

GN # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Spill Response
References	<ul style="list-style-type: none"> • Dahrouge Geological Consulting Ltd. Spill Contingency and Fuel Management Plan: Coppermine River Property, NU. (September 2025). • Environmental Protection Act Spill Contingency Planning and Reporting Regulations, R-068-93

IDENTIFICATION OF ISSUE

The Government of Nunavut (GN) has identified two minor issues regarding the Tundra Copper Corp.'s (Proponent) Spill Contingency and Fuel Management Plan (Spill Plan) for the Coppermine River Property Project (Project). Addressing these items will help strengthen the Spill Plan's alignment with applicable legislation and regulations and enhance overall Project transparency.

IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE

The GN's two minor issues, along with the justification for identifying them, are as follows:

1. In section 3 of the Spill Plan, the Proponent states that, "...[f]uel drums/tanks will be inspected before transport or refilling, with regular monitoring of storage containers, fuel transfer equipment, and caches during drilling. Inspections will identify and document any damage, leaks, or spills, which will be reported and managed accordingly..." (Page 9)

In section 3.4 of the Spill Plan, the Proponent states that, "...[i]nspections will occur each time a hazardous material is used to identify any damaged or leaking containers, with findings documented in a fuel inspection record/log..." (Page 11)

However, the Proponent's Spill Plan is unclear about how these inspections will be documented.

2. Environmental Protection Act, Spill Contingency Planning and Reporting Regulations, R-068-93: 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;" The Proponent's Spill Plan does provide this information in a table in section 3.5 of the Spill Plan. However, the Proponent does not outline the procedures for replenishing spill kit materials.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that the proponent undertake the following:

1. Ensure the use of a standardized fuel inspection (and hazardous material) record/log form and include it as an appendix in the Spill Plan.
2. 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.

GN # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Calving and Post-Calving Season – Flights
References	<ul style="list-style-type: none"> • Tundra Copper Corp. Revised NIRB Application for Screening #126334 Coppermine River Drilling Program. (January 2026). • Darouge Geological Consulting Ltd. Environmental and Wildlife Management Plan: Coppermine River Property, NU. (September 2025).
IDENTIFICATION OF ISSUE	
<p>The Proponent's Application for Screening and Environmental and Wildlife Management Plan (Environmental Plan) outline various caribou protection measures for the Project. However, the GN has identified several inconsistencies with mitigation measures concerning calving grounds.</p> <p>These issues create uncertainty in how caribou mitigation measures are to be applied and may lead to confusion among project personnel or non-compliance with the Environmental Plan. This lack of clarity also constrains the GN's ability to effectively assess the Project's potential impacts on caribou.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>In the Application for Screening, the Proponent states,</p> <p style="padding-left: 40px;"><i>"...pilots are instructed to avoid caribou calving grounds while traveling to and from the project area... According to the [Draft Nunavut Land Use Plan], the whole property intersect caribou calving ground therefore, special care will be taken to avoid critical life timing windows for caribou and muskox (May 15 to September 1), including calving, post-calving, and migration periods."</i> (Page 16)</p> <p>The Project claims (Environmental Plan; Page 16) occur within and are surrounded by mapped caribou calving and post-calving areas. Project flights cannot, in practice, spatially avoid these areas. As such, the proposed mitigation appears internally inconsistent, and it remains unclear whether the proponent intends to temporarily restrict aircraft operations during the calving and post-calving period.</p>	
REQUEST(S)/RECOMMENDATION(S)	

The GN requests that the Proponent:

1. Provide mapped flight paths for all aircraft (helicopters and fixed-wing), clearly demonstrating how aircraft will avoid flying through mapped calving or post-calving areas.
2. Clearly identify any limitations and specify alternative avoidance measures, such as temporal avoidance, for example, where flight paths are unable to spatially avoid calving and post-calving areas.

