



# BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

March 31, 2026

To: The Nunavut Impact Review Board

Via email: [info@nirb.ca](mailto:info@nirb.ca)

**Re: Screening comments on the Whale Cove Project Camp and Regional Exploration Expansion (NIRB # 25EN090)**

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), we thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comment on the Whale Cove Project Camp and Regional Exploration Expansion (NIRB #25EN090). The mandate of the BQCMB is to safeguard the Beverly and Qamanirjuaq caribou herds, primarily in the interests of Indigenous peoples from Nunavut, the Northwest Territories, Saskatchewan and Manitoba who have traditionally relied upon these herds, and to advise governments and caribou range communities on conservation and management of the herds and their ranges.

Based on the materials submitted, the Board understands that Whale Cove Gold Corp. is seeking approval to expand the regional exploration area, increase the Vickers camp from 35 persons to a 100-person all-season camp, increase the number of drills from 2 to 4, and operate a 20-person mobile camp within the project area as needed.

One of the Board's concerns is that the project area is in or near areas used by Qamanirjuaq caribou across multiple seasons, including spring, calving, post-calving, summer, and fall. This increases the sensitivity of the area and reinforces the need for careful consideration of potential effects on caribou, caribou habitat, and migratory areas. If the proposed expansion footprint extends into Qamanirjuaq calving or post-calving areas, the BQCMB does not support the expansion proceeding. At present, however, the materials provided do not clearly show the project footprint in relation to these areas, and the absence of clear mapping makes it difficult to determine the extent of the overlap.

The BQCMB is also concerned that, despite the scale of the proposed expansion, the materials reviewed provide limited project-specific information on caribou. While the submission refers generally to wildlife, wildlife monitoring, and mitigation, it does not clearly explain whether the project overlaps important seasonal caribou habitat, migratory or movement areas, what specific effects the expanded camp and exploration activities may have on caribou, or what caribou-specific mitigation, monitoring, and oversight measures are proposed.

The proposed expansion is not just a continuation of a small existing activity as it would significantly increase camp capacity, add drilling capacity, introduce a mobile camp, and expand the exploration area. The application materials also indicate that the project is intended to support further exploration, economic studies, baseline work, and infrastructure upgrades. Accordingly, the proposal should be considered not only in terms of its immediate footprint, but also in terms of the broader development pathway it may support.



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The BQCMB also notes that caribou-related concerns were raised in the consultation materials, including discussion of helicopter operations near caribou migration routes, wildlife monitoring, and the need for protocols during caribou movement seasons. The consultation materials also reference an agreement to work collaboratively on wildlife oversight with the Issatik Hunters and Trappers Organization (HTO). However, it is not clear how that commitment is reflected in the current proposal documents.

The Board further notes that the community consultation records provided appear to date largely from 2021 and 2022. It is therefore unclear whether those records relate specifically to the current expansion proposal, and whether more recent engagement with communities on the expansion has taken place. This further emphasizes the need for clearer information in the project file regarding both caribou-related concerns and the measures proposed to address them.

At present, based on the materials reviewed, the Board does not have enough information to understand the project's potential implications for caribou. For a project of this nature, the BQCMB would expect to see clear information on:

- Whether the proposed expansion footprint overlaps with calving or post-calving areas, as the BQCMB does not support the expansion proceeding in such areas
- Whether the project area overlaps with other important habitat areas including migratory areas
- Whether local caribou use or caribou harvesting may be affected
- What caribou-specific mitigation, monitoring, oversight, and adaptive management measures are proposed
- Whether seasonal timing restrictions are needed to reduce disturbance to caribou
- How cumulative effects on caribou will be considered given other existing and foreseeable activities in the project area
- Whether updated community engagement has occurred in relation to the current expansion, and how caribou-related concerns raised in consultation have been addressed

To address these concerns, the BQCMB respectfully recommends that the NIRB ensure that caribou are fully considered in its review of the proposal. At minimum, the Board recommends that additional project-specific information on caribou be required before a decision on advancing the project is made, and that this information be made available in sufficient detail to allow the Board and other interested parties to provide informed comments on potential impacts to caribou.

Thank you again for the opportunity to provide comment. The BQCMB would be pleased to answer any questions or provide any additional information that may assist the NIRB in its consideration of this matter.



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Please contact Tina Giroux-Robillard, BQCMB Executive Director at [tgiroux@arctic-caribou.com](mailto:tgiroux@arctic-caribou.com) or (306) 930-7776 if you have any questions or wish to discuss these comments further.

Sincerely,

Earl Evans  
BQCMB Chairperson

cc.

**James Hodson, BQCMB Vice-Chair Administration**

**Stephanie Behrens, BQCMB Vice-Chair Operations**

**Tina Giroux-Robillard, Executive Director**