



July 16, 2025

Kelli Gillard
Manager, Project Monitoring
Nunavut Impact Review Board
PO BOX 1360
CAMBRIDGE BAY, NU, X0B 0C0

by EMAIL

Dear Kelli Gillard:

The Government of the Northwest Territories Submission on the Review of the Nunavut Impact Review Board's Draft Scope and Draft EIS Guidelines for the West Kitikmeot Resources Corporation's Grays Bay Road and Port project proposal (NIRB file number 24XN038)

On April 16, 2025, the Nunavut Impact Review Board (NIRB) invited parties to review and provide comments on both the Draft Scope List and Draft Environmental Impact Statement (EIS) Guidelines developed for the Grays Bay Road and Port (GBRP) project. The Government of the Northwest Territories (GNWT) has reviewed these documents as they relate to our mandate, jurisdiction and areas of expertise, and officials have attended scoping sessions in Yellowknife and Inuvik. GNWT has also considered our August 7, 2024 comments on NIRB's Draft Standard Impact Statement Guidelines. I note that as of today's date, NIRB has not released the updated Standard Guidelines or reports on the GBRP scoping sessions held in April and May 2025.

GNWT provides the attached for the consideration of NIRB and the proponent:

- Comments and Recommendations on Draft Scope List
- Comments and Recommendations on Draft EIS Guidelines

These comments focus on project activities and impacts that may occur in the Northwest Territories (NWT), including potential impacts to transboundary populations of wildlife such as barren-ground caribou, grizzly bears, polar bears, wolverine, beluga whales, bowhead whales, and seals, and potential social, health, economic, and cultural impacts and/or benefits.

The GNWT looks forward to continued participation in NIRB's review. The GNWT is aware that NIRB may be engaging with the Mackenzie Valley Environmental Impact Review Board and the Inuvialuit Settlement Region Environmental Impact Review Board to facilitate a collaborative approach to the assessment of transboundary impacts. The GNWT is supportive of such collaboration.

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Should NIRB or any participants have any questions about this submission, please contact Hannah Ponsonby, Project Assessment Analyst by email at [Hannah Ponsonby @gov.nt.ca](mailto:Hannah.Ponsonby@gov.nt.ca) or by phone at 867-767-9180 ext. 24024 or Alison Heslep, Manager, Project Assessment Branch by email at Alison_Heslep@gov.nt.ca or by phone at 867-767-9180 ext. 24021.

Sincerely,



Lorraine Seale
Director
Impact Assessment and Security Management
Department of Environment and Climate Change
Government of the Northwest Territories

Attachments:

- Comments and Recommendations on Draft Scope List
- Comments and Recommendations on Draft EIS Guidelines

Page	Section	Paragraph or Reference	Issue	Rationale	Suggested Change
COMMENTS ON DRAFT SCOPE LIST					
1	1	Page 1; Scope of the Project; 1) Description of the project, the purpose of, and the need for, the project	Under the description of the project, the text should explain the purpose <i>and</i> need for the project.	The title of the first section of the Scope of the Project (page 1) includes the purpose of and the need for the project, but neither is discussed within this section. As this will be a basin-opening project, understanding the purpose of the project is important when considering what aspects of the environment should be included in the scope of assessment.	The GNWT recommends that NIRB revise this section of the Scope document to explicitly speak to the purpose of, and need for, the project.
General	General	<u>Draft Scope List</u> : Page 3, Scope of the Project: “4) Annual construction of a winter road to connect the Jericho Mine to the ice road at the Nunavut/Northwest Territories.” <u>2024 Proponent Proposal</u> : Section 1.0 (Introduction) “The Project will connect to the already approved Tibbitt to Contwoyto Winter Road (TCWR).”	The GNWT has reviewed all available information on the NIRB registry and it is unclear to the GNWT whether any project components will occur in the NWT. The Tibbit to Contwoyto Winter Road currently does not extend to the NWT/NU border.	All components of the project must be understood to develop a complete understanding of the project and its impacts.	The GNWT recommends that NIRB, after confirming what winter/ice road activities will occur in the NWT, revise the Scope if/as needed. The GNWT is available for further discussion and can provide information on the land tenure and regulatory authorizations in place for the Tibbitt to Contwoyto Winter Road in the NWT.

