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Qikiqtani Inuit Association

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Serving the communities of
ᐃᑲᓗᐊᖅᖢᑎ Arctic Bay | ᑲᖏᕐᕋᐅᑦᓯᐊᖅ Clyde River | ᒋᑦᑎᐊᑦᑕᕐᓂ Grise Fiord | ᐃᓚᓪᓕᒃ Igloolik | ᐃᖁᓗᓖᑦ Iqaluit | ᑭᒥᓂᕐᒥᑦ Kimmirut | ᑭᙵᓚᐃᑦ Kinngait | ᐱᖓᓐᓂᐊᑎᒃ Pangnirtung | ᑭᓛᓕᒫᖅ Pond Inlet | ᖁᑭᖅᑕᕐᔪᐊᖅ Qikiqtarjuaq | ᕆᐹᔪᒃ Resolute Bay | ᓴᓂᑭᓗᐊᖅ Sanikiluaq | ᓴᓂᕆᔭᒃ Sanirajak

April 14, 2025

Francis Emingak
Screening Officer
Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik)
Cambridge Bay, NU X0B 0C0
Email: info@nirb.ca

Dear Francis,

The Qikiqtani Inuit Association (QIA) respectfully submits this correspondence in response to the Nunavut Impact Review Board's (the NIRB or the Board) call for comments on Bronzite Exploration Corp.'s Somerset Trough Project proposal. The comments are enclosed in Appendix A of this letter.

QIA would like to bring it to the Board's attention that Creswell Bay is a very sensitive area that is home to narwhal, beluga, arctic char, and muskox, among other wildlife.

In addition, QIA reminds the proponent that any activities on Inuit Owned Lands require a separate filing a land access application with QIA.

QIA would like to thank the NIRB for the continued opportunity to provide comments on project proposals that have potential to impact Inuit in the Qikiqtani region. Please do not hesitate to contact QIA for any clarification.

Nakurmiik,

Assol Kubeisinova
Manager of Regulatory Review
Qikiqtani Inuit Association

Appendix A QIA Comments—Somerset Trough Project

Comment Number	QIA-1
Issue	**Nest searching**
Reference	Wildlife Management and Monitoring Plan Section 2.0. Environmental Protection Plan Section 3.12
Discussion	To avoid active nests, there must be a clear protocol for identifying active nests, in a way that aligns with Environment Canada guidelines. In the Plan, a "visual scan" for nests prior to disturbance needs to be clearer and more detailed. Breeding season for the Project Area (Nesting Zone N10) is 20 May to 15 August as per Environment and Climate Change Canada. Approximately 30 species are known to nest in and around Somerset Island, for which identification cards can be provided for staff conducting survey with a focus on Species at Risk (SAR). - prior to disturbance, a nest search must be conducted within the footprint and a 25 m radius buffer surrounding the area of disturbance. The search should include meandering transects through the area, searching for any birds flushing from their nests. Breeding bird behaviour (a bird faking an injury to distract you away from nest, aggressive behaviour that can include dive bombing observers, and agitated behaviour, i.e. persistent calling, or a group of males on a lek) can also be an identification of a nest's presence and should be treated the same as if a physical nest is observed; - any clearing activities must be completed within 72 hours or the nest survey has to be conducted again; - if a nest is found, halt activity and move away, make a no-disturbance buffer around the area of at least 20 m radius (longer depending on the species, conservation status, level of disturbance). Note: A SAR, the Buff-breasted Sandpiper, have leks used during breeding where males gather for breeding displays. When possible, these locations should be avoided as the birds return to similar locations year after year and disturbance to these locations can disrupt breeding.
Recommendation	Implement this protocol into both plans for clarity on expectations of surveys.

Comment Number	QIA-2
Issue	**Protection of bird nests and eggs**
Reference	Wildlife Management and Monitoring Plan Section 2.0. Environmental Protection Plan Section 3.12
Discussion	It is prohibited for anyone to "damage, destroy, disturb or remove migratory bird nests when they contain a live bird or viable egg." The language should be altered to align with what is written in the Migratory Birds Act and Regulations.
Recommendation	Alter wording in regard to protection of breeding birds and their nests.

