

GN # 01																																																				
Department	Environment																																																			
Organization	Government of Nunavut																																																			
Subject/Topic	Caribou Protection Measures																																																			
References	<ul style="list-style-type: none"> • 1517081 B.C. LTD. Nunavut Impact Review Board Application for Screening #126345 Victory Lake (February 2026). • 1517081 B.C. LTD. Wildlife Management Plan: Victory Lake Project (February 2026) 																																																			
IDENTIFICATION OF ISSUE																																																				
<p>1517081 B.C. LTD's (the Proponent) Wildlife Management Plan (Wildlife Plan) for the Victory Lake Project outlines the mitigation and management actions intended to reduce the Project's impacts on caribou. The Government of Nunavut (GN) has identified several areas of the Wildlife Plan related to caribou that require clarification.</p> <p>Without these clarifications, there is uncertainty regarding how caribou mitigation measures will be applied. This may lead to confusion among Project personnel or non-compliance with the Wildlife Plan. This lack of clarity also limits the GN's ability to effectively assess the Project's potential impacts on caribou.</p>																																																				
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE																																																				
<p>The Wildlife Plan provides inconsistent information regarding what activities will or will not be permitted during the caribou calving/post calving.</p> <p>For example, the Wildlife Plan states that the Project will observe the following during calving and post calving, "...[c]omplete shutdown, no work in project area at all..." (Page 20)</p> <p><i>Table 2: Pause and shutdown triggers (Page 17) of the Wildlife Plan provides similar information:</i></p> <table border="1"> <thead> <tr> <th rowspan="2">Time</th> <th colspan="2">Operational Pause Threshold</th> <th colspan="2">Operational Shutdown Threshold</th> <th rowspan="2">Allowed Work Type Excluding Operational Pause or Operational Shutdown</th> <th rowspan="2">Aircraft Travel Height (m AGL)</th> </tr> <tr> <th>Distance (km)</th> <th>Number (≥)</th> <th>Distance (km)</th> <th>Number (≥)</th> </tr> </thead> <tbody> <tr> <td>Spring</td> <td>2.5</td> <td>50</td> <td>1</td> <td>50</td> <td>Regular field activities</td> <td>300</td> </tr> <tr> <td>Calving/post calving (15th May–15th July)</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>N/A</td> <td>Complete shutdown of all activities</td> <td>N/A</td> </tr> <tr> <td>Summer</td> <td>2.5</td> <td>50</td> <td>1</td> <td>50</td> <td>Regular field activities</td> <td>300</td> </tr> <tr> <td>Fall</td> <td>2.5</td> <td>50</td> <td>N/A</td> <td>N/A</td> <td>Regular field activities</td> <td>300</td> </tr> <tr> <td>Winter</td> <td>2.5</td> <td>50</td> <td>N/A</td> <td>N/A</td> <td>Regular field activities</td> <td>300</td> </tr> </tbody> </table> <p><i>Note: The Wildlife Plan contains two tables labelled "Table 2" found on pages 13–16 and 17.</i></p>							Time	Operational Pause Threshold		Operational Shutdown Threshold		Allowed Work Type Excluding Operational Pause or Operational Shutdown	Aircraft Travel Height (m AGL)	Distance (km)	Number (≥)	Distance (km)	Number (≥)	Spring	2.5	50	1	50	Regular field activities	300	Calving/post calving (15 th May–15 th July)	N/A	N/A	N/A	N/A	Complete shutdown of all activities	N/A	Summer	2.5	50	1	50	Regular field activities	300	Fall	2.5	50	N/A	N/A	Regular field activities	300	Winter	2.5	50	N/A	N/A	Regular field activities	300
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Fall	2.5	50	N/A	N/A	Regular field activities	300																																														
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However, the Wildlife Plan also states,

“...all activities follow strict caribou management and mitigation procedures, and operations will cease or only comprise low impact work during caribou calving from 15th May to July 15th...” (Page 3).