		<p>Section 1.4 (Works and Undertakings Forming Part of the Project): "Annual construction of a winter road to connect the Jericho Station to the Tibbitt to Contwoyto Winter Road (TCWR) on Contwoyto Lake/<i>Tahikyoak</i>."</p> <p>Section 6 (People and Communities); 6.4.6 (Transportation): "The Tibbitt to Contwoyto Winter Road is a privately maintained winter road that starts 70 km north of Yellowknife and traverses 600 km before currently terminating near the Diavik diamond mine. When the Lupin Mine and Jericho Mine in Nunavut were operating, the winter road extended another 150 km north of the diamond mines. Since these mines closed, this portion of the winter road has only been opened sporadically for remediation of the sites by the Government of Canada"</p> <p><u>NIRB Project Summary (Public Registry)</u>: ""The Tibbitt to Contwoyto Winter Road may be extended north to Jericho Station</p>			
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		<p>allowing seasonal access to Yellowknife in some years."</p> <p><u>NIRB Community Scoping/Guidelines Meeting Presentation May 2025</u>: slide 14 (Project Components): "Winter Road connection to Tibbet-Contwoyto Winter Road", and slide 18 (Project Schedule): "75-year design life – operations."</p>			
3	1	<p>Scope of the Project,</p> <p>4) Annual construction of a winter road to connect the Jericho Mine to the ice road at the Nunavut/Northwest Territories</p>	Potential missing word	The word 'border' may be missing.	Add the word 'border.'
2	<p>Draft Scope List Section 2, subsection a) and b)</p> <p>2024 Proponent Proposal</p>	<p>Project Components – A 230-kilometre Controlled All-season Access Road Between Grays Bay (Kogloктоаkyok) and the Jericho Mine site (Station)</p>	<p>During the 2025 public scoping sessions in Inuvik and Yellowknife, NWT, it was not clearly stated whether the road is intended to be private or public access. The 2024 project description says that access will be controlled but does not provide details.</p>	<p>Understanding how access will be controlled is important for assessing potential impacts of the Project.</p>	<p>Recommend that NIRB update the Draft Scope and the Draft EIS Guidelines to:</p> <ul style="list-style-type: none"> • provide clarity to readers on whether the , road will be public or private and (if applicable) how access will be controlled, and • require the proponent to provide additional information about access control methods, locations, and other relevant factors.

4	1)n)	Scope of Assessment - Anticipated eco-systemic and socio-economic impacts of the Project Marine Wildlife	There are transboundary implications – specifically beluga whales, bowhead whales and seals.	The project is expected to have impacts on marine wildlife.	The GNWT recommends that NIRB specify in the Scope that representative marine wildlife includes beluga whales, bowhead whales and seals.
4	1)q.	Scope of Assessment - Anticipated eco-system and socio-economic impacts of the Project Traditional activity and knowledge and community knowledge including:	As there are transboundary implications, it is important to consider Inuvialuit, Dene, and Métis traditional knowledge.	The project is expected to have impacts in the NWT, as well as in Nunavut.	The GNWT recommends that NIRB specify in the Scope the types of traditional knowledge to be considered and that they include: "Relevant Inuvialuit, Dene, and Métis traditional knowledge"
4	1) p., t. and u., and v.	Anticipated ecosystemic and socio-economic impacts of the Project	It isn't clear why the factors for Health and well-being under bullet (t) are listed separately from Socio-economic factors under bullet . It also isn't clear why Community infrastructure and public services, and Health and safety are listed separately.	Separate sections may imply that health and wellness (and other sections) are distinct from socio-economics. Additionally, so many sections for socio-economic impacts may lead to values which are likely to relate to each other being missed by a reader.	The GNWT recommends that NIRB amend the Draft Scope list to combine Health and well-being, Community infrastructure and public services, and Health and safety including infrastructure and public services under the socio-economics section (p.).
5	1)w.	Scope of Assessment; 1) Anticipated eco-systemic and socio-economic impacts of the Project ; w. Cumulative effects	The cumulative effects assessment needs to include the potential impacts of induced development, as well as reasonably foreseeable	One of the assumed objectives of this project is to open an area of NU to development opportunities, especially opportunities that aren't feasible without	The GNWT recommends that the scope of assessment include induced developments, when considering the cumulative effects of the Project.

