


15th April 2026

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

Dear Francis,

Please see below for responses to the Beverly and Qamanirjuaq Caribou Management Board regarding the Notice of Screening for 1517081 B.C. LTD “Victory Lake” Project Proposal.

Sincerely,



Alex Vilela
Exploration Manager
For and on behalf of:
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BQCMB Comment/Recommendation:

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 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.

Proponent Response:

The Proponent acknowledges and respects the BQCMB's mandate, expertise, and longstanding role in safeguarding the Beverly and Qamanirjuaq herds. The Proponent also agrees that calving and post-calving habitats are among the most sensitive landscapes used by barren-ground

caribou, and that activities proposed in such areas must be approached with a very high degree of caution.

The Victory Lake Project has been deliberately designed as a small, early-stage, short-duration exploration program with a minimal physical footprint. The proposed activities are limited to up to approximately 20 low-impact diamond drill holes, geological mapping and sampling, and possible geophysical surveys. No permanent camp, permanent road, airstrip, quarry, or mine infrastructure is proposed. Operations are intended to rely on existing community accommodations, permitted seasonal camps, local fishing huts, helicopter and fixed-wing support, and winter over-snow access where appropriate, specifically to avoid creating lasting surface disturbance.

The Proponent recognizes that “low impact” must be demonstrated through clear operational controls rather than stated in general terms. For that reason, the current Wildlife Management Plan V1.2 includes a strengthened caribou mitigation framework, including defined operational pause and operational shutdown measures, daily wildlife scans, pilot spot-reports, a wildlife observation log, early-warning checks where caribou are known in the broader area, and clear decision-making by the Site Supervisor. Most importantly, the current plan states that during calving and post-calving from 15 May to 15 July, the Project will implement a complete shutdown of all activities. Outside that period, the current plan includes trigger-based pause and shutdown thresholds intended to reduce the risk of disturbance if caribou are present near operations.

The Project also includes other measures that are intended to reduce the potential for habitat disturbance and repeated industrial footprint, including lightweight drill equipment placed on timber platforms and coco-matting, progressive reclamation of each drill site, backfilling of sumps, removal of all fuel and waste containers, and avoidance of all-weather trail or road construction. The Proponent submits that these measures materially distinguish the current program from more advanced industrial activity and are intended to minimize direct disturbance while further dialogue and review continue.

BQCMB Comment/Recommendation:

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.

Proponent Response:

The Proponent acknowledges the BQCMB's concern that exploration may be viewed as the first step in a longer development pathway, and that cumulative effects and precedent are important considerations in screening. The Proponent also recognizes that these broader concerns cannot be addressed only by describing the current field season in isolation.

At the same time, the Proponent respectfully notes that the Victory Lake Project before NIRB is an early-stage exploration proposal only. It is not a proposal for advanced exploration, mine development, roads, permanent camp infrastructure, or long-term industrial occupation of the site. Any future expansion beyond the currently proposed scope would require additional technical assessment, engagement, and regulatory review. The current proposal should therefore be assessed on the basis of the actual activities presently proposed, together with the mitigation and shutdown measures committed for those activities.

The Proponent has nevertheless scoped the program in a way that is intended to minimize its contribution to cumulative disturbance and avoid creating a lasting industrial footprint. This includes a complete shutdown during the current plan's calving/post-calving period of 15 May to 15 July, reliance on existing accommodations or nearby permitted facilities where possible, no permanent camp construction in the project area, no all-weather roads, over-snow access during frozen conditions where practical, small drill pads, progressive reclamation, and removal of all materials after use. The current consultation record also shows that the Proponent has already been engaging with KivIA and relevant HTOs, and that caribou and helicopter disturbance have been treated as central issues from the outset.

The Proponent agrees that land use planning intent and public concern are important context for screening, and appreciates that this proposal was referred to NIRB for precisely that reason. The Proponent's position is that the current proposal has been intentionally limited and adapted to reduce disturbance to the greatest extent reasonably practicable for an early-stage exploration program, and that its mitigation commitments should be considered alongside the sensitivity of the location.

BQCMB Comment/Recommendation:*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.*
- 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.*

Proponent Response:

The Proponent acknowledges these recommendations and understands the basis on which they have been made. The Proponent agrees that the sensitivity of the habitat, the broader context of caribou conservation, and cumulative effects considerations are all important things to consider when reviewing project proposals, particularly this specific proposal.


The Proponent respectfully submits, however, that the Victory Lake Project has been designed specifically to respond to those concerns through a limited, temporary, low-footprint exploration approach rather than through permanent industrial development. The Project includes a complete shutdown during calving/post-calving, a strengthened Wildlife Management Plan with explicit caribou triggers and logging procedures, no permanent structures, no all-weather road construction, small and progressively reclaimed drill sites, screened water intakes, spill prevention and response measures, and an ongoing commitment to consultation and adaptive mitigation. These are not incidental features of the proposal, they are core elements of the Project design intended to keep effects minor and reversible.

The Proponent also notes that the Project is intended to provide meaningful benefits to nearby Kivalliq communities through local hiring, local procurement, wildlife monitoring roles, freight, air support, and camp and field services, with a stated preference for Whale Cove, Rankin Inlet, and Baker Lake workers and businesses. These benefits are part of the context in which this small exploration program has been planned and discussed.

Accordingly, while the Proponent understands and respects the BQCMB's position, it respectfully submits that the currently proposed Victory Lake program should be considered as a narrowly scoped, early-stage exploration program with conservative seasonal shutdown and wildlife protection measures, rather than as a proposal for industrial development in calving grounds, with very limited potential affect on caribou. The Proponent remains willing to continue working with regulators, HTOs, KivlA, and other interested organizations to further strengthen mitigation and reduce disturbance risk if the review process continues.

Thank you for your review and input regarding the Victory Lake Project.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Vilela". The signature is fluid and cursive, with a prominent loop at the end.

Alex Vilela
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