


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 Ghotelnene K’odtineh Dene 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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Ghotelnene K'odtineh Dene Comment:

Sayisi Dene First Nation and Northlands Denesuline First Nation (collectively referred to as "Ghotelnene K'odtineh Dene") appreciate the opportunity to provide comments on 1517081 B.C. LTD "Victory Lake" project proposal.

Ghotelnene K'odtineh Dene have, and continue to, harvest Beverly/Qamanirjuaq caribou throughout our traditional territory in what is now Nunavut, Manitoba, Saskatchewan, and the Northwest Territories. Ghotelnene K'odtineh Dene have Section 35 rights throughout our traditional territory. The existence, culture, way of life and rights of our people are deeply connected to the caribou and its habitat – any harm to the caribou is a harm to the Dene.

Ghotelnene K'odtineh Dene submit that the activities described in the Victory Lake project may result in significant adverse impacts on the ecosystem, wildlife, wildlife habitat, and harvesting activities of Ghotelnene K'odtineh Dene and other Indigenous peoples, as well as other potential socio-economic effects on Ghotelnene K'odtineh Dene.

Ghotelnene K'odtineh Dene have significant concerns related to the proposed activities, particularly on the potential impacts to caribou and their habitat. The Victory Lake project is located in the calving and post-calving grounds of the Qamanirjuaq herd, which is critical to the health of the herd. The Qamanirjuaq herd is also known to be in the project area during the summer, late summer, pre-breeding and rut or breeding seasons. As noted above, caribou are critical to our well-being, way of life and the exercise of our rights. The proposed mineral exploration activities could result in potential adverse effects to caribou and caribou habitat from activities in this critical habitat. Ghotelnene K'odtineh Dene do not have confidence in the effectiveness of the proposed caribou protection measures for the project.

Proponent Response:

The Proponent acknowledges and respects the concerns raised by Ghotelnene K'odtineh Dene and recognizes the deep cultural, harvesting, and rights-based importance of the Beverly/Qamanirjuaq caribou herds to Dene communities across the broader traditional territory. The Proponent also recognizes that concerns about caribou are serious and must be addressed through practical, conservative, and enforceable operating measures.

The Victory Lake Project is a small, early-stage, short-duration exploration program intended to validate historic results using low-impact methods. The proposed work is limited to up to approximately 20 small diamond drill holes, geological mapping and sampling, and possible ground or airborne geophysics. No permanent structures, all-weather roads, or mine development activities are proposed. Operations are intended to rely on existing community accommodations, permitted camps, local fishing huts, helicopter and fixed-wing support, and winter over-snow access where appropriate, in order to keep the physical footprint temporary and minimal.

Most importantly, the current Wildlife Management Plan V1.2 includes a strengthened caribou mitigation framework. It now defines operational pause, operational shutdown, and low-impact survey work, and sets out a trigger-based system for spring, summer, fall, and winter. In addition, 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. The plan also includes daily crew

scans, pilot spot-reports, wildlife observation logging, early-warning checks where caribou are known in the broader area, and repeated reassessment by the Site Supervisor. These measures were specifically added in Version 1.2 to improve clarity around caribou protection, mitigation, and reporting.

The Proponent further notes that the Project has already incorporated wildlife monitoring and adaptive mitigation commitments elsewhere in the project materials, including avoiding low-level aircraft operations around wildlife, not blocking migration, giving wildlife right-of-way, adjusting field activity if caribou or muskox are present, and maintaining wildlife monitors on the program to assist with sightings and decision-making. The Project has also committed to ceasing or restricting activities during the most sensitive caribou period, and to working with relevant HTOs and knowledge holders to refine mitigation measures and field practices.

The Proponent understands that confidence in mitigation is earned through clear commitments and implementation in the field. For that reason, the current plan is not based on general statements alone, but on defined triggers, logging, reporting, and stand-down requirements. The Proponent is prepared to continue refining these measures through the permitting and screening process and through further dialogue with Indigenous organizations and local communities.

