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Qikiqtani Inuit Association

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Serving the communities of

ᐃᑲᐱᒪᔪᖅ Arctic Bay | ᑲᖏᕋᑐᒍᒃ Clyde River | ᐊᑭᓱᐃᑦᑐᖅ Grise Fiord | ᐃᓚᒍᒃ Igloolik | ᐃᖁᓗᐃᑦ Iqaluit | ᑭᓯᒥᓗᑦ Kimmirut | ᑭᙵᓚᐃᑦ Kinngait | ᐱᖓᓐᓂᑎᒍᖅ Pangnirtung | ᑎᑎᑦᓚᒋᓪᓗᒃ Pond Inlet | ᖁᑭᖅᑕᓂᔪᓇᖅ Qikiqtarjuaq | ᖃᐅᔨᓴᓇᖅ Resolute Bay | ᓴᓂᑭᓗᓇᖅ Sanikiluaq | ᓴᓂᔪᒃ Sanirajak

February 3, 2026

Tracy Okhina
Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik)
Cambridge Bay, NU X0B 0C0
info@nirb.ca

RE: QIA's Review of Aston Bay Holdings' "Aston Bay Property or Storm Project"

Dear Tracy Okhina,

The Qikiqtani Inuit Association (QIA) appreciates the opportunity to provide comments on Aston Bay Holdings' "Aston Bay Property or Storm Project" proposal as requested in the Nunavut Impact Review Board's (NIRB) correspondence dated January 13, 2026. QIA's comments are appended to this document.

QIA will continue to engage with the proponent to advocate for the interests of Inuit and for the responsible development of resources in Nunavut.

Please do not hesitate to contact me for further discussion.

Nakurmiik,

Assol Kubeisinova
Senior Manager, Lands and Regulatory Affairs
Qikiqtani Inuit Association

Attachment: Appendix A

Appendix A QIA Technical Review Comments

Comment Number	**QIA-1**
Issue	Stream Water Withdrawals
Reference	Environmental Management Plan, pg. 4, PDF pg. 8 of 45
Discussion	"Aston Bay will ensure that water withdrawal rates remain <10% of actual (instantaneous) flow and does not result in flows <30% of mean annual discharge" This statement appears to be sourced from Fisheries and Oceans Canada (DFO) Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada (DFO 2013). These flow withdrawal limits should provide protection to aquatic habitat and fish in the Aston River. To ensure operational withdrawals are protective of the environmental flow needs of Aston River, an understanding of the streamflow is required to measure the pumping rates compared to instantaneous flow and/or long term mean annual discharge (MAD). Have streamflow measurements been captured during a variety of flow conditions to ensure that instantaneous withdrawals will be <10% of streamflow?
Recommendation	QIA recommends that streamflow measurements in Aston River be conducted to ensure that proposed withdrawal rates remain will remain within the proposed limits. Measurements during low-flow conditions of the stream will be sufficient if the withdrawal rates are <10% of instantaneous flow during the low-flow period.

Comment Number	**QIA-2**
Issue	Water Withdrawals from lake north of Storm Camp in winter
Reference	Environmental Management Plan, pg. 4, PDF pg. 8 of 45
Discussion	Winter withdrawals in the lake north of Storm Camp is described to have screens over water intakes to reduce fish entrapment and follow the DFO Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut (DFO 2010). This is good use of cautious policies to minimize potential harm to fish and fish habitat from water withdrawals. A critical requirement of the DFO policy is to withdraw water > 2 metres below the bottom of any ice cover. This requires an understanding of ice depth during the winter and lake depth where the intake pipe is placed.
Recommendation	Please clarify details for how the DFO Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut (DFO 2010) will be

	followed and documented with respect to the depth of intake pipe installation during winter months and how the under-ice water volumes are calculated/validated to ensure that <10% of that volume is withdrawn each winter.

Comment Number	**QIA-3**
Issue	Greywater treatment
Reference	Waste Management Plan, pg. 8, PDF pg. 11 of 12
Discussion	Greywater is described as being stored and treated in an excavated sump. It is not clear what type of treatment is being applied (chemical, physical, biological?).
Recommendation	Please describe the treatment applied to greywater as described in Waste Management Plan section 4.2.1.

