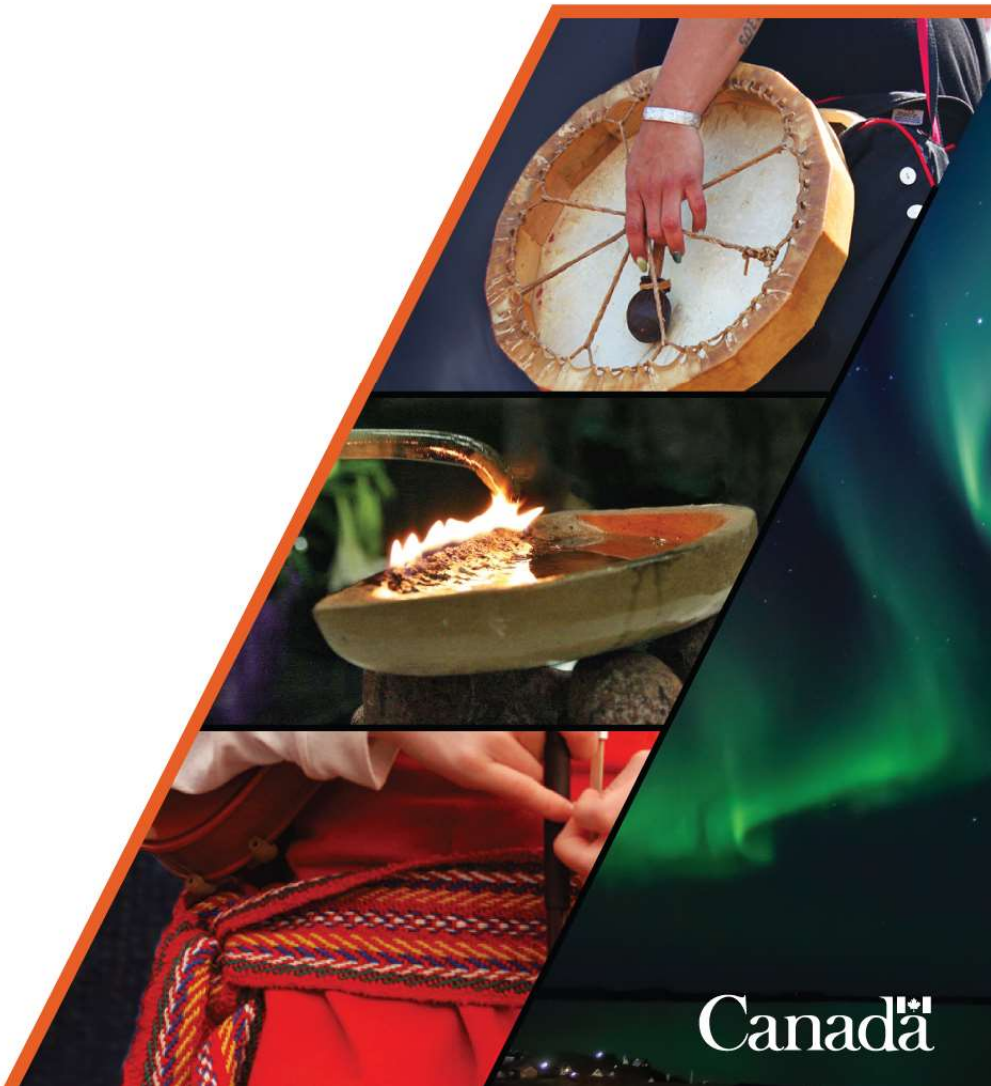
Crown-Indigenous Relations and Northern Affairs Canada
Relations Couronne-Autochtones et Affaires du Nord Canada

CIRNAC Comments to NIRB

Re: Notice of Screening for Tundra Copper Corp's "Coppermine River Drilling Program" Project Proposal



Canada

Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
25EA086
Our file - Notre référence
GCdocs# 143406823

February 4, 2026

Jordan Takkiruq
Impact Assessment Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Tundra Copper Corp's "Coppermine River Drilling Program" Project Proposal

Dear Jordan Takkiruq,

On January 14, 2026, the Nunavut Impact Review Board (NIRB) invited parties to comment on Tundra Copper Corp's "Coppermine River Drilling Program" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

Any matter of importance to the Party related to the project proposal

CIRNAC #1: Fuel Storage and Containment Capacity

The Proponent proposes storing significant amount of fuel on site (including diesel, Jet A, and gasoline) using drums and/or collapsible bladders placed within secondary containment systems (Insta-Berms) equipped with hydrocarbon filtration devices. However, the application does not demonstrate how secondary containment systems are sized relative to the total volume of fuel proposed, nor do they provide site-specific assumptions regarding precipitation accumulation, snowmelt contribution.