The Wildlife Plan defines Low-Impact Survey Work as:

“...[m]apping/prospecting on foot, grab sampling, soil sampling, ground geophysical surveys conducted on foot, hand auger sampling, and non-repetitive reconnaissance helicopter set-downs with engine at idle for ≤10 minutes, and no ground clearing or mechanical excavation. Low impact work is permitted unless a shutdown trigger is met. Low impact is defined by small crew numbers (1-6 people) conducting non-mechanised work on foot, and not using machinery such as drill rigs/snowmobiles/ATVs. Helicopter flights will only be used for ~3 cycles per day per crew and will maintain 610m elevation...” (Page 16)

Additionally, the Wildlife Plan does not provide specific dates to define seasons in *Table 2: Pause and shutdown triggers* or elsewhere, with the exception of the calving/post-calving period. Given that different seasons have different ‘Operational Shutdown Thresholds’ (e.g., Summer and Fall; Page 17), it is unclear how the Proponent will distinguish between seasons and properly implement the corresponding mitigation measures.

REQUEST(S)/RECOMMENDATION(S)

The GN requests that the Proponent revise the Wildlife Plan to:

1. Remove inconsistencies regarding permitted activities during the Calving/Post calving Period.
2. Provide clear definitions for each season referenced in the Wildlife Plan.

GN # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Other Wildlife Protection
References	<ul style="list-style-type: none"> • 1517081 B.C. LTD. Nunavut Impact Review Board Application for Screening #126345 Victory Lake (February 2026). • 1517081 B.C. LTD. Wildlife Management Plan: Victory Lake Project (February 2026)
IDENTIFICATION OF ISSUE	
<p>The Proponent's Wildlife Plan provides only a high-level overview of the mitigation and management measures proposed to reduce Project impacts on key wildlife species, including muskox, polar bear, and grizzly bear. The GN has determined that the Wildlife Plan lacks sufficient detail regarding the specific actions required to effectively mitigate and manage impacts on these species.</p> <p>Without this detail, there is uncertainty regarding how wildlife mitigation measures will be applied. This may lead to confusion among project personnel or even non-compliance with the Wildlife Plan. This lack of clarity also limits the GN's ability to effectively assess the Project's potential impacts on wildlife.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p><i>Table 2. Potential wildlife impacts and mitigations</i> of the Wildlife Plan states that for various wildlife (e.g., muskox, polar bear, grizzly bear, wolverine, fox, wolf), the Proponent will "...[a]lways give wildlife the right-of-way, delay working in any locations where wildlife is present" (Page 13 & 14).</p> <p>However, the Wildlife Plan does not provide specific details that will guide mitigation/management actions such as setback distances (and their justification), how long work will be delayed, or group-size thresholds.</p>	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN requests that the Proponent revise the Wildlife Plan to include specific details, including (but not limited to):</p> <ul style="list-style-type: none"> • Setback distances (and their justification) for wildlife or wildlife abodes/dens • The duration of work delays • Group-size thresholds. 	

GN # 03	
Department	Culture and Heritage
Organization	Government of Nunavut
Subject/Topic	Victory Lake Project – Mineral Exploration
References	NIRB 126345/26EN006: Notice of Screening and Comment Request for 1517081 B.C. LTD "Victory Lake" Project Proposal
CONCERNS	
<p><i>Project Summary</i> 1517081 B.C. Ltd. proposes to conduct a multi-year mineral exploration program at the Victory Lake Project, located approximately 180 km west of Rankin Inlet and 180 km south of Baker Lake. CH notes that the proposed activities include up to 20 diamond drill holes, geological mapping, prospecting, rock and soil sampling, and downhole, ground, and airborne geophysical survey activities. CH further notes that Project logistics include water withdrawal by pump and hose, temporary drill support equipment including a survival shack, as well as fuel and material caches, with winter overland mobilization by snowmobile and/or snowcat and helicopter and fixed-wing aircraft support as required. No new camp is proposed within the project area; instead, operations may be based out of existing community accommodations, permitted seasonal camps, or local fishing huts, including Ferguson Lake Camp and Quartzite Lake Camp. Project activities may occur seasonally between July 2026 and August 2028, and specific drill locations, temporary support areas, and winter access arrangements may be modified as exploration planning advances within the broader project area.</p> <p>A review of Government of Nunavut (GN) records did not identify previous archaeological assessments having been completed within the mineral claims associated with the Victory Lake Project. However, several archaeological assessments have been completed in the broader area defined in the application as the "Project Outline - outer potential boundary of any winter trail." Similarly, while no registered archaeological sites are known from within the associated mineral claim areas, hundreds of sites have been recorded from the broader project outline.</p> <p>Based on landscape-level considerations, including the presence of current lakes and waterways, raised beach ridges reflecting isostatic rebound, eskers, ridges, and other raised landforms, together with regional travel and land use patterns demonstrated by previously recorded sites in the surrounding area, GN considers that there are reasonable grounds to believe there could be sites of archaeological significance on the lands proposed for Project impacts, pursuant to Article 33.5.12 of the <i>Nunavut Agreement</i>. While the application notes that no known sites have been identified within proposed work areas and winter trail corridors, the absence of recorded archaeological sites within the associated mineral claims likely stems from the lack of systematic archaeological assessments having been completed in these areas.</p> <p><i>Project-Specific Concerns</i></p>	