Comment Number	**QIA-4**
Issue	Aquatic ecological effects of water intake pipes
Reference	Revised NIRB Application, Identification of Environmental Impacts table, PDF pg. 17 of 18
Discussion	Potential biological impacts to aquatic species, including habitat and migration/spawning from water withdrawals associated with camp, staging areas and mineral exploration ought to be considered and acknowledged. Withdrawals can present impacts to environmental flow needs, and the physical pipe location can entrain fish and potentially cause damage to fish habitat.
Recommendation	Please adjust the Identification of Environmental Impacts table and associated application accordingly.

Comment Number	**QIA-5**
Issue	Drilling Greywater Sump Sizing
Reference	Revised NIRB Application, Waste Management table, PDF pg. 10 of 18
Discussion	Sumps for residual drilling fluids (greywater) are discussed in detail in the table. Further clarification is necessary on how the sizing of the sumps will be determined to prevent excess runoff being conveyed beyond the drill site extents.

Recommendation	Please provide details for how sump volumes will be determined. A reasonable safety precaution may be to size the sumps to hold a water volume 20% higher than the water that is planned to be used to support the drilling operations for the day.

Comment Number	**QIA-6**
Issue	Inconsistency in caribou mitigation measure descriptions
Reference	Environmental Management Plan, pg. 3, PDF pg. 7 of 45 and pg. 9-10, PDF pg. 13-14 of 45
Discussion	There are certain inconsistencies in the description of the stop-work protocols caused by the presence of caribou within the Project area. Section 2.2 states that "all activities, including drilling, will cease if sightings of caribou are within 10 km," while Section 4.1.3 states in the event "cows/calves come within 10 km of a work area operations will be suspended", and later goes on to state that "activities will be suspended should pregnant cows, cows with young calves or concentrations of 50 or more caribou approach within 1 km." A blanket stop-work zone is preferred over an option that requires the identification of age and sex of the caribou (i.e. cow/calf), because identification can be difficult, especially at 10 km, and this leaves more room for human error and uncertainty of mitigation measures. Additionally, the Peary caribou are a species at risk and populations are very low, as a result if any caribou are seen within 1 km of work areas, including drilling, all operations should cease until they leave the buffer.
Recommendation	Please provide clarity and more details on the stop-work protocol.

Comment Number	**QIA-7**
Issue	Details included in Wildlife Record Log
Reference	Environmental Management Plan, pg. 7, PDF pg. 11 of 45
Discussion	It is mentioned that a "Wildlife Record Log" will be kept, but there is no mention of what details will be included. Given the limited recent information of caribou and other species at risk spatial use on Somerset Island, additional information would be valuable.
Recommendation	Record the species observed, number of individuals, geographic coordinates, general location description, behaviour, approximate distance from project infrastructure, and action taken by staff.

Comment Number	**QIA-8**

Issue	Completion of pre-disturbance bird nest surveys
Reference	Environmental Management Plan, pg. 7-8, PDF pg. 11-12 of 45
Discussion	There is a requirement under the *Migratory Birds Convention Act* (1994) to complete pre-disturbance bird nest surveys prior to disturbing environments that may contain bird nests and eggs. When nests are found, a no disturbance/work buffer is maintained around the nest until the eggs are hatched and young have left the nest. The Government of Canada guidelines for bird nest surveys are discussed at the following link: https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html
Recommendation	When working within the nesting window, please provide details for the Project's plan for identifying locations of any bird nests and how they will be protected. If a nest is found, it is important for staff not to flag a location directly, as this will attract predators to the nest. As this was not stated explicitly in the document, QIA highlights the importance of following this practice.

Comment Number	**QIA-8**
Issue	Incorrect Nesting Zone referenced
Reference	Environmental Management Plan, pg. 8, PDF pg. 12 of 45
Discussion	In the mitigation measures bullet points, a comment states the project is within Nesting Zone C8. This is incorrect, as the project is in Nesting Zone N10.
Recommendation	QIA recommends corrections be made all throughout Project documents. Please see the link below for details on this correction: https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/general-nesting-periods/nesting-periods.html

Comment Number	**QIA-9**
Issue	Location of carnivore dens
Reference	Environmental Management Plan, pg. 10, PDF pg. 14 of 45
Discussion	To ensure that mitigation measures discussed in this section are met, prior to project initiation, the Project team will reach out to Government of Nunavut Wildlife Division to acquire the locations of any known denning sites for species at risk (polar bears and

	wolverines). Locations of drill sites and flight paths and will be planned according to these sites.
Recommendation	Please include the information on denning locations into the Environmental Management Plan.