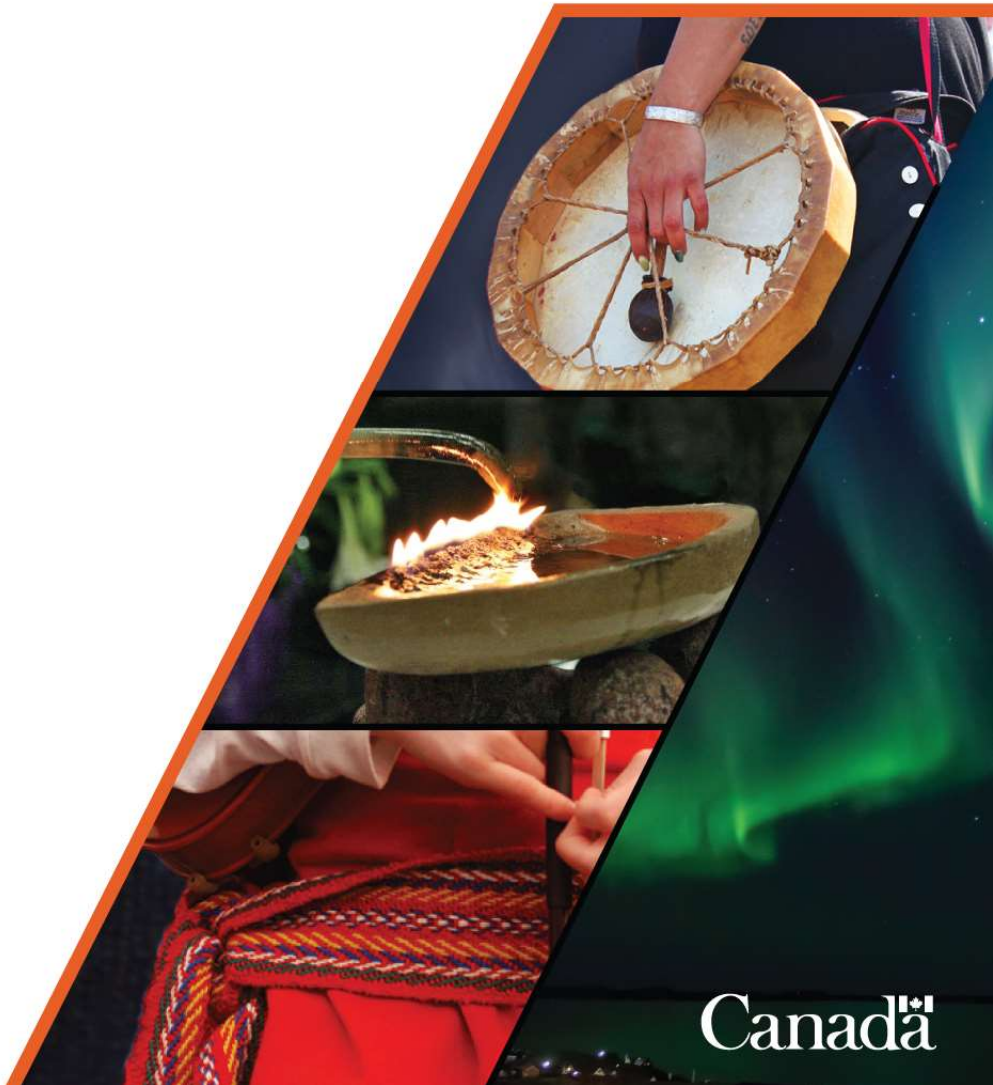




CIRNAC Comments to NIRB

Re: Notice of Screening for Somerset Minerals Ltd.'s “Coppermine Project” Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
25EN075
Our file - Notre référence
GCdocs# 142915023

January 27, 2026

Jordan Takkiruaq
Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Somerset Minerals Ltd.'s "Coppermine Project" Proposal

Dear Jordan Takkiruaq,

On January 8, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Somerset Minerals Ltd.'s "Coppermine Project" proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal

CIRNAC #1: Bulk Fuel Storage and Containment Capacity

While the Proponent commits to storing all fuel drums within secondary containment and describes extensive spill prevention and response measures, the materials provided do not clearly demonstrate how secondary containment systems for large, multi-drum fuel storage areas are sized and managed to contain a credible worst-case release relative to the proposed fuel inventory. In addition, the Fuel Management Plan does not include Safety Data Sheets (SDS) in Appendix B, which are typically relied upon during spill response to confirm substance-specific hazards, handling requirements, and clean-up measures. CIRNAC recommends that in their future authorization applications the Proponent considers:

- Demonstrating that secondary containment systems for bulk, multi-drum fuel storage are sized sufficiently and are managed to maintain effective containment capacity under site-specific conditions; and
- Including SDS for all fuels and hazardous materials referenced in the Fuel Management Plan to support effective spill response and emergency management.



CIRNAC #2: Geochemical Suitability of Tailings for On-Site Disposition

Reverse Circulation (RC) drilling may generate up to 1.5 m³ of dry tailings per drillhole; for up to 100 drillholes, this could result in approximately 150 m³ of RC tailings. The Proponent indicates that RC drilling material remaining after sample retention will be stored in the field for up to one year and then disposed of on site in natural depressions or sumps, followed by re-contouring the ground surface.

The Proponent's approach relies on managing this material through temporary storage followed by on-site placement, without clearly demonstrating that all drilling materials proposed for land disposal have been evaluated for acid rock drainage and/or metal leaching (ARD/ML) potential. Drilling materials derived from mineralized rock are not inert by default, and placement into natural depressions or sumps may increase moisture contact and leaching potential. This represents a potential concern due to the potential volume of material, the long-term nature of on-site disposition, and the absence of a demonstrated linkage between geochemical evaluation and disposal decisions. CIRNAC recommends that the Proponent considers:

- Demonstrating that drilling materials proposed for on-site disposition have been evaluated for ARD/ML potential, and that results are used to inform disposition decisions;
- Clarifying the criteria used to determine whether drilling materials are suitable for on-site placement, including conditions under which alternative management or off-site disposal would be implemented; and
- Describing how drilling materials stored in the field for extended periods will be managed and monitored to prevent uncontrolled release prior to final disposition.

CIRNAC #3: Groundwater / Artesian Flow Management

The Proponent does not describe procedures for managing unexpected groundwater or artesian flows that may be encountered during drilling. Although such events may be infrequent, uncontrolled flows could result in localized erosion or discharge to the land surface if not managed. CIRNAC recommends that the Proponent considers including procedures for managing and containing any unexpected groundwater or artesian flows in regulatory applications, to ensure appropriate management and minimize environmental risks during drilling operations.

CIRNAC #4: Consultation With Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the Hamlet of Kugluktuk, the Kugluktuk Angoniatit Association / Kugluktuk Hunters' & Trappers' Organization, the Kitikmeot Inuit Association, and any other relevant organizations or individuals.

As part of these consultation activities, several issues should be considered, including but not limited to:

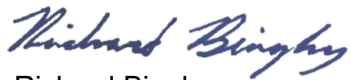
- Incorporation of Inuit Qauijimajatuqangit, Indigenous knowledge, and Community Knowledge, in addition to scientific ways of knowing into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;



- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Richard Bingley
Manager, Impact Assessment

