

April 14, 2025

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Screening Officer  
Nunavut Impact Review Board  
P.O Box 1360  
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**Sent VIA Email: [info@nirb.ca](mailto:info@nirb.ca)**

**Re: Notice of Screening for Bronzite Exploration Corp.'s (BEC) "Somerset Trough Project" project proposal**


Hello Francis,

The Government of Nunavut (GN) thanks the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments regarding Bronzite Exploration Corp.'s (BEC) "Somerset Trough Project" project proposal, NIRB File # 24EN005.

The GN has reviewed the proposed project and related documents and has three comments to raise with the Board at this time, which are attached to this letter.

The GN appreciates participating in the screening of this project through the NIRB process. Should there be any concerns or need for follow-up, please feel free to contact me at [jbuller@gov.nu.ca](mailto:jbuller@gov.nu.ca).

Thank you,

  
Justin Buller

Justin Buller  
Interim Avatiliriniq Coordinator  
Government of Nunavut

<b>GN # 01</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Wildlife Studies
<b>References</b>	<ul style="list-style-type: none"> <li>• Bronzite Exploration Corp. (2025). NIRB Application for Screening #126134 – Somerset Trough Project</li> <li>• <i>Wildlife Act</i>, S. Nu, 2003, c26</li> </ul>
<b>CONCERN(S)</b>	
<p>Bronzite Exploration Corp.'s (the Proponent) Application for Screening for the Somerset Trough Project (the Project) states,</p> <p>“...Project activities for the year 2025 will consist of the construction of an exploration camp, airborne and ground-based geophysical surveys, geological studies (prospecting and mapping), and minor environmental and wildlife studies. These activities have previously been screened and approved by the Nunavut Impact Review Board (NIRB File #: 24EN005, NPC File #: 150217) with applicable Terms and Conditions.” (Page 2).</p> <p>The Government of Nunavut (GN) has reviewed the Project Application materials and notes that “wildlife studies” are not clearly articulated or clearly defined in the project’s proposed operations from 2025 to 2029. Additionally, the GN notes that there are no active Wildlife Research Licenses for this Project.</p>	
<b>REQUEST(S)/RECOMMENDATION(S)</b>	
<p>The GN requests that the Proponent provide more information to clarify this point of uncertainty regarding wildlife studies.</p> <p>The GN wishes to remind the Proponent that Wildlife Research Licenses are required under the Nunavut’s <i>Wildlife Act</i> for studies of terrestrial wildlife (including plants, insects, and animals), polar bears and birds. Proponents may apply for Wildlife Research Permits by contacting <a href="mailto:wildlife_research@gov.nu.ca">wildlife_research@gov.nu.ca</a>.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

