



TUNDRA COPPER CORP. – Nunavut operating entity of KAIZEN DISCOVERY

WILDLIFE AND ENVIRONMENTAL MITIGATION PLAN

*COPPERMINE PROJECT
KITIKMEOT REGION, NUNAVUT*

May 2015 – DRAFT V2

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1 INTRODUCTION

Tundra Copper Corp. (Tundra) is a Vancouver-based mineral exploration company, owned by Kaizen Discovery, committed to the responsible exploration and development of resources within Nunavut.

Kaizen Discovery purchased Tundra in November 2014, which then held 352 square kilometers of crown land for which a water license and land use permits had been granted. Kaizen through Tundra then staked additional crown claims, applied for prospecting permits on crown lands, and applied for access to and mineral rights in two blocks of Inuit Owned Land, bringing total land holdings to approximately 3,500 square kilometers. These holdings are now collectively referred to as the Coppermine Project (the “Project”).

Tundra is proposing to carry out early-stage exploration activities within the Project, which is situated in the western Kitikmeot region of Nunavut.

In February 2015, Tundra submitted amended land-use and water use applications to Aboriginal Affairs and Northern Development Canada (AANDC) and the Nunavut Water Board (NWB) as well as new applications with the Kitikmeot Inuit Association (KitiA) and Nunavut Tunngavik Inc. (NTI). Tundra would like to begin exploration on the project, inclusive of geologic mapping, surficial rock sampling, drilling (one rig) and operation of one 16-man temporary exploration camp (Hope Lake), with associated aircraft landing strip.

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 presented in this document.

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.

Table 1: Wildlife Species and Species Groups addressed by the Wildlife Management Plan

Species or Species Group	Species or Species Group
Barren-ground Caribou – Blue Nose East herd	Geese (and their nests)
Moose	Other Waterfowl and Waterbirds (and their nests)
Muskox	Ptarmigan (and their nests)
Arctic Fox (and their dens)	Short-eared Owl (and their nests)
Wolf (and their dens)	Peregrine Falcon (and their nests)
Grizzly Bear (and their dens)	Rough Legged Hawk (and their nests)
Wolverine (and their dens)	Gyr Falcon (and their nests)
Fish (and other aquatic life)	Other Falcons (and their nests)

Suggestions and additional comments received during all consultations are welcomed and will be given careful consideration in drafting the final version of this document. Tundra will maintain open communications with regulators and the HTO prior to and during the field program.

2 BLUENOSE EAST CARIBOU HERD

Bluenose-East caribou are one of eight mainland migratory barren-ground caribou herds that migrate seasonally across the Northwest Territories and Nunavut and are harvested by nine communities: Wrigley, Norman Wells, Tulít'a, Délı̄në, Whatì, Gamètì, Báhłı̄, Paulatuk and Kugluktuk.

Recent surveys have shown a significant decline in Bluenose East populations from 104,000 in 2000 to the current population estimate of 68,000 in 2013. In June 2014, reconnaissance surveys suggests that Bluenose-East caribou on the calving grounds have further decreased by 30% between 2013 and 2014, which is higher than the estimated annual rate of decline between 2010 and 2013.

The Bluenose-East caribou are an important resource to not only the communities of Nunavut but also communities of the Northwest Territories. With declining caribou populations, emergency measures have already been taken to restrict harvest in the Northwest Territories and management options are being considered in Nunavut.

There is overlap with the proposed locations of Tundra exploration activities and caribou calving and post-calving habitat for the Bluenose-East caribou population. Tundra will minimize potential negative effects by avoiding work during calving season and through caribou-focused mitigation and monitoring measures, detailed below Tundra's revised exploration schedule will also avoid potential interference with an aerial photographic survey of the Bluenose-East caribou herd scheduled for June 2 – 10, 2015.

