



<b>GN # 01</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Spill Response
<b>References</b>	<ul style="list-style-type: none"> <li>• 1501253 B.C Ltd. Spill and Fuel Management Plan – Coppermine Project. Version 1.0. (October 2025).</li> <li>• Environmental Protection Act Spill Contingency Planning and Reporting Regulations, R-068-93</li> </ul>
<b>IDENTIFICATION OF ISSUE</b>	
<p>The Government of Nunavut (GN) has identified several issues and opportunities for improvements concerning 1501253 B.C. LTD/Somerset Minerals' (Proponent) Spill and Fuel Management Plan (Spill Plan) for the Coppermine Project (Project). The issues and opportunities for improvements described by the GN below are intended to reduce potential environmental impacts of the project and improve the Spill Plan's alignment with applicable legislation and regulations.</p>	
<b>SUPPORTING RATIONALE</b>	
<p>The GN has identified the following issues and opportunities for improvement:</p> <p><b>Issues:</b></p> <ol style="list-style-type: none"> <li>1. Section 4(2)(a) of the Spill Contingency Planning and Reporting Regulations R-086-93 (Regulations), enacted under the <i>Environmental Protection Act (R.S.N.W.T. 1988, c.E-7 (Nunavut))</i>, states that a spill contingency plan for a facility must contain the following information: "...the name, address and job title of the owner or person in charge, management or control;". However, the Proponent's Spill Plan does not contain a complete address. Instead, the address is listed as "Perth, Australia" (Page 7). Additionally, the GN notes that spill response times may be increased if there is no local or domestic contact ready to assist.</li> <li>2. Section 4(2)(c) of the Regulations states that a spill contingency plan for a facility must contain "a description of the facility including the location, size and storage capacity." However, the Proponent's Spill Plan does not contain information regarding the storage capacity.</li> <li>3. Section 9(1) and (2) and Schedule B of the Regulations describe the contaminant and amount spilled. This schedule defines when the amount spilled is equal to or greater to amount set out; it must be reported (to the Government of Nunavut/Government of Northwest Territories 24-Hour Spill Report Line or related form). However, the Proponent's Spill Plan does not specify when to report a spill based on the quantity spilled.</li> <li>4. Per the Regulations, 11(1) states that a person reporting a spill (to the 24-Hour Spill Report Line) shall give as much of the following information as possible, including:</li> </ol>	

- “(a) date and time of spill;
- (b) location of spill;
- (c) direction spill is moving;
- (d) name and phone number of a contact person close to the location of spill;
- (e) type of contaminant spilled and quantity spilled; (f) cause of spill;
- (g) whether spill is continuing or has stopped;
- (h) description of existing containment;
- (i) action taken to contain, recover, clean up and dispose of spilled contaminant;
- (j) name, address and phone number of person reporting spill;
- (k) name of owner or person in charge, management or control of contaminants at time of spill.”

However, the Proponent’s Spill Plan does not specify what information is requested (i.e., should be provided) when reporting a spill.

5. Under the Regulations, Section 7(1) states that the person responsible for preparing a spill contingency plan shall review the plan annually. However, the Proponent’s Spill Plan does not specify that this action must be carried out annually.

6. Appendices A: Spill Tracker and B: “MSDS [Material Safety Data Sheet] SHEETS” of the Proponent’s Spill Plan are not listed in the table of contents. Additionally, Appendix B of the Proponent’s Spill Plan is blank.

**Opportunities for Improvement**

1. The Proponent’s Spill Plan includes daily inspections of fuel caches/ fuel storage sites to check for leaks, and that “all issues to be addressed immediately...” (Pages 8–10). However, the Proponent’s Spill Plan does not outline the procedures for conducting and documenting daily inspections.

2. The Regulations, Section 4(2)(i) states that a spill contingency plan for a facility must contain “an inventory of and the location of response and clean-up equipment available to implement the spill contingency plan;” While the Proponent’s Spill Plan lists the items to be included in each spill kit, it does not specify the quantities of those items or outline the procedures for replenishing spill kit materials.

3. Spill Tracker (Appendix A) in the SFMP is not a controlled document. As such, the use of different versions of this document could lead to inconsistent data capture.

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

The GN requests that the Proponent undertake the following:

- 1. Provide the full address of the owner, person in charge, management or control. Additionally, consider having a local or domestic contact available in a supervisory or management role to ensure timely spill response.
- 2. Provide the storage capacity for the fuel storage areas.
- 3. Incorporate the requirements for reporting a spill as described in Section 9 and Schedule B of the Regulations.
- 4. Include requirements listed in Section 11(1) of the Regulations so that as much information as possible can be provided when reporting a spill.

