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Thank you,



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GN # 01	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Scoping List – Moose as a Valued Ecosystem Component
References	<ul style="list-style-type: none"> Nunavut Impact Review Board. NIRB File No.: 24XN038/NPC File No.: 150467 – Draft Scope List for the Grays Bay Road and Port Project Proposal (March 2025) Nunavut Impact Review Board. Reconsideration Report and Recommendations for the Back River Energy Centre Proposal B2Gold Corporation's Back River Gold Mine Project – Project Certificate No. 007 NIRB File No.: 12MN036 (April 2024) Jensen <i>et al.</i> (2018). Expanding GIS Analyses to Monitor and Assess North American Moose Distribution and Density. <i>A/ces</i>, 54, p.45–54.
IDENTIFICATION OF ISSUE	
<p>The Government of Nunavut (GN) notes that moose is not explicitly listed as a Valued Ecosystem Component (VEC) in the Draft Scope List for the Grays Bay Road and Port Project (GBRP, “the Project”) Proposal (Draft Scope List; NIRB, 2025). However, moose is an important harvested resource for communities surrounding the GBRP Project area. Therefore, potential impacts on this species should be included within the scope of the review.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Draft Scope list states:</p> <p>“k. Terrestrial wildlife and wildlife habitat, including:</p> <p>i) Representative terrestrial mammals to include caribou, caribou habitat, migration and behavior, muskoxen, wolverine, grizzly bears, polar bears, wolves and less conspicuous species that may be maximally exposed to contaminants.” (NIRB, 2025, p. 4)</p> <p>The GN notes that moose is not explicitly listed as a VEC in the Draft Scope (NIRB, 2025).</p> <p>Moose are present within the Project regional study area (e.g., Jensen <i>et al.</i> 2018) and are an important harvested species. During the reconsideration of the Back River Project (Back River Energy Centre Project; NIRB 12MN036), community members raised concerns about the lack of discussion regarding moose even though harvesters reported having frequently observed and harvested moose in areas near the Back River Project (NIRB, 2024).</p>	

For example:

“[W]e have been hunting the moose these past several years since we cannot hunt the barren-ground caribou due to the tags allocation to other communities. Our concern is that once the wind farm is in place, the decline will happen with the moose as well.” (Page 155)

and

“People hunt moose in areas around the Marine Laydown Area, Winter Ice Road, and mine site, yet moose were not specifically addressed by the Proponent.” (Page 155)

Given the GBRP’s overlap with moose range and the Project’s proximity to the Back River Project, the GN believes moose should be included as a Valued Ecosystem Component (VEC) to ensure that potential project impacts are thoroughly assessed.

REQUEST(S)/RECOMMENDATION(S)
The GN recommends that NIRB specify moose as a VEC.

GN # 02	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Scenarios for Controlled Access and Usership – All-season Road
References	<ul style="list-style-type: none"> Nunavut Impact Review Board. NIRB File No.: 24XN038/NPC File No.: 150467 – Draft Scope List for the Grays Bay Road and Port Project Proposal (March 2025) West Kitikmeot Resources Corp. Grays Bay Road and Port Project Proposal Nunavut Impact Review Board (August 2024)
IDENTIFICATION OF ISSUE	
<p>The GN notes that the Project is envisioned as a multi-user multi-use infrastructure. Further, managing access of the 230-kilometre all-season road is identified as a key mitigation for wildlife impacts in the Project Proposal and Draft Scope List. Given the potential for the usership of the road and the definition of controlled access to change during the design of the Project and review process, the Proponent should assess potential impacts under different road use and management scenarios in its draft Impact Statement.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>As outlined in the Project Proposal and the Draft Scope List, one of the primary mitigation measures proposed to reduce the impacts of the 230-kilometre all-season road on wildlife, such as caribou, is managing the access of the road. For instance, the Project Proposal states:</p> <p>“The purpose of the Project is to provide a controlled access, multi-modal transportation system to connect to existing transportation infrastructure and serve future needs in the Kitikmeot Region... WKR intends to also manage this road for the public to access and use the multi-user, multi-use infrastructure...</p> <p>In consideration that there will be large and heavy vehicles using the road such as haul trucks (B-train or DPRTs) and transport trucks, access to the road will be strictly controlled and monitored through use of sign-in and radio check-in to ensure the safety of all users. WKR will control and monitor access to the road at its southern terminus, located on Inuit Owned Land...” (WKR, 2024, p. 50)</p> <p>The GN notes that, although a general concept of controlled access has been outlined above, this definition may evolve during the review process. Since predictions of the Project’s residual environmental effects—that is, effects remaining after mitigation—are based on some form of controlled access and defined usership of the road, it is important that the Proponent evaluate</p>	

potential impacts under a range of potential use and road management scenarios in its draft Impact Statement.

