

REGULATORY FRAMEWORK

The primary objectives of the NIRB are set out in Article 12, Section 12.2.5 of the *Nunavut Agreement* and are confirmed by s. 23 of the *NuPPAA*. The purpose of screening is provided for under Article 12, Section 12.4.1 of the *Nunavut Agreement* and s. 88 of the *NuPPAA*.

As set out under Article 12, Section 12.4.4 of the *Nunavut Agreement* and s. 92(1) of the *NuPPAA*, upon conclusion of the screening process, the Board must provide its written report the Minister indicating one of three options:

- (a) a review of the project is not required;
- (b) a review of the project is required; or
- (c) the project should be modified or abandoned.

PROJECT OVERVIEW & THE NIRB ASSESSMENT PROCESS

On January 16, 2026, the NIRB received a referral to screen 1517081 B.C. LTD "Victory Lake" project proposal (NIRB File No: 26EN006) from the Nunavut Planning Commission (Commission), with an accompanying positive conformity determination with the Keewatin Regional Land Use Plan All documents received and pertaining to this project proposal can be accessed from the NIRB's Public Registry by using any of the following search criteria or www.nirb.ca/project/126345.

- Project Name: Victory Lake
- NIRB File No.: 26EN006
- NIRB Application No.: 126345

Table 1: NIRB's Assessment Process

Date	Stage
January 16, 2026	Receipt of project proposal and positive conformity determination (Keewatin Regional Land Use Plan) from the Commission
January 16, 2026	Pursuant to s. 144(1) of the <i>NuPPAA</i> the NIRB requested the Proponent complete an online application to address information required for Screening
February 11, 2026	Receipt of online application from Proponent
February 19, 2026	Scoping pursuant to s. 86(1) of the <i>NuPPAA</i>
March 10, 2026	Translated Public engagement and comment request (which included terms and conditions) was issued to the following communities
March 31, 2026	Receipt of public comments
April 9, 2026	Proponent provided with an opportunity to address comments/concerns raised by public
April 15, 2026	Proponent responded to comments/concerns raised by public
March 31, 2026	Pursuant to Article 12 s 12.4.5 of the <i>Nunavut Agreement</i> and s. 92(3) of the <i>NuPPAA</i> , an extension to the 45-day timeline for the provision of the Board's Report was requested from the Minister of Northern and Arctic Affairs

Date	Stage
May 4, 2026	Issuance of Screening Decision Report

1. Project Scope

Location	Kivalliq region, Victory Lake 180 kilometers (km) west of Rankin Inlet and 180 km south of Baker Lake
Objective	The Proponent proposes a small short-term mineral exploration program with diamond drilling up to 20 small holes with a depth between 200-400 metres deep, and a small number may be extended to 500 metres, basic geology mapping and small rock and soil sampling. The goal is to confirm historic exploration results and collect new information to better understand the potential for minerals including silver, zinc, lead, copper, and gold.
Timeline	Operations: July 2026 to August 2028 – Seasonal and either not operate or only low impact work between May 15 and July 15 annually

As required under s. 86(1) of the *NuPPAA*, the Board accepted the scope of the project as set out by 1517081 B.C. LTD in the proposal. The scope of the project proposal includes the following undertakings, works, or activities:

- No permanent structures are proposed, operations would be based out of existing community accommodations, permitted seasonal camps, or local fishing huts;
 - Potential use of Ferguson Lake Camp
 - Potential use of Quartzite Lake Camp
- Use of fixed-wing aircraft, helicopter, snowmobiles, or snow cats to move equipment on a proposed winter trail, personnel and supplies, access drilling locations, geophysics ground methods and/or airborne surveys;
- Use of snow cats and snowmobiles traveling over snow/ice cover to avoid ground disturbance to transport drilling equipment and personnel;
- Use of a diamond drill rig, solids removal equipment, heater, generator, water pump, and a survival shack for drill operations;
- Storage, and use of up to 41,000 liters of diesel, 41,000 liters of aviation fuel, 1,000lbs of propane, 2,050 liters of gasoline, 200 liters of oil, 200 liters of lubricants, 200 liters of drill additives;
- Use of up to 50m³ of water per day from large lakes within the project area; and
- Waste managed by back hauling to an approved facility in Rankin Inlet, Baker Lake, Whale Cove, or Yellowknife in approved sealed containers.

2. Inclusion or Exclusion to Scoping List

The NIRB has identified no additional works or activities in relation to the project proposal; as a result, the NIRB will proceed with screening the project based on the scope as described above. The NIRB notes that the Ferguson Lake Camp was previously screened in NIRB File No.: 06EN008 and Quartzite Camp was screened as a part of NIRB File No.: 11EN027 and 21CN042 and therefore, would not be considered as a part of this assessment.

3. Public Comments and Concerns

As outlined in Table 1 above, notices regarding the NIRB’s screening of this project proposal were distributed to community organizations as well as to relevant federal and territorial government agencies, Inuit organizations and other parties with a request for interested parties to provide the Board with any comments or concerns regarding:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;
- Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why;
- Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures); and
- Any matter of importance to the Party related to the project proposal.

On or before March 31, 2026, the NIRB received comments from the following interested parties:

Table 2: Comments Received

Commenting Party	NIRB Doc ID No.
Kivalliq Inuit Association (KIA)	360584
Government of Nunavut (GN)	360546
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	360269
Transport Canada (TC)	360021
Athabasca Denesūliné NÉNé Land Corporation (ADNLC)	360746
Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	360285
Ghotelnene K’odtineh Dene (GKD)	360299
World Wildlife Fund Canada (WWF)	360302

a. Summary of Comments and Concerns Received

The following provides a summary of the comments and concerns received by the NIRB in relation to the Victory Lake project proposal:

Kivalliq Inuit Association (KIA)

- As long as the KIA Mobile Caribou Protection Measures are followed and all required permits and licences are obtained and maintained, KIA has no issue with the Project as there are concerns related to traditional uses of land.

Government of Nunavut (GN)

The Government of Nunavut’s review focused on wildlife protection, terrestrial, and archaeological concerns.

- Remove inconsistencies regarding permitted activities during the Calving/Post calving Period.
- Provide clear definitions for each season referenced in the Wildlife Plan.

- Requested that the Proponent revise the Wildlife Plan to include specific details, including setback distances for wildlife or wildlife abodes/dens, the duration of work delays, and group-size thresholds.
- Recommended that the Proponent consult with the Cultural and Heritage on archaeological permitting and regulatory review processes prior to any ground disturbance, the GN further recommends the following:
 - Site protection: All heritage sites in Nunavut are protected by law, Government of Nunavut- Culture and Heritage (GN-CH) recommends that known or newly recorded sites are avoided using a minimum 50-meter buffer or greater were directed by GN-CH;
 - Chance finds: If archaeological and/or palaeontological materials are encountered, all activities shall cease immediately within the buffer area, the site shall be documented with coordinates, description, and photographs and reported to GN-CH
 - General protections: 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.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

Fuel and Hazardous Material Storage and Spill Risk

- Reconciling fuel inventories across all filings to clearly define the maximum concurrent on-site volumes and associated worst-case scenario.
- Provide a high-level fuel logistics and transfer schedule to contextualize handling frequency.
- Confirming secondary-containment specifications that demonstrate adequacy under extreme precipitation/snowmelt.

Drill Cuttings and Artesian Groundwater Management

- Recommends that the Proponent considers confirming if only inert drilling fluids would be deposited to sumps/natural depressions and the backfilling occurs after contents have frozen with grading to avoid ponding.
- Describing procedures for managing artesian groundwater, including immediate control measures and final drillhole abandonment practices to ensure long-term hydraulic isolation.

Soil Disturbance and Reclamation

- Recommends that the Proponent consider salvaging/replacing vegetation mats/organics loosening compacted soils or post-drilling surface stabilization for use in reclamation to support natural vegetation.

Consultation with Interested Parties

- Recommends the Proponent continue its efforts to engage with interested parties regarding its project proposal. These parties include the Issatik Hunters and Trappers Organization (HTO), Kangiqtinig HTO, the Baker Lake HTO, the Hamlet of Whale Cove, Rankin Inlet, and Baker Lake, the Kivalliq Inuit Association, and any other relevant organizations or individuals.

Transport Canada

- Transport Canada has reviewed the project proposal. The project components and activities as they are described in the proposal do not require comments from Transport Canada. Thank you for the opportunity to review.

Beverly and Qamanirjuaq Caribou Management Board (BQCMB)

Does not support the advancement of Victory Lake

Key Concerns

- The primary concern with the Project is its location, within the Qamanirjuaq calving and post-calving grounds, areas of exceptional importance to caribou reproduction, calf survival, and long-term herd conservation.
- Project activities could introduce disturbance into sensitive habitats through aircraft presence, localized site activity, and broader industrial use of the landscape.
- The implications extend beyond the current exploration season, exploration is the first step in whether a deposit could support more advanced exploration or eventual mine development, this could lead to larger and longer-duration programs.
- Cumulative effects and precedent.

Recommendations

- 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.
- 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.
- 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.
- Consider cumulative effects and precedent, including the implications of permitting industrial activity within an area that is critical to the Qamanirjuaq herd.
- Give consideration to the long-standing land use planning intent that Qamanirjuaq calving grounds should be protected from mineral exploration and development.
- 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.

World Wildlife Fund Canada (WWF)

- Noted that the Qamanirjuaq herd core calving grounds were designated as areas of Limited Use that would prevent any mineral exploration or development under the draft Nunavut Land Use Plan.
- It should be noted that the whole point of the Nunavut land use plan is to avoid situations like this where projects are proposed in areas that after decades of consultation have been proposed to be off limits to mineral exploration.
- All proponents should be aware of the proposed designations of the NLUP, and any argument of stranded assets when staking claims in proposed Limited Use areas years after the release of the RNLUP is irresponsible.
- We reassert that the issuance of mineral claims in caribou calving grounds serves no one, simultaneously threatening the integrity of the Limited Use designations and the NLUP

itself, while creating lengthy and costly Environmental Impact Assessment processes for proponents attempting to operate in an area that communities have clearly identified as being off limits.

