



RAE COPPER PROJECT

Wildlife Management and Monitoring Plan

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1. Introduction

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 small one to three-drill 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

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.

This Plan has been updated to reflect comments provide by the Kitikmeot Inuit Association and the Kugluktuk Hunters and Trappers Organization (HTO) provided during the Nunavut Impact Review Board's (NIRB's) screening of this Project, as well as conditions set out in the NIRB's Screening Decision Report for NIRB File No. 24EN047 (NIRB SRD 24EN047) and Land Use Permit (LUP) N2024C0029 issued by Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). WCM will continue to work with the HTO and the Kitikmeot Inuit Association 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

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], pecto, 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 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. Seasonal exploration activities would usually extend from a few weeks to a few months in duration each season.

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. In response to comments submitted by the KIA and Kugluktuk HTO during the NIRB's screening of this Project, and in alignment with the requirements of the NIRB SDR 24EN047 and CIRNAC LUP N2024C0029, this activity shut down period will be expanded to May 15th to July 15th to allow for annual differences in timing of caribou migration, unless approved otherwise. Further mitigations can also be found in Section 4 of this Plan.

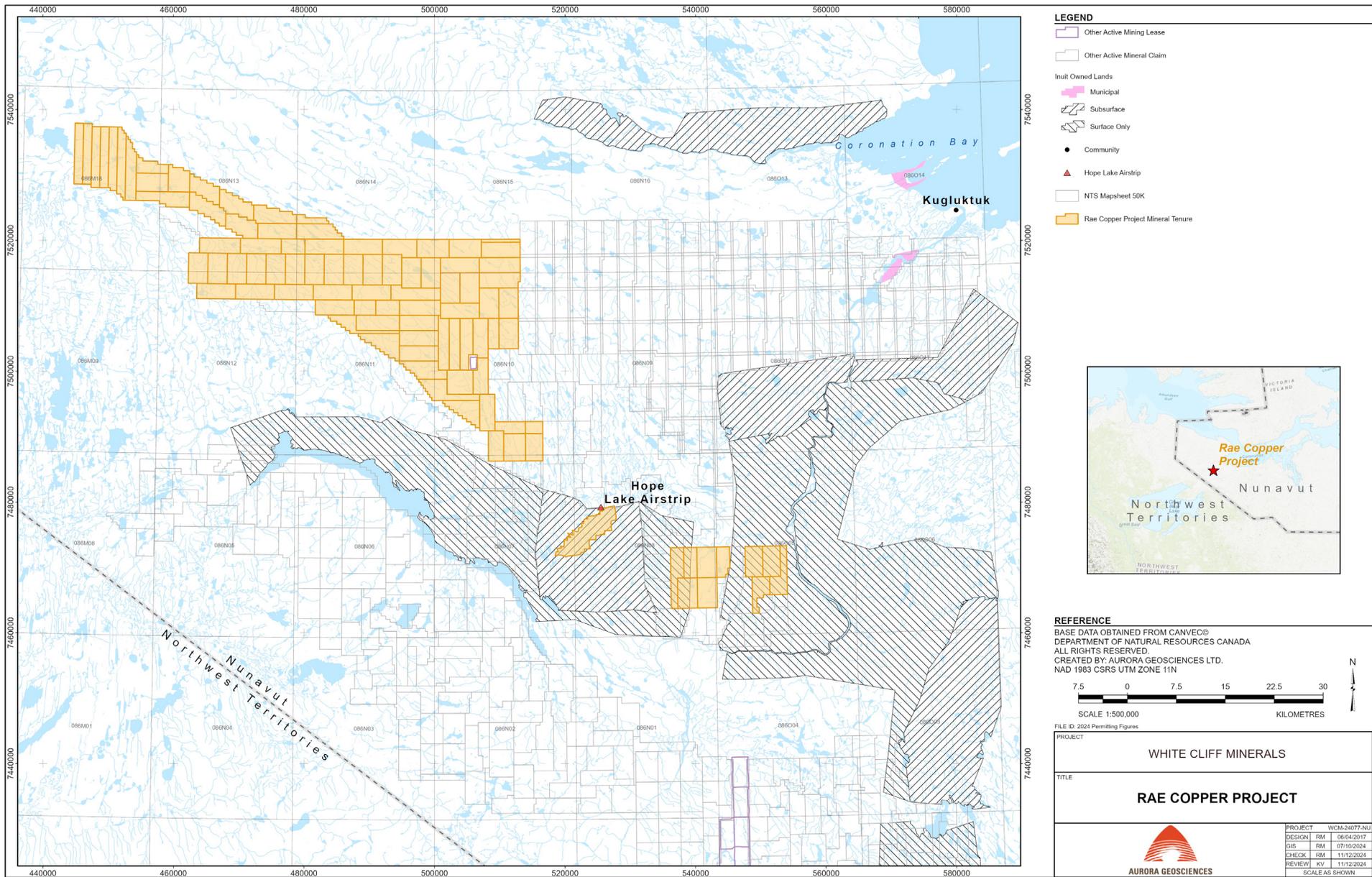


Figure 1. Project Location

4. Management and Mitigation Measures

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 and not unnecessarily damaging wildlife habitat
2. Establishment of camp locations on dry durable ground to minimize ground impacts and erosion
3. Maximize the distance of camp and drilling activities from eskers wherever possible to reduce impacts to denning mammals and other wildlife that use them for insect relief
4. Detour winter roads around all sand hills, unless otherwise authorized in writing by a Land Use Inspector
5. 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
6. The Proponent shall not move any equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging. Overland travel of equipment or vehicles must be suspended if rutting occurs
7. Minimizing and winter road development by keeping widths to those necessary and using existing roads and corridors where available and practical
8. Ensure that bank disturbances are avoided and no mechanized clearing carried out immediately adjacent to any watercourse
9. Construct drill sites in a manner to facilitate minimizing the environmental footprint of the project area and minimizing impacts surface drainage
10. 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
11. Ensure no drilling wastes are allowed to spread to the surrounding lands or water bodies.
12. Ensure that that no deleterious substances (as defined in the Fisheries Act) enter into any water bodies frequented by fish.
13. Follow applicable DFO protective measures for fish and fish habitat and standard codes of practice to extent possible, and seek DFO advice where appropriate
14. Implementation of a spill contingency plan focused on minimization of spills and spill impacts
15. Preferential use of biodegradable drilling additives
16. Minimize the use of salt during drilling to reduce potential for vegetation impacts
17. Prevent introduction of non-native species by cleaning debris and soil from mobile heavy equipment brought to site
18. Ceasing winter trail/road use prior to freshet and V-notching of any winter stream ice crossings prior to melt to prevent unnatural ponding

