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Francis Emingak
Screening Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: NIRB File No.: 26EN006, Application No.: 126345, Project Name: Victory Lake

WWF-Canada is a national environmental organization with a permanent office in Iqaluit and a longstanding history of participation in regulatory processes in Nunavut. We appreciate the opportunity to comment on this file and respectfully offer our comments for consideration by the Nunavut Impact Review Board (NIRB).

For over a decade, in multiple iterations of the draft Nunavut Land Use Plan (NLUP), the core calving grounds of the Qamanirjuaq herd have been designated as areas of Limited Use that would prevent any mineral exploration or development. The Recommended Nunavut Land Use Plan (RNLUP), submitted to the parties for signature in 2023, reiterated this draft designation, confirming clear intent for calving grounds across the territory to be off limits to mineral exploration. The designations in the RNLUP are based on the Nunavut Planning Commission's (NPC) decades-long public process and is rooted in oral testimonies and written submissions from Inuit elders and leaders representing groups such as Hunters and Trappers Organizations, hamlets, and co-management authorities.

As such, we agree with the rationale of the decision by the NPC to refer this project to the NIRB under Schedule 12-1 of the Nunavut agreement due to concerns of potential cumulative impacts from this and other projects on the Qamanirjuaq calving grounds.

In response to the question of if this project proposal is likely to arouse significant public concern, a detailed list of parties and their concerns over any mineral development project on the Qamanirjuaq calving rounds has already been provided by the NPC on their January 16, 2026, referral letter. Even more concerns and in greater detail can be found in the RNLUP Options and Recommendations document section 2.2.8 Caribou Calving Areas.

While we acknowledge that the comments made on the NLUP are not specific to this particular project, it should be noted that the whole point of the NLUP process is to avoid situations like this where projects are proposed in areas that after decades of consultation have been proposed to be off limits to mineral exploration.

It is not acceptable to indicate that exploration activities will be minimal relative to the development of a mine, when the explicit goal of any mineral exploration project is to advance exploration, sell their claim interests, or independently develop their exploration site into an operating mine. It is for these exact reasons that even minimally invasive mineral exploration

activities are slated to be not permitted in the very area this project is proposed under the RNLUP. Future mineral development activities are not compatible with the well- documented ecological and cultural importance of this area.

At the very least, once the RNLUP comes into effect, there should be no grandfathering of rights associated with this, or any project staked since the cut-off date of the RNLUP in Limited Use areas. All future activities should be evaluated against the eventual approved NLUP. All proponents should be aware of the proposed designations of the RNLUP, and any argument of stranded assets when staking claims in proposed Limited Use areas years after the release of the RNLUP is irresponsible. In the event that the calving grounds of the Qamanirjuaq herd are indeed designated a Limited Use area, as has been proposed for over a decade, there is no rationale to automatically exempt future activities of this project. This project should trigger a formal NPC process to amend or exempt these activities prior to any future developments at the site.

We reassert that the issuance of mineral claims in caribou calving grounds serves no one, simultaneously threatening the integrity of the Limited Use designations and the NLUP itself, while creating lengthy and costly Environmental Impact Assessment processes for proponents attempting to operate in an area that communities have clearly identified as being off limits.

Sincerely,



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