4. b. Comments and Concerns with respect to Inuit Qaujimaningit, Indigenous and Community Knowledge

Several parties raised concerns related to caribou habitat and migration, seasonal land use, wildlife disturbance, cumulative effects, and traditional harvesting activities.

Athabasca Denesūliné Néné Land Corporation (ADNLC)

ADNLC does not support the Project moving forward at this time 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 and to all peoples who rely on the herd to continue our way of life. Our Denesūliné teachings tell us that these grounds are sacred and not to be disturbed and mitigation is not adequate in the calving grounds.

Key Concerns

- Impacts from industrial projects, including exploration, on critical caribou habitat including caribou calving and post-calving grounds and freshwater crossings and important migration corridors at a sensitive time of the year.
- Recommend that the proposal not be looked at as stand-alone, but as part of a bigger pathway which would lead to industrial development in calving grounds.
- Requests that the Board consider and respect the long-standing Nunavut Land use Plan process and uphold protection of these lands from industrial disturbances.
- Lack of information about how this project interacts with 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.
- Not all Athabasca Denesūliné communities or the ADNLC office were engaged.

Ghotelnene K’odtineh Dene (GKD)

Ghotelnene K’odtineh Dene (GKD) do not support the Victory Lake project proposal and provided comments expressing concern regarding potential impacts of the Project on caribou, traditional land use, and cumulative effects within their asserted traditional territory now Nunavut, Manitoba, Saskatchewan, and the Northwest Territories. Further, the Ghotelnene K’odtineh Dene do not have confidence in the effectiveness of the proposed caribou protection measures for the project

Key Concerns

- 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.
- Potential impacts to caribou life cycle and their habitat such as the critical areas such as the calving grounds and post-calving grounds of the Qamanirjuaq herd.
- The potential for cumulative effects on disturbance to caribou from other projects or proposed projects in the Beverly/Qamanirjuaq herds range.

- Potential long-term adverse irreversible cumulative effects are possible from increased stress to caribou and impacts to caribou and their habitat.

5. Proponent’s Response to Public Comments and Concerns

Due to the comments, and questions received from parties, the NIRB provided an opportunity for the Proponent to respond. The following is a summary of the Proponent’s response to concerns:

Kivalliq Inuit Association (KIA)

- The Proponent confirmed that these recommendations align with their current Wildlife Management Plan version 1.2 (updated to version 1.3) and will enforce a full operational shutdown during wildlife periods and use real-time monitoring and response protocols at other times.

Government of Nunavut (GN)

- The Proponent has revised their Wildlife Management Plan (version 1.3) and project procedures to address GN’s concerns, clarify operational rules, and strengthen environmental and heritage protections.
- 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
- These changes are intended to reduce confusion, improve compliance, and ensure responsible stewardship during the project.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

Fuel and Hazardous Material Storage and Spill Risk

- The Proponent acknowledges inconsistencies in fuel inventory reporting and clarifies that the maximum concurrent on-site fuel should be taken from the Spill and Fuel Management Plan (100–200 drums per fuel type, with caches under 80,000 L).
- Fuel will be stored in smaller, distributed caches (typically 20,000 L each) to reduce single-point spill risk, with resupply as needed.
- All fuel drums will be stored within lined berm containment or approved portable units, sized to contain at least 110% of the largest drum, with extra capacity for precipitation.
- Storage sites will be set back at least 31 m from waterbodies, inspected daily, and equipped with spill kits and recovery drums.

Drill Cuttings and Artesian Groundwater Management

- Diamond drilling will use a closed-loop mud system, recycling water where possible, and directing cuttings/fluids to sumps at least 31 m from waterbodies.
- Only inert or standard non-toxic fluids (like salt) will be used, and sumps will be backfilled and graded to avoid ponding and support site recovery.
- If artesian groundwater is encountered, drilling will be suspended, water contained and redirected, casing/sealing applied, and the hole abandoned to ensure hydraulic isolation.

Soil Disturbance and Reclamation

- The Proponent commits to progressive reclamation after each drillhole, removal of all temporary infrastructure, use of timber platforms and coco-matting, hand levelling, debris checks, and site photography.
- Where practical, vegetation mats and organics will be salvaged and replaced to support revegetation, especially on tundra or organic surfaces.
- Compacted or unstable surfaces will be loosened or stabilized by hand tools as needed.

Consultation with Interested Parties

- Ongoing consultation is confirmed with local Hunters and Trappers Organizations, Hamlets, and the Kivalliq Inuit Association.
- Engagement includes incorporating Inuit Qaujimagatuqangit and local knowledge, wildlife and heritage mitigation, understanding harvesting patterns, and identifying local employment/procurement opportunities.
- The project is designed to be temporary and low-impact, with strict caribou mitigation, shutdown periods during calving, wildlife monitoring, and preference for existing accommodations.

Athabasca Denesúliné Néné Land Corporation (ADNLC)

Cultural and Environmental Concerns

- The Proponent recognizes the deep cultural, harvesting, and rights-based importance of the Qamanirjuaq, Beverly, and Bathurst caribou herds to Denesúliné communities.
- They acknowledge ADNLC's concerns about the broader impacts of exploration and the importance of caribou to food security, culture, health, and future generations.

Project Design and Mitigation Measures

- The Victory Lake Project is intentionally designed as a small, early-stage, short-duration, low-impact exploration program.
- There would be no permanent camp, no all-weather roads, no mine development, and no permanent infrastructure.
- Activities are limited to up to 20 small diamond drill holes, mapping, sampling, and possible geophysical surveys, using lightweight equipment and temporary setups.
- Progressive reclamation and removal of all materials would occur after each drillhole.
- The Wildlife Management Plan (Version 1.3) includes a complete shutdown of all project activities from 15 May to 15 July (calving/post-calving period), daily crew scans, pilot spot-reports, wildlife logging, early-warning checks, and operational pause/shutdown triggers.

Calving Grounds Concerns

- The Proponent acknowledges ADNLC's position that no industrial activity should occur in calving grounds, rooted in Denesúliné teachings and advocacy.
- The Proponent clarified that the current proposal is for early-stage exploration only, not for advanced exploration or mine development.
- No exploration activity would take place during calving or post-calving.
- Any future expansion would require further planning, engagement, and regulatory assessment.

- The project is deliberately limited and adapted to minimize disturbance.
- The Proponent is not seeking approval or grandfathering of any future development pathway through the current application

Cumulative Effects

- The Proponent agrees that cumulative disturbance to caribou is an important issue and not unique to Victory Lake.
- The project is low-footprint and temporary, with no permanent infrastructure or road construction.
- Drill sites are temporary and progressively reclaimed.
- The proponent is willing to discuss cumulative-effects concerns further with Indigenous organizations and communities.

Community Benefits and Engagement

- The Proponent acknowledges that Athabasca Denesų́liné communities may bear risk from harm to the Qamanirjuaq herd, regardless of proximity.
- They stress that strict mitigation measures are in place to minimize any negative impact on the herd.
- The Proponent agrees that direct engagement with ADNLC has not yet occurred and commits to improving this in the future.
- Economic benefits are expected to flow primarily to nearby Kivalliq communities, but the proponent does not claim these benefits outweigh caribou protection.
- The project proposal is designed to minimize disturbance while providing modest community benefits.

Beverly and Qamanirjuaq Caribou Management Board (BQCMB)

The Proponent recognizes the importance of the Qamanirjuaq calving and post-calving grounds and respects BQCMB's role in caribou conservation.

Project Design and Scope

- The Victory Lake Project is described as a small, early-stage, short-duration exploration program with a minimal physical footprint.
- Activities are limited to up to 20 low-impact diamond drill holes, geological mapping, sampling, and possible geophysical surveys.
- No permanent infrastructure (camp, road, airstrip, quarry, or mine) is proposed.
- Operations would use existing community accommodations, permitted seasonal camps, and helicopter/fixed-wing support to avoid lasting surface disturbance.

Mitigation Measures and Wildlife Protection

- The Wildlife Management Plan Version 1.3 includes a complete shutdown of all activities during the calving and post-calving seasons, pause/shutdown triggers if caribou are present or near operations, daily wildlife scans, pilot spot-reports, wildlife observation logs, early-warning checks, and Site Supervisor decision-making authority.
- 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

Addressing Cumulative Effects and Precedent

- The Proponent acknowledges concerns about cumulative effects and precedent but emphasizes that the current proposal is only for early-stage exploration.
- Any future expansion would require further assessment, engagement, and regulatory review.
- The project is intentionally limited to minimize disturbance and avoid lasting industrial footprint.
- 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

Community Benefits and Consultation

- The Project aims to provide benefits to nearby Kivalliq communities through local hiring. Procurement, wildlife monitoring, freight, air support, and camp/field services
- Preference is given to Whale Cove, Rankin Inlet, and Baker Lake workers and businesses.
- The Proponent remains willing to continue working with regulators, HTOs, KivIA, and other interested organizations to further strengthen mitigation and reduce disturbance risk if the review process continues Ghotelnene K'odtineh Dene (GKD)
- 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
- Reaffirmed the current Wildlife Monitoring Plan V1.3 includes a strengthened caribou mitigation framework.
- 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.
- Notes that the project is a small, early-stage, short duration exploration program intended to validate historic results using low-impact methods.
- 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.
- 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 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 Proponent remains open to continued dialogue with Ghotelnene K’odtineh Dene and other affected Indigenous groups as the review process continues.

