



P.O. Box 18
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Cambridge Bay
Ikaluktutiak
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Kugluktuk
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Bathurst Inlet
Kingaok
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Bay Chimo
Umingmaktok
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Gjoa Haven
Okhoktok
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Taloyoak
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Kugaaruk
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Kelli Gillard, Pag, CTAJ
Senior Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, Nunavut
X0B 0C0

Sent by e-mail: kgillard@nirb.ca.

April 14th, 2025

RE: Screening of Somerset Trough Project.

Dear Kelli Gillard, the Kitikmeot Inuit Association's (KIA) has reviewed the documents submitted for the proposed Somerset Trough Project and our comments are in the enclosed screening form.

The KIA's comments pertain to the areas of wildlife and their habitat; birds and their habitat; marine mammals and their habitat, terrain; water quality; fish and their habitat; traditional uses of land, Inuit harvesting activities; and community involvement and consultations.

First we would like NIRB to note that in the NIRB Application for Screening #126134 Somerset Trough Project it states under Description of Existing Environmental: Socio-economic Environment that *"The project camp is located on QIA territory, and the full project boundaries cover QIA and KIA territory. The closest communities to the project camp site are Taloyoak and Resolute Bay, both of which are roughly 300 km away."*

The project camp is actually located on Crown Land in the Kitikmeot Region of Sommerset Island because it is south of the boundary by several kilometres and is not in the Qikiqtani Region. Project work will be done in both the Kitikmeot and Qikiqtani regions. All though Bronzite Exploration Corp. acknowledges it has not conducted any work on IOL parcels and will seek Land Use Licences for exploration on Inuit Owned Land when needed from both QIA and KIA, it only refers to QIA IOL parcels RB-01 and RB-02 in its submission and not KIA IOL SB52 which also is in its trough.

Should Bronzite Exploration Corp. conduct exploration on IOL SB52 it will need to obtain a Land Use Licence from KIA's Department of Lands, Environment, and Resources in Kugluktuk.



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Since the southern part of the proposed trough is an area frequented by Inuit from Taloyoak, the KIA request further community engagement with residents of Taloyoak and the local Hunting and Trapping Organization (HTO) to solicit feedback on project activities.

Given this and that the project camp location is in the Kitikmeot Region, the Kitikmeot Inuit Association will continue to monitor this project closely. The size of the project does not warrant an Environmental Impact Statement (EIS) at this time, but several issues have been identified which need to be addressed in an updated and improved project submission to NIRB.

Thank you.

A handwritten signature in black ink that reads "John Roesch". The signature is written in a cursive style.

John Roesch, P.Eng.

Senior Project Officer
Kitikmeot Inuit Association, Department of Lands, Environment and Resources

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment



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COMMENT FORM FOR NIRB SCREENINGS

The Nunavut Impact Review Board (NIRB) has a mandate to protect the integrity of the ecosystem for the existing and future residents of Nunavut. To assess the environmental and socio-economic impacts of the project proposal, NIRB would like to hear your concerns, comments and suggestions about the following project proposal application:

Project Proposal Title:	Somerset Trough Project		
Proponent:	Bronzite Exploration Corp.		
Location:	Qikiqtani and Kitikmeot Region		
Comments Due By:	April 14, 2025	NIRB #:	24EN005

Indicate your concerns about the project proposal below:

<input type="checkbox"/> no concerns	<input checked="" type="checkbox"/> traditional uses of land
<input checked="" type="checkbox"/> water quality	<input checked="" type="checkbox"/> Inuit harvesting activities
<input checked="" type="checkbox"/> terrain	<input checked="" type="checkbox"/> community involvement and consultation
<input type="checkbox"/> air quality	<input type="checkbox"/> local development in the area
<input checked="" type="checkbox"/> wildlife and their habitat	<input type="checkbox"/> tourism in the area
<input checked="" type="checkbox"/> marine mammals and their habitat	<input type="checkbox"/> human health issues
<input checked="" type="checkbox"/> birds and their habitat	<input type="checkbox"/> other: _____
<input type="checkbox"/> fish and their habitat	_____
<input checked="" type="checkbox"/> heritage resources in area	_____

Please describe the concerns indicated above:

- There is a need for a staged approval process for this project, with additional information coming out of the limited non-intrusive field exploration program planned for 2025, with information learned to be incorporated into revised management plans for the subsequent active drilling phase. For example, additional information is required on wildlife and archaeological considerations in the areas of the camp, airstrip and proposed drill sites.
- The Community and Stakeholder Engagement Log suggested problems arranging a community hall meeting last November to present the project and gather feedback. Are efforts continuing to have that meeting with the community and various stakeholders. It doesn't seem that there have been any face-to-face meetings, just e-mails, texts and phone chats.
- There is an abundance of unknowns in the Identification of Environmental Impacts table (ref: NIRB Application) that need to be answered and why is there no consideration of Construction and Decommissioning phases' environmental impacts. More work is required to identify these potential impacts and whether mitigation can reduce/remove these impacts.
- Camp layout drawings do not show a waste hazardous materials storage area (nor are there any details anywhere as to what it will consist of) nor where the helicopter landing pad will be.
- What are the quantities of new hazardous materials to be in storage at any one time in the "fuel cache" or other containment area? Documents suggest a large number of drums of hazardous materials are to be utilized.
- The Spill Contingency Plan should include minimum reportable quantities for spilled materials. References for guidance Regulations were noted but the specific quantities for the materials to be used on site should be included in the one Management Plan.



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- Several documents refer to the reporting of spills and their phone numbers. These must all clarify who is responsible for notifying the authorities.
- The use of a waterfront beach as an airstrip is concerning – its closeness to open water, waterfowl disruption, possibility of spills, etc. Does the Company know how amenable the beach is to use as an airstrip? Is there an alternate?
- Need to confirm mandatory training of all project staff and contractors to ensure they are fully aware of management plans and their respective areas of potential involvement and responsibilities. And all training needs to be documented.
- A significant quantity of water is envisioned for the 2026-2029 drilling phase of the exploration program (i.e.; 299 m3/d). And only 1 or 2 drills are being envisioned. That seems really high. Are these diamond drills or reverse circulation drills? In KIA's experience NQ core diamond drilling may use some 50-60m3/d and less if you carefully manage the recirc water or up to 100-125 m3/d with no recirculation. Where did the 299 number come from? Are there drills that could do the same work with less water consumption? The NIRB application document states up to 45,000m of drilling annually! The concern is the large quantity of water being estimated and finding adequate supplies close by to each of the drill rigs as well as the potential for excess sediment-laden waters escaping small sumps at the drill sites.

Do you have any suggestions or recommendations for this application?


As mentioned above a conditional approval should be granted for the proposed 2025 program with a subsequent review of additional information after that field season that can be utilized to further detail the plans for the more invasive 2026-2029 drill program and permit regulatory review and approval of those plans.

Do you support the project proposal? Yes ☒ No ☐ Any additional comments?

But with conditions as mentioned in the text above.

Name of person commenting: John Roesch **of** Department of Lands, Environment, and Resources

Position: Senior Project Officer **Organization:** Kitikmeot Inuit Association

Signature:  **Date:** 2025-04-14