

February 10, 2026

Mia Beattie

Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik)
Cambridge Bay, NU X0B 0C0
Phone: 867-983-4600
Toll Free: 1-866-233-3033
mbeattie@nirb.ca

RE: Comments Response for Storm Project, NIRB File No. 25EN077

Aston Bay Holdings Ltd. (Aston Bay) has reviewed the comments provided from Transport Canada (TC), Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), Government of Nunavut (GN), the Kitikmeot Inuit Association (KIA) and the Qikiqtani Inuit Association (QIA) regarding the Storm Project (the Project) authorizations amendment. Aston Bay would like to express our appreciation for the time these agencies and individuals spent reviewing the proposed Project activities and providing their comments.

Response to Transport Canada

Aston Bay will ensure that the water intake source locations and activities comply with the Canadian Navigable Waters Act and associated Regulations and Orders. The appropriate applications and notices will be submitted as required for any work done on known or suspected navigable waters.

Response to Crown-Indigenous Relations and Northern Affairs Canada

CIRNAC #1: Fuel and Hazardous Material Storage Risks

The Storm Project Spill Prevention and Response Plan (SPRP) has been revised to include expanded, site-specific provisions for the storage, handling, and management of chemicals at the Property, including Calcium Chloride (CaCl₂). Updates include more detailed assessment of potential environmental effects (with particular consideration of soil salinity and tundra sensitivity), enhanced preventative measures, and clearly defined spill response procedures to minimize the risk of releases and to ensure timely containment, recovery, and remediation should a spill occur.

Identified preventative measures include effective storage of CaCl₂ such as within wooden crates, for longer term storage at the Marine Landing Area, and stored in mega bags within impermeable berms when at the camp and drillsites.

The chemical spill response procedures have been revised to explicitly include calcium chloride (CaCl₂). In the event of a spill of a solid chemical, such as CaCl₂, all visible material and residues will be fully recovered, and any affected soils will be excavated and removed for appropriate off-site disposal. The site will be assessed to confirm that no migration of contaminants to surface water, groundwater, or surrounding tundra has occurred, and remediation will be completed to return the area to a stable condition equivalent to pre-spill conditions. Water flushing or dilution of CaCl₂ is expressly prohibited to prevent salinity mobilization and off-site migration.

CIRNAC #2: Soil & Permafrost Disturbance

At the exploration stage, the project footprint remains relatively small and temporary, with limited and short-duration ground disturbance. All facilities associated with the current program, including drill pads, camp infrastructure, and the seasonal marine landing area, are considered temporary exploration facilities and do not involve permanent foundations or extensive ground disturbance typical of development-stage infrastructure.

Standard mitigation measures to manage permafrost and soil impacts are currently implemented and are considered appropriate for this stage of exploration. These measures include avoidance of sensitive patterned ground and clay soils, elevating heated structures to promote air circulation and reduce heat transfer to the ground, minimizing vegetation clearing, and confining activities to previously disturbed or naturally sparsely vegetated areas where practicable. Based on visual field observations, natural vegetation density within the camp area, marine landing area, and drill sites is minimal to non-existent.

No new access trails, land clearing, or excavation are planned as part of the exploration program. Drill pads are temporary and constructed with minimal surface disturbance, and activities are confined within existing operational boundaries. The use of the marine landing area is intended to be on a limited and intermittent seasonal basis and does not involve ground modification beyond temporary placement of materials and equipment during mobilization and demobilization.

Baseline investigations such as terrain sensitivity mapping, active-layer thickness measurements, and ground ice characterization are not typically conducted to support exploration programs that do not involve permanent or semi-permanent infrastructure or significant disturbance of surface soils and landforms. These more extensive studies are typically conducted during the development phase for permanent or semi-permanent infrastructure, including roads, water management structures, and other mine infrastructure, where it is necessary to accurately assess site-specific risks and mitigation that is then incorporated into closure and reclamation plans. Accordingly, as terrain sensitivity and ground-ice assessments are typical for advanced project stages, these site-specific permafrost studies will be considered during planning for permanent and semi-permanent infrastructure.