In Arctic environments, snowmelt can rapidly reduce effective containment capacity, and without explicit sizing operational thresholds, it is difficult to confirm that containment systems will function as intended under various climate conditions. In addition, while spill response and cleanup procedures are described, the proposed methodology relies on visual inspection to confirm cleanup effectiveness and does not clarify whether post-spill verification would be conducted after thaw periods to confirm that residual fuel contamination has not remobilized. CIRNAC recommends that the Proponent considers:

- Demonstrating that secondary containment capacity at each fuel storage location is sufficient to contain at least 110% of the largest container volume stored;

- Discussing any post-thaw follow-up inspections or sampling to verify cleanup effectiveness beyond initial visual confirmation; and
- Clarifying how precipitation and snowmelt accumulation within containment systems will be managed to ensure effective containment capacity is maintained throughout the operating season.

CIRNAC #2: Management of Drill Cuttings and Greywater Sumps in Permafrost Terrain

The Proponent indicates that camp greywater (≤10 m³/day) and drill-related greywater and cuttings (≤289 m³/day) will be managed in natural depressions or constructed sumps located at least 31 m from water sources, with coarse gravel bases for filtration, side supports to prevent slumping, and backfilling once full. However, the application does not describe how sump performance will be monitored during operations to confirm that liquids are being retained and managed as intended, or activities after the closure of the sump.

The Project area is underlain by continuous permafrost, where infiltration is limited to the seasonal active layer and varies spatially and temporally. Sump performance therefore depends on thaw depth, timing, and cumulative loading rates. In a continuous permafrost environment, sump performance can change rapidly due to freeze-up, limited thaw depth, or seasonal melt, increasing the risk of pooling, lateral migration, or overtopping if not actively monitored.

CIRNAC recommends that the Proponent considers describing how sump performance will be monitored to detect pooling, overflow, and identifying the response actions that would be implemented if such conditions are observed.

CIRNAC #3: Organic Surface Material Management and Post-Closure Reclamation

The Abandonment and Restoration Plan describes recontouring and backfilling of disturbed areas and indicates that post-closure inspections may be conducted to confirm stabilization. However, it does not address the management of the organic surface layer during site preparation or reclamation. In addition, permafrost-related instability, erosion, or ponding may develop several seasons after disturbance. In tundra environments underlain by continuous permafrost, the organic surface layer plays a critical role in insulating frozen ground, retaining moisture, and enabling vegetation recovery. Disturbance without explicit preservation or reapplication of this layer can increase susceptibility to permafrost degradation and delay recovery. It is unclear whether delayed or progressive effects would be identified and addressed.

CIRNAC recommends that the Proponent considers:

- Clarifying whether and how organic surface material will be preserved, managed, and reapplied during progressive or final reclamation; and
- Establishing post-closure monitoring timelines and how monitoring results would be used to determine whether additional remedial actions are required.

CIRNAC #4: Consultation with Interested Parties

CIRNAC recommends that the Proponent continue its efforts to engage with potentially interested parties regarding its project proposal. These parties include the Hamlet of Kugluktuk,

the Kugluktuk Angoniatit Association / Kugluktuk Hunters' & Trappers' Organization, the Kitikmeot Inuit Association, and any other relevant organizations or individuals.

As part of these consultation activities, several issues should be considered, including but not limited to:

- Incorporation of Inuit Qauijimajatuqangit and Community Knowledge into project activities;
- Mitigation measures to prevent any disturbance to wildlife and the environment;
- Mitigation measures to prevent disturbance to sites of cultural, archaeological, and/or environmental significance;
- The experience of community members who participate in traditional harvesting activities within or in close proximity to the project area;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities.

CIRNAC #5: Nomination of the Coppermine – Kugluktuk River as a Canadian Heritage River

As communicated in the Proponent's application, no mineral exploration activities will occur within 1 km of the Coppermine – Kuglukuk River, which has been nominated - but has yet fully designated - as a Canadian Heritage River. CIRNAC recommends that the Proponent maintain ongoing engagement with the Government of Nunavut's Department of Environment (Parks and Special Places), the Kitikmeot Inuit Association and Nunavut Tunngavik Inc. to ensure project planning and mitigation measures adequately prevent adverse impacts to this river. According to the Canadian Heritage Rivers System, these organizations will jointly manage the river once its designation is finalized (https://chrs.ca/en/rivers/coppermine-kugluktuk-river).

CIRNAC appreciates the opportunity to provide comments. Should you have any questions, please contact Muhammad Arslan by e-mail at muhammad.arslan@rcaanc-cirnac.gc.ca or David Abernethy by email at david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,

Richard Bingley
Manager, Impact Assessment