



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

March 31, 2026

To: The Nunavut Impact Review Board

Via email: info@nirb.ca

Re: Screening comments on the Victory Lake Project (NIRB # 26EN006)

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 Victory Lake Project (NIRB file # 26EN006). 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.

The BQCMB is providing these comments because the proposed Victory Lake Project is located within the Qamanirjuaq calving and post-calving grounds. Calving and post-calving grounds are among the most sensitive and important habitats used by barren-ground caribou, and their protection is fundamental to the long-term conservation of the herd. Our core concerns are outlined below.

1. Project location within the Qamanirjuaq calving and post-calving grounds

The primary concern with the Victory Lake Project is its location. This is not simply a mineral exploration proposal in a general caribou range area; it is a proposal within the Qamanirjuaq calving and post-calving grounds, areas of exceptional importance to caribou reproduction, calf survival, and long-term herd conservation.

In the BQCMB's view, that fact must carry decisive weight. The key question is not only whether the proposed activities are small, temporary, or described as low impact, but whether exploration should proceed in an area where Inuit and co-management bodies have been clear that mining should not occur. If mining is not appropriate in caribou calving and post-calving areas, it is difficult to justify allowing exploration whose purpose is to support future mining in those same areas. The Beverly and Qamanirjuaq Caribou Management Board's position is that no development should be permitted in caribou calving and post-calving areas. This position is also consistent with concerns raised by communities and community-based organizations in the Kivalliq region.

2. Exploration activities may still disturb caribou and important habitat

The Board recognizes that the current proposal is framed as an early-stage exploration program with no permanent infrastructure. However, the absence of permanent infrastructure does not mean the absence of impact. The proposed activities include diamond drilling, helicopter and fixed-wing access, winter overland travel, and exploration work distributed across a large claim area. Even at the exploration stage, these activities



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can introduce disturbance into sensitive habitat through aircraft presence, repeated movements, localized site activity, and broader industrial use of the landscape. In calving and post-calving grounds, the standard for caution must be high. The Board is concerned that exploration activity in this location may disturb caribou and affect how these important habitats are used.

3. The implications extend beyond the current exploration season

The Board is also concerned that the implications of this proposal extend well beyond the immediate footprint of the 2026 program. Exploration is the first step in determining whether a deposit could support more advanced exploration or eventual mine development. If results are favourable, the likely next steps are not smaller. They may include expanded drilling, increased aircraft activity, larger and longer-duration programs, more surface access, camps, roads, and other supporting infrastructure.

For this reason, the Board's concern is not limited to the direct effects of the current proposal in isolation. It also includes the development pathway that may be opened by allowing industrial exploration to proceed within the Qamanirjuaq calving and post-calving grounds.

4. Cumulative effects and precedent

The Board is concerned about cumulative effects and precedent. Caribou already face multiple pressures across their range and calving and post-calving grounds warrant the highest level of protection and caution. Approval of industrial activity in this location may contribute to a broader pattern of disturbance and increasing development pressure over time. It may also create precedent for future proposals in similarly sensitive habitat.

The BQCMB notes that the Nunavut Planning Commission referred this proposal to NIRB for screening despite determining that it conformed with the Keewatin Regional Land Use Plan. In the Board's view, that referral reflects the seriousness of the project location and the strong public concern already expressed about protecting caribou calving and post-calving grounds.

More broadly, the Board considers it important that land use planning processes are meant to help avoid exactly this type of conflict by identifying areas where certain forms of development are inappropriate. Where there has been long-standing planning and public direction that calving grounds should be off limits to mineral exploration, that context should be given meaningful weight in screening decisions.

Recommendations

In light of the above concerns, the BQCMB respectfully recommends that the NIRB:

1. Give substantial weight to the location of the Victory Lake Project within the Qamanirjuaq calving and post-calving grounds in its screening of the proposal.
2. Assess the project not only in terms of the direct effects of the proposed exploration activities, but also in terms of the sensitivity of the habitat in which those activities are proposed.



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3. Explicitly consider the longer-term implications of allowing mineral exploration to proceed in this area, including the potential for expanded exploration, increased access, additional infrastructure, and eventual mine development.
4. Consider cumulative effects and precedent, including the implications of permitting industrial activity within an area that is critical to the Qamanirjuaq herd.
5. Give consideration to the long-standing land use planning intent that Qamanirjuaq calving grounds should be protected from mineral exploration and development.
6. Conclude that industrial exploration should not proceed within the Qamanirjuaq calving and post-calving grounds, and that the **Victory Lake Project should therefore not be advanced.**

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 NIRB in its consideration of this matter.

Please contact Tina Giroux-Robillard, BQCMB Executive Director at 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