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July 14, 2025

Kugluktuk
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Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0
Sent via email: info@nirb.ca

Bathurst Inlet
Kingaok
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Bay Chimo
Umingmaktok
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Cambridge Bay
Ikaluktutiak
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Gjoa Haven
Okhoktok
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Taloyoak
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Kugaaruk
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Re: NIRB File No. 24XN038: KitIA comments regarding the Draft Scope List and Draft Impact Statement Guidelines for the West Kitikmeot Resources Corp’s “Grays Bay Road and Port” Project Proposal

Dear Ms. Kapolak,

The Kitikmeot Inuit Association (KitIA) would like to thank the Nunavut Impact Review Board (NIRB) for the opportunity to provide comments on the Draft Scope List and Draft Impact Statement Guidelines for the West Kitikmeot Resources Corp’s “Gray’s Bay Road and Port” (GBRP) Project Proposal.

KitIA is a Designated Inuit Organization (DIO) under the Nunavut Agreement. The KitIA manages Inuit owned lands in trust for Kitikmeot Inuit, supporting traditional and cultural values and providing economic and social benefits to Kitikmeot Inuit.

As commented on during the screening of the GBRP, the construction and operation of the GBRP could have significant impacts on a variety of species of wildlife and the marine environment in turn affecting Inuit harvesting activities. KitIA is pleased that the NIRB will review the GBRP under Part 5 of the Nunavut Planning and Project Assessment Act (NuPPA).

KitIA has reviewed the Draft Scope List and Draft Impact Statement Guidelines, and provides the following comments.

Usage of GBRP facilities is excluded from scope

KitIA is concerned that the Draft Scope List excludes a critical component of activities that will occur at the Project: Traffic volumes and operational activity. The current Scope appears to assess the road and port infrastructure as if they will be constructed but not actively used; which may result in significant underestimation of Project-related impacts.

While the Scope references the construction of two deep water wharves, it does not include potential operational use such as: the number of and type of vessels expected to dock annually, duration of port activity or volume and type of materials to be handled. Similarly, although the Scope includes 10 million litres fuel storage and associated unloading and re-fueling facilities, it

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does not identify anticipated volume of fuel to be handled annually and its associated environmental risks. The Scope does not describe the types of materials expected to be stored and handled at the port.

The same issue applies to the 230 kilometre all season access road, omitting key details such as: frequency of use, types of vehicles, and type of material expected to be travelling on the road. Without this information, it is not possible to adequately assess potential impacts of the project on the environment, Inuit land use and community well-being.

KitIA recommends that the Scope of the Project explicitly include operational use of both the port and the road. This should include:

- The anticipated number and type of vessel calls at the port;
- The volume and type of materials to be transported and handled;
- The expected number of vehicle transits along the road per day or season; and
- The types of materials anticipated for transport (including any hazardous substances).

Temporal and spatial boundaries

The Scope of the Assessment at the first paragraphs of Sections 1 and 3, states that the assessment will “take into account appropriate temporal and spatial boundaries and draw upon relevant information from scientific sources, Inuit Qaujimajatuqangit (IQ), traditional and community knowledge”. The definition of spatial and temporal boundaries is extremely important to KitIA. IQ along with traditional and community knowledge must be central to informing these boundaries, particularly in relation to wildlife movements, traditional use, and observation of changes to the climate and ecosystem over time.

We note that IQ is omitted from the first paragraph of Section 3 – mitigation measures, and we ask that it be inserted. We note that IQ, traditional and community knowledge are not mentioned in Section 2 – anticipated effects of the environment on the project and ask that it be included.

Additionally, we recommend that the list of traditional activity and knowledge in Section 1(q) be broadened to capture the full scope of Inuit knowledge of the environment and wildlife.

Cumulative Impacts

KitIA emphasizes the need for a robust cumulative effects assessment with temporal and spatial boundaries defined from Inuit perspectives. This includes consideration of cumulative impacts over time, across the landscape and in relation to Inuit land use, harvesting and ecological knowledge of reasonably foreseeable, existing and proposed projects.

The current list of projects identified for “specific focus” includes only existing Projects, or proposed Projects that have applications before the NIRB. This list does not include reasonably



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foreseeable projects that may arise within the lifetime of the GBRP but do not have current applications before the NIRB.

KitIA recommends that the cumulative effects assessment explicitly include all reasonably foreseeable projects including those that may result from or be facilitated by the GBRP to ensure that the full cumulative effects of the GBRP are considered.

Impact Statement Guidelines (IS Guidelines)

The IS Guidelines refer to “reasonably foreseeable” activities when describing the cumulative effects or impacts to be assessed (Page 47). However, at 7.1 f) a different standard is used for “cumulative impacts”:

“f) the cumulative ecosystemic and socio-economic 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;

This language introduces inconsistency as the phrase “likely to be carried out” is not equivalent to “reasonably foreseeable” and may unduly narrow the scope of activities assessed. KitIA recommends that Section 7.1(f) be revised for consistency by using the term “reasonably foreseeable activities”.

Further the distinction between “cumulative effects” and “cumulative impacts” is not clear, despite the explanation at page 45. It is not clear if one holds more weight than the other, for example would cumulative effects be discounted if they are not found to also be cumulative impacts? KitIA recommends that the Guidelines clarify this distinction and ensure that both cumulative effects and cumulative impacts are fully assessed, addressed and mitigated.

If you have any question regarding the attached submission, please contact the undersigned directly at cbarker@lands.kitia.ca.

Regards,

A handwritten signature in black ink that reads "C. Barker".

Cory Barker, M.Sc.
Regulatory Affairs Manager
Kitikmeot Inuit Association