During the exploration phase, the Proponent will continue to monitor ground conditions during operations and will work with the Inspector to identify and implement appropriate corrective measures should localized subsidence or permafrost degradation be observed.

CIRNAC #3: Waste Handling and Disposal

Waste management operations at the Property comprise several activities intended to minimize waste generation, ensure appropriate segregation and containment, and support responsible reuse, recycling, and off-site disposal. Wastes are segregated at the source into a number of categories, including:

- Organics (food waste).
- Combustible materials for incineration.
- Inert recyclables.
- Inert non-combustible materials.
- Hazardous materials.

Combustible wastes (e.g. food, cardboard, untreated wood) are incinerated on site using a batch feed dual-chamber controlled. Residual ash is collected and placed into sealed metal drums or 5 gal pails, stored within a contained area (mini berm), and backhauled off site for appropriate disposal on a routine basis throughout the program and upon seasonal shutdown. Waste volumes for each waste stream (e.g., incinerator ash, sump residues, hazardous solids) are low and consistent with short-duration exploration activities. Waste logs and backhaul flight records are maintained to document waste handling and removal, and will be submitted as part of the Annual Reports provided to the Nunavut Impact Review Board (NIRB), CIRNAC and the Nunavut Water Board (NWB).

Incinerator ash management and the commitment to submitting waste log and backhaul records in the Annual reports has been updated in the Waste Management Plan.

Camp greywater is stored and treated in an excavated sump, located at least 31 m from the ordinary high-water mark of any water body and designed to promote infiltration and evaporation while avoiding surface discharge. Greywater sumps are approximately 2 by 2 ft in area and approximately 3 ft deep. They are constructed with

plywood walls and filled with loose cobbles to aid filtration, support the walls, and prevent slumping. Filters and grease traps are installed on kitchen drains to ensure solid food wastes do not enter the sumps or attract wildlife. Detergents and cleaning products used on site are selected to be biodegradable. The sump and associated piping are inspected at regular intervals for leaks or overflow. When full, sumps are covered with sufficient material for future ground settlement. Upon seasonal shutdown, any sumps that are not full are covered with plywood for future use.

Drilling fluids and cuttings are managed at the drill site to minimize ground disturbance and potential soil impacts. Drill cuttings are captured and contained in natural depression sumps positioned down slope from the drill collar in such a manner that runoff flows into the sump, located a minimum of 31 metres from the ordinary high-water mark of any waterbody. Sumps and drill sites are inspected regularly during operations for signs of fluid migration, ponding, or subsidence. Where required, cuttings are redistributed or backfilled into the drill collar area at the completion of drilling to stabilize the surface and restore local drainage patterns.

Progressive reclamation is implemented across all Project components and is integrated into day-to-day site management practices. This includes maintaining camp and work areas in a clean and orderly condition, ensuring that all wastes and residues are contained within designated receptacles at all times. Prior to each seasonal shutdown, a systematic inspection of all Project areas is conducted to confirm that waste has been properly removed or secured, and no materials or debris remain on the land. Any issues identified during inspections are addressed prior to demobilization.

CIRNAC #4: Closure & Abandonment Risks

At the exploration stage, and based on our team's experience with similar exploration projects, closure success criteria are based on observable and verifiable indicators appropriate to temporary exploration activities and are consistent with long-standing northern exploration practice. Typical closure success criteria include, but are not limited to: absence of visible waste, debris, or infrastructure; absence of hydrocarbon staining or odour; and stable ground surface conditions with no evidence of erosion, excessive settlement, or ponded water. These criteria are applied through systematic visual inspections conducted at the time of closure and prior to seasonal shutdown.