World Wildlife Fund Canada (WWF)

- The Proponent acknowledges the sensitivity of the Qamanirjuaq caribou calving grounds and is proceeding with the low-impact Victory Lake exploration project within the current regulatory framework.
- recognizes the significance of the broader land use planning context for the Qamanirjuaq calving grounds
- The Project is not being advanced on the assumption that land use planning concerns are unimportant or should be set aside
- The Proponent clarifies that the current proposal is limited to early-stage, low-impact exploration designed to avoid a lasting footprint and is not seeking approval for future development.
- The Proponent understands WWF-Canada’s position that mineral exploration in this area should be considered in light of its possible future development pathway
- The Proponent is not requesting that future activities be assumed, approved, or grandfathered through the current proposal. The Proponent accepts that any future activities would be subject to the legal and planning framework in effect at that time, including any applicable NPC processes, land use plan requirements, permitting requirements, and screening or impact review processes.
- In remote regions where employment options can be limited or highly seasonal, exploration and mining can provide stable income for households, help build transferable skills, support local service companies, and generate wealth that circulates through the community and is passed on to future generations. The Proponent recognizes that this does not override concerns about caribou or sensitive land use areas, but it is an important part of the broader public-interest. The Victory Lake Project has therefore been designed not only to minimize environmental disturbance, but also to create genuine, practical benefits for nearby communities through local hiring, wildlife monitoring roles, freight and logistics work, camp and field support services, and procurement from businesses in Whale Cove, Rankin Inlet, and Baker Lake, with the understanding that any future increase in exploration success could also increase those community benefits

ASSESSMENT OF THE PROJECT PROPOSAL IN ACCORDANCE WITH PART 3 OF *NUPPAA*

In determining whether a review of the project is required, the Board considered whether the project proposal had potential to result in significant ecosystemic or socio-economic impacts. Table 3. The Board took particular care to consider Inuit Qaujimaningit, Indigenous and Community Knowledge in carrying out its assessment and determination of the significance of impacts.

Table 3: Summary of the Board’s Assessment of Factors s. 90 NuPPAA

Factor	Comment
<p>The size of the geographic area, including the size of wildlife habitats, likely to be affected by the impacts.</p>	<ul style="list-style-type: none"> ▪ The physical footprint of the proposed project components is 178 square kilometres. ▪ The proposed project would take place within habitats of far-ranging wildlife species such as migratory and non-migratory birds, Arctic fox, arctic hare and Species at Risk such as Polar Bears. ▪ Although the claim block directly overlap mapped calving grounds and lies within the broader seasonal range of the Qamanirjuaq caribou herd and within a region that includes a designated Caribou Protection Area. Wildlife movement and habitat use extend beyond mapped polygons; therefore, disturbance may influence adjacent tundra and migration pathways. ▪ The region contains a dense network of interconnected lakes, wetlands, and heritage rivers. This hydrological connectivity increases the potential geographic extent of effects in the event of sedimentation or spill. ▪ When considered with other past, present, and proposed mineral exploration projects in the region (Table 4), the geographic area relevant to assessment extends beyond the project footprint to the broader regional landscape where cumulative disturbance may occur.
<p>The ecosystemic sensitivity of that area.</p>	<ul style="list-style-type: none"> ▪ The Project is located within a tundra ecosystem characterized by slow vegetation recovery, permafrost conditions, and high hydrological connectivity. Surface disturbance may persist for extended periods due to limited natural regeneration. ▪ The region includes designated Caribou Protection Areas and mapped calving grounds, indicating elevated wildlife sensitivity, particularly during seasonal migration and calving periods. The Project is directly overlapping calving grounds, and the wider caribou range. ▪ The area also contains numerous interconnected lakes, wetlands, and heritage rivers, increasing sensitivity to potential spill or sediment-related impacts. ▪ Overall, the ecosystem is considered moderately to highly sensitive due to wildlife values, hydrological connectivity, and slow recovery capacity.

Factor	Comment
<p>The historical, cultural and archaeological significance of that area.</p>	<ul style="list-style-type: none"> ▪ The Project is located within a region that supports ongoing traditional land use, including harvesting and travel. Portions of the broader area include Inuit Owned Lands, reflecting recognized land tenure and cultural value. ▪ Although no confirmed archaeological sites have been identified within the immediate project footprint, the region has a long history of Inuit and Indigenous land use and previous exploration activity. The potential for undocumented archaeological or culturally significant sites cannot be excluded. ▪ Given the importance of caribou and the surrounding landscape to Inuit and Indigenous communities, the area holds cultural and subsistence significance. Appropriate precaution and engagement are therefore warranted.
<p>The size of the human and the animal populations likely to be affected by the impacts.</p>	<ul style="list-style-type: none"> ▪ The Project is located in a remote area and is not situated near permanent settlements. Direct impacts to human populations are therefore expected to be limited with impacts to hunting. ▪ However, the broader region supports Inuit communities that rely on wildlife, particularly caribou, for subsistence and cultural purposes. Indirect effects may occur if wildlife movement or availability is altered. ▪ Animal populations potentially affected include migratory species, most notably the Qamanirjuaq caribou herd. Given the regional distribution of multiple exploration projects, wildlife may be exposed to repeated disturbance across the landscape. ▪ Impacts to animal populations are expected to be behavioural in nature (e.g., displacement or avoidance), rather than direct mortality.
<p>The nature, magnitude and complexity of the impacts; the probability of the impacts occurring; the frequency and duration of the impacts; and the reversibility or irreversibility of the impacts.</p>	<ul style="list-style-type: none"> ▪ The Project includes seasonal drilling, trail construction, camp operations, aircraft use, and fuel storage. Potential effects include localized ground disturbance, temporary wildlife disruption, and spill risk. ▪ Impacts are expected to be low to moderate in magnitude and largely confined to the immediate activity area. Routine disturbance during operations is likely; high-consequence events such as major spills are less probable.

Factor	Comment
	<ul style="list-style-type: none"> ▪ Activities are seasonal, and most effects are temporary. Some surface disturbance may persist due to slow tundra recovery. Effects are generally reversible with proper reclamation and compliance with regulatory requirements. Irreversible effects are not anticipated at the project scale.
<p>The cumulative impacts that could result from the impacts of the project combined with those of any other project that has been carried out, is being carried out or is likely to be carried out.</p>	<ul style="list-style-type: none"> ▪ The Project occurs within a region where multiple mineral exploration projects were carried out, are ongoing, or are proposed. While the Project's individual footprint is localized, cumulative effects may arise from repeated seasonal disturbance, incremental increases in linear features, and expanded human presence across the broader landscape. ▪ Wildlife, particularly migratory caribou, may be exposed to disturbance from multiple projects over time. Increased fuel storage and transport associated with regional exploration activity also contributes to cumulative risk. ▪ Although the Project alone is not expected to result in significant adverse effects, it contributes incrementally to regional disturbance within the broader ecosystem.
<p>Any other factor that the Board considers relevant to the assessment of the significance of impacts.</p>	<ul style="list-style-type: none"> ▪ Additional relevant considerations include the remote location of the Project, limited seasonal duration of activities, and existing regulatory oversight. The effectiveness of mitigation measures, spill prevention and response planning, and reclamation practices would influence the overall level of impact. ▪ Uncertainty related to wildlife movement patterns and the potential interaction of multiple regional projects also remains a relevant consideration. Ongoing monitoring and adaptive management are therefore important in addressing potential effects over time. ▪ Available information from prior assessments, Commission mapping, regional wildlife data, and established wildlife protection measures applicable to the designated area were considered in the assessment of potential environmental effects.

Regulatory Requirements

The Proponent is also advised that the following legislation may apply to the Project:

Acts and Regulations

1. The *Fisheries Act* (<http://laws-lois.justice.gc.ca/eng/acts/F-14/index.html>).
2. The *Nunavut Waters and Nunavut Surface Rights Tribunal Act* (<http://laws-lois.justice.gc.ca/eng/acts/n-28.8/>).
3. The *Migratory Birds Convention Act* (<http://laws-lois.justice.gc.ca/eng/acts/M-7.01/>), the *Migratory Birds Regulations* (https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1035/index.html) and the *Migratory Bird Sanctuary Regulations* (https://laws-lois.justice.gc.ca/eng/regulations/C.R.C.,_c._1036/index.html).
4. The *Species at Risk Act* (<https://laws-lois.justice.gc.ca/eng/acts/s-15.3/>). Attached in **Appendix A** is a list of Species at Risk in Nunavut.
5. The *Wildlife Act (Nunavut)* and its corresponding regulations (<http://www.canlii.org/en/nu/laws/stat/snu-2003-c-26/latest/snu-2003-c-26.html>).
6. The *Nunavut Act* (<http://laws-lois.justice.gc.ca/eng/acts/N-28.6/>). The Proponent must comply with the proposed terms and conditions listed in the attached **Appendix B**.
7. The *Canadian Environmental Protection Act* (<http://laws-lois.justice.gc.ca/eng/acts/C-15.31/>).
8. The *Storage Tank System for Petroleum Products and Allied Petroleum Products Regulations* (<http://laws-lois.justice.gc.ca/eng/regulations/SOR-2008-197/FullText.html>). The Proponent must identify their tank system to Environment and Climate Change Canada, and installation of new systems must comply with the regulations' design requirements.

Other Applicable Guidelines

1. Environmental Guidelines for the Management of Hazardous Waste, Government of Nunavut, Revised October 2010 (https://www.gov.nu.ca/sites/default/files/Guideline%20-%20General%20Management%20of%20Hazardous%20Waste%20%28revised%20Oct%202010%29_0.pdf).

