURBANCE TO NESTS OR DENS

To mitigate disturbance of wildlife dens and bird nests by field activities, WCM will:

1. Close camp/cease exploration activities during the calving and post-calving periods of the Bluenose East caribou herd (May 28 - July 3)
2. Avoid habitat disturbance during the bird nesting period where practical



3. Apply a 300 m setback from concentrations of birds (e.g., bird breeding colonies and moulting areas)
4. If nests containing eggs or young are found, stop all disruptive activities until nesting is complete and establish a suitable buffer zone for the species and activity (based on regulatory guidance)
5. If carnivore dens are found, avoid drilling in these areas while they are in use
6. Skirt camp tents to deter wildlife denning

### 4.3 MITIGATION OF AIRCRAFT DISTURBANCE

To mitigate disturbance of wildlife by helicopter activity, WCM will:

1. Cease all exploration activities and close the exploration camp during the Bluenose East caribou herd use of the area for their calving and post-calving periods, including helicopter flights
2. Aircraft will avoid unnecessary low flights and landing in areas where wildlife are present
3. Helicopters will generally fly at an altitude above 610 m altitude, and not below 300 m (~ 1,000 ft) except during landing, takeoff, or for specific operational reasons (e.g. low ceilings or low-level surveys)
4. When necessary to fly at lower levels, any wildlife will be avoided by revising flights paths
5. Aircraft will maintain minimum vertical setback of 1100 m (3500 feet) in areas where concentrations of birds are present
6. Maintain minimum lateral aerial setback of 1.5 km from concentrations of birds (e.g., bird breeding colonies and moulting areas)
7. Flights will detour around wildlife to avoid overflight disturbance
8. Field crews will conduct a scan for wildlife prior to landing and helicopters will avoid landing in areas where wildlife are present

### 4.4 MITIGATION OF WILDLIFE ATTRACTION

Wildlife attractants will be managed to prevent wildlife access at all times. This is important to ensure that wildlife does not become habituated. To mitigate attraction of wildlife by on-site storage and use of food and food waste and other potential wildlife attractants, WCM will:

1. Implement a strict 'no feeding of wildlife' policy
2. Store food waste and wildlife attractants in a manner resistant to wildlife access and that reduces smells
3. Require all field crews to return any food scraps and associated wastes to the camp for appropriate management
4. Wastes attractive to wildlife will be disposed of promptly, either by backhaul to an approved waste management facility, or in an onsite incinerator (if available)
5. No landfill will be established on site; these have the potential to attract wildlife
6. Screen kitchen greywater to remove food particles prior to discharge, and inspect greywater sump regularly and treat as need with lime or crystal lye to prevent becoming an attractant
7. Orientate and train all staff on Project waste management practices aimed at minimizing wildlife attraction
8. Erect a bear fence if deemed necessary
9. Conduct routine inspection of work areas to verify that wildlife attractants are being appropriately managed, food wastes are returned to the camp daily, and that there is no indication of wildlife access

## 4.5 MITIGATION OF DIRECT WILDLIFE IMPACTS AND HUMAN-WILDLIFE CONFLICT

Direct human-wildlife conflict can lead to wildlife injury or mortality. This risk can be significantly reduced through the appropriate management of wildlife attractants (see above). In addition, WCM will:

1. Close camp/cease exploration activities during the calving (May 28 - July 3) and post-calving (June 21 to July 3) periods of the Bluenose East caribou herd
2. Implement a strict no hunting policy for Project staff
3. Not allow fishing without appropriate fishing licence, as applicable
4. Train staff in appropriate bear awareness and deterrence measures
5. Equip field crews with bear deterrence kits which may include: air horn or whistle, bear bangers, and bear spray (and train field crews in their use)
6. Where necessary, use bear fences
7. Where appropriate, make use of wildlife monitors
8. Avoid and not intentionally approach wildlife
9. Orientate and train all staff on Project policies regarding wildlife, waste management, and work area management of wildlife access
10. Inspect work areas regularly when in use for evidence of wildlife access or initiation of nesting

## 4.6 MITIGATION OF SPILLS

Spills of fuel or other chemicals pose a risk to the environment and to wildlife who may ingest spilled materials. To minimize this risk, the following measures will be implemented:

