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Ikaluktutiak
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Kugluktuk
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Bay Chimo
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Taloyoak
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Kugaaruk
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Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, Nunavut
X0B 1J0

Sent by e-mail: Robert Hunter – Robert.hunter@nwb-oen.ca

March 13, 2025

RE: 2BE-RCE2532 Rae Copper Project: Closure and Reclamation Plan

Dear Rober Hunter,

The Kitikmeot Inuit Association's (KIA) has reviewed the Rae Copper Project's Closure and Reclamation Plan. During the NIRB screening process the KIA had commented as follows *"Finally, there is little to no information on closure procedures and plans. What will be done at closure to ensure the site is fully cleared of debris and materials brought in, will undergo timely natural revegetation, will stabilize any eroding areas, and to ensure that the chemical environment is returned to baseline?"*

KIA had recommended in the NIRB screening to *"Provide more details on planned actions/commitments for the closure phase of the project. Provide information on what will be done to expedite the return of conditions to baseline and to ensure the area is chemically and physically healthy for future Inuit and wildlife use."*

The KIA finds the plan submitted to the NWB to be quite minimal and mainly presents options for meeting seasonal/temporary and final closure goals, without any commitment to implementation. The KIA finds the plan to be full of non-committal language that would enable the proponent to do things in multiple ways (e.g., disturbed areas will be allowed to revegetate naturally. Revegetation may be encouraged through reseeding with plants species appropriate and native to the area), and in those cases KIA expects the easier of the two listed options to be done.

This is a typical and reasonable closure description for this stage of an exploration project. If the project moves forward to advanced exploration, the KIA will request a more complete closure and reclamation plan providing greater detail on reclamation activities with a clear commitment to execution along with a reclamation security cost estimate.



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KIA Recommendations:

The KIA recommends that a more thorough Closure and Reclamation Plan be developed when the project moves forward to advanced exploration with a clear commitment to detailed reclamation activities tied to a reclamation security cost estimate.

The KIA looks forward to conducting further reviews of the project and participating in the NWB process to determine impacts and potential mitigation measures for the environment and KIA rights.

Thank you.

A handwritten signature in black ink that reads "John Roesch". The signature is written in a cursive, flowing style.

John Roesch, P.Eng.

Senior Project Officer
Kitikmeot Inuit Association, Department of Lands, Environment and Resources

Cc Wynter Kuliktana, Director, KIA, Department of Lands and Environment