Table 4: Past, Present, and Reasonably Foreseeable Projects Considered

NIRB Project Number	Project Title	Project Type
<i>Proposed Developments – undergoing assessment</i>		
26EN012	Cache Zone 2026	Prospecting & Staking
26EN016	Baker Basin	Mineral Exploration
25EA090	Whale Cove Camp	Mineral Exploration
<i>Present Projects – approved or in operation</i>		
25EN025	Nut Lake Project	Mineral Exploration
25RN083	Aberdeen Lake-Pelly Lake Overland Haul	Winter Road / Winter Trail
25EN084	Angilak Property	Mineral Exploration
25EN080	Hook Lake	Mineral Exploration
<i>Past Projects</i>		
19RA046/06EN008	Ferguson Lake Project	Mineral Exploration

NIRB Project Number	Project Title	Project Type
07EN046	North Thelon Joint Venture	Mineral Exploration
07EN057	Schultz Lake Campsite and Exploration	Mineral Exploration
08EN015	Turqavik/Aberdeen Project	Mineral Exploration
11EN046	Marce Claims Exploration	Mineral Exploration
16EN035	Huckleberry Claim	Mineral Exploration
16EN049	Tagak	Mineral Exploration
18EN033	Tugak Gold Project	Mineral Exploration
17EN044	Witch Lake Claim Staking	Mineral Exploration
17EA020	Meadowbank Precious Metal Property	Mineral Exploration
22EN032	Nunavut Uranium Project	Mineral Exploration
24EN052	Thelon Property	Mineral Exploration
21EN009	Turquetil-Esker Drilling Program	Mineral Exploration
24EN039	Yath Property	Mineral Exploration

IEWS OF THE BOARD

At the outset, the Board notes that some of the public concern expressed is based on the draft Nunavut Land Use Plan not yet being complete and concern that the exploration program will lead to further development of the project proposal in key caribou habitat for the Qamanirjuaq herd. These general concerns were presented to the Board during the Board's previous assessments of these types of projects. As there is currently no moratorium or other type of land use limitation for these types of activities in the region, the NIRB is tasked with assessing the potential for negative environmental and socio-economic impacts associated with this Project Proposal specifically as proposed. Several commenters expressed concern that if the early exploration activities proposed in this proposal were to be allowed to proceed that a potential mine project would inevitably follow. The Board emphasizes that the scope of the activities proposed in this Project Proposal are limited to exploration activities only and do not include mining activities. If the Proponent were to decide in future to advance the Project Proposal to develop a mine, assessment of those activities would be triggered and would be subject to a new NIRB impact assessment.

In reviewing the factors outlined above during the Board's screening of the Project Proposal, the Board has identified a series of specific issues. Below is a summary of the Board's views and conclusions regarding the potential for the Project Proposal to have significant negative impacts. The NIRB has also proposed terms and conditions that would prevent, mitigate and adaptively manage the potential for adverse impacts. The NIRB has recommended terms and conditions that require the proponent to monitor and report to the NIRB as the project progresses. These requirements ensure all commitments are fulfilled, mitigation measures remain effective, terms and conditions are properly implemented, and potential impacts are identified and adaptively managed.

Ecosystem, wildlife habitat and Inuit harvesting activities:

Valued Component	Ecosystem Integrity and Wildlife Habitat (with emphasis on Caribou)
Potential effects:	<p>Exploration activities including helicopter transport, drilling operations, use of existing camps, and overland travel may result in temporary disturbance to wildlife. Particular concern was raised regarding potential disturbance to caribou during calving, post-calving, and sensitive seasonal periods. Noise, low-level aircraft activity, and ground-based operations may result in short-term avoidance behaviour or temporary displacement.</p> <p>In combination with other past, present, and reasonably foreseeable activities in the region, the Project may contribute incrementally to cumulative disturbance within wildlife habitat and tundra ecosystems.</p>
Nature of Impacts:	Direct habitat alteration is expected to be limited and localized; however, indirect disturbance from aircraft noise and human presence may extend beyond the immediate project footprint. The Project occurs within the seasonal range of the Beverly and Qamanirjuaq caribou herd, including areas used during migration and calving and post-calving grounds. Disturbance during these sensitive periods may have elevated ecological relevance. While impacts are anticipated to be temporary and reversible at the project scale, cumulative disturbance associated with multiple exploration projects in the region remains a relevant consideration.
Mitigating Factors:	Disturbance would be minimized using existing infrastructure, seasonal access planning, and adherence to wildlife interaction protocols. Aircraft flight restrictions and setback requirements would reduce wildlife disturbance. Fuel and hazardous materials would be stored within secondary containment systems, supported by routine inspection and spill response procedures. Disturbed areas would be stabilized following completion of activities.
Proposed Terms and Conditions:	<p>Waste Management: 6</p> <p>Noise: 17</p> <p>Wildlife General – 18 through 22</p> <p>Migratory Birds and Raptors Disturbance-23 through 24</p> <p>Aircraft Flight Restrictions – 25 through 30</p> <p>Caribou and Muskox – 31 through 37</p> <p>Ground Disturbance – 38 and 43</p>

Valued Component	Water Resources
Potential effects:	Drilling activities, temporary camp operations, fuel storage, and refuelling activities have the potential to affect surface water and groundwater quality. Accidental releases of fuel, lubricants, or drilling additives could result in localized contamination if not effectively contained and remediated. Given the Arctic setting, seasonal thaw and

Valued Component	Water Resources
	interconnected surface water systems may increase sensitivity to spill-related impacts. During the comment period, spill prevention and response planning were identified as areas requiring clarification. As such, water quality protection remains a key consideration for this Project.
Nature of Impacts:	Potential impacts are primarily related to water quality rather than water quantity and would be localized to areas near active operations. No watercourse diversions or permanent water control structures are proposed. The risk pathway is associated with accidental releases rather than routine operations. In a regional context, the Project may contribute incrementally to cumulative pressures on water resources, particularly where other exploration activities are occurring.
Mitigating Factors:	The Project is subject to strengthened fuel storage, inspection, reporting, and spill response requirements. Secondary containment systems, routine inspection protocols, and immediate reporting obligations reduce the likelihood and severity of contamination events. Drill holes and sumps would be properly managed and sealed at the end of each field season.
Proposed Terms and Conditions:	Fuel and Chemical Storage: 7 through 16 Ground Disturbance: 38 through 43 Drilling – General: 44 through 46 Drilling on Land: 47 through 51 Drilling on Ice: 52 through 53 Land Use and Restoration of Disturbed Areas: 54 through 58

Valued Component	Cultural Land Use and Access
Potential effects:	Exploration activities, including temporary camp establishment, helicopter transport, drilling operations, and overland travel, may interact with areas used for travel, harvesting, or other traditional land use activities. Increased aircraft traffic and localized ground disturbance may temporarily affect access routes or create avoidance behaviour in nearby wildlife, which could indirectly influence land use patterns. The presence of industrial activity may also affect perceptions of land use quality or safety within the project area. When considered alongside other regional exploration activities, there is potential for cumulative interaction with traditional land use and access within the broader landscape.
Nature of Impacts:	Potential impacts are expected to be localized and temporary, occurring during periods of active exploration. No permanent infrastructure or access restrictions are proposed. Effects would primarily relate to short-term disruption or perceived changes in land use conditions.

Valued Component	Cultural Land Use and Access
	The Project's contribution to cumulative effects would be associated with the timing and location of seasonal activities relative to traditional land use patterns.
Mitigating Factors:	The Proponent is required to avoid interference with harvesting and traditional land use activities. Engagement with local residents and incorporation of Inuit Qaujimaningit are encouraged to inform operational planning. Wildlife protection measures and seasonal operational controls reduce indirect impacts on harvesting access. Disturbed areas would be stabilized following completion of activities.
Proposed Terms and Conditions:	Wildlife – General: 18 through 22 Aircraft Flight Restrictions: 25 through 30 Caribou and Muskoxen: 31 through 37 Ground Disturbance: 38 through 43 Other (Engagement and Land Use): 62 through 64

Socio-economic effects on northerners:

Valued Component	Archaeological and Cultural Heritage Sites
Potential effects:	Ground disturbance associated with drill pad preparation, temporary trail development, camp expansion, and equipment movement has the potential to inadvertently disturb undiscovered archaeological or palaeontological resources. Surface disturbance, soil excavation, or repeated vehicle traffic could damage or alter heritage features if present within the project area. No known designated heritage sites are identified within the immediate project footprint; however, previously undocumented sites may exist.
Nature of Impacts:	Any disturbance to archaeological or cultural heritage resources would be localized to the area of ground disturbance. Impacts to heritage sites are considered irreversible if destruction or alteration occurs. The likelihood of impact is dependent on the presence of previously unidentified resources within the active work areas.
Mitigating Factors:	Project personnel would be informed of heritage protection requirements prior to commencement of activities. Activities would avoid known heritage locations. If archaeological or palaeontological materials are encountered, work would cease in the immediate area, and the appropriate authority would be notified. A buffer zone would be maintained around identified sites in accordance with regulatory requirements.
Proposed Terms and Conditions:	General: 1 through 5 Ground Disturbance: 38 through 43 Drilling-General: 59 through 60 Heritage Sites: 59 through 61

Significant public concern:

Valued Component	Public Concern
Potential effects:	During the review process, comments were received regarding spill prevention and response planning, potential disturbance to wildlife particularly caribou and protection of water resources. Concerns also related to cumulative regional activity within caribou range and the protection of culturally significant land use areas. These concerns reflect the sensitivity of Arctic ecosystems and the importance of wildlife and land use to local communities.
Nature of Impacts:	Public concern relates primarily to environmental protection, cumulative regional activity, and confidence in mitigation and monitoring measures. The level and scope of concern would inform the Board’s assessment of significance.
Mitigating Factors:	The Project is subject to detailed Terms and Conditions addressing fuel storage, spill response, wildlife protection, aircraft operations, and engagement with local residents. Clarifications provided during the comment period strengthen operational controls and transparency.
Proposed Terms and Conditions:	General: 1 through 5 Fuel and Chemical Storage: 7 through 16 Wildlife – General: 18 through 22 Migratory Birds: 23 through 24 Aircraft Flight Restrictions: 25 through 30 Caribou and Muskoxen: 31 through 37 Land Use and Restoration of Disturbed Areas: 54 through 58 Other (Engagement and Land Use): 62 through 64

Technological innovations for which the effects are unknown:

- No specific issues have been identified associated with this project proposal.

Administrative Conditions:

To encourage compliance with applicable regulatory requirements and assist the Board and responsible authorities with compliance and effects monitoring for project activities, the following project-specific terms and conditions have been recommended: 1-5.

