



VIA EMAIL (info@nirb.ca)

July 15, 2025

Kelli Gillard
Manager, Impact Assessment
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, Nunavut X0B 0C0

Re: Request for Comment Regarding the NIRB's Draft Scope List and Draft Impact Statement Guidelines for West Kitikmeot Resources Corp.'s "Grays Bay Road and Port" Project Proposal (NIRB File No: 24XN038)

Dear Ms. Gillard,

Nunavut Tunngavik Inc. (NTI) is writing to provide its submissions to the Nunavut Impact Review Board (NIRB) in response to the NIRB's request for comments on the Draft Scope List and Draft Impact Statement Guidelines for West Kitikmeot Resources Corp.'s (the Proponent) "Grays Bay Road and Port" project proposal.

NTI's Roles

NTI's mission is to advance the economic, social, and cultural well-being of Nunavut Inuit. NTI represents Nunavut Inuit and safeguards Inuit rights recognized and affirmed by section 35 of the Canadian Constitution, including treaty and other Aboriginal rights, as well as those affirmed by the *United Nations Declaration on the Rights of Indigenous Peoples*.

NTI is the Designated Inuit Organization (DIO) under the *Nunavut Agreement* for the purpose of ensuring that the rights and obligations provided under the Agreement are fully implemented. In this regard, NTI works closely with the Regional Inuit Associations (RIAs) that exercise certain responsibilities as designated by NTI.

Kitikmeot Inuit Association (KitIA) is designated as the DIO administering the surface titles of the Inuit Owned Lands in the Kitikmeot Region. KitIA is also designated as the DIO for the negotiation of Inuit Impact and Benefit Agreements with proponents with respect to major development projects in the Kitikmeot Region.

NTI is the DIO under Article 5 of the *Nunavut Agreement*, which guarantees Inuit many rights with respect to wildlife harvesting and co-management. For example, under Section 5.6.1 of the *Agreement*, Inuit have the right to harvest wildlife to their full level of economic, social, and cultural needs when there is no total allowable harvest level established. NTI's role is to ensure that Inuit rights under Article 5 are recognized, implemented, and not infringed upon. NTI's role in ensuring the full implementation of Inuit rights set out in the *Agreement* also includes ensuring that Institution of Public Government processes are in keeping with the *Agreement* and respect Inuit participation and consultation requirements.

In this NIRB review process, NTI supports KitIA, recognizing KitIA as the primary DIO in the assessment of projects in the Kitikmeot Region by virtue of its designated responsibility on the

management of the surface titles of the IOLs. Further, NTI supports KitlA, the Regional Wildlife Organization (Kitikmeot Regional Wildlife Board), the Hunters and Trappers Organizations (HTOs) and communities generally in addressing issues that are of concern to all Inuit in Nunavut including the promotion of Inuit culture and the safeguarding of Nunavut's wildlife, environment, culture, lands, and economy.

Comments Regarding the Draft Scope List and the Draft Impact Statement Guidelines

NTI shares the concerns raised by KitlA regarding the Draft Scope List and Draft Impact Statement Guidelines and supports the modifications that KitlA proposes to address these concerns.

Furthermore, considering:

- the level of concern that has been expressed regarding the potential adverse effects of the project on caribou (as demonstrated by the comments submitted by the NIRB during the screening phase), and on the Bathurst and Dolphin and Union herds in particular;
- the significance of caribou to Inuit and the Inuit way of life; and,
- the importance of ensuring that information regarding the project is communicated in a non-technical, accessible, and easily understood way,

NTI would like to emphasize several other points, as outlined below.

First, with regard to the criteria set out in section 3.3 regarding the format of the Impact Statement, NTI suggests that the PDF version of the Statement allow the reader to annotate and comment within the document and that it include bookmarks that allow for easy navigation of the document.

Second, with regard to caribou, while the Draft Guidelines require the Proponent to provide maps and photographs within the Statement,¹ to “describe the spatial boundaries” of each valued ecosystemic component,² and to identify “key wildlife habitats in the Local Study Area and Regional Study Area ... including: ... caribou calving and nursing areas,”³ NTI suggests that it be made explicit that the Impact Statement must specifically provide maps and other visual information that will allow audiences to understand how the project will interact with caribou habitats, migration patterns, and calving grounds. This type of information is much easier to understand when depicted in maps and diagrams than when only described in words, and will assist Inuit in understanding the potential effects of the project on caribou.

Finally, considering the concerns expressed by Inuit regarding the effect of the proposed roadway on caribou migration, NTI believes that the Impact Statement must provide a detailed description, aided by visual components and supported by Inuit Qaujimajatuqangit and scientific studies, of the design and anticipated effectiveness of the mitigation measures the Proponent proposes to integrate into the roadway to facilitate caribou crossings.⁴

¹ Draft Impact Statement Guidelines, p. 15.

² *Ibid.*, p. 31.

³ *Ibid.*, p. 68.

⁴ As described at p. 2.8 of the August 2024 Project Proposal.

Conclusion

NTI, working with KitlA, looks forward to engaging with NIRB and other participants during the review of this project. Healthy wildlife populations, especially caribou, and respect for harvesting rights, are of critical importance to Inuit and other Indigenous groups affected by the project. NTI believes that the preparation of a robust and comprehensive Impact Statement is the best way to ensure that the appropriate balance is struck between development and the protection of Inuit lands and way of life.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Fredlund', with a horizontal line underneath it.

Dustin Fredlund
Chief Operating Officer