


15<sup>th</sup> 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 Government of Nunavut 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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## GN # 01 – Environment Department. Caribou Protection Measures.

### Comment/Recommendation:

#### **IDENTIFICATION OF ISSUE**

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.

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.

#### **IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE**

The Wildlife Plan provides inconsistent information regarding what activities will or will not be permitted during the caribou calving/post calving.

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)

Table 2:

Time	Operational Pause Threshold		Operational Shutdown Threshold		Allowed Work Type Excluding Operational Pause or Operational Shutdown	Aircraft Travel Height (m AGL)
	Distance (km)	Number ( $\geq$ )	Distance (km)	Number ( $\geq$ )		
Spring	2.5	50	1	50	Regular field activities	300
Calving/post calving (15 <sup>th</sup> May–15 <sup>th</sup> 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

Note: The Wildlife Plan contains two tables labelled "Table 2" found on pages 13–16 and 17.

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  $\leq 10$  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.*

**Proponent Response:**

The Proponent thanks GN for identifying this inconsistency and agrees that the Wildlife Management Plan should present a single, unambiguous rule for the calving and post-calving period. The Proponent confirms that the intended commitment for the Victory Lake Project is a complete shutdown of all project activities during the calving/post-calving period from 15 May to 15 July, with no low-impact survey work undertaken in the project area during that time. The reference on page 3 stating that operations will “cease or only comprise low impact work” during calving was legacy wording and should be read as superseded by the more specific trigger table and caribou sections added in Version 1.3.

The Wildlife management plan has been updated to reflect this (Version 1.3). Outside that shutdown window, the Project will continue to apply the mobile trigger-based approach already described in the Wildlife Management Plan, including operational pause and operational shutdown thresholds, daily crew scans, pilot spot-reports, a Wildlife Observation Log, and re-assessment by the Site Supervisor.

The Proponent also agrees that the seasons used in the trigger table should be explicitly defined. The Wildlife Management Plan has been revised to include clear seasonal date ranges for spring, summer, fall, and winter so that field personnel can readily determine which threshold applies at any given time. This will improve implementation clarity, reduce the potential for confusion in the field, and better align the plan with the Project’s existing commitment to clear caribou mitigation and reporting procedures.

The labelling of Table 2 has also correctly been updated.

**GN # 02: Environment Department. Other Wildlife Protection.**

**Comment/Recommendation:**

**IDENTIFICATION OF ISSUE**

*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.*

*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.*

### **IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE**

*Table 2. Potential wildlife impacts and mitigations 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).*

*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.*

### **REQUEST(S)/RECOMMENDATION(S)**

*The GN requests that the Proponent revise the Wildlife Plan to include specific details, including (but not limited to):*

- *Setback distances (and their justification) for wildlife or wildlife abodes/dens*
- *The duration of work delays*
- *Group-size thresholds.*

### **Proponent Response:**

The Proponent agrees that the Wildlife Management Plan can provide more operational detail for non-caribou wildlife species. The Project's current Wildlife Management Plan already includes species-specific mitigation for muskox, polar bear, grizzly bear, fox, wolf, wolverine, birds, marine mammals, insects, tundra plants, and fish, including aircraft buffers for birds, daily wildlife scans, bear deterrents, wildlife attractant control, and immediate reporting procedures. However, the Proponent agrees that additional field-facing detail on setback distances, work-delay duration, and group-size triggers would improve implementation.

The Proponent has revised the Wildlife Management Plan to add clearer operating rules for muskox and carnivores (version 1.3, section 3.5). In general, where muskox, bears, wolves, wolverines, or foxes are present in or immediately adjacent to the active work area, work will be delayed until the animals have moved away voluntarily and the Site Supervisor is satisfied that work can resume without continued disturbance or risk. Dens, nests, and abodes, where identified, will be avoided with conservative setbacks and no intentional disturbance. For bears in particular, the focus will remain on avoiding wildlife attractants, conducting daily inspections and scans, using deterrents where appropriate, and stopping work when required for personnel safety and wildlife protection.

The Proponent's intention is not to apply rigid one-size-fits-all thresholds to every species in the same manner as for caribou, because the appropriate response varies by species, behaviour, and site circumstance. However, the revised plan will provide practical minimum stand-off guidance, clearer stop-work language around dens and abodes, and clearer direction that work delays remain in place until the animal or group has left the area and is no longer showing signs

of disturbance from the Project. This revision will make the plan more usable for crews while preserving the adaptive, wildlife-first approach already embedded in the Project.

### **GN # 03: Culture and Heritage**

#### **Comment/Recommendation:**

##### *Project Summary*

*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.*

*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.*

*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 Nunavut Agreement. 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.*

##### *Project-Specific Concerns*

*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.*

#### **Proponent Response:**

Thank you for your detailed review and recommendations regarding archaeological considerations for the Project. The Proponent fully understands and respects that Archaeological sites are protected by law, and wishes to uphold the safeguarding of any potential sites to the highest standards. We share the objective of protecting Nunavut's heritage resources and propose a targeted, risk-based approach that achieves that goal through practical workflows. The Proponent acknowledges GN-CH's concerns and agrees that a chance-find protocol is not a substitute for prior archaeological review where terrestrial ground disturbance may occur. The Proponent also recognizes that the absence of recorded sites within the claims does not mean the absence of archaeological potential.

The Proponent agrees to consult directly with GN-CH regarding suggested archaeological requirements for the specific Project components that may involve terrestrial disturbance before those activities proceed. The Proponent's preferred approach is an avoidance-first, risk-based process: to use existing information, traditional knowledge, desktop studies, terrain sensitivity analysis, and Project planning to avoid sensitive areas where practicable, and to complete any suggested archaeological assessment and permitting prior to terrestrial disturbance where such disturbance cannot be avoided, in specific areas that are previously identified as being identified as high-potential zones. This approach is proportionate to the Project's very small footprint, while still respecting the Nunavut Archaeological and Palaeontological Sites Regulations and GN-CH's permitting role.

The Proponent also confirms the following commitments:

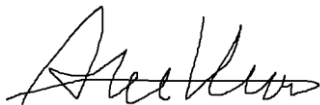
- known or newly identified archaeological or palaeontological sites will be strictly avoided with a minimum 50 m buffer, or greater where directed by GN-CH;
- if archaeological or palaeontological materials or features are encountered, all activities will cease immediately within the protective buffer area, the location will be documented with coordinates, description, and photographs, and GN-CH will be notified;
- no collection, disturbance, alteration, littering, or defacement of heritage sites will occur;

- all staff and contractors will be informed of these legal obligations during site orientation; and
- no inuksuit will be constructed as part of Project activities.

This is also consistent with the Project's broader low-impact approach. The Victory Lake Project proposes no permanent camp in the project area, no all-weather road construction, very small temporary drill sites, and progressive cleanup and reclamation following drilling. Where support is based from existing facilities such as Ferguson Lake Camp, Quartzite Lake Camp, or community accommodations, the Proponent does not intend to cause new terrestrial disturbance at those locations. During overland travel, this would only ever be during thick and appropriate level of snow cover, which would act as a protectant for any previously unidentified archaeological sites.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Vilela', with a stylized, cursive script.

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