In considering the above factors and subject to the Proponent’s compliance with regulatory requirements and the terms and conditions necessary to mitigate against the potential adverse environmental and social effects, the Board is of the view that the proposed project is unlikely to cause significant public concern and its adverse ecosystemic and socioeconomic impacts are unlikely to be significant, or are highly predictable and can be adequately mitigated by known technologies.

The Board is recommending the following specific terms and conditions to apply in respect of the project:

General

1. 1517081 B.C. LTD (the Proponent) shall maintain a copy of the Project Terms and Conditions at the site of operation at all times and make it accessible to enforcement officers upon request.
2. The Proponent shall operate in accordance with all commitments stated in correspondence provided to the Nunavut Planning Commission (NPC File No.:150967), and the NIRB (Online Application Form, February 11, 2026). This information should be accessible to enforcement officers upon request.
3. The Proponent shall operate the site in accordance with all applicable Acts, Regulations and Guidelines.
4. The Proponent shall ensure that it meets the standards and/or limits as set out in the authorizing agencies' permits or licences as required for this project.
5. The Proponent shall ensure that all personnel, staff and contractors are adequately trained prior to commencement of all project activities, and shall be made aware of all operational plans, management plans, guidelines and Proponent commitments relating to the project.

Waste Management

6. The Proponent shall manage all hazardous and non-hazardous waste including food, domestic wastes, debris and petroleum-based chemicals (e.g., greases, gasoline, glycol-based antifreeze) in such a manner to avoid release into the environment and access to wildlife at all times until disposed of appropriately or at an approved facility.

Fuel and Chemical Storage

7. The Proponent shall locate all fuel and other hazardous materials a minimum distance away from the high-water mark of any water body and environmentally sensitive areas as required by the appropriate authorizing agencies. The materials shall be stored in such a manner as to prevent their release into the environment.
8. The Proponent shall use adequate secondary containment or a surface liner (e.g., self-supporting insta-berms and fold-a-tanks) when storing barreled fuel and chemicals at all locations.
9. The Proponent shall ensure that re-fuelling of all equipment occurs a minimum distance away from the high-water mark of any water body as required by the appropriate authorizing agencies.
10. Fuel and hazardous material storage areas and fuel lines should be clearly marked with signs or flagging to avoid accidental breaks and punctures, and to ensure areas remain visible during the winter months.
11. All fuel and chemical storage containers must be clearly marked with the Proponent's name for ease of identification.
12. The Proponent shall routinely inspect and document the conditions of fuel and hazardous material storage containers and containment areas as required by the appropriate

authorizing agencies. Fuel containment areas shall be kept clear of debris, water and snow to facilitate inspections for leaks.

13. The Proponent shall have a Spill Contingency Plan in place at all fuel storage or transfer locations and shall ensure that appropriate spill response equipment and clean-up materials (e.g., shovels, pumps, barrels, drip pans, and absorbents) are readily available.
14. The Proponent shall follow the authorizing agencies' direction for management and removal of hazardous materials and wastes (e.g., contaminated soils, sediment and waste oil).
15. The Proponent shall ensure that wildlife deterrent systems are utilized at the time of a spill incident in order to avoid wildlife (terrestrial or marine) and migratory birds from being contaminated.
16. The Proponent shall ensure that all spills of fuel or other deleterious materials of 100 litres or more must be reported immediately to the 24-hour Spill Line at (867) 920-8130.

Noise

17. All construction and road vehicles must be fitted with standard and well-maintained noise suppression devices.

Wildlife – General

18. The Proponent shall not substantially alter or damage or destroy any wildlife habitat in conducting this operation unless otherwise authorized by the appropriate authorizing agencies.
19. The Proponent shall not chase, weary, harass or molest wildlife. This includes persistently circling, chasing, hovering over, pursuing or in any other way harass wildlife, or disturbing large groups of animals.
20. The Proponent shall not hunt or fish, unless proper Nunavut authorizations have been acquired.
21. The Proponent shall ensure that all wildlife have the right-of-way on any roads or trails. Vehicles are required to slow down or stop and wait to permit the free and unrestricted movement of wildlife across roads or trails at any location.
22. The Proponent shall ensure that drivers maintain spacing appropriate for driving and road conditions, and speed limits, to ensure drivers have time to safely react to any wildlife on the road.

Migratory Birds and Raptors Disturbance

23. The Proponent shall carry out all phases of the project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines. The Proponent's actions in applying the Avoidance Guidelines shall be in compliance with the Migratory Birds Convention Act, 1994 and with the Species at Risk Act.
24. The Proponent shall not disturb or destroy the nests or eggs of any birds. If active nests of any birds are discovered or located (i.e., with eggs or young), the Proponent shall avoid these areas until nesting is complete and the young have naturally left the vicinity of the nest by establishing a protection buffer zone appropriate for the species and the surrounding habitat.

Aircraft Flight Restrictions

25. The Proponent shall not alter flight paths to approach wildlife and avoid flying directly over animals.
26. The Proponent shall plan flight paths that minimize flights over known habitat likely to have birds or concentrations of wildlife. Aircraft should avoid critical and sensitive wildlife areas at all times by choosing alternate flight corridors.
27. The Proponent shall restrict aircraft/helicopter activity related to the project to a minimum flight altitude of 610 metres (2,100 ft) above ground level except during landing, take-off or if there is a specific requirement for low-level flying, which does not disturb wildlife or migratory birds.
28. The Proponent shall avoid known concentrations of birds (e.g., bird colonies, moulting areas) by a lateral distance of 1.5 kilometre. If avoidance is not possible maintain a minimum flight altitude of 1,100 metres (3,500 feet) over these areas.
29. The Proponent shall ensure that aircraft/helicopter do not, unless for emergency, touch-down in areas where wildlife is present.
30. The Proponent shall advise all pilots of relevant flight restrictions and enforce their application over the project area, including flight paths to/from the project area.

Caribou and Muskoxen Disturbance

31. The Proponent shall avoid interfering with any paths or crossings known to be frequented by caribou during periods of migration as identified by current land use plans in place and/or by Inuit Qaujimaningit.
32. The Proponent shall not locate any operation or undertake activities that could block or cause any diversion to migration of caribou or muskoxen.
33. The Proponent shall implement mobile caribou conservation measures and immediately cease activities that may interfere with the migration or calving of caribou or muskox, until the caribou or muskox have passed.
34. The Proponent shall not construct or operate any camp, cache any fuel or conduct blasting within ten (10) kilometres, or conduct any drilling operation within five (5) kilometres of any designated caribou water crossings.
35. During the period of May 15 to July 15, the Proponent shall suspend all operations and activities outside the immediate vicinity of the camps. Restricted activities include, but are not limited to, air and vehicle traffic, loud or repetitive noise or vibration disturbances, low-level over flights, blasting, and use of mobile equipment including snowmobiles and all terrain vehicles, and personnel walking within sight of the caribou group(s), until the caribou are no longer in the immediate area. Should the results of localized monitoring satisfy the land use inspector the project operations may resume without disturbing pregnant caribou cows or cows with young calves the suspension may be lifted for the periods specified.
36. Should pregnant caribou cows, cows with young calves, or groups of 50 or more caribou be observed within one (1) kilometer of project operations at any time, the Proponent shall suspend all operations in the vicinity, including low level overflights, drilling, blasting/trenching, and use of snowmobiles and all terrain vehicles outside the immediate vicinity of the camp, until caribou are no longer in the immediate area.
37. During the period of April 14 to June 1 when muskoxen are present, the Proponent shall not approach muskoxen closer than one (1) kilometer. This includes all operations,

including low-level over flights, blasting, and use of snowmobiles and all-terrain vehicles outside the immediate vicinity of the camps.

Ground Disturbance

38. The Proponent shall not move any equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging. Overland travel of equipment or vehicles must be suspended if rutting occurs.
39. The Proponent shall ensure snowbank heights along the road/trail are managed to allow wildlife visibility and passage. Further, the Proponent shall ensure breaks are created along snowbanks along the road/trail at regular intervals to allow wildlife passage.
40. The Proponent shall select a winter route that maximizes the use of frozen water bodies.
41. The Proponent shall not move any equipment or vehicles without prior testing the thickness of the ice to ensure the lake, river or stream is in a state capable of fully supporting the equipment or vehicles.
42. The Proponent shall ensure that stream crossings and/or temporary crossings constructed from ice and snow, which may cause jams, flooding or impede fish passage and or water flow, are removed or notched prior to spring break-up.
43. The Proponent shall ensure sufficient thickness of snow and ice is present on the winter road to prevent unnecessary erosion of the underlying ground surface and impact on underneath vegetation.

Drilling – General

44. The Proponent shall not allow any drilling wastes to spread to the surrounding lands or water bodies.
45. The Proponent shall ensure that that any deleterious substances (as defined in the Fisheries Act) resulting from its activities do not enter into any water bodies frequented by fish.
46. The Proponent shall ensure that all drill areas are constructed to facilitate minimizing the environmental footprint of the project area.

Drilling on Land

47. The Proponent shall not conduct any land-based drilling or mechanized clearing activities a minimum distance of the normal high-water mark of any water body as required by an authorizing agency.
48. If an artesian flow is encountered, the Proponent shall ensure the drill hole is immediately plugged and permanently sealed.
49. The Proponent shall ensure that all sump/depression capacities are sufficient to accommodate the volume of wastewater and any fines that are produced. The sumps shall only be used for inert drilling fluids, and not any other materials or substances.
50. The Proponent shall not locate any sumps within a minimum distance of the normal high-water mark of any water body as required by an authorizing agency.
51. The Proponent shall ensure all drill holes are backfilled or capped prior to the end of each field season. All sumps must be backfilled and restored to original or stable profile prior to the end of each field season.

Drilling on Ice

52. The Proponent shall ensure that drill muds and additives are not used in connection with holes drilled through lake ice unless they are re-circulated or contained such that they do not enter the water body or are demonstrated to be non-toxic.
53. The Proponent shall ensure that all drill cuttings are removed from ice surfaces daily.