With regard to potential impacts to permafrost and post-thaw stability land surface in the vicinity of temporary site infrastructure and drill sites, pro-active measures have been adopted to minimize risk. These include avoiding locations that may be susceptible to ground ice such as sensitive patterned ground and clay soils, avoiding areas with vegetation (noting that vegetation is very sparse or absent in the camp and work areas), and elevating heated temporary structures.

With regard to the small camp expansion and marine landing area, a visual inspection of those areas indicates highly competent ground conditions with no evidence of ice rich or organic soils.

At closure stage, all infrastructure locations, including the camp area, marine landing area, camp sumps, drill sumps, and drill sites, will be visually inspected for ground stability, signs of surface settling, standing water, or other indicators of potential permafrost degradation or residual contamination.

In the unlikely event that verifiable indicators of permafrost degradation or ground instability are observed, the Company will notify the Inspector and work collaboratively to identify and implement appropriate corrective measures, as required. This approach is reflected in the Abandonment and Restoration Plan.

CIRNAC #5: Consultation with Interested Parties

To date, virtual and in-person engagement on the Project has been conducted with the Mayor and Council of Resolute Bay, the Hunters and Trappers Association (HTA), and community members. An in-person meeting was also held in Iqaluit at the QIA offices with the Senior Manager, Lands and Regulatory Affairs, who advised the Company on recommended next steps to engage with the QIA. Engagement has also been initiated with

the Hamlets and HTOs of Arctic Bay, Taloyoak, and Grise Fisord. In person and/or virtual meetings with those communities are planned during the first half of 2026.

On a go-forward basis, and using best efforts, the Proponent intends to conduct a combination of in-person consultation visits and virtual meetings, typically in advance of annual exploration activities, to provide updates on proposed exploration programs, discuss potential effects, and address any concerns raised by the QIA, Hamlets, HTO's, and community members. If in-person visits are not possible, due to factors such as flight availability or weather conditions, virtual presentations will be provided.

Through these engagement activities, the Proponent will seek to incorporate available Inuit Qaujimagatuqangit (IQ) and Community Knowledge, alongside scientific information, into project planning and execution, including consideration of culturally, environmentally, or socially sensitive areas and traditional land use activities.

Participation by local community members in the Project will be emphasized and encouraged. The KIA will also be notified and kept informed of Project activities, if this is their preference.

Whenever possible, goods and services will be sourced from local and Inuit-owned businesses. As has been the practice in the past, the Proponent intends to provide seasonal employment opportunities for local community members and support training opportunities where possible.

Response to Environment and Climate Change Canada

ECCC #1: Marine Landing Area

The proposed Marine Landing Area will not involve constructed infrastructure in the intertidal or marine environment. Materials, fuel, and equipment will be delivered by barge to the shoreline, where they will be temporarily staged on existing natural beach or gravel areas a minimum of 31 metres above the high-water mark. There are no anticipated direct pathways for effects to water quality from construction, since no excavation, dredging, or permanent structures are required.

Potential pathways for effects to water quality are limited to indirect pathways, such as minor sediment disturbance from temporary shoreline equipment movement and the potential for accidental spills during material handling; however, as no in-water works are proposed and shoreline disturbance will be minimal and short-term, these pathways are expected to be localized and negligible.

Standard environmental management and spill prevention measures will be applied to all activities at the Marine Landing Area, including:

- Fuel and hazardous materials will be stored on impermeable surfaces or within secondary containment to prevent accidental release.
- All handling of materials and refueling operations will occur under direct supervision, with spill kits and response equipment immediately available.
- Equipment used for transporting and handling cargo from the barge area to the beach will undergo daily inspections for hydrocarbon leaks to minimize the potential for accidental hydrocarbon release.
- Visual inspections of the staging area will be conducted to ensure no contamination of sediments or adjacent receiving waters occur.
- Personnel will be trained in spill response and procedures to prevent hydrocarbons or other deleterious substances from entering the marine environment.