19. Locating sumps, fuel storage, and infrastructure > 31 m (and preferably >100m, especially when salt is used) from any waterbody ordinary high water level to protect waterbodies from contamination
20. Conduct on-ice drilling using closed drill circuit and without the use of salt to protect water quality
21. Avoid conducting activity in areas overlapping identified sensitive features
22. Progressively close drill sites and fly camps as work is completed to reduce cumulative Project footprint
23. 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 (100 m, or as based on regulatory guidance found here: www.ec.gc.ca/paom-itmb.)
5. If carnivore dens are found, avoid drilling in these areas while they are in use
6. Not destroy or damage any beaver dams or muskrat lodges (if present)
7. Skirt camp tents to deter wildlife denning

4.3 MITIGATION OF AIRCRAFT DISTURBANCE

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

1. Close camp/cease exploration activities, including helicopter flights, during the calving (May 28 - July 3) and post-calving (June 21 to July 3) periods of the Bluenose East caribou herd
2. Due to occasional variability in migration dates, all land use activities will further be suspended between May 15 to July 15, unless otherwise approved by the Inspector, based on localized monitoring
3. During the period of May 1st to July 15th, when caribou are observed within 1 km of project operations, all operations, including low-level flights, and use of snowmobiles and overland vehicles outside the immediate vicinity of the camps will be suspended
4. During the period following July 15th, if caribou cows or calves are observed within 1 km of project operations, operations in the vicinity will be suspended, including low-level over flights and use of all-terrain vehicles, until caribou are no longer in the immediate area.
5. Activities that may interfere with migration or calving of caribou or muskox, such as airborne geophysical surveys, drilling, or movement of equipment or personnel will be ceased until such a time that the caribou or muskox have passed
6. Avoid blocking or causing any diversion to caribou migration, and cease activities likely to interfere with migration such as airborne geophysics surveys, drilling, or movement of equipment or personnel until such time as the caribou have passed

7. Avoid the following activities within the designated proximity of any paths or crossings known to be frequented by caribou:
 - a. Construct or operate any camp or cache any fuel within 10 km
 - b. Conduct a drilling operation within 5 km.
8. Plan flight paths that minimize flights over known habitat likely to have birds or concentrations of wildlife
9. Aircraft should avoid critical and sensitive wildlife areas at all times by choosing alternate flight corridors when possible
10. Aircraft will avoid unnecessary low flights and landing in areas where wildlife are present
11. Aircraft will fly at an altitude above 610 m altitude above ground level except during landing, take-off or if there is a specific requirement for low-level flying, which does not disturb wildlife or migratory birds
12. When necessary to fly at lower levels, any wildlife will be avoided by revising flights paths
13. Avoid known concentrations of birds (e.g., bird colonies, moulting areas) by a lateral distance of 1.5 kilometre. If avoidance is not possible maintain a minimum flight altitude of 1,100 metres (3,500 feet) over these areas
14. Flights will detour around wildlife to avoid overflight disturbance
15. Field crews will conduct a scan for wildlife prior to landing and helicopters will avoid landing in areas where wildlife are present except for emergency reasons
16. Advise pilots of relevant flight restrictions and enforce their application over the project area, including flight paths to/from the project area