Land Use and Restoration of Disturbed Areas

54. The Proponent shall use existing trails where possible during project activities on the land.
55. The Proponent shall ensure that the land use area is kept clean and tidy at all times.
56. The Proponent shall avoid disturbance on slopes prone to natural erosion, and alternative locations shall be utilized.
57. The Proponent shall remove all garbage, fuel and equipment at the end of each field season and/or upon completion of work and/or upon abandonment.
58. The Proponent shall ensure that all disturbed areas are restored to a stable or pre-disturbed state using Best Available Technology Economically Achievable (BATEA) upon completion of work and/or abandonment.

Heritage Sites

59. The Proponent shall ensure that archaeological and paleontological sites are not purposely or inadvertently disturbed by clients or staff as a result of project activities.
60. The Proponent shall ensure that all clients and staff are aware of the Proponent's responsibilities and requirements regarding archaeological or palaeontological sites that are encountered during land-based activities. This should include briefings explaining the prohibitions regarding removal of artifacts, and defacing or writing on rocks and infrastructure.
61. No activities shall be conducted in the vicinity (50 metres buffer zone) of any archaeological/historical sites. If archaeological sites or features are encountered, activities shall immediately be interrupted and moved away from this location. Each site encountered needs to be recorded and reported to the Government of Nunavut-Department of Culture and Heritage.

Other

62. The Proponent should consult with local residents regarding their activities in the area and solicit available Inuit Qaujimaningit and information that can inform project activities.
63. The Proponent shall ensure that project activities do not interfere with wildlife harvesting or traditional land use activities.
64. The Proponent should, to the extent possible, hire local people and access local services where possible.

MONITORING AND REPORTING REQUIREMENTS

In addition, the Board is recommending the following:

Community Consultation Report:

1. The Proponent shall submit a community engagement strategy plan and a public consultation report to the Nunavut Impact Review Board as follows:

- a. Community Engagement Strategy Plan should be provided prior to the commencement of project activities and include:
 - i. information on how the Proponent plans to inform local residents of the project proposal; and
 - ii. how the community will be briefed on the monitoring results.
- b. Public Consultation Report should be provided following completion of project activities and include:
 - i. copy of materials presented to community members;
 - ii. a description of issues and concerns raised; and
 - iii. advice offered to the Proponent as well as any follow-up actions that were required or taken to resolve any concerns expressed about the project.

Annual Report

2. The Proponent shall submit a comprehensive annual report with copies provided to the Nunavut Impact Review Board, Crown-Indigenous Relations and Northern Affairs Canada, Athabasca Denesūliné NÉNé Land Corporation and the Beverly and Qamanirjuaq Caribou Management Board, by March 31st of each year of permitted activities beginning March 31, 2027. The annual report must contain at least the following information:
 - a) A summary of activities undertaken for the year, including:
 - a map showing the approximate location of drill sites;
 - a map showing the location of the fuel cache;
 - a description of local hires, contracting opportunities and initiatives;
 - flight altitudes, frequency of flights and anticipated flight routes;
 - site photos;
 - b) A work plan for the following year, including any progressive reclamation work undertaken;
 - c) A summary of community consultations undertaken throughout the year, providing copy of materials presented to community members, a description of issues and concerns raised, discussions with community members and advice offered to the company as well as any follow-up actions that were required or taken to resolve any concerns expressed about the project proposal;
 - d) A log of instances in which community residents occupy or transit through the project area for the purpose of traditional land use or harvesting. This log should include the location and number of people encountered, activity being undertaken (e.g., berry picking, fishing, hunting, camping, etc.), date and time; and any mitigation measures or adaptive management undertaken to prevent disturbance;
 - e) A discussion of issues related to wildlife and environmental monitoring, including the number of cease-work orders required as a result of proximity to caribou and any other wildlife;
 - f) A brief summary of WMMP results as well as any mitigation actions that were undertaken. In addition, the Proponent shall maintain a record of wildlife observations while operating within the project area and include it as part of the summary report. The summary report based on wildlife observations should include the following:

1. Locations (i.e., latitude and longitude), species, number of animals, a description of the animal activity, and a description of the gender and age of animals if possible.
 2. Prior to conducting project activities, the Proponent should map the location of any sensitive wildlife sites such as denning sites, calving areas, caribou crossing sites, and raptor nests in the project area, and identify the timing of critical life history events (i.e., calving, mating, denning and nesting).
 3. Additionally, the Proponent should indicate potential impacts from the project, and ensure that operational activities are managed and modified to avoid impacts on wildlife and sensitive sites.
- g) An analysis of the effectiveness of mitigation measures for wildlife;
 - h) Summary of any heritage sites encountered during the exploration activities, any follow-up action or reporting required as a result and how project activities were modified to mitigate impacts on the heritage sites;
 - i) Summary of its knowledge of Inuit land use in/near the project area and explain how project activities were modified to mitigate impacts on Inuit land use; and
 - j) A summary of how the Proponent has complied with conditions contained within this Screening Decision, and all conditions as required by other authorizations associated with the project proposal.

OTHER NIRB CONCERNS AND RECOMMENDATIONS

In addition to the project-specific terms and conditions, the Board is recommending the following:

Change in Project Scope

1. Responsible authorities or Proponent shall notify the Nunavut Planning Commission and/or Parks Canada as appropriate, and the NIRB of any changes in operating plans or conditions, including phase advancement, associated with this project prior to any such change.

Copy of licences, etc. to the Board and Commission

2. The NIRB respectfully requests that responsible authorities submit a copy of each licence, permit or other authorization issued for the Project to the NIRB to assist in enabling possible project monitoring that may be required. Please forward a copy of the licences, permits and/or other authorizations to the NIRB directly at info@nirb.ca or upload a copy to the NIRB's online registry at www.nirb.ca.

Use of Inuit Qaujimaningit

3. The Proponent is encouraged to work with local communities and knowledge holders to inform project design, to carry out the project, and to confirm or validate the perspectives represented in publications, and reports as part of the project. Care should be taken to ensure that Inuit Qaujimaningit and local knowledge collected for the project is used with permission and is accurately represented.

Bear and Carnivore Safety

4. The Proponent should review the Government of Nunavut's booklet on Bear Safety, which can be downloaded from this link: http://gov.nu.ca/sites/default/files/bear_safety_-_reducing_bear-people_conflicts_in_nunavut.pdf. Further information on bear/carnivore detection and deterrent techniques can be found in the "*Safety in Grizzly and Black Bear Country*" pamphlet, which can be downloaded from this link: https://www.enr.gov.nt.ca/sites/enr/files/resources/safety_in_grizzly_and_black_bear_country_english.pdf.
5. There are polar bear and grizzly bear safety resources available from the Bear Smart Society with videos on polar bear safety available in English, French and Inuktitut at <http://www.bearsmart.com/play/safety-in-polar-bear-country/>. Information can also be obtained from Parks Canada's website on bear safety at the following link: <http://www.pc.gc.ca/eng/pn-np/nu/quttinirpaaq/visit/visit6/d.aspx> or in reviewing the "*Safety in Polar Bear Country*" pamphlet, which can be downloaded from the following link: http://www.pc.gc.ca/eng/pnnp/nu/quttinirpaaq/visit/visit6/~media/pnnp/nu/auyuittuq/pdf/shared/PolarBearSafety_English.ashx
6. Any problem wildlife or any interaction with carnivores should be reported immediately to the local Government of Nunavut, Department of Environment Conservation Office (Conservation Officer of Baker Lake, phone: (867) 793-2944).

Species at Risk

7. The Proponent review Environment and Climate Change Canada's "Environment Assessment Best Practice Guide for Wildlife at Risk in Canada", available at the following link: http://www.sararegistry.gc.ca/virtual_sara/files/policies/EA%20Best%20Practices%202004.pdf. The guide provides information to the Proponent on what is required when Wildlife at Risk, including *Species at Risk*, are encountered or affected by the project

Migratory Birds

8. The Proponent review Canadian Wildlife Services' "Key migratory bird terrestrial habitat sites in the Northwest Territories and Nunavut", available at the following link: <http://publications.gc.ca/site/eng/317630/publication.html> and "Key marine habitat sites for migratory birds in Nunavut and the Northwest Territories", available at the following link: <http://publications.gc.ca/site/eng/392824/publication.html>. The guide provides information to the Proponent on key terrestrial and marine habitat areas that are essential to the welfare of various migratory bird species in Canada
9. For further information on how to protect migratory birds, their nests and eggs when planning or carrying out project activities, consult Environment and Climate Change Canada's Incidental Take web page and the fact sheet "Planning Ahead to Reduce the Risk of Detrimental Effects to Migratory Birds, and their Nests and Eggs" available at: http://publications.gc.ca/collections/collection_2013/ec/CW66-324-2013-eng.pdf

Heritage Resources

10. During the assessment, the NIRB has identified that no archaeology surveys have been conducted in the proposed project areas and that potential for the presence of archaeological resources is likely, therefore the Proponent shall contact the Department of

Culture and Heritage to initiate a field archaeology assessment program prior to undertaking any land disturbance activities.

Aircraft Identification

11. The Proponent shall provide the community of Baker Lake the planned helicopter activities, including photo(s) of the helicopter to be used, approximate flight paths, plans and times as available prior to commencement of activities to ensure community members are aware of the planned activities.

Caribou Management

12. Territorial and federal government agencies in Nunavut should work together with Regional Inuit Associations, co-management boards and industry to develop an action plan to identify and mitigate potential cumulative effects of human land use activities, including mineral exploration, on barren-ground caribou. This assessment of cumulative effects should occur at a regional scale (i.e., larger than individual project areas).
13. Territorial and federal government agencies update the Caribou Protection Map with updated data and information from the Beverly Qamanirjuaq Caribou Management Board.
14. As a result of expressed concerns regarding mineral exploration and the associated potential for cumulative effects on caribou and caribou habitat within the Kivalliq region, the NPC, territorial and federal government agencies should work together with Regional Inuit Associations, co-management boards, the public, and industry to develop a plan that identifies appropriate land use in these areas prior to potential mineral exploration. The plan should identify and mitigate potential cumulative effects of human land use activities on barren-ground caribou on both localized and regional scales.