GN # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Kivalliq Inuit Association – Mobile Caribou Conservation Measures
References	<ul style="list-style-type: none"> • Tundra Copper Corp. Revised NIRB Application for Screening #126334 Coppermine River Drilling Program. (January 2026). • Darouge Geological Consulting Ltd. Environmental and Wildlife Management Plan: Coppermine River Property, NU. (September 2025).
IDENTIFICATION OF ISSUE	
<p>The Proponent’s Environmental Plan and Application for Screening both state that the Kivalliq Inuit Association’s (KIA) Mobile Caribou Conservation Measures will be followed for this Project. However, the Proponent does not extensively describe KIA’s Mobile Caribou Conservation Measures or provide a link or appendix to them.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>In the Environmental Plan, the Proponent states,</p> <p style="padding-left: 40px;"><i>“Tundra will follow the thresholds in Table 2 of the “Kivalliq Inuit Association’s [KIA] Mobile Caribou Conservation Measures: 2022 update for the Nunavut Planning Commission”, as referenced in the Draft Nunavut Land Use Plan (2023). which specify seasonal and timing considerations, zone radii, and observed numbers of collared or adult caribou to determine when to suspend exploration activities such as drilling...[t]he Coppermine River Property is situated within mapped calving and post-calving areas, and exploration activities will therefore be subject to the seasonal restrictions and zone-based mitigation measures (EWZ/ZOI thresholds). Please refer to Figure 4-1 & Figure 4-2 for the detailed mitigation measures Tundra will implement when caribou are observed”</i> (Page 10)</p> <p>Additionally, the Proponent states that</p> <p style="padding-left: 40px;"><i>“...While these measures were developed for Inuit-owned lands, similar proactive triggers will be applied to Crown lands within the Property. For consistency, the Environmental Plan will reference the original KIA measures rather than restating them in summary tables...”</i> (Page 9)</p> <p>However, based on its review, the GN has identified several concerns.</p>	

1. The KIA's Mobile Caribou Conservation Measures are not included as an appendix, nor are they succinctly reproduced in the Environmental Plan, despite serving as the primary basis for the Project's caribou protection measures. The GN understands that the Environmental Plan is an operational document, and the absence of this information directly impacts the Project personnel's ability to comply with the Project's own mitigation measures.
2. The Proponent states that "similar proactive triggers" to KIA's Mobile Caribou Conservation Measures will be applied on Crown lands within the Property. However, the Environmental Plan does not clearly articulate these similar proactive triggers.
3. Figure 4-1 and Figure 4-2 are referenced in the Environmental Plan, but they do not appear in the Environmental Plan or in the associated referenced documents.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent undertake the following:

1. Edit their Environmental Plan and any other relevant documents to provide details on how KIA's Mobile Caribou Conservation Measures would be applied.
2. Include KIA's Mobile Caribou Conservation Measures as an appendix to the Environmental Plan.
3. Articulate what "similar proactive triggers" to KIA's Mobile Caribou Conservation Measures will be applied on Crown lands within the Property, as the Environmental Plan does not articulate this.
4. Clarify references to Figure 4-1 and 4-2.

GN # 04	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Archaeology
References	NIRB 126334/25EA086: Notice of Screening and Comment Request for Tundra Copper Corp's "Coppermine River Drilling Program" project proposal
CONCERNS	
<p><i>Project Summary</i> Tundra Copper Corp. proposes to conduct a multi-year mineral exploration program at the Coppermine River Project, located near Hope Lake, southwest of the community of Kugluktuk. The proposed activities include prospecting, geological mapping, geochemical sampling, airborne and ground geophysical surveys, diamond and reverse-circulation drilling, helicopter-supported drilling operations, and the establishment and operation of a seasonal exploration camp and associated infrastructure at the Hope Lake airstrip. Project activities may occur annually between March and October, and Project components and areas of ground disturbance may be modified or relocated between or within field seasons.</p> <p>A review of Government of Nunavut (GN) records indicates that archaeological assessments have previously been completed in the broader regional area, including in proximity to the Hope Lake Mining Exploration Camp and airstrip. However, based on a review of available records, GN notes that no previous archaeological assessment appears to have involved a systematic, field-based assessment of the specific areas proposed for ground disturbance under the current Project application. As such, no areas within the proposed Project footprint can be confirmed as having been assessed and cleared for ground disturbance through an archaeological assessment conducted under a permit issued by the Department of Culture and Heritage (CH).</p> <p>A review of the Nunavut Archaeological Sites Database indicates that archaeological sites have been previously recorded within one of the mineral claims associated with the Project area, including sites located in proximity to the Hope Lake Mining Exploration Camp and airstrip. The absence of additional recorded sites within other 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 demonstrated by previously recorded sites in the surrounding area, and in light of the absence of prior field-based archaeological assessment for the areas of proposed impact, GN 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

GN 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;
- geotechnical and geochemical sampling (rock, soil, till);
- establishment, operation, installation, and seasonal removal of the exploration camp, including tents, generator shack, storage facilities, fuel caches, incinerator, and wastewater systems;
- any construction, levelling, or use of pads associated with camp infrastructure;
- helicopter landing areas that are planned, identified, or intended for use in support of helicopter-supported drilling or other Project activities; and
- any ancillary ground disturbance associated with equipment staging, fuel handling, or terrestrial access.

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 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 direction is provided 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.