



October 7, 2021

Andrew Nakashuk
Chairperson
Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, Nunavut X0B 0C0

RE: Letter of Submission - Comments on the 2021 Draft Nunavut Land Use Plan

Dear Chairperson Nakashuk,

GGL Resources Corp. (GGL, the Company) appreciates the opportunity to submit comments to the Nunavut Planning Commission (NPC) regarding the recently released latest version of the draft Nunavut Land Use Plan (dNLUP). Members of the company have been active mineral explorers in Nunavut for two decades and recognize the importance of a respectful and balanced relationship between the environment and economic development, a relationship that should be integral to a land use plan in any jurisdiction.

GGL Resources Corp. currently has a joint venture option on mineral claims located on the southern Boothia peninsula. The joint venture is with Arctic Star Exploration Corp., and the claims are registered in the name of Jeff Stuart, an Arctic Star employee. The claim block is referred to as the Stein Project (the Project) and is considered prospective for diamonds after 16 years of exploration expenses and activities.

GGL is a proud member of the NWT & Nunavut Chamber of Mines and is aware and supportive of their Letter of Submission to the NPC. As the Chamber has voiced concerns regarding the dNLUP at a broader and higher level, GGL will use this Letter of Submission to comment on the dNLUP as it relates specifically to the company's current Stein Project and future activities.

Firstly, GGL would like to express its concern regarding the complexity of the dNLUP, the hard to follow maps and format it is presented in, and the very limited timeframe to review, understand and formulate a response to the content and apparent onerous restrictions it would impose on the Company and its future exploration activities and potential development at the Stein Project. This submission and letter for the record can in no way be interpreted as a comprehensive summary of GGL's concerns however, as time is of the essence the company will comment on several of the more obvious issues and concerns. Many of the points expressed below are concerns that apply to other projects encompassed by the dNLUP.

The Stein Project lies within a "*Limited Use Area*" which fundamentally renders the project unviable as resource development is not permitted. The Project is protected under the "existing rights" clause however, there is no possibility to expand the project footprint for additional economic discoveries or development infrastructure. Transportation corridors and infrastructure linking the Project to supply chains is also not permitted. The Project is most obviously land-locked which would seem to go against the principles behind "existing rights" which are to allow a project to proceed in a reasonable fashion as to expect a likely development outcome. Such is not the case with the Stein Project being effectively chocked off.



GGL RESOURCES CORP.

Without the reasonable possibility of a development outcome the project would be extremely difficult, if not impossible to finance. This should be of great concern to all stakeholders, Nunavummiut and Governments. Mineral endowment is confined by nature to select geological environments of which an economic deposit is but a small potential subset. The Territory should be concerned about future investment which will lead to revenue streams.

With the information available, it is difficult to understand the process that is used to designate the three land use categories, in particular, the "Limited Use" category. The entire Boothia peninsula has been categorized as Limited Use (no resource development). In the dNLUP, there are 31 map pages (pp72-103) which depict *Valued Ecosystem Components* (B1 series maps) and *Valued Socio-Economic Components* (B2 series maps). Within these *Valued Component maps* is one that shows *Evidence For Mineral Potential* (B2.2) with the Stein Project included. Map B2.2 shows *Community Identified Priority Locations* which has what appears to be +90% of Nunavut highlighted. The +90% blanket over Nunavut makes it difficult to understand the categorization process and why the entire Boothia is designated as Limited Use. On the remaining 29 maps there is not a single highlighted *Value* in and around the Stein Project. It only seems logical to conclude that if only a single *Value* (other than mineral potential) is required to render an area as Limited Use, then +90% of Nunavut should fall into this category with the *Community Identified Priority Locations*. GGL would like to understand why the entire Boothia, and particularly the area in and around the Stein Project, appears to have been burdened with an overly restrictive category. It would appear that the policies used to define areas is not universal across Nunavut and that the Stein Project area may have been subject to a harsher review.

If individual projects such as the Stein Project are effectively rendered unviable by the dNLUP, and have no chance to move forward with a reasonable expectation of development, what will be the compensation and considerations for past exploration expenses, deployed risk capital and lost potential future revenues.

With travel restrictions and limitations due to the pandemic, the complex and complicated nature of the dNLUP, and the short window for review, digestion and understanding, GGL and its partner Arctic Star have not had an opportunity to engage the local community and review their comments and concerns with the dNLUP.

Respectfully submitted,

GGL RESOURCES CORP.

David Kelsch, B.Sc., P.Geo.
President, COO and Director
GGL Resources Corp.