Crown Indigenous and Northern Affairs Canada

15. Crown Indigenous and Northern Affairs Canada (CIRNAC) impose mitigation measures, conditions and monitoring requirements pursuant to the Federal Land Use Permit, which require the Proponent to respect the sensitivities and importance of the area. These mitigation measures, conditions and monitoring requirements should be in regard to the location and area; type, location, capacity and operation of facilities; use, storage, handling and disposal of chemical or toxic material; wildlife and fisheries habitat; and petroleum fuel storage.
16. CIRNAC consider the importance of conducting regular Land Use Inspections, pursuant to the authority of the Federal Land Use Permit, while the project is in operation. The Land Use Inspections should be focused on ensuring the Proponent is in compliance with the conditions imposed through the Federal Land Use Permit.
17. CIRNAC forward to the NIRB copies of any decisions by Inspectors which allow project activities to continue in areas of caribou presence between dates indicating work stoppages are necessary (exemptions from Caribou Protection Measures).
18. It is recommended to CIRNAC that no extension be issued to the Land Use Permit until Spill Contingency Plan report is received.

Kivalliq Inuit Association

19. The Kivalliq Inuit Association impose strict mitigation measures and/or conditions upon the Proponent pursuant to the Inuit Owned Lands License in regard to fuel and chemical storage, drilling, water conditions, ground disturbance, and wildlife on Inuit Owned Lands.

Nunavut Water Board

20. The Nunavut Water Board impose mitigation measures, conditions and monitoring requirements pursuant to the Water Licence, which require the Proponent to respect the sensitivities and importance of water in the area. These mitigation measures, conditions and monitoring requirements should be in regard to use of water, snow and ice; waste disposal; access infrastructure and operation for camps; drilling operations; spill contingency planning; abandonment and restoration planning; and monitoring programs.

Crown Indigenous and Northern Affairs Canada – Water Resources Division

21. CIRNAC – Water Resources Division should consider the importance of conducting regular inspections, pursuant to the authority of the *Nunavut Waters and Nunavut Surface Rights Tribunal Act*, while the project is in operation. Inspectors should focus on ensuring the Proponent is in compliance with the conditions imposed through the Water Licence.

CONCLUSION

The foregoing constitutes the Board's screening decision with respect to the 1517081 B.C. LTD "Victory Lake". The NIRB remains available for consultation with the Minister regarding this report as necessary.

Dated May 4, 2026 at Iqaluit, NU.



Albert Ehaloak, Chairperson

Attachments: Appendix A: Species at Risk in Nunavut
Appendix B: Archaeological and Palaeontological Resources Terms and Conditions for Land Use Permit Holders

APPENDIX A: SPECIES AT RISK IN NUNAVUT

Due to the requirements of Section 79(2) of the *Species at Risk Act*, S.C. 2002, c. 29 (*SARA*), and the potential for project-specific adverse effects on listed wildlife species and its critical habitat, measures should be taken as appropriate to avoid or lessen those effects, and the effects need to be monitored. Project effects could include species disturbance, attraction to operations and destruction of habitat. This section applies to all species listed on Schedule 1 of *SARA*, as listed in the table below, or have been assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC), which may be encountered in the project area. This list may not include all species identified as at risk by the Territorial Government. The following points provide clarification on the applicability of the species outlined in the table.

- Schedule 1 is the official legal list of Species at Risk for *SARA*. *SARA* applies to all species on Schedule 1. The term “listed” species refers to species on Schedule 1.
- Schedule 2 and 3 of *SARA* identify species that were designated at risk by the COSEWIC prior to October 1999 and must be reassessed using revised criteria before they can be considered for addition to Schedule 1.
- Some species identified at risk by COSEWIC are “pending” addition to Schedule 1 of *SARA*. These species are under consideration for addition to Schedule 1, subject to further consultation or assessment.

If species at risk are encountered or affected, the primary mitigation measure should be avoidance. The Proponent should avoid contact with or disturbance to each species, its habitat and/or its residence. All direct, indirect, and cumulative effects should be considered. Refer to species status reports and other information on the Species at Risk Registry at <http://www.sararegistry.gc.ca> for information on specific species.

Monitoring should be undertaken by the Proponent to determine the effectiveness of mitigation and/or identify where further mitigation is required. As a minimum, this monitoring should include recording the locations and dates of any observations of Species at Risk, behaviour or actions taken by the animals when project activities were encountered, and any actions taken by the proponent to avoid contact or disturbance to the species, its habitat, and/or its residence. This information should be submitted to the appropriate regulators and organizations with management responsibility for that species, as requested.

For species primarily managed by the Territorial Government, the Territorial Government should be consulted to identify other appropriate mitigation and/or monitoring measures to minimize effects to these species from the project.

Mitigation and monitoring measures must be undertaken in a way that is consistent with applicable recovery strategies and action/management plans.

Schedules of *SARA* are amended on a regular basis, so it is important to check the *SARA* registry (www.sararegistry.gc.ca) to get the current status of a species.

Updated: September 2024

Terrestrial Species at Risk ¹	COSEWIC Designation	Schedule of SARA	Government Organization with Primary Management Responsibility ²
Buff-breasted Sandpiper	Special Concern	Schedule 1	Environment and Climate Change Canada (ECCC)
Common Nighthawk	Threatened	Schedule 1	ECCC
Eskimo Curlew	Endangered	Schedule 1	ECCC
Harlequin Duck	Special Concern	Schedule 1	ECCC
Harris's Sparrow	Special Concern	Schedule 1	ECCC
Horned Grebe	Special Concern	Schedule 1	ECCC
Ivory Gull	Endangered	Schedule 1	ECCC
Olive-sided Flycatcher	Threatened	Schedule 1	ECCC
Peregrine Falcon	Special Concern	Schedule 1	ECCC
Red Knot Islandica Subspecies	Special Concern	Schedule 1	ECCC
Red-necked Phalarope	Special Concern	Schedule 1	ECCC
Ross's Gull	Threatened	Schedule 1	ECCC
Rusty Blackbird	Special Concern	Schedule 1	ECCC
Short-eared Owl	Special Concern	Schedule 1	ECCC
Porsild's Bryum	Threatened	Schedule 1	Government of Nunavut (GN)
Transverse Lady Beetle	Special Concern	No Schedule	GN
Caribou (Dolphin and Union Population)	Endangered	Schedule 1	GN
Caribou (Barren-ground Population)	Threatened	No Schedule	GN
Caribou (Torngat Mountains Population)	Endangered	No Schedule	GN
Grizzly Bear (Western Population)	Special Concern	Schedule 1	ECCC
Peary Caribou	Endangered	Schedule 1	GN
Polar Bear	Special Concern	Schedule 1	ECCC
Wolverine	Special Concern	Schedule 1	GN
Atlantic Walrus (High Arctic Population)	Special Concern	No Schedule	Fisheries and Oceans Canada (DFO)
Atlantic Walrus (Central/Low Arctic Population)	Special Concern	No Schedule	DFO
Beluga Whale (Cumberland Sound Population)	Threatened	Schedule 1	DFO
Beluga Whale (Eastern Hudson Bay Population)	Endangered	No Schedule	DFO
Beluga Whale (Eastern High Arctic-Baffin Bay Population)	Special Concern	No Schedule	DFO
Beluga Whale (Western Hudson Bay Population)	Special Concern	No Schedule	DFO
Atlantic Cod (Arctic Lakes Population)	Special Concern	No Schedule	DFO
Fourhorn Sculpin (Freshwater Form)	Data Deficient	Schedule 3	DFO
Lumpfish	Threatened	No Schedule	DFO
Thorny Skate	Special Concern	No Schedule	DFO

¹ The Department of Fisheries and Oceans has responsibility for aquatic species.

² Environment and Climate Change Canada (ECCC) has a national role to play in the conservation and recovery of Species at Risk in Canada, as well as responsibility for management of birds described in the Migratory Birds Convention Act (MBCA). Day-to-day management of terrestrial species not covered in the MBCA is the responsibility of the Territorial Government. Populations that exist in National Parks are also managed under the authority of the Parks Canada Agency.

**APPENDIX B: ARCHAEOLOGICAL AND PALAEOLOGICAL RESOURCES TERMS AND
CONDITIONS FOR LAND USE PERMIT HOLDERS**



INTRODUCTION

The Department of Culture and Heritage (CH) routinely reviews land use applications sent to the Nunavut Water Board, Nunavut Impact Review Board and the Indigenous and Northern Affairs Canada. These terms and conditions provide general direction to the permittee/proponent regarding the appropriate actions to be taken to ensure the permittee/proponent carries out its role in the protection of Nunavut’s archaeological and palaeontological resources.

TERMS AND CONDITIONS

- 1) The permittee/proponent shall have a professional archaeologist and/or palaeontologist perform the following **Functions** associated with the **Types of Development** listed below or similar development activities:

	Types of Development (See Guidelines below)	Function (See Guidelines below)
a)	Large scale prospecting	Archaeological/Palaeontological Overview Assessment
b)	Diamond drilling for exploration or geotechnical purpose or planning of linear disturbances	Archaeological/Palaeontological Overview Assessment and/or Inventory and Documentation and/or Mitigation
c)	Construction of linear disturbances, Extractive disturbances, Impounding disturbances and other land disturbance activities	Archaeological/Palaeontological Overview Assessment and/or Inventory and Documentation and/or Mitigation

Note that the above-mentioned functions require either a Nunavut Archaeologist Permit or a Nunavut Palaeontologist Permit. CH is authorized by way of the *Nunavut and Archaeological and Palaeontological Site Regulations*³ to issue such permits.