REQUEST(S)/RECOMMENDATION(S)

The GN emphasizes that controlled access and usership of the road may change during the review process or in the design of the Project.

As such, the GN recommends that NIRB include language in the draft Impact Statement guidelines to ensure the Proponent assesses impacts under various road use and management scenarios (e.g., use by the public, industrial use only, control checkpoints, restricted vehicles, etc.). These scenarios would account for impacts related to changes in road activity, including, for example, traffic volume, density, and seasonality; vehicle type; and any proposed limits on road use.

GN # 03	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	6.2.1 Alternatives
References	Draft Guidelines for the Preparation of an Impact Statement for the “West Kitikmeot Resource Corp’s Gray Bay Road and Port Proposal (April 2025).
IDENTIFICATION OF ISSUE	
<p>In section 6.2.1 on Alternatives, the Proponent is required to provide information within their Draft Impact Statement on what alternative routes for a road or other linear infrastructure were considered, but there is no requirement for the Proponent to describe what alternative locations were considered when selecting the preferred port location.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Project, if approved and constructed, is expected to result in increased shipping activities and potential impacts in the location considered for the port. The Proponent should provide in their Draft Impact Statement whether alternative locations for the port were considered and explain how their evaluation incorporated multiple perspectives including Inuit Qaujimajatuqangit.</p>	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN recommends the NIRB consider revising section 6.2.1, with the additions of the bolded text to include specific mention of the alternatives for the port location:</p> <p><i>Where different routes or locations are being considered for components such as ports, roads and transmission line corridors, the Proponent must demonstrate strong consideration of Inuit Qaujimajatuqangit and avoidance of impacts on Inuit values.</i></p>	

GN # 04	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	8.1.11 Terrestrial Wildlife and Wildlife Habitat
References	Draft Guidelines for the Preparation of an Impact Statement for the “West Kitikmeot Resource Corp’s Gray Bay Road and Port Proposal (April 2025).
IDENTIFICATION OF ISSUE	
<p>8.1.11 does not explicitly request the Proponent to consider seasonal areas or caribou wintering grounds in identification of key wildlife habitats as described in vi:</p> <p><i>vi. Identification of key wildlife habitats in the Local Study Area and Regional Study Area as applicable, including: National Parks, Critical Wildlife Areas, Territorial Parks and other areas with legislated protection; eskers; caribou calving and nursing areas; denning sites; staging areas; and special locations as salt licks, insect relief habitats, and areas used by females and their young. Related discussion should also include migration routes, water course crossings, travel corridors and areas important for Inuit harvesting;” (Page 76)</i></p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>Barren-ground caribou are in the process to be listed as ‘Threatened’ species under the federal <i>Species at Risk Act</i> and the Dolphin and Union caribou herd are in the process to be listed federally as ‘Endangered.’ Critical habitat would be defined under these processes for the two subspecies of caribou under a recovery strategy.</p> <p>Critical habitat includes the habitat that is needed for the species to thrive, which could be different than other sensitive habitats (calving ground, water crossing location, migration routes).</p>	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN is seeking confirmation/clarity from NIRB regarding whether Section 8.1.11.1 vi, as written, is intended to include seasonal areas, such as any caribou wintering grounds that may over overlap with the Project.</p>	

