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Dear Calvin Ehaloak, Richard Dwyer, Luis Manzo, Tracey McCaie and Alexandre Jones Vilela da Silva:

RE: NPC File # 150967 [Victory Lake]

The following works and activities have been proposed in the above-noted project proposal:

1. **Primary Land Use:** Mineral Exploration
2. **Project description:** The Victory Lake program is a mineral exploration project designed to validate historical drilling and test new targets using low-impact methods. The project will include up to ~20 low-impact diamond drill holes as well as geological mapping, prospecting, chip, channel, soil sampling with helicopter support.
3. **Associated NIRB File No.:** 11EN046
4. **Location:** Kivalliq Region; [180 km west of Rankin Inlet]

A complete description of the project proposal reviewed by the Nunavut Planning Commission (NPC) can be accessed online using the link below.

The NPC has completed its review of the above-noted project proposal. It conforms to the Keewatin Regional Land Use Plan (KRLUP). The proponent has undertaken to comply with the applicable conformity requirements of Appendix C, G, and H of the KRLUP.

Although the project proposal belongs to a class of works or activities that are exempt from screening by the Nunavut Impact Review Board (NIRB) under Schedule 12-1 of the Nunavut Agreement, the NPC has concerns in respect of potential cumulative impacts that could result from the impacts of the project combined with those of other projects on the Qamanirjuaq caribou herd. In particular:

1. The mineral tenure for the project proposal is located within core caribou calving areas for the Qamanirjuaq herd near identified caribou freshwater crossings (see Figure 1 of the attached Appendix);
2. There are other existing and proposed projects within the range of the Qamanirjuaq caribou herd that could also impact the herd, including other mineral exploration projects¹ as well as a potential Kivalliq-Manitoba linear infrastructure corridor that would significantly increase access to the area²; and
3. Significant concerns have been raised by participants during previous impact assessments³ and land use planning processes⁴ regarding the impacts of industrial activities on the Qamanirjuaq caribou herd (see Table 1 of the attached Appendix).

Because of these concerns, by way of this letter, the NPC is forwarding the project proposal with this determination to the NIRB for screening under subsection 80(1) of the *Nunavut Planning and Project Assessment Act (NuPPAA)*. Project materials, including the applicable conformity requirements, are available at the following address: <https://lupit.nunavut.ca/portal/registry/registry.aspx?appid=150967>.

The regulatory authorities to which this letter is addressed are responsible under the *NuPPAA* to implement any of the applicable requirements by incorporating the requirements directly, or otherwise ensuring that they must be met, in the terms and conditions of any authorizations issued.

This conformity determination applies only to the above-noted project proposal as submitted. Proponents may not carry out projects and regulatory authorities may not issue licenses, permits and other authorizations in respect of projects if a review by the NPC is required. Regulatory authorities may consult with the NPC to obtain recommendations on their duties to implement the existing land use plans prior to issuing licenses, permits and other authorizations under subsection 69(6) of the *NuPPAA*.

My office would be pleased to discuss how best to implement the applicable requirements and to review any draft authorizations that regulatory authorities wish to provide for that purpose. If you have any questions, please do not hesitate to contact me at (867) 447-4563.

Sincerely,



Solomon Amuno, PhD
Senior Planner
Nunavut Planning Commission

¹ Some nearby projects/project proposals include: Meliadine Gold Mine Project (NIRB Project Certificate No. 006), Parker Lake (NIRB FILE NO.:10EN020), Marce Claim Exploration (11EN046); Baker Basin (NIRB FILE NO.:08EA038), Pistol Bay (NIRB FILE NO.: 11EN027). Angilak Property (25EN084); Tugak Gold Project (NIRB FILE NO.: 18EN033); Huckleberry Claim (NIRB FILE NO.: 17EA068); Hook Lake (NIRB FILE NO.: 25EN080)