³ P.C. 2001-1111 14 June, 2001

- 2) The permittee/proponent shall not operate any vehicle over a known or suspected archaeological or palaeontological site.
- 3) The permittee/proponent shall not remove, disturb, or displace any archaeological artifact or site, or any fossil or palaeontological site.
- 4) The permittee/proponent shall immediately contact CH at (867) 934-2046 or (867) 975-5500 should an archaeological site or specimen, or a palaeontological site or fossil, be encountered or disturbed by any land use activity.
- 5) The permittee/proponent shall immediately cease any activity that disturbs an archaeological or palaeontological site encountered during the course of a land use operation until permitted to proceed with the authorization of CH.
- 6) The permittee/proponent shall follow the direction of CH in restoring disturbed archaeological or palaeontological sites to an acceptable condition. If these conditions are attached to either a Class A or B Permit under the Territorial Lands Act Indigenous and Northern Affairs Canada directions will also be followed.
- 7) The permittee/proponent shall provide all information requested by CH concerning all archaeological sites or artifacts and all palaeontological sites and fossils encountered in the course of any land use activity.
- 8) The permittee/proponent shall make best efforts to ensure that all persons working under its authority are aware of these conditions concerning archaeological sites and artifacts and palaeontological sites and fossils.
- 9) If a list of recorded archaeological and/or palaeontological sites is provided to the permittee/proponent by CH as part of the review of the land use application the permittee/proponent shall avoid the archaeological and/or palaeontological sites listed.
- 10) Should a list of recorded sites be provided to the permittee/proponent, the information is provided solely for the purpose of the proponent's land use activities as described in the land use application, and must otherwise be treated confidentially by the proponent.

Legal Framework

As stated in Article 33 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)*:

Where an application is made for a land use permit in the Nunavut Settlement Area, and there are reasonable grounds to believe that there could be sites of archaeological importance on the lands affected, no land use permit shall be issued without written consent of the Designated Agency. Such consent shall not be unreasonably withheld. [33.5.12]

Each land use permit referred to in Section 33.5.12 shall specify the plans and methods of archeological site protection and restoration to be followed by the permit holder, and any other conditions the Designated Agency may deem fit. [33.5.13]

Palaeontology and Archaeology

Under the *Nunavut Act*⁴, the federal government can make regulations for the protection, care and preservation of palaeontological and archaeological sites and specimens in Nunavut. Under the *Nunavut Archaeological and Palaeontological Sites Regulations*⁵, it is illegal to alter or disturb any palaeontological or archaeological site in Nunavut unless permission is first granted through the permitting process.

Definitions

As defined in the *Nunavut Archaeological and Palaeontological Sites Regulations*, the following definitions apply:

“archaeological site” means a place where an archaeological artifact is found.

“archaeological artifact” means any tangible evidence of human activity that is more than 50 years old and in respect of which an unbroken chain of possession or regular pattern of usage cannot be demonstrated, and includes a Denesuline archaeological specimen referred to in section 40.4.9 of the Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement).

“palaeontological site” means a site where a fossil is found.

“fossil” includes:

Fossil means the hardened or preserved remains or impression of previously living organisms or vegetation and includes:

- (a) natural casts;*
- (b) preserved tracks, coprolites and plant remains; and*
- (c) the preserved shells and exoskeletons of invertebrates and the preserved eggs, teeth and bones of vertebrates.*

Guidelines for Developers for the Protection of Archaeological Resources in the Nunavut Territory

(Note: Partial document only, complete document at: www.ch.gov.nu.ca/en/Archaeology.aspx)

Introduction

The following guidelines have been formulated to ensure that the impacts of proposed developments upon heritage resources are assessed and mitigated before ground surface altering activities occur. Heritage resources are defined as, but not limited to, archaeological and historical sites, burial grounds, palaeontological sites, historic buildings and cairns. Effective collaboration between the developer, the Department of Culture, and Heritage (CH), and the contract archaeologist(s) will ensure proper preservation of heritage resources in the Nunavut Territory. The roles of each are briefly described.

⁴ s. 51(1)

⁵ P.C. 2001-1111 14 June, 2001

CH is the Nunavut Government agency which oversees the protection and management of heritage resources in Nunavut, in partnership with land claim authorities, regulatory agencies, and the federal government. Its role in mitigating impacts of developments on heritage resources is as follows: to identify the need for an impact assessment and make recommendations to the appropriate regulatory agency; set the terms of reference for the study depending upon the scope of the development; suggest the names of qualified individuals prepared to undertake the study to the developer; issue an archaeologist or palaeontologist permit authorizing field work; assess the completeness of the study and its recommendations; and ensure that the developer complies with the recommendations.

The primary regulatory agencies that CH provides information and assistance to are the Nunavut Impact Review Board, for development activities proposed for Inuit Owned Lands (as defined in Section 1.1.1 of the *Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement)*), and the Indigenous and Northern Affairs Canada, for development activities proposed for federal Crown Lands.

A developer is the initiator of a land use activity. It is the obligation of the developer to ensure that a qualified archaeologist or palaeontologist is hired to perform the required study and that provisions of the contract with the archaeologist or palaeontologist allow permit requirements to be met; i.e. fieldwork, collections management, artifact and specimen conservation, and report preparation. On the recommendation of the contract archaeologist or palaeontologist in the field and the Government of Nunavut, the developer shall implement avoidance or mitigative measures to protect heritage resources or to salvage the information they contain through excavation, analysis, and report writing. The developer assumes all costs associated with the study in its entirety.

Through his or her active participation and supervision of the study, the contract archaeologist or palaeontologist is accountable for the quality of work undertaken and the quality of the report produced. Facilities to conduct fieldwork, analysis, and report preparation should be available to this individual through institutional, agency, or company affiliations. Responsibility for the curation of objects recovered during field work while under study and for documents generated in the course of the study as well as remittance of artifacts, specimens and documents to the repository specified on the permit accrue to the contract archaeologist or palaeontologist. This individual is also bound by the legal requirements of the *Nunavut Archaeological and Palaeontological Sites Regulations*.

Types of Development

In general, those developments that cause concern for the safety of heritage resources will include one or more of the following kinds of surface disturbances. These categories, in combination, are comprehensive of the major kinds of developments commonly proposed in Nunavut. For any single development proposal, several kinds of these disturbances may be involved

- *Linear disturbances: including the construction of highways, roads, winter roads, transmission lines, and pipelines;*
- *Extractive disturbances: including mining, gravel removal, quarrying, and land filling;*

- *Impoundment disturbances: including dams, reservoirs, and tailings ponds;*
- *Intensive land use disturbances: including industrial, residential, commercial, recreational, and land reclamation work, and use of heritage resources as tourist developments.*
- *Mineral, oil and gas exploration: establishment of camps, temporary airstrips, access routes, well sites, or quarries all have potential for impacting heritage resources.*

Types of Studies Undertaken to Preserve Heritage Resources

Overview: An overview study of heritage resources should be conducted at the same time as the development project is being designed or its feasibility addressed. They usually lack specificity with regard to the exact location(s) and form(s) of impact and involve limited, if any, field surveys. Their main aim is to accumulate, evaluate, and synthesize the existing knowledge of the heritage of the known area of impact. The overview study provides managers with baseline data from which recommendations for future research and forecasts of potential impacts can be made. A Class I Permit is required for this type of study if field surveys are undertaken.

Reconnaissance: This is done to provide a judgmental appraisal of a region sufficient to provide the developer, the consultant, and government managers with recommendations for further development planning. This study may be implemented as a preliminary step to inventory and assessment investigations except in cases where a reconnaissance may indicate a very low or negligible heritage resource potential. Alternately, in the case of small-scale or linear developments, an inventory study may be recommended and obviate the need for a reconnaissance.

The main goal of a reconnaissance study is to provide baseline data for the verification of the presence of potential heritage resources, the determination of impacts to these resources, the generation of terms of reference for further studies and, if required, the advancement of preliminary mitigative and compensatory plans. The results of reconnaissance studies are primarily useful for the selection of alternatives and secondarily as a means of identifying impacts that must be mitigated after the final siting and design of the development project. Depending on the scope of the study, a Class 1 or Class 2 Permit is required for this type of investigation.

Inventory: A resource inventory is generally conducted at that stage in a project's development at which the geographical area(s) likely to sustain direct, indirect, and perceived impacts can be well defined. This requires systematic and intensive fieldwork to ascertain the effects of all possible and alternate construction components on heritage resources. All heritage sites must be recorded on Government of Nunavut Site Survey forms. Sufficient information must be amassed from field, library and archival components of the study to generate a predictive model of the heritage resource base that will:

- allow the identification of research and conservation opportunities;
- enable the developer to make planning decisions and recognize their likely effects on the known or predicted resources; and

- make the developer aware of the expenditures, which may be required for subsequent studies and mitigation. A Class 1 or 2 permit is required.

Assessment: At this stage, sufficient information concerning the numbers and locations of heritage resources will be available, as well as data to predict the forms and magnitude of impacts. Assessments provide information on the size, volume, complexity and content of a heritage resource, which is used to rank the values of different sites or site types given current archaeological knowledge. As this information will shape subsequent mitigation program(s), great care is necessary during this phase.

Mitigation: This refers to the amelioration of adverse impacts to heritage resources and involves the avoidance of impact through the redesign or relocation of a development or its components; the protection of the resource by constructing physical facilities; or, the scientific investigation and recovery of information from the resource by excavation or other method. The type(s) of appropriate mitigative measures are dictated by their viability in the context of the development project. Mitigation strategies must be developed in consultation with, and approved by, the Department of Culture and Heritage. It is important to note that mitigation activities should be initiated as far in advance of the construction of the development as possible.

Surveillance and monitoring: These may be required as part of the mitigation program.

Surveillance may be conducted during the construction phase of a project to ensure that the developer has complied with the recommendations.

Monitoring involves identification and inspection of residual and long-term impacts of a development (i.e. shoreline stability of a reservoir); or the use of impacts to disclose the presence of heritage resources, for example, the uncovering of buried sites during the construction of a pipeline.