Comment Number	**QIA-3**
Issue	**Caribou and muskox impact mitigations**
Reference	Wildlife Management and Monitoring Plan Section 4.0 Table 2.
Discussion	The proponent states it will "avoid landing helicopter or fixed wing aircraft in areas where wildlife are present." QIA recommends the statement be revised to say that the proponent will not land within a 1 km buffer of any caribou or wolverine and 500 m for muskox, polar bears, or wolves (unless under emergency circumstances). Sources: Most recent species-specific COSEWIC reports: Document search - Species at risk registry https://edepot.wur.nl/120972 (Section 2.1) Microsoft Word - Helicopter_Disturbance_Biblio_FINAL_Standard.doc (Table 3-2; Chapters 4 Annotated Bibliography] and 7 [Index])
Recommendation	QIA recommends revising the quoted statement in the table.

Comment Number	**QIA-4**
Issue	**Caribou and muskox impact mitigations**
Reference	Wildlife Management and Monitoring Plan Section 4.0 Table 2.
Discussion	More specific on Potential Impacts, the table column should include noise disturbance specifically as a primary disturbance and specific mitigation measure should be detailed: - Maintain equipment in proper working order to help minimize noise. - Keep appropriate distances from wildlife. - If operation of equipment is unnecessary, shut down equipment to minimize noise.
Recommendation	QIA recommends revising the quoted statement in the table.

Comment Number	**QIA-5**
Issue	**Carnivores – Wolverine, Wolf, Polar Bear**
Reference	Wildlife Management and Monitoring Plan Section 4.0 Table 2/Environmental Protection Plan (EPP) Section 3.9
Discussion	Actions to be taken in the event of polar bear sighting in section 3.9 of the EPP should be included in both documents, and a similar flow chart should be applied for wolverines and wolves.
Recommendation	Please revise the documents as recommended.

Comment Number	**QIA-6**
Issue	**Habitat disturbance**
Reference	Wildlife Management and Monitoring Plan Section 5.0 Monitoring and Mitigation Procedures
Discussion	Minimize the disturbance for all clearing activities; only clear what is necessary for safety and functionality of equipment. Avoid disturbing vegetation when operating ATVs by

	driving on a single trail. Disturbance to the surrounding tundra will be minimized adjacent to the Project footprint.
Recommendation	Add a commitment under the main header of section 5.0

Comment Number	**QIA-7**
Issue	**At-Risk or Species of Conservation Concern List – Missing Species / Designation Update**
Reference	Wildlife Management Plan (v1.1), Tables 1 & 2
Discussion	1. Beluga whale (Eastern High Arctic – Baffin Bay population) summer core area overlaps the marine area adjacent to Somerset Island. This population was designated *Special Concern* by COSEWIC (Nov 2020) and is currently "under consideration for addition" to SARA, Schedule 1. 2. Narwhal is not currently listed on SARA, Schedule 1 and has been reassessed by COSEWIC (May 2024) as Not at Risk. However, given Inuit concerns, it is best to remain in Tables 1 & 2. 3. Killer whale here refers to the Northwest Atlantic / Eastern Arctic population. 4. Peregrine Falcon (subspecies) is not currently listed on SARA, Schedule 1 5. Red-necked Phalarope could occur within the Project Area. It is currently designated Special Concern by both COSEWIC and on SARA, Schedule 1.
Recommendation	Update Tables 1 & 2 to account for species with current SARA Schedule listing and/or COSEWIC designations: Species search - Species at risk registry

Comment Number	**QIA-8**
Issue	**Potential impacts to fish and fish habitat**
Reference	Environmental Protection Plan (2023-07-12) Section 2.2
Discussion	Although there are not impacts expected which might harm fish or fish habitat, there is the potential to have small-scale effects such as deleterious substances entering waterbodies.
Recommendation	We suggest that DFO's Measures to Protect Fish and Fish Habitat be included in Section 2.2

Comment Number	**QIA-9**
Issue	**Erosion and sediment control (ESC), prevention of deleterious substances entering waterbodies**
Reference	Environmental Protection Plan (2023-07-12) Section 3.5
Discussion	ESC measures that function elsewhere tend to be ineffective in the arctic where harsh conditions such as wind and lack of soils prevent proper use of measures such as silt fences.
Recommendation	We suggest the use of filter socks/coir logs (installed correctly) in place of silt fences.

Comment Number	QIA-10
Issue	Drill Water Runoff
Reference	Environmental Protection Plan (Section 3.5.3, pg. 8 of 23)
Discussion	"*Drilling muds contained in drilling fluids must be settled out in sumps or by silt fences prior to entering any water bodies or streams.*" Silt fences are not typically intended to be used to settle out suspended solids, but intercept mobilized sediments.
Recommendation	Sumps should be prioritized as settling areas for drilling muds/fluids and ESCs (as recommended in previous comment) should be used as redundancy safeguards.

