



NIRB File No.: 25EN077

NIRB Public Registry link: www.nirb.ca/project/126241

NPC File No.: 150931

February 6, 2026

Thomas Ullrich
Aston Bay Holdings
80 Richmond Street West, Suite 204
Toronto, ON M5H 2A4

Sent via email: Thomas.ullrich@astonbayholdings.com

Re: **Opportunity to address comments regarding Aston Bay Holdings' "Aston Bay Property or Storm Project" proposal**

Dear Thomas Ullrich:

The Nunavut Impact Review Board (NIRB or Board) received comments from parties on your project proposal that require additional information prior to the Board making its assessment decision. Please provide your clarifications by **February 20, 2026**, or as soon as possible.

Comment submissions were received from the following parties and are posted to the NIRB's online public registry at the link in the header:

- *Kitikmeot Inuit Association (KitIA)*
- *Qikiqtani Inuit Association (QIA)*
- *Government of Nunavut (GN)*
- *Crown – Indigenous Relations and Northern Affairs Canada (CIRNAC)*
- *Environment and Climate Change Canada (ECCC)*
- *Transport Canada (TC)*

Summary of the clarification requested:

Kitikmeot Inuit Association

- Recommends:
 - That crew should observe wildlife carefully and avoid causing undue disturbance, or to approach animals.
 - Adherence to “leave-no-trace” principles and recommends that all food, waste and other potential wildlife attractants be securely stored in sealed, animal resistant containers to minimize the risk of wildlife interactions.
 - That the Proponent ensure proper storage, handling and containment of all waste and fuel as well as implement preventative measures for potential spills.

- Engagement with the Kitikmeot's closest regional Hunters and Trappers Association, which would be *Taloyoak Umarulirrigut Association* for safety and planning purposes.

Qikiqtani Inuit Association

- Recommended the following plans be updated or clarification provided:
 - Streamflow measurements in Aston River be conducted to ensure that proposed withdrawal rates would remain within the proposed limits.
 - 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.
 - Greywater treatment as described in Waste Management Plan section 4.2.1.
 - Update the Identification of Environmental Impacts table and associated application accordingly to impacts to aquatic species, including habitat and migration/spawning from water withdrawals associated with camp, staging areas and mineral exploration.
 - How sump volumes would be determined.
 - How the stop-work protocol is designed.
 - Wildlife log to be used and provided.
 - Pre-disturbance bird nest surveys be conducted prior disturbance as per the *Migratory Birds Convention Act (1994)* and associated protocols followed.
 - Update documents to state that the project is in Nesting Zone N10 and not Nesting Zone C8.
 - Update plans to include discussions with Government of Nunavut Wildlife Division to acquire the locations of any known denning sites for Species at Risk (polar bears and wolverines) and incorporate into drill sites and flight paths planning.

Government of Nunavut

- Recommends the following:
 - With respect to their Spill Plan, the GN requests more in-detail information regarding address of owner, person in charge, site map of location of the facility, responsibilities for undertaking review of spill plan annually, and inventory and replenishing of cleanup equipment.
 - Updating the Environmental Management Plan so that all activities are suspended when any caribou are within 10km of the project activities.
- Notes the following:
 - Notes that all heritage sites (archeological and paleontological) in Nunavut are protected by law. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed during the course of project activities.
 - If archeological and/or paleontological materials or features are encountered, all activities shall cease immediately within the 50-metre buffer area. The site shall be documented and reported to Culture and Heritage (CH), and work shall not resume within the buffer area until direction is provided by CH.

Crown – Indigenous Relations and Northern Affairs Canada

- Recommends the following:
 - The Proponent considers identifying specific spill response measures for saline drilling additives (e.g., CaCl₂), given their potential to alter soil chemistry.
 - Considers completing terrain sensitivity and ground-ice assessments to validate the closure and reclamation documentation in the regulatory process.
 - Estimating expected annual waste volumes of each waste stream (e.g., ash, sump sludge, and hazardous solids) over the project life;
 - Confirming how incinerator residues and ash will be managed and documented prior to removal from site; and
 - Verifying waste disposal areas prior to closure to confirm that no residual contamination remains.
 - Defining measurable closure success criteria (e.g., infrastructure) to support closer plans in the regulatory phases.
 - Continue its efforts to engage with potentially interested parties regarding its project proposal.

Environment and Climate Change Canada

- Recommends that the Proponent:
 - Discuss pathways of effects to water quality from development of a marine laydown area.
 - Outline mitigation measures and update management plans that will be implemented to prevent effects to aquatic life during construction and operation of the marine laydown area.
 - Take extra precautions around Important Bird Areas (IBA), particularly during the periods of high use for staging in spring and fall, as well as during the late summer moult.
 - Identify adverse effects of the Project on the species at risk likely to be affected and their critical habitat.
 - Recommends that the Proponent avoid habitat disturbance during the general nesting period, which extends from late May to mid August for this region.
 - Mitigation and monitoring measures be consistent with applicable species at risk Recovery Strategies and Action Plans or Management Plans.
 - At minimum, monitoring should include recording timing and location of observed species at risk, their behaviour when encountered, and actions taken by the Proponent to avoid disturbance to the species, its habitat, and/or its residence.
 - The Proponent submit monitoring reports to the appropriate regulators and organizations with management responsibility for that species.
 - Must consider options such as avoiding, adapting, rescheduling or relocating activities. If a nest containing a migratory bird or egg is discovered/disturbed, the Proponent **must**:
 - Halt all disruptive activities in the nesting area until nesting is complete and the young have fledged; and
 - Establish a protective buffer zone around the nests.

- Ensure their employees and contractors are made aware of plans and commitments related to storing, handling and transportation of petroleum products and other hazardous substances and take all necessary precautions to prevent spills.
- Incorporate into existing emergency response plans:
 - Steps to protect wildlife (including migratory birds) in the event of a pollution incident and keep wildlife out of contaminated areas;
 - Equipment and resources available for incident response; and
 - Measures to take if wildlife does come into contact with the spill.
- Notify ECCC's Canadian Wildlife Service for instances involving:
 - Interactions and incidents involving the potential disturbance of individuals of nests and any mortality events of these species.

If you have questions or require more time to respond, please send an update to Mia Beattie at (867) 983-4622 or mbeattie@nirb.ca. The additional information should be sent to info@nirb.ca, or through the online public registry at www.nirb.ca.

Sincerely,



Mia Beattie
Impact Assessment Officer
Nunavut Impact Review Board

cc: Distribution List