GN notes that the proposed project includes activities involving terrestrial ground disturbance, which constitute potential impacts to archaeological resources. Impacts include, but are not limited to:

- drill site preparation, drilling, sumps, and associated temporary work areas;
- fuel caches, laydown and staging areas, and temporary storage areas;
- helicopter landing areas that are planned, identified, or intended for use in support of Project activities;
- any terrestrial fixed-wing landing or support areas proposed outside existing authorized airstrips;
- use of Ferguson Lake Camp, Quartzite Lake Camp, or any other support location where new terrestrial disturbance, expansion, staging, or repeated Project use is required;
- use of terrestrial access routes associated with Project mobilization, including any terrestrial portions of the proposed winter access routes; and,
- demobilization, back-hauling, cleanup, removal, and closure activities associated with drill sites, support areas, camps, fuel caches, waste storage areas, and any other Project components, including the removal of equipment, materials, wastes, fuel drums, hoses, pumps, survival shacks, and associated infrastructure, where terrestrial access or terrestrial ground disturbance is required.

GN notes that the application refers to the absence of currently known archaeological sites, the integration of traditional knowledge in route selection, and to the use of a chance-find protocol for proposed work areas, winter trail corridors, and support locations. CH does not consider a chance-find protocol to be a substitute for prior archaeological assessment. A chance-find protocol is a contingency response measure that applies only if archaeological materials or features are encountered during Project activities. Based on the information provided in the application, CH does not have sufficient information to confirm that the proposed activities will entirely avoid terrestrial ground disturbance or adequately ensure the Proponent can comply with the *Nunavut Archaeological and Palaeontological Sites Regulations* (NAPSR). Any ground disturbance occurring outside areas previously assessed through an archaeological assessment conducted under a permit issued by CH constitutes a potential impact to archaeological resources and requires archaeological assessment prior to disturbance.

RECOMMENDATIONS

To ensure compliance with the *Nunavut Act* and the NAPSR, the GN recommends that the Proponent consult directly with CH on archaeological requirements for specific Project components through CH's archaeological permitting and regulatory review processes prior to any ground disturbance, including any requirements for archaeological assessment, avoidance, buffering, monitoring, mitigation, and chance-find response.

GN further recommends the following:

- **Site protection:** All heritage sites (archaeological and palaeontological) in Nunavut are protected by law. The Proponent must understand that it is their responsibility to ensure that no heritage sites are disturbed during the course of Project activities. CH recommends that known or newly recorded archaeological sites are avoided using a minimum 50 metre buffer, or greater where directed by CH.

- **Chance finds:** If archaeological and/or palaeontological materials or features are encountered, all activities shall cease immediately within the protective buffer area. The site shall be documented (including coordinates, description, and photographs) and reported to CH, and work shall not resume within the buffer area until direction is provided by CH.
- **General protections:** No alteration, disturbance, artifact removal, littering, or defacement of archaeological sites is permitted. No collection or disturbance shall occur unless authorized through the appropriate permitting process. The Proponent shall ensure that all staff and contractors are informed of these legal obligations. The construction of inuksuit is not supported.

ADDITIONAL COMMENTS

Under the *Nunavut Act*, the *Nunavut Archaeological and Palaeontological Sites Regulations* provide for the protection, care, and preservation of archaeological and palaeontological resources. The Department of Culture and Heritage (GN-CH) is the Designated Agency responsible for the administration of the archaeological and palaeontological permitting system, in close coordination with Inuit land claim partners, including the Inuit Heritage Trust (IHT), which serves as the Designated Organization under Article 33 of the Nunavut Agreement. All archaeological and palaeontological sites in Nunavut are protected by law. It is illegal to search for, survey, excavate, alter, or otherwise disturb any archaeological or palaeontological site without a valid permit issued by the Government of Nunavut.