



June 4, 2015

Kelli Gillard, B.Sc., P.Ag  
Technical Advisor  
Nunavut Impact Review Board  
P.O. Box 1360 (29 Mitik)  
Cambridge Bay, NU, X0B 0C0

**RE: Tundra Copper Corp. Opportunity to Address Comments – Screening for Coppermine Exploration Project Proposal; NIRB File No.:15EN009**

Dear Ms. Gillard,

Thank you for the opportunity to respond to questions and concerns raised during the Nunavut Impact Review Board's ("NIRB") recent screening of our Land Use Permit and Water License amendment applications.

The documents included with this cover letter include:

- Tundra Copper Corp. – Wildlife and Environmental Mitigation Plan, May 2015 – "Draft V2";
- Coppermine Project Description, May 2015;
- Tundra Copper Corp. – Consultation Record; and
- Tundra Copper Corp. – Environmental Policy

Company Description:

Tundra Copper Corp. ("Tundra"), a Vancouver B.C. based mineral exploration Company owned by Kaizen Discovery Inc. ("Kaizen"), is committed to the responsible exploration and development of resources within Nunavut (Tundra and Kaizen collectively referred to herein as the "Company").

Kaizen also controls mineral exploration Projects in Australia, Africa and five Projects in British Columbia ("B.C."), two of which are the subject of multi-year programs conducted within traditional First Nations' lands.

Kaizen is entering its 4<sup>th</sup> year of operations near the "Sacred Headwaters" in Tahltan Territory in northern B.C. where it maintains a strong track-record in stewardship of wildlife and the land. In southern B.C. the Company is entering year-three of a program to explore within traditional lands of

several different First Nations Bands, where it has achieved an equivalent level of care and consideration for the environment.

Tundra and other Kaizen group companies operate under a strict Environmental Policy, which has been provided with this letter as an attachment.

Background:

In November 2014 Kaizen acquired Tundra a private Company holding 352 sq km's of crown mineral claims southwest of the Hamlet of Kugluktuk, Kitikmeot region, Nunavut. Tundra was in possession of a valid water use permit (2BE-COP1416) granted by the Nunavut Water Board ("NWB") and a land use (N2014C0015) permit granted by Aboriginal Affairs and Northern Development Canada ("AANDC").

Subsequent to the acquisition of Tundra, an additional 1,515 sq km's of crown land was staked, and applications for 7 prospecting permits covering 1,299 sq km's of crown land were filed (collectively the "Coppermine Project" or "Project").

Tundra is proposing to carry out early-stage exploration activities within the Project. A comprehensive Project Description is provided with this letter as an attachment.

In February 2015, Tundra applied for amendments to its existing land and water use permits to allow for a slightly larger exploration camp and additional drill holes. This would in turn enable more efficient exploration of the newly enlarged Project. In the same month Tundra applied for surface use rights with the Kitikmeot Inuit Association ("KitIA") and exploration rights with Nunavut Tunngavik Inc. ("NTI") in two parcels of Inuit Owned Land ("IOL") (CO-58 and CO-59) totalling 614 sq km's.

In March 2015, NWB, AANDC, and KitIA referred Tundra's applications to the Nunavut Impact Review Board for screening and public comment.

In late March 2015, Tundra commenced consultation.

New Understanding:

It was not until the Company had begun to review comments received during NIRB screening and receive early consultation feedback that we realized the incompatibility of our proposed exploration program timetable given that the Project overlaps with delicate and important caribou calving grounds and other species habitat. Tundra incorrectly assumed that because it was already in possession of the permits it needed to build a camp, explore and use water, that applying for small amendments would not alter the already imposed terms and conditions.

Additionally Tundra has become aware of the efficiencies attainable by conducting consultation prior to formulating explorations plans and submitting applications and permits to conduct activities. An oversight attributable to the Company's lack of experience in Nunavut; nevertheless a lesson well learned and an error that will not be made again.

Tundra acknowledges that exploration programs have the potential to impact wildlife and wildlife habitat. Potential impacts to wildlife and wildlife habitat include displacement from and avoidance of habitat, habituation and attraction to personnel and/or the camp, and unintentional interactions and disturbance. Tundra further recognizes that the Bluenose East Caribou herd is of particular sensitivity in the regional Project area. Accordingly, Tundra will strive to prevent or minimize potential impacts on caribou and other wildlife and wildlife habitat, by implementation of a Wildlife and Environmental Mitigation Plan as referenced herein.