Given the temporary and non-intrusive nature of the Marine Landing Area, and with the implementation of standard spill prevention and containment measures, potential effects to water quality and aquatic life are expected to be negligible.

Mitigation and management measures applicable to the Marine Landing Area have been incorporated into the Project's management plans to ensure consistency in environmental protection measures across all Project components.

ECCC #2: Creswell Bay Important Bird Area, Creswell Bay Marine and Terrestrial Key Habitat

The Proponent acknowledges the ecological importance of the Creswell Bay Important Bird Area (IBA) and the Creswell Bay Marine and Terrestrial Key Habitats, including their role in supporting migratory birds, moulting waterfowl, and staging geese during spring, summer, and fall periods.

The Project footprint does not overlap with the Creswell Bay IBA or the identified Marine or Terrestrial Key Habitat areas, and no ground-based exploration activities or permanent infrastructure are planned within these designated habitats. Use of the Creswell Bay area is limited to logistics support during seasonal mobilization and demobilization activities.

As part of these logistics activities, fuel will be temporarily staged at Creswell Bay to support helicopter operations during mobilization and demobilization. Fuel staging will be short in duration, confined to existing disturbed or naturally durable areas, and will not involve new land clearing or excavation. Fuel will be stored in appropriate containers with secondary containment, and spill prevention and response measures will be implemented in accordance with the Project's Environmental Management Plan and Spill Contingency Plan. Authorization for the temporary staging of fuel at Creswell Bay is being sought through an application to the Qikiqtani Inuit Association, and any such activities will be conducted in accordance with the terms and conditions of that authorization, if approved. The location proposed for temporary fuel staging has been used historically by other parties for similar seasonal logistics purposes.

Interaction with the Creswell Bay area will otherwise be limited to aircraft transit and refueling associated with mobilization and demobilization. No low-level or repeated helicopter flights associated with exploration activities are planned within the IBA or Key Habitat areas beyond what is necessary to support these logistics operations. No Project activities, staging, or aviation routing are planned in the vicinity of Leopold Island, and the Project will maintain separation from this known bird colony.

Aviation and logistics activities will be conducted using extra caution in the vicinity of known bird colonies and key habitat areas, particularly during sensitive periods such as migration, nesting, and molting. All Project activities will be conducted in compliance with applicable federal legislation, including the Migratory Birds Convention Act, and in a manner that avoids harming or disturbing migratory birds or damaging nests or eggs.

ECCC #3: Species at Risk – SAR Missing and/or Effects and Measures Missing

The Environmental Management Plan (EMP) has been developed to support the identification, consideration, and mitigation of potential adverse effects of the Project on wildlife, including species assessed by COSEWIC and species listed under Schedule 1 of the Species at Risk Act (SARA), in accordance with section 79 of SARA.

With respect to recommendations (a) and (b), the EMP applies a consistent, precautionary framework for assessing potential adverse effects on wildlife, with specific consideration given to species at risk and their habitats where applicable. Potential effects associated with Project activities, including habitat disturbance, sensory disturbance (e.g., noise), and wildlife interactions, are identified throughout the EMP, alongside mitigation measures intended to avoid or lessen these effects. Avoidance is identified as the primary mitigation measure where species at risk are encountered.

Table 1 summarizes the species assessed by COSEWIC or listed under SARA that may occur in the Project area, along with potential effects and applicable mitigation measures. Species-specific considerations are addressed within relevant subsections of Section 2.4 (Wildlife and Habitats), including Caribou (Section 2.4.3), Polar Bear (Section 2.4.6), Wolverines (Section 2.4.5), migratory birds and other avian species (Section 2.4.1), and Beluga Whale and other marine mammals (Section 2.4.2). Additional contextual mitigation measures

addressing indirect effects to wildlife (e.g., noise and air quality) are addressed in Sections 2.1 to 2.3, with Section 2.2 (Air and Noise Quality) updated to clarify how Project-related noise may influence wildlife behaviour, including movement and breeding activities.