GN # 05	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	8.2.6 Traditional Activity and Knowledge
References	Draft Guidelines for the Preparation of an Impact Statement for the “West Kitikmeot Resource Corp’s Gray Bay Road and Port Proposal (April 2025).
IDENTIFICATION OF ISSUE	
The bulleted lists under section 8.2.6.1 (Traditional Activity and Knowledge - Baseline Information) and 8.2.7.1 (Non-traditional Land Use and Resource Use – Baseline Information) appear to include bullets that may be an error.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
It is necessary to ensure it is clear what baseline information should be collected by the Proponent to assess the potential effects and/or impacts from the Project with respect to harvesting and other traditional activities.	
REQUEST(S)/RECOMMENDATION(S)	
<p>1. The GN requests that NIRB clarify if the following bullets were intended to be placed within the corresponding sections of the draft Impact Statement Guidelines for the Project:</p> <p>Under 8.2.6 Traditional Activity and Knowledge, 8.2.6.1 Baseline Information:</p> <ul style="list-style-type: none"> • <i>ii. Description of known non-traditional land and resource use including protected areas, visual and aesthetic resources;</i> <p>Under 8.2.7 Non-traditional Land Use and Resource Use, 8.2.7.2 Baseline Information:</p> <ul style="list-style-type: none"> • <i>ii. Description of current and traditional land use areas and the importance of those areas to Inuit culture and social well-being;</i> <p>2. The GN requests that NIRB clarify the temporal scope of “current” when referring to land use (e.g., 8.2.6.1, iv), particularly for harvesting of caribou with respect to the collection of baseline information by the Proponent to inform the understanding of Traditional Activity and Knowledge.</p>	

3. The GN requests clarity from NIRB regarding what source(s) of information would be used to gather this information. If there are no specific sources, the GN recommends revising the above bullets to include the wording “based on a wide variety of sources, including, but not limited to Traditional Knowledge and scientific baseline studies.”
4. Under 8.2.6.1, iv, the GN recommends the addition of the **bolded text** to the second sub bullet to broaden the scope of the information collected and depicted with respect to harvesting ranges and patterns:
 - *Descriptions of the significance of, availability of, and level of dependence on, traditional foods as major nutritional sources by local residents within the Project Regional Study Area;*
 - *What country foods are consumed, or are expected to be consumed in the Project Regional Study Area, which parts of country foods are consumed, and their consumption frequency; and*
 - *Descriptions, including maps, of traditional and current hunting ranges and patterns in the Local Study Area and the **Project Regional Study Area**;*

GN # 06	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	8.1.11 Terrestrial Wildlife and Wildlife Habitat
References	Draft Guidelines for the Preparation of an Impact Statement for the “West Kitikmeot Resource Corp’s Gray Bay Road and Port Proposal (April 2025).
IDENTIFICATION OF ISSUE	
Section 8.1.11.1, Terrestrial Wildlife and Wildlife Habitat - Baseline Information, bullet ii) touches on the description of the biodiversity and the associated trophic relationships (food chain relationships) but lacks a requirement for the Proponent to gather information on the additional ecological relationships between species.	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
To better understand and assess the potential impacts from the Project to wildlife, the Proponent should include other ecological relationships beyond the associated food chain relationships.	
REQUEST(S)/RECOMMENDATION(S)	
<p>The GN recommends the NIRB consider adding a point in the baseline information under section 8.1 that states:</p> <ul style="list-style-type: none"> • <i>Identify all ecosystems potentially affected by the Project and describe the components of each ecosystem, including spatial variation in community composition.</i> <p>In doing so, the Proponent should address how environmental factors, biotic interactions, and spatial structuring potentially contribute to changes across the landscape from the Project. Additionally, the Proponent should highlight ecological assembly processes that could be potentially affected by the Project and explain how the potential Project effects on species and species assemblages influence the structure and function of ecosystems in the Regional Study Area.</p>	

GN # 07	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Wildfire-Related Impacts on Vegetation
References	<ul style="list-style-type: none"> Nunavut Impact Review Board. Draft Guidelines for the Preparation of an Impact Statement for the “West Kitikmeot Resource Corp’s Gray Bay Road and Port Proposal (April 2025). Government of Nunavut. “GN declares State of Emergency in Bathurst Inlet due to wildfire.” (August 2023) West Kitikmeot Resources Corp. Grays Bay Road and Port Project Proposal Nunavut Impact Review Board (August 2024)
IDENTIFICATION OF ISSUE	
<p>The GN notes that the Draft IS Guidelines do not clearly indicate whether wildfires are included as a potential impact to the terrestrial environment, specifically to vegetation and terrestrial wildlife/wildlife habitat.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The GN notes that the Draft IS Guidelines do not clearly indicate whether wildfires are included as a potential impact to the terrestrial environment, specifically vegetation and terrestrial wildlife/wildlife habitat. However, wildfires can occur in the Bathurst Inlet area, such as the August 2023 wildfire (GN, 2023).</p> <p>The GN notes that currently the following references from section 8.1.11.2 of the Draft IS Guidelines may include wildfires, but are not explicit:</p> <p> "ii. Potential impacts on population size, abundance, distribution, and behaviour of wildlife VECs from: ... Direct and indirect impacts from climate change;" (NIRB, 2025, p. 77)</p> <p> "xi. Potential impacts from the loss or alteration of habitat (i.e., vegetation) due to pollutants and noise and any ancillary effects;" (NIRB, 2025, p. 77).</p> <p>Additionally, the GN notes that the Project Proposal does not include reference wildfires under any of the scopes of management plans to be developed by the Proponent (i.e., WKR, 2024, p 119-120).</p>	