- 5.** Include the requirement for reviewing the spill plan annually under Section 3 Roles and Responsibilities for Senior Management of the Spill Plan (Pages 13–14).
- 6.** List Appendices A and B in the table of contents for the Spill Plan. Additionally, provide the MSDS for Appendix B.

The GN recommends that the Proponent undertake the following:

- 1.** Consider developing a checklist/documentation to verify that daily inspections are carried out and that if issues are identified, they are corrected.
- 2.** List the quantities of spill cleanup materials under Section 2 Resource Inventory of the Spill Plan, and identify who will conduct an inventory of the response and clean-up equipment. Additionally, identify who will be responsible for replenishing spill kit materials after a spill occurs.
- 3.** Provide a version number and date on the Spill Tracker Form to ensure the correct version of the Spill Tracker form is used for all aspects of the project.

<b>GN # 02</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Wildlife Management Plan Details
<b>References</b>	<ul style="list-style-type: none"> <li>• 1501253 B.C. Ltd. NIRB Application for Screening #126241 Coppermine Project. (October 2025).</li> <li>• 15101253 B.C. Ltd. Wildlife Management Plan – Coppermine Project. Version 1.0. (October 2025)</li> <li>• Somerset Minerals. 251025-25EN075-May Community Flyer. (May 2025).</li> </ul>
<b>IDENTIFICATION OF ISSUE</b>	
<p>The Proponent’s Coppermine Project Wildlife Management Plan (Wildlife Management Plan) and related documentation do not clearly describe the mitigation measures that will be implemented to minimize the Project’s impacts on caribou.</p>	
<b>SUPPORTING RATIONALE</b>	
<p>In the Wildlife Management Plan, the Proponent states:  <i>“During the Blue Nose East Caribou Herd calving and post-calving...exploration activities will conform with approved caribou mitigation measures and permit conditions.”</i> (Page 4)</p> <p>For all other times of the year, the Proponent commits to mitigations such as giving the right-of-way to caribou (and other wildlife), avoidance of aircraft when wildlife are present, including vertical setbacks for aircraft, and locating operations to avoid blocking or diverting migration. Specifically, the Proponent states, "1501253 B.C. Ltd will work with fixed-wing and helicopter pilots to follow best practices for minimizing disturbance to local wildlife such as caribou, muskox, and polar bears." (Page 12)</p> <p>However, there are no references to any specific approved caribou mitigation measures or best practices used to inform the development of the Wildlife Management Plan.</p> <p>In the Proponent’s May Community Flyer, the Proponent commits to “[o]perational shutdown during caribou calving to protect wildlife” (Page 2) and also states that, “the program will begin in spring with low-impact survey work, pause respectfully during the caribou calving season and resume with drilling from July through September” (Page 1).</p> <p>However, the GN notes that the terms “operational shutdown”, “pause” and “low-impact survey work” are not sufficiently defined. As such, it is unclear what specific actions would be taken to mitigate potential disturbance of caribou.</p>	
<b>REQUEST(S)/RECOMMENDATION(S)</b>	

The GN requests that the Proponent undertake the following amendments to the Wildlife Management Plan:

1. Describe the terms “pause” and “operational shutdowns,” including whether staff and/or equipment will remain on site, and what activities will be ceased.
2. Describe the term “low-impact survey work,” including the methods, timing, frequency, and duration of anticipated aircraft or ground activity and the rationale used to determine the level of impact.
3. Clearly specify the avoidance, minimization, and mitigation measures that will be implemented, including the:
  - best management practices that will be followed (including specific references);
  - monitoring methods that will be used to detect caribou presence near the camp and work areas, particularly during migration;
  - decision-making process and thresholds for pausing operations; and,
  - specific mitigation actions and thresholds for caribou and other wildlife

<b>GN # 03</b>	
<b>Department</b>	Culture and Heritage
<b>Organization</b>	Government of Nunavut
<b>Subject/Topic</b>	Archaeological Assessment
<b>References</b>	NIRB 25EN075 / 126241 Notice of Screening and Comment Request for "Coppermine" Project Proposal
<b>CONCERNS</b>	
<p><b>Project Summary</b>  1501253 B.C. Ltd. (operating as Somerset Minerals Ltd.) proposes to expand mineral exploration activities at the Coppermine Project, located approximately 60 kilometres southwest of the community of Kugluktuk. The proposed multi-year program (2025–2031) includes prospecting, airborne and ground geophysical surveys, till sampling, and up to 100 diamond and reverse-circulation drill holes across approximately 1,665 km<sup>2</sup> of Crown Land and Inuit Owned Land. The Project also includes the establishment and operation of two temporary exploration camps (Jura and Hope Lake), fuel caches, drilling support infrastructure, and the use of overland transport, including winter access, to support mobilization, resupply, and movement of drill rigs. Project activities may occur year-round and Project components and areas of ground disturbance may be modified or relocated over time.</p> <p>CH acknowledges that limited archaeological assessment has occurred historically in the broader region, including in proximity to the proposed Hope Lake camp area. Based on a review of CH records and the current Project Proposal, CH notes that the majority of lands within the proposed Project footprint do not appear to have been subject to archaeological assessment conducted under a permit issued by the Department of Culture and Heritage.</p> <p>CH notes that a review of the Nunavut Archaeological Sites Database indicates that archaeological sites have been previously recorded within the broader regional landscape. The absence of recorded sites within specific portions of the proposed Project footprint does not preclude the presence of undocumented archaeological resources.</p> <p>Based on landscape-level considerations, including proximity to lakes and waterways, the presence of eskers, ridges, and other raised landforms, and established regional travel and land-use patterns, and in light of the absence of prior field-based archaeological assessment for much of the proposed footprint, CH considers that there are reasonable grounds to believe that there could be sites of archaeological significance on the lands affected by the Project, pursuant to Article 33.5.12 of the <i>Nunavut Agreement</i>.</p>	