In response to recommendation (c), the EMP was informed by available and applicable Recovery Strategies, Action Plans, and Management Plans accessed through the SARA Public Registry, as well as regional planning guidance such as the Nunavut Planning Commission's Recommended Nunavut Land Use Plan (2023). Where appropriate, the Companies will continue to consider guidance from regulators, Indigenous organizations, and community members. The Companies may also engage a Qualified Professional to support wildlife-related decision-making and adaptive mitigation, if warranted by Project activities or observed interactions.

With respect to recommendations (d) and (e), Section 2.4 of the EMP outlines the monitoring and documentation requirements for wildlife interactions and observations, with specific reference to COSEWIC- and SARA-listed species. The Wildlife Log has been updated to specify that records will include, at a minimum:

- Species observed and number of individuals
- Geographic coordinates and general location
- Observed behaviour, including direction of travel
- Description of the interaction or incident, if applicable
- Distance from Project infrastructure, where relevant
- Actions taken by Project personnel to avoid or reduce disturbance

As outlined in Section 2.4, wildlife monitoring information, including observations of species at risk, will be compiled and submitted annually to CIRNAC, NWB, NIRB and other relevant organizations with wildlife management responsibilities, including the Government of Nunavut, as part of required annual reporting. Consolidation of reporting requirements within Section 2.4 has improved clarity and consistency across the EMP.

ECCC #4: Project Activities Within Migratory Bird Habitat and Project Activities During Nesting Season

Mitigation measures to avoid negative impacts on migratory birds are outlined Section 2.4.1 (Migratory Birds and Other Avian Species) of the Environmental Management Plan. These measures include prohibiting the disturbance, relocation, or destruction of birds, nests, or eggs, and ensuring the activities are conducted with care or minimized during sensitive periods such as migration, nesting, and moulting.

ECCC #5: Project Activities (Clearing) Within Migratory Bird Habitat During Nesting Season

Mitigation measures to prevent adverse impacts on migratory birds and their habitat are outlined in Section 2.4.1 (Migratory Birds and Avian Species) of the Environmental Management Plan and apply throughout all Project operation phases. These measures include establishing buffer zones around active nests. Section 2.4.1 has been revised for improved flow and clarity, particularly regarding procedures to be followed if a nest is discovered. The nesting zone has been corrected to N10, and the general nesting period (late May to mid August) has been noted. While avoidance of all activities during this time is not feasible, sites will be monitored for wildlife to ensure that existing nest are not disturbed and that appropriate buffer zone is implemented. For additional details, refer to the updated Environmental Management Plan.

ECCC #6: Contamination of Water Bodies

The SPRP establishes comprehensive policies, procedures, and responsibilities to ensure that all Project personnel are adequately trained and equipped to prevent the release of hazardous materials, including petroleum products, into the environment. The SPRP provides clear, enforceable requirements for the storage, handling, transfer, and use of fuels and other hazardous substances to minimize the risk of contamination of surface water, groundwater, and terrestrial environments, and to prevent potential effects on migratory birds and other wildlife. In the event of an accidental release, the SPRP outlines timely, practical, and effective spill

response and remediation measures to contain and recover spilled materials, protect sensitive receptors, and safeguard worker health and safety.

ECCC #7: Oil Spills

Steps to secure contaminated areas and the equipment/resources available to respond to a spill incident are detailed in the Spill Prevention and Response Plan, specifically section 7. Action Plan. Details on containment procedures are outlined in 7.3 with details specific to hydrocarbon materials both on land and on water located in 7.3.1. Any spill is cleaned up immediately, effectively protecting wildlife from the contamination. Spills near or in a water body are most likely to come into contact with wildlife. All spills in or near a water body are required to be reported to the NU Spill Report Line who provide the necessary contacts and instructions for further action. The Project team will adhere to the spill report process for the appropriate instructions on how to handle the wildlife that may be affected or come into contact with such a spill.