3 EXPLORATION PROGRAM SCHEDULE

Tundra has revised its originally proposed exploration program schedule, which would have overlapped with the June and early July calving season in the Blue Nose East Caribou herd. Tundra has chosen to restrict activity until after July 1, and any helicopter supported activity until after July 15th. Tundra's revised schedule is as follows:

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

4 INTERNAL POLICIES AND MITIGATION MEASURES

Caribou and All Other Wildlife

All employees and contractors of the company will be trained in the internal policies, procedures and made familiar with the Terms and Conditions of the project's licenses and permits. Training will include, but not be limited to:

- Spill contingency/response
- Environmental policies
- Safety
- Bear safety
- Wildlife Mitigation Measures
- Caribou Protection Measures

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

These policies will be strictly enforced. Any employee or contractor who is found to be violating any of these rules will find their employment terminated and will be removed from site immediately.

- **Approaching and feeding wildlife is prohibited.** There are absolutely no exceptions to this rule. If wildlife are present in the area, all employees and contractors are to avoid any contact with wildlife.
- **Harassment and disturbance of wildlife is prohibited.** If any employees and contractors are approaching a work site where migrating caribou, caribou cows and

calves, muskoxen nurse groups or other wildlife are in the area, this work site will be avoided until the animals have moved on a distance of 2 km from the site.

- If employees and/or contractors encounter wildlife at any time, every effort should be made to stay out of sight of wildlife or redirect travel away from wildlife where possible, to avoid impact to the wildlife.
- **Hunting and fishing is prohibited.** While conducting business on behalf of Tundra Copper Corp., hunting and fishing is strictly forbidden. There are no exceptions to this rule.
- **Flight altitudes must be strictly observed and recorded.** Fixed wing aircraft and helicopters will maintain a minimum altitude of 610 meters above ground level if flying through places where there are migrating caribou, caribou cows and calves, muskoxen nurse groups and other wildlife. In areas where there are colonies of birds observed, the flight levels will be restricted to a vertical distance of 1000 meters and a horizontal distance of 1500 meters from the birds.

Low-level aircraft and helicopter flights will be kept to a minimum. Low-level (<610m altitude) aircraft and helicopter flights will avoid wildlife-occupied areas that are migration, calving, nesting and denning habitats. No aircraft landings will occur when migrating caribou, caribou cows and calves, muskoxen nurse groups or other wildlife are present.

- Helicopter pilots will be instructed that they are not to fly over wildlife in a way to cause them to change behavior, run or flee at any time, within or outside of migration. If such an interaction should occur incidentally, helicopter pilots will be instructed to divert and/or change altitude as quickly as safely practicable.
- In the event of bad weather or an emergency when low-level flights or landings are required, these instances will be recorded and reported to the Government of Nunavut (GN) wildlife biologist and the KitlIA and will be documented in the annual report.
- A trained, locally hired Wildlife Monitor will be present at the drill site at all times during drilling to look for approaching caribou and other wildlife, and advise the project manager and drill foreman if migrating caribou, caribou cows and/or calves are within 2 km of the drill site.
- Should caribou approach a worksite outside of the calving or migration period, workers will remain quietly out of sight where possible, will not approach the caribou, and will cease activities that incidentally draw the attention of the caribou or cause them to flee.

- Airborne Geophysical Surveys – Tundra does not currently have plans to conduct any airborne geophysical surveys over the Project area. Prior to conducting any airborne geophysical surveys, the Government of Nunavut, the KitlA and the Hunters and Trappers Organization (HTO) would be contacted and the proposed dates, duration and location of surveys would be provided. The Company would conduct a pre-survey reconnaissance of the area to ensure that there were no wildlife present, and would monitor for wildlife during the survey. If caribou and/or muskox were seen in the area, the geophysical survey would not be flown until they have moved a safe distance (at least 2 km) from the area to be surveyed.
- **Bear Safety Training will be provided.** All employees and contractors will receive Bear Safety Training. Bear safety information and material will be kept in a binder on site. The Government of the Northwest Territories published the “Territorial Safety in Bear Country Manual”. This document will be referred to in the safety orientation that all personnel, contractors and consultants receive when they arrive at site. A copy of the manual will be kept at the camp office and in Vancouver in the head office.
- If bears are present in the area, work will cease until the bears have moved safely out of the area. All human-bear interactions are to be reported immediately to the KitlA, the Government of Nunavut Department of Environment, Environment Canada, HTO’s and the Government of Nunavut Wildlife Biologist. A Wildlife Monitor trained in bear safety will be employed from Kugluktuk to ensure that camp employees and contractors are safe.
- **All den sites are to be avoided.** An environmental scan of the exploration areas is proposed prior to exploration activities to map out active den sites for avoidance. If an active den site is discovered, the GPS coordinates will be recorded so that the site can be avoided. These coordinates will be provided to the appropriate regulatory authorities. No dens are to be disturbed.
- The following buffers between active dens and exploration activities were agreed upon by the Kugluktuk Hunters and Trappers Association. Any exploration activities within these active den buffers will cease immediately.