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. Due to occasional variability in migration dates, all land use activities will further be suspended between May 15 to July 15, unless otherwise approved by the Inspector, based on localized monitoring
3. During the period of May 1st to July 15th, when caribou are observed within 1 km of project operations, all operations, including low-level flights, and use of snowmobiles and overland vehicles outside the immediate vicinity of the camps will be suspended
4. During the period following July 15th, if caribou cows or calves are observed within 1 km of project operations, operations in the vicinity will be suspended, including low-level over flights and use of all-terrain vehicles, until caribou are no longer in the immediate area.
5. If pregnant caribou cows, cows with young calves, or groups of 50 or more caribou be observed within one (1) kilometer of project operations at any time, all operations in the vicinity, including low level overflights, drilling, and use of snowmobiles and all terrain vehicles outside the immediate vicinity of the camp, will be suspended until caribou are no longer in the immediate area
6. During the period of April 14 to June 1 when muskoxen are present, they will not be approached closer than one (1) kilometer. This includes all operations, including lowlevel over flights, blasting, and use of snowmobiles and all-terrain vehicles outside the immediate vicinity of the camps.
7. Activities that may interfere with migration or calving of caribou or muskox, such as airborne geophysical surveys, drilling, or movement of equipment of personnel will be ceased until such a time that the caribou or muskox have passed
8. Avoid blocking or causing any diversion to caribou migration, and cease activities likely to interfere with migration such as airborne geophysics surveys, drilling, or movement of equipment or personnel until such time as the caribou have passed
9. Avoid the following activities within the designated proximity of any paths or crossings known to be frequented by caribou:
 - a. Construct or operate any camp or cache any fuel within 10 km
 - b. Conduct a drilling operation within 5 km.
10. Implement a strict no hunting policy for Project staff
11. Not allow fishing without appropriate fishing licence, as applicable
12. Train staff in appropriate bear awareness and deterrence measures
13. 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)
14. Where necessary, use bear fences
15. Where appropriate, make use of wildlife monitors
16. Avoid and not intentionally approach wildlife
17. Orientate and train all staff on Project policies regarding wildlife, waste management, and work area management of wildlife access
18. 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 (and, where practical, >100 m) away from the ordinary high water mark of any waterbody
2. Adequate secondary containment will be used for storage of fuel and chemicals
3. Spill response supplies will be located at each cache
4. Caches will be inspected daily when exploration is underway
5. A Spill Contingency Plan will be implemented
6. All staff will be trained in basic chemical management and spill response procedures
7. Any spills will be cleaned up promptly
8. If clean-up is delayed, measures will be put in place to protect any nearby waterbodies
9. Any contaminated material will be securely stored to ensure contaminants are not released to the environment
10. 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 Program

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 inspected daily 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)
- 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).

5.6 REPORTING

Any problem wildlife or any interaction with carnivores should be reported immediately to the local Government of Nunavut, Department of Environment Conservation Office (Conservation Officer of Kugluktuk, phone: (867-982-7450).

Per the requirements of NIRB SDR File No. 24EN047, a brief summary of wildlife sightings (observations), incidents, and number of cease-work orders (works suspensions related to wildlife presence) will be included in an annual report provided annually to the Nunavut Impact Review Board, Kitikmeot Inuit Association, Hamlet of Kugluktuk, Kugluktuk HTO, and Crown-Indigenous Relations and Northern Affairs Canada, by March 31st of each year. Information reported will include:

- A discussion of issues related to wildlife and environmental monitoring, including the number of cease-work orders required as a result of proximity to caribou and any other wildlife;
- A brief summary of WMMP results as well as any mitigation actions that were undertaken. In addition, the Proponent shall maintain a record of wildlife observations while operating within the project area and include it as part of the summary report. The summary report based on wildlife observations should include the following:
 - Locations (i.e., latitude and longitude), species, number of animals, a description of the animal activity, and a description of the gender and age of animals if possible.
 - Prior to conducting project activities, the Proponent should map the location of any sensitive wildlife sites such as denning sites, calving areas, caribou crossing sites, and raptor nests in the project area, and identify the timing of critical life history events (i.e., calving, mating, denning and nesting).
 - Additionally, the Proponent should indicate potential impacts from the project and ensure that operational activities are managed and modified to avoid impacts on wildlife and sensitive sites.
- An analysis of the effectiveness of mitigation measures for wildlife

Appendix 1. Wildlife Sightings Log

Appendix 2. Wildlife Incident Reporting Form