ECCC #8: ECCC Contact Information

Section 2.4.1 (Migratory Birds and Other Avian Species) has been updated to include notifying any incidents involving migratory birds to the Canadian Wildlife Service. The Wildlife Emergency Contacts table in Appendix A has also been updated to include the newly provided email address

Response to the Government of Nunavut

GN #1: Spill Response

The SPRP has been revised to include: the complete contact information for the companies responsible for the Project, that the plan will be reviewed on an annual basis, and the Project Supervisor will ensure spill kits and response supplies are replenished following any spill event. In addition, a site map of the Storm Camp has been incorporated in Appendix A.

GN #2: Triggers for Suspension of Operations – Caribou Mitigations

The stop-work protocols triggered by the presence of caribou have been revised and refined based on the information provided by the QIA and the Government of Nunavut, as well as a review of similar mitigation protocols in the area, the Kivalliq Inuit Association's Mobile Caribou Conservation Measures, and scientific study (Boulanger et al. 2012, Johnson et al. 2014). Previous reference to caribou mitigation in section 2.2 has been referred to section 2.4.3.

The following have replaced previous mentions of operation suspension in section 2.4.3:

- Dedicated monitoring of caribou movements if more than 10 caribou come within 25 km of an active worksite
- Between the calving window of June 13 and July 12, operations will be suspended if any caribou come within 5 km of an active work site.
- Outside of the calving window, operations will be suspended if a group of 10 or more caribou come within 5 km of an active worksite, or;
- if any caribou come within 1 km of an active worksite.
- Work may only resume after the caribou have left the buffer zone by their own accord.

This simplifies the implementation of the stop-work measures and removes the need to identify the age and sex of the caribou, with special consideration taken during periods of migration and calving.

GN #3: Archaeology

The Proponent is committed to ensuring that all ground-disturbing activities are conducted with due regard for cultural heritage and in accordance with applicable legislation.

Archaeological review has been completed for the Project through a combination of desktop and field-based studies undertaken by qualified professional archaeologists. A desktop archaeological study completed in 2024 covered a broader regional area encompassing the Project footprint and surrounding landscape features. This desktop assessment informed the identification of areas of archaeological potential and guided subsequent field investigations.

Field-based archaeological surveys were conducted in 2024 and 2025 and included low-level helicopter reconnaissance and pedestrian ground surveys. These surveys cleared all main proposed drilling areas and the proposed Marine Landing Area on the ground.

Where new ground-disturbing activities are proposed outside areas previously assessed and cleared, archaeological review will be undertaken as appropriate. This may include additional desktop review and, where recommended by a qualified archaeologist and required by the Department of Culture and Heritage, field-based archaeological surveys conducted under the appropriate permits.

Any known archaeological sites, identified through desktop studies or field surveys will be avoided using protective setbacks recommended by the archaeologist and in accordance with direction from the Department of Culture and Heritage. If previously undocumented archaeological materials are identified during planned surveys or encountered incidentally during exploration activities, work in the immediate area will cease and the Nunavut Department of Culture and Heritage will be notified. No artifacts or materials will be removed or disturbed at any archaeological or paleontological site.

Response to Kitikmeot Inuit Association

The Proponent acknowledges the Kitikmeot Inuit Association's comments regarding wildlife considerations associated with the expanded exploration program.

All personnel will continue to be mindful of local wildlife in the area. Crews will observe wildlife carefully and avoid approaching or causing undue disturbance to animals. Wildlife awareness and appropriate conduct are addressed through site orientation and ongoing safety and environmental briefings.

Every effort will be made to adhere to "leave-no-trace" principles. All food, waste, and other potential wildlife attractants to be securely stored in sealed, animal-resistant containers to minimize the risk of wildlife interactions. Proper storage, handling, and containment of all waste and fuel will be maintained, and preventative measures for potential spills will be implemented on site.