REQUEST(S)/RECOMMENDATION(S)

The GN recommends the removal of the strikethrough text and the addition of the **bolded text** in sections 8.1.10.2 (Vegetation – Impact Assessment) and/or 8.1.11.2 (Terrestrial Wildlife and Wildlife Habitat) to broaden the scope of the impact analysis conducted to include assessment of potential impacts from wildfire:

8.1.10.2

*iii. Assessment of the potential loss, disturbance, and/or changes to vegetation abundance, diversity, and forage quality as a result of Project components and activities, including potential effects from airborne fugitive dust fall, airborne contaminants from emission sources, ~~and~~ changes to water quality and quantity, permafrost, or snow accumulation, **and wildfires (human-caused)**;*

*ix. Potential impact from the loss or alteration of habitat (i.e., vegetation) due to pollutants, ~~and~~ noise, **wildfires (human-caused)** and its effects on wildlife, wildlife calving grounds and marine habitat; and*

8.1.11.2

*"xi. Potential impacts from the loss or alteration of habitat (i.e., vegetation) due to pollutants, ~~and~~ noise, **wildfires (human-caused)** and any ancillary effects.*

Additionally, the GN recommends that the Proponent incorporate wildfire prevention and response into a management plan.

GN # 08	
Department	Environment
Organization	Government of Nunavut
Subject/Topic	Temporal Scope of Project
References	<ul style="list-style-type: none"> Nunavut Impact Review Board. NIRB File No.: 24XN038/NPC File No.: 150467 – Draft Scope List for the Grays Bay Road and Port Project Proposal (March 2025) West Kitikmeot Resources Corp. Grays Bay Road and Port Project Proposal Nunavut Impact Review Board (August 2024)
IDENTIFICATION OF ISSUE	
<p>The GN notes that it is unclear whether the Project is being evaluated as a permanent development or based on its planned design life of 75 years. Clarifying the temporal scope is crucial, as it influences the conclusions drawn from the impact assessment review.</p> <p>The GN also notes that the reference in the summary of the Project scope provided in the Draft Scope List, stating “there are no plans for closure and reclamation other than areas used solely for pre-construction/construction activities,” appears to be inconsistent with Section 11.4 of the Draft Impact Statement Guidelines.</p>	
IMPORTANCE TO REVIEW AND SUPPORTING RATIONALE	
<p>The Project Proposal states:</p> <p>“The road and port components of the Project are considered permanent infrastructure with a design life of 75 years...” (WKR, 2024, p. 20)</p> <p>The Draft Scope List states:</p> <p>“The project is proposed to start in December 2029 and be constructed (both pre-construction and construction) over the course of five (5) years, with operations starting in 2034 and continuing for at least 75 years. As the project facilities are designed as permanent, there are no plans for closure and reclamation other than areas used solely for pre-construction/construction activities that are not required for ongoing operations and maintenance.” (NIRB, 2025, p. 1)</p> <p>However, Section 11.4 of the Draft Impact Statement Guidelines, entitled Closure and Reclamation Plan, states that the:</p>	

The Proponent shall develop a preliminary Closure and Reclamation Plan for the proposed project, which outlines how the various components set out in Section 6.0 will be designed for closure and how they will be decommissioned, reclaimed, and closed following project facilities closure. The Closure and Reclamation Plan shall include measures to restore the ecosystemic integrity after permanent closure of the proposed project.

As a result, the GN finds it unclear whether the Project is being evaluated as a permanent development or based on its planned design life of 75 years, and the extent to which a Closure and Reclamation Plan is required for the Project.

REQUEST(S)/RECOMMENDATION(S)

The GN recommends that NIRB clarify whether the Project is being evaluated as a permanent development or based on its planned design life of 75 years.

Additionally, the GN requests the NIRB clarify the potential inconsistency regarding the requirement for a Closure and Reclamation Plan as described within the Draft Scope List and Draft Impact Statement Guidelines.