Comment Number	QIA-11
Issue	**Use of prescriptive language**
Reference	Environmental Protection Plan - Sections 3.2, 3.5, 3.6, 3.7, 3.8, 3.9, 3.11, 3.13, 3.14
Discussion	There are several instances where the ambiguous phrase "should be" needs to be clarified with what "will be" done as a form of environmental mitigation. For example, Section 3.6 "Spill kits *should* be made available on-site for the purpose of spill control and clean-up."
Recommendation	Replace instances of '*should be done'* with what '*will be done'* with respect to environmental mitigation measures.

Comment Number	QIA-12
Issue	**Polar Bear Safety**
Reference	Environmental Protection Plan (v.1.2), Section 3.9
Discussion	The training video *Working in Bear Country* is primarily for field projects in black bear and grizzly bear territory.
Recommendation	Also consider adding the companion video specific to polar bears (which also presents Inuit feedback), *Polar Bears A Guide to Safety: Practical Advice on Human Safety Around Polar Bears* (Youtube link).

Comment Number	QIA-13
Issue	**Caribou sightings**
Reference	Environmental Protection Plan (v.1.2), Section 3.11 (Caribou Protection Measures) Wildlife Management Plan (v1.2), Section 5.0Wildlife Observation Log
Discussion	Appendix D: Wildlife Observation Log. Given the limited recent information of caribou spatial use on Somerset Island, additional information would be valuable.
Recommendation	1. Location on the log form will include geographic coordinates with distance from observed noted in the comments. 2. Indicate if caribou (Peary or Barren Ground) observation/sighting was aerial- or ground-based

Comment Number	QIA-14
Issue	**Drill program – wildlife distance shutdown criteria**
Reference	Environmental Protection Plan (v.1.2), Section 3.5 (Caribou Protection Measures)
Discussion	There is no mention of shutdown criteria with respect to wildlife encounters and active drill rigs for the 2026 season onwards. In general, wildlife avoid large noise signatures such exploratory drilling; however, threshold distances for SARA-listed mammal species (Peary caribou, wolverine, and polar bear) should be defined. The average avoidance distance of caribou from industrial activities was ~3 km (*as reviewed in* Johnson et al. 2016).
Recommendation	Ground crews and vehicles should not approach caribou within 1 km. Ground crew teams can be provided with range finders to assist distance measurements and recording information for the Wildlife Observation Log. During active work, crews will monitor for wildlife and if any caribou are within 1 km of the project area, all activities will be paused and when feasible equipment shutdown (including generators and drills) until the caribou move beyond 1 km. When a sighting occurs, the observation will be communicated immediately to other staff to inform of wildlife and enforce work stoppage. Refer to Miller and Gunn (1979) and Johnson et al. (2016). Source: Johnson, C.A., Neave, E., Blukacz-Richards, A., Banks, S.N., and P.E. Quesnelle. 2016. Knowledge assessment (community and scientific) to inform the identification of critical habitat for Peary caribou, Rangifer tarandus pearyi, in the Canadian Arctic. Environment and Climate Change Canada, Science and Technology, Ottawa, Ontario, Canada.

Comment Number	QIA-15
Issue	**Spills to freshwater**
Reference	Spill Contingency Plan (2023-12-05) Section 3.0
Discussion	Accidental spills to freshwater have the potential to kill fish and/or aquatic organisms through short and/or long-term exposures. The definition of a spill to fish habitat includes sediment-laden water, not only hydrocarbons.
Recommendation	Sediment-laden water should also be addressed as a potential spill. We also suggest that DFO be added to the list of key contacts in the event of spills to freshwater supporting fish or fish habitat.

Comment Number	QIA-16
Issue	**Drummed fuel storage inventory**
Reference	Spill Contingency Plan, v1.1, Table 1.
Discussion	There is a total of ~500 drums (205 L each) of fuel proposed for the 2025 field season listed in Table 1. Additional details would be helpful to assess transport of drummed fuel

	to the project fuel cache (i.e, if aircraft-cargo only, a Basler BT-67 (DC3T) can hold ~17 drums per trip; there is no mention of marine shipment by barge), and timeline of fuel cache inventory (i.e., how many drums on site during spring, summer, estimated stored over-winter, etc.). This information would be needed to further assess spill management scenarios at the fuel cache.
Recommendation	Clarify the transportation method of drummed fuel to the project fuel cache. State if all fuel will be transported to site via air cargo as drums, via transfer to drums via aircraft bladder, or other. Clarify the maximum volume of drummed fuel proposed at the fuel cache for the 2025 field season (e.g. will there be 500 drums at any one time (102,500 L) or is this staggered over the 2025 field season?).

Comment Number	**QIA-17**
Issue	**Domestic Refuse**
Reference	Waste Management Plan (Table 1, pg. 8 of 15)
Discussion	50 kg/day of domestic refuse from the camp kitchen may be an overstatement. What is the number based on and what is the mass of refuse per capita expected? 6 tents with 3 people/tent implies a maximum occupancy of 20 people. Is each person going to generate 2.5 kg of refuse per day?
Recommendation	Please provide a clarification.

Comment Number	**QIA-18**
Issue	**Project Timing**
Reference	NPC Project Application
Discussion	We are unclear why the start date is listed as 2024-03-15. We understand that the project was suspended, but should the start date not be amended to 2025?
Recommendation	Please clarify

Comment Number	**QIA-19**
Issue	**Inuit Qaujimajatuqangit (IQ)**
Reference	Community Engagement Plan Section 5.0
Discussion	We suggest that IQ be incorporated into operations and used to guide location and avoidance measures, during early stages of the project.
Recommendation	Please update all sections of the report

Comment Number	**QIA-20**
Issue	**Aircraft runway**
Reference	Map of Proposed Camp Location and Layout

Comment Number	QIA-20
Issue	**Aircraft runway**
Discussion	We notice that the runway is within the 50 m watercourse buffer (although not shown) and that the runway is within a few metres of the ocean to the NW. Please provide rationale for the proximity to the ocean.
Recommendation	We recommend that the runway be located greater than 31 m from any body of water

Comment Number	QIA-21
Issue	**Aircraft Transport: Fixed-wing and Helicopter**
Reference	Map of Proposed Camp Location and Layout;
Discussion	Given the possibility of marine mammal use in the inshore area adjacent to the airstrip, it would be ideal if the flight path for take-off and landing approaches avoided low-level banking over marine waters. Some marine mammal species that may occur are protected under SARA, Schedule 1.
Recommendation	State that the aircraft will avoid inshore marine flight routes when arriving/departing the airstrip. Also, consider presenting proposed flight lane for take-off and landing approaches to the air strip in future versions of maps.

Comment Number	QIA-22
Issue	**Fuel Cache**
Reference	Various Documents
Discussion	The fuel cache is located between 50-100 m from the marine shoreline (adjacent to the aircraft landing strip) and ~200 m from the proposed camp. Any jerry cans stored within this fuel cache, even if inside a secondary containment berm, could be an attractant to transiting polar bear(s). This includes jerry cans attached to snowmobile or ATV racks, trailers, or even the fuel tank of machines (i.e., snowmobile left near the airstrip for the returning flight crew).
Recommendation	No jerry cans of fuel (filled or empty) are to be stored open at the fuel cache. This includes during the field project duration and during off-season periods (i.e., Abandonment and Restoration Plan, v.1.1, Section 4.0 Seasonal Shutdowns). As this is a long-term field exploration project, consider the use of a mini (8') shipping container to secure 'non-drummed' petroleum items (e.g., jerry cans, hoses, etc.) for storage during the off-season(s).

Comment Number	QIA-23
Issue	**Disturbance to tundra vegetation**
Reference	Environmental Protection Plan (2023-07-12)
Discussion	We do not see the potential impact to tundra vegetation/lichen addressed in the documents. Impacts particularly from helicopter landings and from extensive ATV use should be addressed.

Comment Number	**QIA-23**
Issue	**Disturbance to tundra vegetation**
Recommendation	Please address potential impacts to tundra vegetation/lichen and/or shallow soils and possible mitigation and remediation measures.

Comment Number	**QIA-24**
Issue	**Abandonment and Reclamation**
Reference	Abandonment and Restoration Plan
Discussion	For a complete Abandonment and Restoration Plan, there ought to be included a timeline of activities along with a financial estimate of required expenditures on abandonment and restoration.
Recommendation	Please provide the required information.

Comment Number	**QIA-25**
Issue	**Abandonment and Reclamation**
Reference	Abandonment and Restoration Plan
Discussion	Abandonment and restoration of the airstrip or any aircraft landing area should be included in the management plan.
Recommendation	Please provide the required information.