#### Consultation:

Tundra is committed to undertaking open, honest and comprehensive consultation on an on-going basis with all stakeholders. Since late March 2015 the Company has completed significant consultation with a particular focus on the Hamlet of Kugluktuk. Representatives of Tundra also conducted informal consultation/discussions while in attendance at the Yellowknife Geoscience Forum (November 2014), Nunavut Mining Symposium (April 2015), Kugluktuk Community Readiness – Partner Feedback Forum (May 2015) and also hosted a Kugluktuk community consultation event (April 2015).

Tundra's complete Consultation Record has been provided with this letter as an attachment.

Through its consultation efforts Tundra has developed a strong working relationship with the Kugluktuk Angoniatit Association – Hunters' and Trappers' Organization ("HTO"). After several meetings, the cooperative efforts and contributions of the HTO Board of Directors its Administrators and representatives of Tundra has resulted in a mutually agreed Wildlife and Environmental Mitigation Plan ("Mitigation Plan" – provided with this letter as an attachment), which will act as a guideline governing the exploration programs proposed by Tundra. The HTO has additionally provided a letter of support for Tundra's Mitigation Plan.

Tundra is currently in contact with representatives of several Dene organizations of the NWT to schedule consultations for mid June 2015 to discuss concerns raised in comments filed during NIRB's public comment period.

#### Revised Exploration Schedule:

The most important aspect of Tundra's revised exploration plan is a change to the proposed start date of its exploration programs. Through consultation, advice from the HTO and review of the most up to date government information on timing and location of calving in the Blue Nose East Caribou herd, Tundra has chosen to restrict any activity until after July 5, and any helicopter supported activity until after July 15<sup>th</sup>. Proposed dates are as follows:

- |                                |   |
|--------------------------------|---|
| • July 5 – July 15, 2015       | <b>Camp construction</b>  |
| • July 15 – September 30, 2015 | <b>Helicopter supported geological activities, including drilling</b> |

Wildlife and Environmental Mitigation Plan:

Tundra in close consultation with the HTO has devised a detailed Mitigation Plan for the Coppermine Project.

The main purpose of the Plan is to formally outline Tundra's wildlife protection, avoidance and mitigation strategies. The Plan will function as a set of Standard Operating Procedures for Tundra staff and contractors working on the Project and in lands proximal to the Project, inclusive of those surrounding the local hamlet of Kugluktuk. The Plan commits to wildlife protection by preventing or minimizing personnel/wildlife interactions and wildlife impacts.

The plan addresses the following specific wildlife species, species groups and their critical habitats:

- those that occur within and immediately adjacent to the Project site or along Project flight paths during Project operations,
- those that are important harvestable species, and
- those with special conservation status.

Regional wildlife biologists, community members of Kugluktuk, and the Government of Nunavut have identified areas in proximity to the Project as being important for wildlife, especially the Bluenose East caribou herd, as well as for traditional hunting sites. The will adopt the best management practices outlined in the Mitigation Plan to protect wildlife and wildlife habitat, and mitigate against disturbance to wildlife and sensitive areas.

Tundra views its Mitigation Plan as a "living document" and welcomes suggestions and additional comments, which will be given careful consideration for possible inclusion when updates are made.

Primary Public Concerns and Tundra's Responses:

1. Water Quality: Tundra Copper would like to confirm that all due care and attention will be made to ensure that water resources in Nunavut are protected from harm by our proposed exploration activities. Tundra is aware that the Project partially falls within the Coppermine River basin. A local baseline description of the Coppermine River water quality is provided in the Coppermine Project Description, along with the location (including map) of water bodies identified for camp and/or drilling purposes. All grey water will be diverted to a sump/natural depression at least 31 m above the high water level of any local water body to allow for natural filtration through the tundra. Detailed descriptions of Project water management and mitigation measures are provided in the Coppermine Project Description. All territorial and federal legislation will be followed.

a. Concern raised by: A. Havioyak, B. Adjun, Anonymous, B. Hikhiatok, F. Taptuna, R. Hinanik, Aboriginal Affairs and Northern Development Canada, I. Ayalik-McWilliams.