1. Fuel caches will be located at least 31 m away from the ordinary high water mark of any waterbody
2. Spill response supplies will be located at each cache
3. Caches will be inspected daily when exploration is underway
4. A Spill Contingency Plan will be implemented
5. All staff will be trained in basic chemical management and spill response procedures
6. Any spills will be cleaned up promptly
7. If clean-up is delayed, measures will be put in place to protect any nearby waterbodies
8. Any contaminated material will be securely stored to ensure contaminants are not released to the environment
9. Where practical, chemicals that are toxic to wildlife or harmful to the environment will be substituted for others, particularly if they are also a wildlife attractant (e.g. propylene glycol will be used in substitution for ethylene glycol, calcium chloride in substitution for sodium chloride)

## 5. Monitoring and Reporting

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The efficacy of the management and mitigation measures outlined in this plan will be monitored to identify areas for continual improvement. The monitoring programs to be implemented are outlined below.

## **5.1 MITIGATION MONITORING**

Regular surveys or inspections will be conducted by project personnel to verify that mitigation measures outlined in this Plan are being implemented as planned and/or are functioning as intended.

If deficiencies are noted in any inspections, they will be promptly addressed.

Regular monitoring surveys are outlined further below.

### **5.1.1 Camp and Worksite Inspections**

All work areas will be regularly inspected when in use to ensure that:

1. Wildlife attractants are being appropriately managed
2. All food wastes are returned to the camp on a daily basis
3. That there is no evidence of wildlife access or initiation of nesting
4. There are no spills (if a spill is found it will be addressed promptly as outlined in the Spill Contingency Plan)
5. That any wildlife sighted are noted
6. Any active nests or dens will be avoided to the extent possible and/or as required by the relevant regulatory authority (depending on species)

## **5.2 WILDLIFE AWARENESS TRAINING**

All project staff will receive orientation and training on wildlife awareness to ensure activities are conducted in a manner that minimizes impacts to wildlife and wildlife habitat. This training will be documented and will include:

- An overview of wildlife which may be encountered in the area, with a focus on any species at risk
- An overview of Project policies re: no feeding of wildlife, no hunting
- The importance of minimizing Project impacts on wildlife habitat
- The process for documenting wildlife sightings and any incidents
- An overview of Project waste management practices aimed at minimizing wildlife attraction
- Jobsite/activity-specific orientation of work area management of wildlife access, waste management, and spill response
- Field crews will be trained in requirements to check for and avoid wildlife and large congregations of birds prior to helicopter landing and avoidance of active nests and dens
- Pilots will be informed of requirement to avoid low level flying except where required for a specific reason, and to avoid low level overflights of wildlife or congregations of birds unless unsafe to do otherwise

## **5.3 WILDLIFE RESPONSE TRAINING**

All project staff will receive orientation and training on basic wildlife awareness, and field crews will be provided supplementary training in the use of bear deterrents and response. This training will include:

- An overview of wildlife which may be encountered in the area
- Measures to be employed to minimize human-wildlife conflict

- The requirements for documenting any wildlife incidents (including the use of deterrents)
- Training related to working in bear habitat, appropriate bear response
- Field crews will be trained in the use of deterrents
- Field crews and helicopter pilots will be trained to check for wildlife prior to helicopter landing

#### **5.4 WILDLIFE SIGHTINGS**

Incidental wildlife observations will be recorded by site staff to develop a better sense of wildlife in the area and their seasonal patterns of use and emergence. Project personnel will be asked to record any incidental wildlife sightings in a Wildlife Sightings Log maintained in a central location (e.g. the dining area). This log will document the observation date, location, type and number of animals, and any other notes of relevance. Field crews will review this log prior to each day's activities, for their awareness and consideration in the conduct of their field activities.

#### **5.5 WILDLIFE INCIDENTS**

Wildlife incidents refer to any Project-related wildlife injury, mortality, use of deterrents, or threats from wildlife on human safety or property. Any such events will be documented and immediately reported to the GN, and, where related to a migratory bird species or species at risk, to Environment and Climate Change Canada (ECCC). The information provided will include the date, animal type, nature and cause of injury/mortality, and corrective actions implemented to reduce recurrence (if any).