Ghotelnene K'odtineh Dene Comment:

Also of concern for Ghotelnene K'odtineh Dene is the need for greater assessment of the cumulative impacts to wildlife and wildlife habitat, particularly caribou, from this project proposal. There is potential for cumulative effects on disturbance to caribou from other projects or proposed projects in the Beverly/Qamanirjuaq herds' range. These include:

- *Cache Zone 2026*
- *Whale Cove Project Camp and Regional Exploration Expansion*
- *Baker Basin Project*
- *Angilak Property*
- *Hook Lake*
- *Nut Lake Project*
- *Meliadine Mine*
- *Kivalliq Hydro-Fibre Link Project*
- *Aberdeen Lake-Pelly Lake Overland Haul*
- *Ferguson Lake Project*
- *North Thelon Joint Venture*
- *Schultz Lake Campsite and Exploration*
- *Turqavik Aberdeen Project*
- *Marce Claims Exploration*
- *Huckleberry Claim*
- *Tagak*
- *Tugak Gold Project*
- *Witch Lake Claim Staking*
- *Meadowbank Mine's Complex*

- Nunavut Uranium Project
- Thelon Property
- Turquetil-Esker Drilling Program
- Yath Property

Potential long-term adverse irreversible cumulative effects are possible from increased stress to caribou and impacts to caribou habitat. There does not appear to be an effective framework for the identification and assessment of cumulative impacts to caribou that could result from the impacts of the proposed activities combined with those of any other project that has been carried out, is being carried out or is likely to be carried out within the Beverly/Qamanirjuaq herds' range in Nunavut.

Ghotelnene K'odtineh Dene submit that the activities described in the Victory Lake project proposal may result in significant adverse impacts on the ecosystem, wildlife, wildlife habitat, and harvesting activities of Ghotelnene K'odtineh Dene and other Indigenous peoples, as well as other potential socio-economic effects on Ghotelnene K'odtineh Dene. Ghotelnene K'odtineh Dene have significant concerns related to the proposed activities, particularly on the potential impacts to caribou and their habitat. Also of concern for Ghotelnene K'odtineh Dene is the need for greater assessment of the cumulative impacts to wildlife and wildlife habitat, particularly caribou, from this project proposal. As noted above, caribou are critical to our well-being, way of life and the exercise of our rights. On this basis, Ghotelnene K'odtineh Dene do not support the Victory Lake project proposal.

Proponent Response:

The Proponent acknowledges the cumulative-effects concern raised by Ghotelnene K'odtineh Dene and agrees that potential cumulative disturbance to caribou across the broader Beverly/Qamanirjuaq herd range is an important regional issue. The Proponent also understands that this concern is broader than the Victory Lake Project alone, and reflects the combined effect of multiple exploration, infrastructure, and mining activities across the herd's large annual range.

At the same time, the Proponent notes that the Victory Lake Project itself is an early-stage, low-footprint exploration program with a very limited physical disturbance area, no permanent infrastructure, no all-weather road construction, no processing, and no mine development. Drill sites are small, temporary, and progressively reclaimed. Drill rigs are lightweight, sit on timbers with coco-matting, and all items, waste, and fuel barrels are removed following completion of each hole. The Project is therefore materially different in scale and intensity from larger, permanent industrial developments.

The Proponent has nevertheless designed the Project to minimize its contribution to cumulative disturbance. This includes:

- a complete shutdown of all activities during the current plan's calving/post-calving period of 15 May to 15 July
- use of trigger-based operational pauses and shutdowns outside that window
- avoidance of permanent infrastructure
- reliance on existing accommodations, seasonal camps, or local huts where possible

- use of over-snow travel and aircraft rather than road construction
- progressive reclamation of each drill site.


These measures are specifically intended to reduce repeated disturbance, prevent long-term habitat alteration, and keep the Project's incremental effect as low as reasonably achievable.

The Proponent also recognizes that cumulative-effects concerns are closely tied to harvesting and Indigenous rights. For that reason, the Project has committed to continued engagement with KivIA, relevant HTOs, and nearby communities, and to integrating traditional knowledge, harvesting use, and local travel-route information into field planning. The consultation log records early introductory engagement with KivIA, the Rankin Inlet HTO, and the Whale Cove HTO, with caribou and helicopter disturbance identified as central concerns. The Project also provides preference for local hiring and procurement from Whale Cove, Rankin Inlet, and Baker Lake, including wildlife monitors and other field support roles.

The Proponent respectfully submits that while broader regional potential cumulative-effects concerns are real and deserve continued review and consultation by regulators and affected Indigenous organizations, the Victory Lake Project has been intentionally scoped as a minimal-disturbance, temporary exploration program and includes conservative wildlife mitigation intended to keep its incremental contribution to potential cumulative effects low. The Proponent remains open to continued dialogue with Ghotelnene K'odtineh Dene and other affected Indigenous groups as the review process continues.

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

Sincerely,



Alex Vilela
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