### **Project-Specific Concerns**

CH notes that the proposed Project includes activities involving ground disturbance, which constitute potential impacts to archaeological resources. Activities requiring archaeological assessment include, but are not limited to:

- drill site preparation, drilling pads, sumps, and associated staging or laydown areas;
- trenching, stripping, grubbing, sampling, or other surface or subsurface disturbance;
- establishment and operation of camps, caches, fuel storage areas, berms, sumps, and other Project infrastructure;
- construction, development, and use of access routes or trails, including winter access routes;
- borrow areas, quarries, and any use of eskers, ridges, or other raised landforms;
- water intake locations and associated linear disturbance;
- off-strip fixed-wing aircraft landings on unprepared terrain; and
- helicopter landing areas that are planned, identified, or intended for use in support of Project activities.

Any ground disturbance occurring outside areas that have been cleared for disturbance through an archaeological impact assessment conducted under a permit issued by the Department of Culture and Heritage constitutes a potential impact to archaeological resources.

## **RECOMMENDATIONS**

CH recommends that NIRB include the following project-specific Terms and Conditions in the Screening Decision Report to ensure compliance with the *Nunavut Act* and the *Nunavut Archaeological and Palaeontological Sites Regulations*:

### **1) Requirement for Archaeological Assessment (Proponent responsibility)**

The Proponent shall retain a qualified archaeologist eligible to hold a Class 2 Nunavut Archaeologist Permit to conduct an archaeological impact assessment of all Project activities involving ground disturbance.

- Archaeological assessment shall be completed prior to the commencement of ground disturbance in the affected areas and under conditions that provide sufficient surface visibility for CH to accept the areas for proposed disturbance.
- The Proponent shall implement the recommendations of the qualified archaeologist, including avoidance, buffering, and/or mitigation measures, as applicable.

### **2) Adaptive Management for Multi-Year Exploration**

Where Project components are modified, expanded, or relocated between or within field seasons, the Proponent shall ensure that archaeological assessment and permitting are completed prior to ground disturbance in any newly affected areas.

### **3) Aviation**

- Off-strip fixed-wing aircraft landings on unprepared natural terrain shall not occur unless the landing areas have been archaeologically assessed prior to use.
- Helicopter landing areas that are planned, identified, or intended for repeated use in support of Project activities shall be archaeologically assessed prior to use.

- Opportunistic, single-use helicopter landings supporting foot traffic only may proceed only where no ground disturbance occurs.

#### 4) Standard Protective Measures

- **Site protection:** All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. No Project activities shall occur within 50 metres of any known or suspected heritage site. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed during the course of Project activities.
- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the 50-metre buffer area. The site shall be documented (including coordinates, description, and photographs) and reported to CH, and work shall not resume within the buffer area until authorized by CH.
- **General protections:** No alteration, disturbance, artifact removal, littering, or defacement of archaeological sites is permitted. No collection or disturbance shall occur unless authorized through the appropriate permitting process. The Proponent shall ensure that all staff and contractors are informed of these legal obligations. The construction of inuksuit is not supported.

#### ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *Nunavut Archaeological and Palaeontological Sites Regulations* provide for the protection, care, and preservation of archaeological and palaeontological resources. The Department of Culture and Heritage (GN-CH) is the Designated Agency responsible for the administration of the archaeological and palaeontological permitting system, in close coordination with Inuit land claim partners, including the Inuit Heritage Trust (IHT), which serves as the Designated Organization under Article 33 of the *Nunavut Agreement*. All archaeological and palaeontological sites in Nunavut are protected by law. It is illegal to search for, survey, excavate, alter, or otherwise disturb any archaeological or palaeontological site without a valid permit issued by the Government of Nunavut.