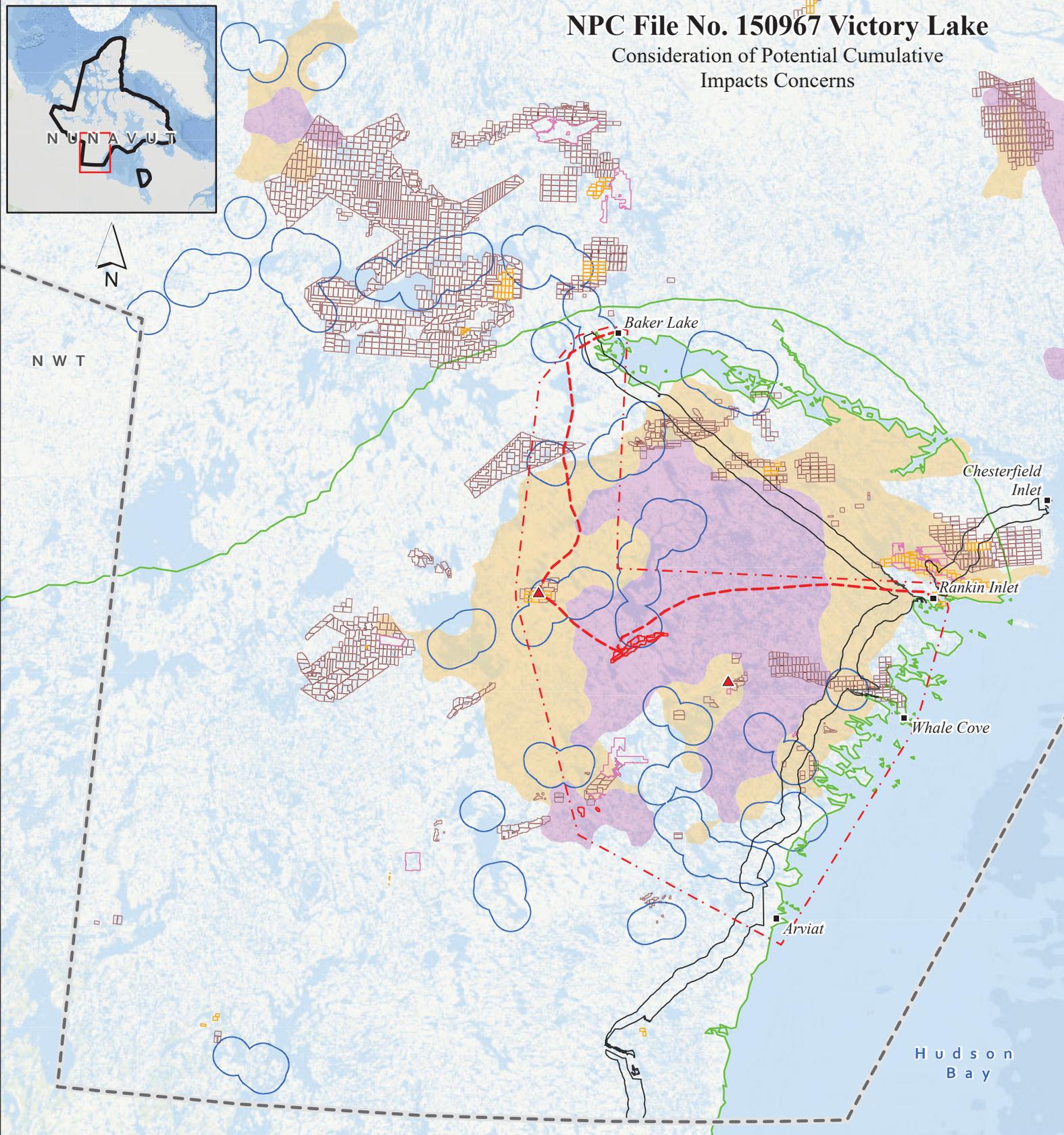
² Government of Nunavut Transportation and Infrastructure Nunavut. Kivalliq Inter-Community Road Study - Summary Report (2025).