On a go-forward basis, and using best efforts, the Proponent intends to conduct a combination of in-person consultation visits and virtual meetings, typically in advance of exploration activities, to provide updates on proposed programs and to address any concerns raised by the Kitikmeot Inuit Association, the Taloyoak Umarulirrigut Association, and community members. Where in-person visits are not feasible, virtual meetings will be used to support continued engagement and the sharing of local knowledge, including available Inuit Qaujimagatuqangit.

Response to Qikiqtani Inuit Association

QIA #1: Stream Water Withdrawals

The Proponent notes that water use for the camp is minimal and well below the maximum of 10 m³/day authorized under the current water licence, and represents a very small proportion of flow in the Aston River. A hydrological field study completed in July 2025 (report in preparation) indicated that the flows in Aston River upstream of the camp did not fall below 2 m³/s. This flow rate corresponds to a daily discharge of over 170,000 m³/day.

Based on observed flow rates in the Aston River and the proportionally small volume of authorized withdrawals relative to river discharge, routine streamflow monitoring is not anticipated to be required to maintain compliance with environmental flow guidelines. No measurable effects on water levels, fish habitat, or ecological function are anticipated.

If, at any time, the volume of water in the Aston River appears to have been significantly reduced, or if there is a concern that environmental flow requirements may not be maintained, Aston Bay will conduct streamflow measurements to verify that instantaneous withdrawals remain below 10% of actual flow and do not reduce flows below 30% of the mean annual discharge. Preventive measures may include distributing withdrawals between the two camp sources, to avoid localized stress on any single system.

QIA #2: Water Withdrawals from lake north of Storm Camp in winter

Based on bathymetry work completed in 2024, the lake north of Storm Camp contains a volume of approximately 2.68 million cubic metres. Winter water withdrawals will continue to follow best practices consistent with the DFO Protocol for Winter Water Withdrawal from Ice-covered Waterbodies in the Northwest Territories and Nunavut (DFO 2010). This includes:

- Installing intake screens to prevent fish entrainment.
- Measuring ice thickness and lake depth at the intake location to ensure withdrawals occur at least 2 m below the bottom of the ice, as required by DFO.
- Tracking withdrawal volumes and comparing them against the known lake volume to ensure that total winter withdrawals remain well below 10% of the available under-ice water volume.

Given the large volume of the lake and the relatively small volumes required for camp operations, withdrawals represent a very small proportion of available under-ice water. Through these measures, the Proponent ensures that water withdrawals for both camp and drilling activities are protective of aquatic habitat, fish, and overall ecosystem integrity, consistent with QIA and DFO guidance.

QIA #3: Greywater Treatment

Camp greywater will not undergo any active chemical or biological treatment. Greywater will be managed through a passive physical treatment, consisting of containment, settling, and controlled infiltration within a dedicated, excavated greywater sump. The sump will be designed and located to prevent runoff to surface water, minimize potential effects on vegetation, and avoid areas of sensitive permafrost or other environmentally sensitive sites.

Environmental safeguards will include:

- Regular inspection and maintenance of the sump to ensure proper containment and infiltration.
- Placement of the sump on well-drained, stable soils to prevent pooling or surface seepage.
- Visual monitoring of surrounding soils and vegetation for any signs of saturation, erosion, or contamination.
- Implementation of corrective actions if any evidence of discharge beyond the sump is observed.

Greywater management in this manner aligns with best practices for exploration camps in northern environments and is outlined in the Project's Environmental Management Plan.

QIA #4: Aquatic ecological effects of water intake pipes

The NIRB application will be revised to explicitly acknowledge the potential for biological impacts to aquatic species, including effects to habitat and migration or spawning, associated with water withdrawals for camp operations, staging areas, and mineral exploration activities. These potential effects will be listed in the Identification of Environmental Impacts table.