2. Terrain: All measures will be made to protect the terrain from harm. Tundra will implement a strict waste management plan, wherein all personnel working on the Project will be required to read and become familiarized with acts included in the GN's Environmental Protection Legislation. The camp site will be kept clean, cigarette butts disposed of in tin cans, and garbage will be stored in sealed containers to minimize wildlife attraction. Travel to/from the airstrip will be via ATV on existing trails at the proposed Hope Lake camp site. Spill kits will be located at the camp, the airstrip, and drill sites. Camp personnel will be trained in the use of Spill Kits and any spills will be reported immediately to the Spill Line. Grey water and drill cuttings will be diverted to a sump at least 31 m above the high water level of any local water body to allow for natural filtration through the tundra.

a. Concern raised by: J. Nivingalok, F. Kaitak, Wek'eezhi Renewable Resources Board, Aboriginal Affairs and Northern Development Canada, A. Havioyak, I. Ayalik-McWilliams, Kugluktuk Hunters and Trappers Organization.

3. Wildlife and their habitat: Tundra Copper heard comments concerning exploration in the calving grounds and during calving and migration of the Bluenose East caribou. The Company has adjusted the period of proposed exploration activities to commence from July 15 through to the end of September. The new exploration program dates will also avoid the planned aerial caribou survey. In addition, a Wildlife and Environment Mitigation Plan was developed in co-operation with the Kugluktuk Hunters and Trappers Organization. The Plan (attached) states that the Company will hire local wildlife monitors to monitor wildlife activities and advise the Company on any possible temporary shut downs and/or changes to work activities including drilling and helicopter flights. Bear monitors will also be hired to ensure that camp personnel are kept safe. Wildlife monitors will also identify bird nests and active dens to ensure that birds and wildlife are not disturbed by exploration activities. A wildlife sighting log will be completed daily and information will be provided to regulators in the annual reports. The camp and all work activities will be kept clean, with garbage stored in sealed containers to avoid attracting wildlife unnecessarily. All caribou crossings will be avoided.

a. Concern raised by: Tlich, D. Nivingalok, K. Klengenberg, B. Adjun, J. Nivingalok, North Slave Metis Alliance, A. Egotak, A. Kelly Jr., Anonymous, Sahtu Secretariat Incorporated, Deline Land Corporation, F. Kaitak, F. Taptuna, Government of the Northwest Territories, Jennifer Waterhouse, Nunavut Wildlife Management Board, R. Hinanik, Sahtu Renewable Resource Board, Tuktut Nogait Management Board, Wek'eezhi Renewable Resource Board, A. Havioyak, I. Ayalik-McWilliams, Aboriginal Affairs and Northern Development Canada, Government of Nunavut, Kugluktuk Hunters and Trappers Organization, Kitikmeot Inuit Association.

4. Marine Mammals and their habitat: Given the limited work programs and after extensive review, Tundra Copper does not believe that their activities proposed at Hope Lake will negatively affect marine mammals or their habitat.

a. Concern raised by: B. Adjun, K. Klengenberg

5. Birds and their habitat: Tundra Copper remains committed to not disturbing any birds or wildlife and will abide by all terms and conditions of licenses and permits. Local wildlife monitors will be hired to identify bird nests in the vicinity of proposed drill sites and the camp. These will be flagged and buffers staked and flagged. Nets will be logged and GPS coordinates collected. This information will be included in annual reports.

a. Concern raised by: J. Nivingalok, A. Kelly Jr., Anonymous, Sahtu Secretariat Incorporated, Deline Land Corporation, F. Kaitak, F. Taptuna, J. Waterhouse, Sahtu Renewable Resource Board, A. Havioyak, I. Ayalik-McWilliams,

6. Fish and their habitat: All due care and attention will be made to ensure that fish and their habitats in Nunavut will be protected from harm by our proposed exploration activities. No fishing is permitted by employees and contractors. An appropriately sized screen will be utilized on the water intake valve for pumping water from lakes identified for camp/drilling use. All efforts will be made to ensure that grey water/drill water will be diverted to sumps/natural depressions at least 31 meters above the natural high water level to naturally filter into the tundra.