³ Including screening of NIRB FILE NO: 11EN046 for previous mineral exploration in the same area as the current proposal.

⁴ For summaries of participant comments on caribou calving areas and freshwater crossings, see sections 2.2.5, 2.2.8 and 2.2.11 of the NPC's 2023 Options and Recommendations document for the Recommended Nunavut Land Use Plan (NPC Public Registry File # 23-012E).

NPC File No. 150967 Victory Lake

Consideration of Potential Cumulative Impacts Concerns



■ Nunavut Community	■ Caribou Calving
▭ Nunavut Settlement Area	■ Caribou Post-Calving
▲ Proposal 150967 - Camp Site	■ Qamanirquaq Caribou Herd Range
--- Proposal 150967 - Winter Road	Mineral Claim (CIRNAC)
▭ Proposal 150967 - Mineral Tenure	▭ Active Mineral Claim
▭ Proposal 150967 - Project Outline	▭ Mineral Lease
▭ Kivalliq-Manitoba Linear Infrastructure Corridor	NTI Mineral Agreements
▭ Caribou Freshwater Crossings	▭ Exploration Agreement



Scale: 1:3,009,000
 Projection: NAD 1983 Canada Atlas Lambert
 Date: 2026-01-14
 Esri, GEBCO, Garmin, NaturalVue



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 Commission d'Aménagement du Nunavut

APPENDIX

Table 1: Sample of participant comments regarding Qamanirjuaq caribou calving grounds and freshwater crossings between 2010 and 2023 during land use planning consultations (not an exhaustive list; for additional detail see footnote 4 above)

Year	Participant	NPC Public Registry File Number	Comment
2010	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	10-085E	"Exploration and development activities are increasing across the caribou ranges... Land use activities of concern include, but are not restricted to, industrial development. For instance, new roads built to support industrial developments often result in increasing levels of recreational and tourism activities on caribou ranges, because of the access they provide. The combined impacts from all land use activities are potential problems across the caribou ranges, but are of particular concern on calving grounds and post-calving areas, and near important water crossings."
2013	Baker Lake Hunters and Trappers Organization (Baker Lake HTO)	12-109E	"The board members as well as residents of Baker Lake oppose mining and exploring/in the Beverly and Qamanirjuaq calving grounds. Inuit of Baker Lake have a unique inland culture. We rely mostly on caribou to sustain our inland culture and lifestyle. The mining/exploration already has an impact on caribou hunting culture and lifestyle. Baker lake HTO is firmly and adamantly opposed to any and all mineral exploration and mining in caribou calving areas. Baker Lake HTO board of directors and the residents of Baker Lake are concerned about mining and exploration companies disturbing the caribou calving and post calving grounds."
2013	Kivalliq Wildlife Board (KWB)	12-028M	"... the KWB strongly opposes any form of exploration and/or development within the Kivalliq caribou calving and post-calving grounds, and that a letter will be written to all stakeholders and Nunavut wildlife management organizations indicating this."
2014	Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	12-138M	"The position of the Beverly and Qamanirjuaq Caribou Management Board is that 'no development should be permitted in caribou calving and post-calving areas'."