Wolves	800 m buffer
Grizzly Bear	2 km buffer
Wolverine	1 km buffer
Fox	150 m buffer

Bear incidents and/or interactions, and wolf or fox den sightings will be reported immediately to:	
Bob Hansen, GN wildlife deterrent specialist bhansen@gov.nu.ca	867 934 2075
X, Sr. CO, Kugluktuk District, GN,	
Bear sightings/incidents and large herd sightings will be reported to:	
Mathieu Dumond, GN Wildlife Manager, Kugluktuk	867 982 2505
Paul Emingmak, KitlA, Executive Director	867 983 2458
Geoff Clark , KitlA, Director of Lands	867 982 3310
Luigi T, KitlA , Lands Use Inspector	867 982 3310

- **Breeding Birds are not to be disturbed.** An environmental scan of the exploration areas is proposed prior to exploration activities to map out nests for avoidance. No eggs or nests are to be disturbed by any activities. If any employee or contractor comes across any active nests, they are to cease all activities immediately to ensure that the nest is not disturbed. Coordinates are to be recorded on the wildlife sighting sheets and these coordinates are to be reported to Environment Canada. Moving or disturbing the nest of a migratory bird is in contravention of the Migratory Birds Convention Act.
- The peregrine falcon has been identified as species of Special Concern by Committee on the Status of Endangered Wildlife in Canada. If any nests are found, a buffer must be maintained. A 1.5 km buffer is recommended for the peregrine falcon. Any nests discovered will be recorded and the GPS coordinates provided to the applicable regulatory authorities and interested parties.
- **Sightings of wildlife will be recorded.** Sightings of wildlife will be reported by all employees and contractors to an appointed staff member who will record the wildlife sighting information into the Tundra Copper Wildlife Incidental Observation Log. (example attached) This information will be reported in the required annual reports provided to various regulatory agencies.
- **Aquatic Life will be protected.** Working in and around waterbodies must be done in such a way that prevents disturbance to aquatic life and habitat.
- Waterlines must be properly placed and screened in accordance with the “Freshwater Intake End-of-Pipe Screen Guideline” (DFO). No wastes are to enter any water-bodies. This includes any discharge from any exploration camp.
- All sumps, fuel caches and camps must be located at least 31 meters from the high water mark of any water-body unless otherwise approved by the appropriate regulatory authority.

- **Waste will be managed properly.** Proper food storage and handling of cooking wastes will prevent problems with attracting wildlife. Food waste will be stored such that it is not accessible to wildlife, and will be compacted and exported out of camp for disposal in Yellowknife on a regular basis. Nuisance wildlife will be reported immediately.
- **Firearms will only be carried for safety reasons.** Firearms may be carried for safety reasons, but only if such firearms are properly registered and stored in accordance with applicable legislation. All firearm discharges must be reported to the Project Manager.
- **Archaeological sites will be recorded and are not to be disturbed.** An archaeologist has been contracted to work with the community to identify any sites of concern. The archeologist will also conduct an Archeological Inventory of the proposed work sites. If any archaeological sites are discovered they will be left undisturbed, a 50 m buffer will be implemented, and their GPS coordinates will be recorded and reported to the Government of Nunavut Culture and Heritage Department and the KitIA.

I have read and agree to the Tundra Copper Corp. Wildlife and Environmental Mitigation Plan outlined in the above document:

Signature: _____

Date: _____

COMMENTS: