



NIRB File No.: 24EN005

NPC File No.: 150418

Related to NPC File No.: 150217

April 22, 2025

Samuel Robb
Bronzite Exploration Corp.
218 Holmwood Ave
Ottawa, ON K1S 2P7
Canada

Sent via email: sam.robbs@bronziteexploration.com

Re: Opportunity to Address Comments Received Regarding Bronzite Exploration Corp.'s "Somerset Trough Project" Proposal

Dear Samuel Robb:

On May 24, 2024, the Nunavut Impact Review Board (NIRB or Board) received Bronzite Exploration Corp.'s (BEC) "Somerset Trough Project" proposal from the Nunavut Planning Commission (NPC or Commission) for screening. On March 24, 2025, the NIRB circulated a public notice of the screening for this project proposal, inviting interested parties to provide comments directly to the NIRB by April 14, 2025.

On or before April 14, 2025, the NIRB received comments from the following interested parties and all comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/126134.

Commenting Party	NIRB Doc ID No.
Qikiqtani Inuit Association (QIA)	354588
Kitikmeot Inuit Association (KIA)	354587
Government of Nunavut (GN)	354586
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	354456
Transport Canada (TC)	353875
Taloyoak Umarulirigut Association	354286
Peter Aqqaq	354274

A *summary* of the public concerns reflected in the comment submissions relate to the following:

QIA

- Noted that Creswell Bay is a very sensitive area that is home to narwhal, beluga, Arctic char, and muskox and other wildlife;
- Reminded the Proponent that any activities on Inuit Owned Lands require a separate filing for a land access application with QIA.

KIA

- Noted that Project work would be done in both the Kitikmeot and Qikiqtani Region, should Bronzite Exploration Corp. conduct exploration on IOL SB52 it would need to obtain a Land Use Licence from KIA's Department of Lands, Environment, and Resources in Kugluktuk;
- Noted that the southern part of the proposed trough is an area frequented by Inuit from Taloyoak, KIA requests further community engagement with the residents of Taloyoak and the local Hunters and Trapping Organization to solicit feedback on project activities.

GN

- Requested that the Proponent provide more information to clarify this point of uncertainty regarding wildlife studies, the GN wishes to remind the Proponent that Wildlife Research Licences are required under the Nunavut's *Wildlife Act* for studies of terrestrial wildlife (including plants, insects, and animals), polar bears and birds. Proponents may apply for Wildlife Research Permits by contacting wildlife_research@gov.nu.ca;
- Noted 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. The GN recommended that the Proponent identify polar bear denning habitat within section 3.2 of the Wildlife Management and Monitoring Plan (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.
- Noted that the 2024 Screening Decision Report for the original Project Proposal indicated the following term and condition by the NIRB concerning aircraft flight restrictions, the GN recommended that the Proponent adopt the NIRB's recommendations concerning minimum flight altitudes and incorporate this into the Proponent's latest WMMP.

CIRNAC

- CIRNAC noted that the most recent version of the Abandonment and Restoration Plan, dated January 25, 2025, does not describe procedures for using native plant species for re-vegetation. CIRNAC recommended that the Proponent update the Abandonment and Restoration Plan to include re-vegetation procedures, to satisfy the requirement outlined in the Screening Decision Report.

TC

- Noted that the Proponent would need to complete self-assessments of the navigability of all waterways where water intakes would be placed, if a waterway is navigable, the water

in take that would be used for water withdrawal may be a “minor work” under the *Canadian Navigable Waters Act* (CNWA).

- Noted that the shipper preparing the dangerous shipment for air transportation must have International Civil Aviation Organization (ICAO) training for dangerous goods.

Taloyoak Umarulirigut Association

- Noted that they strongly oppose the Bronzite Somerset Island Project and its proposed amendment to extend operations from 18 months to five years;
- Noted that the Proponent has not conducted a in-person consultation with the community of Taloyoak, noting that it is a complete disregard for the people who would be most affected by the project proposal;
- Noted that Somerset Island and its surrounding waters are critical habitat for narwhal and beluga species that are essential to their culture, food security, and a way of life. Any industrial activity in the sensitive ecosystem poses a serious threat to these marine mammals;
- Noted that Somerset Island holds deep historical and cultural significance for the people of Taloyoak, stating that our ancestors and grandparents lived there for generations;
- Noted that the Taloyoak Umarulirigut Association is currently in the process of establishing an Indigenous Protected and Conserved Area (IPCA) to safeguard Somerset Island and its surrounding environment.

Peter Aqqaq

- Noted that the area is a critical habitat for three marine species, the narwhal, beluga, and bowhead whales and is known that the whales go to the area where the proposed project is located,
- Notes that the Proponent sent emails to an old HTA email which is no longer in use and the Proponent has put that “no response” on their no consultation;
- Noted that Peary caribou live on Somerset Island and is a protected species in Canada; and
- Noted that he is fully opposed to the amendment.

The NIRB would like to provide Bronzite Exploration Corp. with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **May 6, 2025**.

If Bronzite Exploration Corp. determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at femingak@nirb.ca.

Sincerely,



Francis Emingak
Screening Officer
Nunavut Impact Review Board

cc: Distribution List
Richard Dwyer, Nunavut Water Board
Nidhi Singh, Nunavut Water Board
Abid Jan, Nunavut Water Board
Carson Gillis, Nunavut Tunngavik Inc.
Jorgan Aitaok, Nunavut Tunngavik Inc.
Dustin Fredlund, Nunavut Tunngavik Inc.
Wynter Kuliktana, Kitikmeot Inuit Association
Tannis Bolt, Kitikmeot Inuit Association
Conor Goddard, Qikiqtani Inuit Association
Jared Ottenhof, Qikiqtani Inuit Association
Chris Spencer, Qikiqtani Inuit Association
Joel Fortier, Qikiqtani Inuit Association
Justin Buller, Government of Nunavut
Dianne Lapierre, Government of Nunavut
Caroline Whittle, Department of Culture and Heritage - Government of Nunavut
Sylvie LeBlanc, Department of Culture and Heritage - Government of Nunavut
Natalie D'Souza, Department of Environment - Government of Nunavut
Bradley Pirie, Department of Environment - Government of Nunavut
Michele LeBlanc-Havard, Department of Environment - Government of Nunavut
Drikus Gissing, Department of Environment - Government of Nunavut
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs Canada
Lisa Pirie-Dominix, Canadian Wildlife Service
Environment Climate Change Canada
Fisheries and Oceans Canada