Year	Participant	NPC Public Registry File Number	Comment
2014	Government of Nunavut (GN)	12-203E	"Caribou are especially vulnerable to disturbance during calving and the effects of development cannot be mitigated in these areas. Key Access Corridors are regularly used pathways that lead on and off the calving grounds. These corridors are essential for providing access to calving grounds. Development and/or disturbance along these routes could lead to caribou shifting or abandoning their calving grounds."
2014	Nunavut Wildlife Management Board (NWMB)	12-198E	"Both science and Inuit Quajimajatuqangit stress the importance of protecting caribou calving and post-calving grounds. Cows and calves are most sensitive to disturbance and factors that influence growth rate during the calving and post-calving season. During this time, cows need uninterrupted foraging time to meet the increased energy demands associated with milk production. In the NWMB's opinion, disturbance during this sensitive period, and destruction of this important habitat should be prohibited. Furthermore, the NWMB is also concerned about the cumulative effects of development in caribou calving and post-calving grounds and how this may affect productivity and herd size."
2015	Arviat Hunters and Trappers Organization (Arviat HTO)	14-106E	"... We would especially like mining and exploration activity banned in and near caribou calving grounds and important caribou water crossings."
2015	Baker Lake Hunters and Trappers Organization (Baker Lake HTO)	14-098E	"Our IQ is clear - there should be no mining or exploration on calving grounds. These areas are sacred for caribou and Inuit. Caribou are very sensitive to disturbance when they give birth and immediately afterwards. Even if exploration is stopped seasonally, the disturbance to the land would impact calving. This may cause the herds to decline further. Baker Lake Inuit did not traditionally live or camp in calving areas. We do not hunt female caribou during calving or immediately after giving birth. We respect this sensitive area for caribou. The mining industry should do the same, and not mine and explore in calving grounds."

Year	Participant	NPC Public Registry File Number	Comment
2015	Issatik Hunters and Trappers Organization (Issatik HTO), Whale Cove	14-031E	"The Issatik (Whale Cove) HTO directors agreed that mining and exploration should be banned in caribou calving and post calving grounds for the time being."
2017	Kivalliq Wildlife Board (KWB)	16-069E	"Caribou water crossings must be protected for their heritage, cultural/economic, and ecological values. Inuit Qaujimagatuaqangit clearly shows that mining and mineral exploration are not appropriate activities near caribou water crossings. Inuit from Baker Lake have fought since the 1970s to ensure that these important areas are protected, and this has been recognized in the federal government's caribou protection measures and the Kivalliq Inuit Association's land use regulations for Inuit Owned Lands."
2020	Arviat Community Participants	16-267E	"Activities like mining, oil and gas, all-weather roads, hydro-electric infrastructure, and quarries should be prohibited in caribou freshwater crossing areas year-round."
2020	Rankin Inlet Community Participants	16-265E	"Activities like mining, oil and gas, all-weather roads, hydro-electric infrastructure, and quarries should be prohibited in caribou freshwater crossing areas year-round. Some Rankin Inlet residents noted the concern regarding helicopters was from early September to mid-October."
2020	Baker Lake Community Residents	16-269E	"Year-round protections were needed for caribou freshwater crossing areas."
2021	Athabasca Denesųłin�	21-028E	"For more than two decades, the size of caribou populations, including the Beverly/Qamanirjuaq herd, has been steadily decreasing, making it more and more difficult for us to exercise our rights within Nuhen�n�. Climate change, with its disproportionate impact on northern ecosystems, has certainly been a major driver of this change. Barren-ground caribou are, in general, very sensitive to disturbances in the environment and the landscape, and we are in a critical time where management decisions need to be based on the precautionary principle."

Year	Participant	NPC Public Registry File Number	Comment
2022	Ghotelnene K'odtineh Denesųtiné	21-147E	"Ghotelnene K'odtineh Denesųtiné are concerned about development in 1: calving areas; 2: post-calving areas; 3:key access corridors; and 4: freshwater crossings. Development in these areas could reduce the ability of the herd to recover. This may limit the ability of our members to maintain their culture and way of life and may adversely affect our Section 35 rights to harvest caribou"
2022	Nunavut Wildlife Management Board (NWMB)	21-094E	"... across the territory, many of these herds are experiencing significant population declines. Although these population declines are related to many factors, including natural fluctuations, environmental change and harvest, disturbance from human land use activities has also been recognized as a potential threat..."
2023	Baker Lake Hunters and Trappers Organization (Baker Lake HTO)	21-239E	"Caribou are very sensitive to disturbance before they cross the water. If caribou see past activity and disturbance to the land, they will not cross and change their routes. Caribou do not cross immediately when they reach water crossings. - they gather and linger at the crossing first. It seems like they observe and assess, to make sure there are no threats nearby. If they are disturbed, they will not cross."