Habitat protection during installation and operation of water intake infrastructure will include:

- Avoidance of disturbance or permanent alteration of shorelines or streambanks.
- Installation of intake pipes using non-invasive methods, minimizing disturbance to substrates and riparian vegetation.
- Use of intake screens and operational controls to reduce the risk of fish entrainment.
- Prevention of fuel, lubricants, or other deleterious substances from entering water during setup and operation.
- Regular visual inspections of intake locations and adjacent shorelines for signs of erosion, sedimentation, or habitat disturbance.
- Monitoring of withdrawal rates and operational conditions to ensure they remain within approved limits.

Adaptive management measures will be implemented if unexpected low-flow conditions or environmental concerns arise, including adjusting withdrawal rates or temporarily suspending withdrawals, as appropriate.

QIA #5: Drilling Greywater Sump Sizing

Sumps for drilling fluids (greywater) are established in existing natural depressions, located a minimum of 31 m from the ordinary high-water mark of any waterbody, positioned downslope of the drill collar, and oriented to ensure that all surface runoff and drill return fluids are directed into the sump, thereby preventing uncontrolled discharge.

Natural depression sump sizing is determined based on anticipated daily drilling water use, site-specific topography, and prevailing weather conditions to ensure adequate containment capacity and account for operational variability, precipitation events, and short-term increases in water use.

During drilling operations, drillers and the site geologist actively monitor drill fluid returns and sump conditions to confirm that fluids remain fully contained and that there is no overflow, seepage, or migration toward surrounding terrain or waterbodies. If site conditions change or additional capacity is required, a new sump site will be utilized or supplementary containment measures will be implemented immediately.

These measures ensure that drilling greywater is effectively contained on site, prevent runoff beyond the drill area, and minimize any potential risk to surface water, groundwater, or aquatic habitat.

QIA #6: Inconsistency in caribou mitigation measure descriptions

Aston Bay is committed to adhering to all applicable regulator requirements and accepted best practices to prevent, mitigate, and manage any potential impacts of activities conducted at the Storm Project. Please see the response to the Government of Nunavut #2 for streamlined commitments to caribou mitigation.

QIA #7: Details included in Wildlife Record Log

Section 2.4 Wildlife and Habitats of the Environmental Management Plan has been revised to clarify the scope and intent of wildlife observations recorded in the Wildlife Log. Given the nature of an exploration-stage field program and the northern environment, it is not feasible to document all wildlife observed (e.g., common birds, insects, or rodents) when no incident or interaction has occurred. Accordingly, the Wildlife Record Log will focus on recording observations of aquatic mammals and larger, less common terrestrial animals and birds, as well as all species listed under the Species at Risk Act (SARA) or assessed by COSEWIC.

To ensure appropriate oversight, the Environmental Management Plan further clarifies that all wildlife interactions or incidents, regardless of species, will be documented in the Wildlife Record Log.

The information to be included in a record has been updated to specify the following:

- Species observed and the number of individuals present
- Geographic coordinates
- General location description
- Behaviour of the wildlife, including direction of travel
- Description of the incident/interaction, if applicable
- Distance from drillpad/camp, if applicable
- Any actions taken by Project personnel

QIA #8: Completion of pre-disturbance bird nest surveys

Section 2.4.1 has been updated to include a pre-disturbance sweep within a 100 m radius of the drillsite to check for nests prior to ground disturbance. Personnel will also be trained to identify the birds listed as Species at Risk and the characteristics of a nesting bird. While the method of recording and identifying nest locations did not require a physical landmark, the management plan has been updated to specifically prohibit the use of identifying a nest location with flagging tape.

QIA #9: Incorrect Nesting Zone referenced

The nesting zone has been corrected to N10 and the nesting timeframe updated to late May to mid-August.

QIA #10: Location of carnivore dens

Section 2.4.5 Carnivores and Dens of the Environmental Management Plan has been updated to include the wording provided by the QIA; that prior to commencement of field work, the Government of Nunavut Wildlife Division will be contacted to acquire the locations of any known denning sites, particularly for polar bears and wolverines, so that the planning of Project activities may take these sites into consideration.