GN # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Management and Monitoring Plan – Polar Bear
References	<ul style="list-style-type: none"> <li>• Anderson, E. M., Wilson, R. R., Rode, K. D., Durner, G. M., Atwood, T. C., &amp; Gustine, D. D. (2025). The post-emergence period for denning Polar Bears: phenology and influence on cub survival. <i>Journal of Mammalogy</i>, 105(3), 490–501. <a href="https://doi.org/10.1093/jmammal/gyae010">https://doi.org/10.1093/jmammal/gyae010</a></li> <li>• Bronzite Exploration Corp. (2025). NIRB Application for Screening #126134 – Somerset Trough Project</li> <li>• Bronzite Exploration Corp. (2025). Wildlife Management and Monitoring Plan: Somerset Trough Project</li> <li>• Linnell, J.D.C., Swenson, J.E., Andersen, R., &amp; Barnes, B. (2000). How vulnerable are denning bears to disturbance? <i>Wildlife Society Bulletin</i>, 28(2), 400–413. <a href="https://www.jstor.org/stable/3783698">https://www.jstor.org/stable/3783698</a></li> <li>• Messier, F., Taylor, M. K., &amp; Ramsay, M. A. (1994). Denning Ecology of Polar Bears in the Canadian Arctic Archipelago. <i>Journal of Mammalogy</i>, 75(2), 420–430. <a href="https://doi.org/10.2307/1382563">https://doi.org/10.2307/1382563</a></li> <li>• Quigley, G., Brinkman, T. J., Wilson, R., &amp; Christ, A. (2024). Behavioral response of polar bears to aircraft activity on the northern coast of Alaska. <i>The Journal of Wildlife Management</i>, 88(3)e22554. <a href="https://doi.org/10.1002/jwmg.22554">https://doi.org/10.1002/jwmg.22554</a></li> <li>• Woodruff, S.P., Andersen, E.M., Wilson, R.R., Mangipane, L.S., Miller, S.B., Klein, K.J., &amp; Lemons, P.R. (2022) Classifying the effects of human disturbance on denning polar bears. <i>Endangered Species Research</i>, 49, 43–56. <a href="https://doi.org/10.3354/esr01203">https://doi.org/10.3354/esr01203</a></li> </ul>
CONCERN(S)	
<p>The GN notes that the Proponent’s project area overlaps with sensitive polar bear denning habitat and that the start date of annual operations coincides with the timing of adult female polar bears first emerging from dens (Bronzite Exploration Corp., 2025; Messier et al., 1994).</p> <p>Studies have shown that denning polar bears are sensitive to disturbance by human activities and that disturbance can lead to premature emergence from dens, den abandonment, and significant reductions in cub survival (see Linnell et al., 2000; Quigley et al., 2024; Woodruff et al., 2022).</p>	

The Proponent proposes to increase the temporal scope of their activities by 5 years. However, the Proponent's Wildlife Management and Monitoring Plan (WMMP) does not identify polar bear denning habitat as "Sensitive Habitat" in section 3.2. Additionally, the Proponent's WMMP does not include mitigation measures that specifically seek to minimize the disturbance of denning polar bear and their habitat. It is unclear how the Proponent will minimize or mitigate potential impacts to denning polar bears from its project activities.

#### **REQUEST(S)/RECOMMENDATION(S)**

The GN recommends that the Proponent identify polar bear denning habitat within section 3.2 of the WMMP.

Additionally, the GN recommends that the Proponent specify, within the WMMP, any mitigation or monitoring measures undertaken to minimize disturbance to polar bears and their habitat during the denning period.

#### **ADDITIONAL COMMENT(S)**

N/A

GN # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildlife Management and Monitoring Plan – Flight Altitudes
References	<ul style="list-style-type: none"> <li>Bronzite Exploration Corp. (2025). Wildlife Management and Monitoring Plan: Somerset Trough Project</li> <li>Nunavut Impact Review Board. (2024). Screening Decision Report NIRB File No.:24EN005/NPC File No. 150217</li> </ul>
CONCERN(S)	
<p>The 2024 Screening Decision Report for the original Project Proposal indicates the following recommended term and condition by the NIRB concerning aircraft flight restrictions:</p> <p>“...34. The Proponent shall restrict aircraft/helicopter activity related to the project to a minimum flight altitude of 610 metres (2,100 ft) 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...” (Page 16)</p> <p>However, the Proponent’s latest WMMP indicates the following:</p> <p>“...[a]s per the <i>North Baffin Land Use Plan</i>, over-flight altitudes of at least 300 m above ground level (AGL) will be maintained when caribou are present to help reduce stress on the animals. When safe to do so, helicopters and fixed wing aircraft will avoid landing in areas where wildlife are present...” (Page 15)</p> <p>and</p> <p>“...[a]void flying below 610 m above ground level during straight and level flight or operating snowmobiles/ATVs in areas where caribou or muskox are present...” (Page 11).</p> <p>With this in mind, it is unclear to the GN why this recommended term and condition imposed by the NIRB has not been fully incorporated into the Proponent’s latest WMMP.</p>	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN recommends that the Proponent adopt the NIRB’s above recommendation concerning minimum flight altitudes and incorporate this into the Proponent’s latest WMMP.</p>	

ADDITIONAL COMMENT(S)
N/A