a. Concern raised by: A. Havioyak, B. Adjun, Anonymous, B. Hikhiatok, Kugluktuk Hunters and Trappers Organization

7. Heritage resources in area: An application for all known archaeological sites in the Project area has been submitted. There will be no activities within a 50 m buffer zone of any known sites. Any areas where potential archaeological remains are identified will be assigned GPS coordinates, flagged for avoidance and reported to the Government of Nunavut's Department of Culture and Heritage, and the Kitikmeot Inuit Association. These will be reported in annual reports. The proponent confirms that overland circulation will be confined to existing routes/tracks at the Hope Lake campsite as shown in the Project Description. All drill holes will be visually assessed by means of over-flight assessment. Land activities will be limited to the camp site, pre-existing routes and tracks and the planned drill locations.

a. Concern raised by: J. Nivingalok, A. Kelly Jr., F. Kaitak, J. Waterhouse, I. Ayalik-McWilliams, Government of Nunavut.

8. Traditional uses of land: Tundra Copper acknowledges that people have been active in the area for many years and does not believe that the proposed exploration activities will interfere with any traditional uses of the land. Exploration activities are short term and temporary in nature. Local persons wishing to carry out traditional uses of the land will not be interfered with or discouraged.

a. Concern raised by: K. Klengenber, B. Adjun, A. Egotak, Anonymous, B. Hikhiatok, R. Hinanik, F. Kaitak, I. Ayalik-McWilliams.

9. Inuit harvesting activities: As above, Tundra Copper realizes that local residents have in the past and will continue to harvest wildlife and pursue traditional activities. Proposed exploration activities have been changed from May/June 2015 to July 15 to September 2015 thus avoiding the sensitive migration and calving times. Exploration activities are short term and temporary in nature.

a. Concern raised by: K. Klengenber, B. Adjun, J. Nivingalok, A. Egotak, Anonymous, B. Hikhiatok, R. Hinanik, I. Ayalik-McWilliam

10. Community involvement and consultation: Tundra Copper recognizes that errors were made in not consulting with interested stakeholders prior to filing amendment applications to the regulators. Initial introductory meetings were held in Kugluktuk in early April 2015, followed by meetings with government officials in Iqaluit later in April. Tundra followed up with stakeholder consultation in Kugluktuk in early May. Additional meetings were held during the month of May with the Kugluktuk Hunters and Trappers Organization to review and collaborate on the Wildlife and Environmental Mitigation Plan. Meetings with other stakeholders are planned for June 2015.

a. Concern raised by: B. Adjun, J. Nivingalok, A. Jelly Jr., J. Waterhouse, Tuktut Nogait Management Board, I. Ayalik-McWilliams, Aboriginal Affairs and Northern Development Canada

11. Local development in the area: Currently there are no other exploration activities in the area that Tundra Copper is aware of. It is understood that other exploration is currently underway in the West Kitikmeot, but not in the vicinity of Tundra Copper. Every effort will be made to minimize any possible negative effects of the exploration program and provide positive socio-economic benefits wherever possible. If permitting is successful, Tundra intends to hire several members of the community in positions such as core-cutter, wildlife monitor, bear safety monitor or other positions as necessary.

a. Concern raised by: J. Nivingalok, F. Taptuna, I. Ayalik-McWilliams, Tuktut Nogait Management Board.

12. Air Quality: The Company is unaware of how early stage exploration activities could negatively impact the air quality.

a. Concern raised by: J. Nivingalok, and Anonymous

13. Tourism in the area: Not raised, however during a recent overseas visit to Tokyo, senior management of Kaizen met with the two leading travel agencies in Japan to begin promotion of tourism to the region and Kugluktuk specifically.

14. Human health issues: not raised

If you or your Board of Directors have further questions or require any clarifications, we would be pleased to provide any information at your convenience.

Thank you again for the opportunity to respond.

Sincerely,  
Tundra Copper Corp.



B. Matthew Hornor  
President and Chief Executive Officer

cc     Distribution List:  
         Kitikmeot Inuit Association  
         Nunavut Water Board  
         Aboriginal Affairs and Northern Development Canada