


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 Athabasca Denesųtiné NéNé Land Corporation regarding the Notice of Screening for 1517081 B.C. LTD “Victory Lake” Project Proposal.

Sincerely,



Alex Vilela
Exploration Manager
For and on behalf of:
1517081 B.C. Ltd.
alex.vilela@vanguardmv.com.au
+1 (775) 587-5995

ADNLC Comment/Recommendation:

The Athabasca Denesųtiné NÉNé Land Corporation (ADNLC) represents the three Denesųtiné 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.

Proponent Response:

The Proponent acknowledges and respects the concerns raised by Athabasca Denesųtiné NÉNé Land Corporation and recognizes the deep cultural, harvesting, and rights-based importance of the Qamanirjuaq, Beverly, and Bathurst caribou herds to Denesųtiné communities. The Proponent understands that ADNLC's concern is not limited to the immediate project footprint, but to the broader importance of caribou to food security, cultural continuity, health, and future generations.

The Proponent also recognizes that the Victory Lake Project is located in a highly sensitive caribou landscape and that any proposal in such an area must be approached cautiously. For that reason, the Project has been intentionally designed as a small, early-stage, short-duration, low-impact exploration program with no permanent camp in the project area, no all-weather roads, no mine development, and no permanent infrastructure. The currently proposed activities are limited to up to approximately 20 small diamond drill holes, mapping and sampling, and possible geophysical surveys, with use of lightweight drill equipment, temporary setups, progressive reclamation, and removal of all materials following completion of each drillhole.

The current Wildlife Management Plan V1.3 also includes strengthened caribou mitigation measures, including a complete shutdown of all project activities from 15 May to 15 July, together with daily crew scans, pilot spot-reports, wildlife logging, early-warning checks, and additional operational pause/shutdown triggers outside that period. The Proponent understands that ADNLC's position is that mitigation is not adequate in calving grounds; however, the Proponent respectfully submits that the Project has been specifically designed to minimize potential disturbance to the greatest extent possible for an early-stage exploration program and to keep any effects temporary, localized, and reversible.

ADNLC Comment/Recommendation:

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 Denesųtiné 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 Denesųtiné 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 Denesųtiné 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.

Proponent Response:

The Proponent acknowledges ADNLC's position that industrial activity, including exploration, should not proceed within calving grounds, and understands that this position is rooted in Denesųtiné teachings, long-standing advocacy, and the cultural and ecological significance of these lands. The Proponent also recognizes that this concern extends beyond the direct footprint of the current proposal and reflects concern about the broader development pathway that exploration can open in certain circumstances.

The Proponent respectfully notes, however, that the proposal currently before NIRB is an early-stage exploration proposal only, and not a proposal for advanced exploration, road development, permanent camps, or mine construction, and that no exploration activity of any sort will take place during calving or post-calving. Any future expansion beyond the currently proposed scope would require additional planning, engagement, technical review, and regulatory assessment. The Proponent is not seeking approval or grandfathering of any future development pathway through the current application.

The Proponent has specifically designed the current Project to minimize disturbance through a narrow scope of work, a complete shutdown during the project's current calving/post-calving window of 15 May to 15 July, use of existing accommodations or nearby facilities where possible, no permanent camp in the project area, no all-weather roads, over-snow access where practicable, lightweight drill equipment, progressive reclamation, and removal of all equipment and materials after use. While the Proponent understands that ADNLC considers avoidance of industrial activity to be the only acceptable approach in this habitat, the Proponent respectfully submits that the current proposal has been deliberately limited and adapted to reduce potential disturbance to the greatest extent possible within the current regulatory process.

ADNLC Comment/Recommendation:

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.

Proponent Response:

The Proponent acknowledges ADNLC's concern regarding cumulative effects and agrees that cumulative disturbance to caribou across the broader Qamanirjuaq range is an important issue. The Proponent recognizes that this concern is not unique to Victory Lake and reflects the combined influence of multiple exploration, infrastructure, and development activities across Nunavut and northern Canada.

The Proponent also respectfully notes that the Victory Lake Project itself is an early-stage, low-footprint, temporary exploration program with no permanent infrastructure, no all-weather road construction, no mine development, and a very small direct disturbance footprint relative to larger industrial projects. Drill sites are temporary and progressively reclaimed, and field logistics are intended to rely on existing accommodations, existing facilities, or local fishing huts wherever practicable. The Proponent has also included a complete shutdown during the Project's current calving/post-calving window, together with additional wildlife mitigation and stand-down measures outside that period, specifically to reduce the Project's contribution to cumulative disturbance.

The Proponent accepts that cumulative effects are a legitimate part of the screening context and understands ADNLC's concern that they are difficult to assess at the scale of a single project filing. The Proponent remains willing to continue discussing cumulative-effects concerns through the regulatory process and through further engagement with Indigenous organizations and communities affected by the Qamanirjuaq herd.

ADNLC Comment/Recommendation:

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 Denesųtiné 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 Denesųtiné communities, now and for many future generations to come.

Proponent Response:

The Proponent acknowledges ADNLC's point that Athabasca Denesųtiné communities may bear risk from any harm to the Qamanirjuaq herd even if they are not the geographically nearest communities to the project. The Proponent agrees that proximity alone is not the only relevant measure of who may be affected where caribou, harvesting, rights, and cultural continuity are concerned.

The Proponent would also like to stress that due to the complete shutdown of all exploration activities during calving and post-calving, and the strictly enforced caribou mitigation measures with large buffers and standdown times, combined with the very minimal scope of exploration activities, that the Proponent does not expect there to be any negative impact on the Qamanirjuaq herd. These management practises and exploration plans have been specifically designed to minimise any potential negative affect on the Qamanirjuaq herd and other wildlife.

The Proponent also acknowledges that ADNLC and Athabasca Denesųtiné communities have not yet been directly engaged on this Project, and agrees that this should be improved and will seek to engage in the future. The Proponent is willing to extend engagement directly to ADNLC and relevant Athabasca Denesųtiné representatives so that concerns regarding caribou, cultural values, harvesting, and cumulative effects can be discussed directly rather than only through written screening comments.

With respect to benefits, the Proponent recognizes that the Project's direct near-term economic benefits are expected to flow primarily to nearby Kivalliq communities such as Whale Cove, Rankin Inlet, and Baker Lake through local hiring, wildlife monitoring roles, freight and logistics work, camp and field support services, and procurement from local businesses, which additionally has subsequent flow-on effects to Canada's broader economy. At the same time, the Proponent recognizes that broader communities who depend on the Qamanirjuaq herd may not view those local benefits as offsetting any perceived risk to caribou. For that reason, the Proponent does not suggest that economic benefits outweigh the importance of caribou

protection. Rather, the Proponent's position is that the Project has been intentionally designed as a small, temporary, low-impact program with conservative mitigation, so that any potential disturbance to caribou is minimized while modest and practical community benefits are created where the work is being supported operationally.

The Proponent appreciates ADNLC's comments and the seriousness of the concerns raised. The Proponent remains committed to responsible exploration, continued dialogue, and implementation of conservative wildlife protections throughout the current review process.

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 flourish at the end.

Alex Vilela
Exploration Manager
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alex.vilela@vanguardmv.com.au
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