



Athabasca Denesuline Né Né Land Corporation

Athabasca Denesuliné Né Né Land Corporation
Box 23126 South Hill P.O.
Prince Albert SK S6V 8A7
Phone: (306) 953-7287

April 2, 2026

To: Nunavut Impact Review Board
via email: info@nirb.ca

RE: Athabasca Denesuliné NéNé Land Corporation (ADNLC) Screening comments on NIRB File 260211-26EN006 Victory Lake Project.

Dear Nunavut Impact Review Board Members.

The Athabasca Denesuliné NéNé Land Corporation (ADNLC) represents the three Denesuliné First Nations of Fond du Lac, Black Lake and Hatchet Lake. Our lands, Nuhenéné, where we have lived, trapped, hunted, gathered, fished, camped, buried our ancestors, travelled, and carried out our ceremonies for thousands of years encompass the SW corner of what is today known as the Kivalliq region of Nunavut. We are deeply connected to this land and to the caribou with whom we share the lands. We are caribou people; our culture, way of life, food security and sovereignty, health and well-being, and traditions depend on the Qamanirjuaq, Beverly, and Bathurst caribou who have shared our lands, Nuhenéné, with us for thousands of years.

We have reviewed this proposed project which sits within the heart of critical calving and post-calving habitat of the Qamanirjuaq herd, as well as near freshwater crossings, and covering important migration corridors **and we do not support this project moving forward due to the risk it poses to the Qamanirjuaq caribou herd in their critical calving and post-calving habitat and therefore the dire risk it poses to our communities.**

Chief Joseph Custer Reserve # 201
Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7
Phone: (306) 953-7287 Fax: (306) 763-2973

1. Industrial Projects, including exploration, should not be advanced within the calving grounds.

Throughout more than a decade of engagement and consultations on the Nunavut Land Use Plan, Athabasca Denesūliné communities, as well as many other communities and caribou management organizations, have been strong advocates for the protection of caribou calving grounds. This project is proposed in the core of the calving and post-calving grounds of the Qamanirjuaq herd and poses a serious threat to the Qamanirjuaq caribou and to all peoples who rely on the herd to continue our way of life.

While the proponents state that the majority of work will take place during the winter, and that the impacts to wildlife and environment are minimal due to the short-lived nature of this project proposal, the entire purpose of an exploration project is to move forward into developing mineral resource extraction which is not a compatible activity within the calving grounds of a herd that many communities and cultures rely on. This proposal must be looked at not as a stand-alone, but as part of a bigger pathway which would lead to industrial development in the calving grounds. Additionally, exploration projects do have the potential to disturb and negatively impact caribou, in particular during such sensitive seasons and within such sensitive habitat as the calving grounds. Disturbance in these grounds, including from exploration, are too risky. No industrial activity, including exploration, is appropriate in this critical habitat.

Athabasca Denesūliné do not support this project and recommend that no permits are granted and that the project does not advance. We ask that the Board consider and respect the long-standing Nunavut Land Use Plan process and uphold protection of these lands from industrial disturbances. Caribou must be protected at the most sensitive time of year, and in their most critical habitat, the calving grounds. Our Denesūliné teachings tell us that these grounds are sacred and not to be disturbed. While we acknowledge that the proponent has provided a wildlife monitoring and mitigation plan, **mitigation is not adequate** in the calving grounds. The only way to protect caribou in this critical habitat is to avoid industrial activity in the calving grounds.

2. Cumulative effects have not been addressed in this proposal

This proposal does not provide any information about how this project interacts with many other proposed and active project within the region that would cumulatively have the potential to have a significant and long-term impact on the Qamanirjuaq caribou. Without a thorough analysis of cumulative impacts, we cannot know how this project and the proposed activities, fit into the full picture of all the disturbances on the landscape that may be affecting caribou at critical times or in critical habitats.

3. Athabasca Denesuline communities receive no benefits from this proposed project, however, the risks to our communities are significant

In the project proposal, the proponent outlines possible benefits to nearby communities if the project were to move forward. The proponent has not engaged at all with Athabasca Denesūliné

Chief Joseph Custer Reserve # 201

Mailing address: Box 23126 South Hill PO, Prince Albert, Sask. S6V 8A7

Phone: (306) 953-7287 Fax: (306) 763-2973

communities, or the ADNLC office, despite the fact that the Qamanirjuaq caribou are our primary source of food, and our ability to continue living our traditions, culture, rights, and way of life. Any negative impacts to the Qamanirjuaq herd will be felt by our communities, whether that disturbance takes place within Nuhenéné, our lands, or further from us in the calving and post-calving grounds. If this project has a negative impact on the Qamanirjuaq population, it doesn't matter the proximity of our communities to the project location, AD families will feel the pain and suffering caused by losing the caribou.

We recommend that the Board not allow this project to advance as it poses a significant threat to the Qamanirjuaq caribou and therefore the rights, culture, and way of life of Athabasca Denesų́́né communities, now and for many future generations to come.

Sincerely,



Ron Robillard,
Chief Negotiator, Athabasca Denesų́́né NÉNé Land Corporation (ADNLC):
rrobillard@adnlc.ca

CC:

Katie Rasmussen, Ecological Consultant, ADNLC:
katiebeth.rasmussen@gmail.com