			future mining and transportation infrastructure projects.	transportation infrastructure in place. As such, these potential future developments need to be included in the cumulative effects assessment.	
5	1)w.	Scope of Assessment; 1) Anticipated eco-systemic and socio-economic impacts of the Project ; w. Cumulative effects	The cumulative effects assessment should include reasonably foreseeable future mining and transportation infrastructure projects within the NWT.	The project is expected to have impacts within the NWT.	The GNWT recommends that NIRB expand this section to include relevant NWT projects in the list of projects to be considered.
5	2)	Scope of the Assessment; 2) Anticipated Effects of the Environment on the Project	The list of environmental factors does not include wildfires, a natural environmental occurrence.	Extreme fire seasons can have impacts on the project, and on the VECs that are to be assessed.	The GNWT recommends that NIRB include wildfires in the list of environmental factors
5	2)	Scope of the Assessment: 2) Anticipated Effects of the Environment on the project	The last paragraph speaks to Nunavut's unique socio-economic environment.	The project is expected to have impacts on and opportunities for the NWT.	The GNWT recommends that NIRB add "and the NWT's." to the statement "The scope of the assessment will include the potential for conditions n Nunavut's unique socio-economic environment, including the following specific factors:".

6	5)	Measures proposed by the proponent to compensate persons whose interests are adversely affected by the Project	The Scope of assessment will include “steps that the Proponent proposes to take to compensate interests of parties adversely affected by the Project including all non-confidential details pertaining to any Inuit Impact and Benefit Agreement pursued in connection with the Project”. This statement does not consider Impact Benefit Agreements that the Proponent may negotiate with other Indigenous peoples in connection to the Project.	Language lacks inclusivity. Consider adding the word Indigenous to widen the context of this statement.	The GNWT suggests modifying the statement to read as follows: “The scope of the assessment will include the steps that the Proponent proposes to take to compensate interests of parties adversely affected by the Project including all non-confidential details pertaining to any Inuit or other Indigenous Impact and Benefit Agreement pursued in connection with the Project.”
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PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
COMMENTS ON DRAFT EIS GUIDELINES						
5	v	Definitions and Terms	Country Foods definition	Definition only includes Inuit.	In the context of this project, this should include Inuit and other Indigenous people.	The GNWT recommends adding “and Indigenous Peoples” after Inuit.
7	vii	Definitions and Terms	Transboundary impacts	This definition is very technical and difficult to understand.	The definition should be modified specifically for the project or written in plain language to improve understanding.	Revise definition to improve understanding.
8	viii	Definitions and Terms	Well-being	Definition includes specifics on connection to the land for Inuit.	Consider a more inclusive description that includes Indigenous peoples within the NWT.	The GNWT recommends adding “and Indigenous Peoples” within NU and NWT.
17	9	2.1	The second paragraph of the “ <i>Study Strategy and Methodology</i> ” Section	Bullet c) states: “the anticipated ecosystemic and socio-economic impacts of the project, including those arising from the effects referred to in paragraph (b);”. However, NIRB’s states: “The environment is comprised of interconnected and interdependent biophysical, socio-economic, cultural, health, and well-being components and systems” (Section 1.4 bullet 1).	The impacts mentioned in bullet c) exclude other important environmental impacts (if one considers NIRB’s definition of environment).	Consider adding cultural, health and well-being impacts to the list of impacts. The GNWT suggests that NIRB modify bullet c) to read as follows c): “ the anticipated ecosystemic, socio-economic, cultural, health, and well-being impacts of the project, including those arising from the effects referred to in paragraph (b);”
32	24	6.2	Project Purpose, Need, and Alternatives 2 nd Bullet	The Draft EIS Guidelines require the proponent to describe the benefits of the proposed project for communities in Nunavut. The proponent should also	The project may have benefits to communities in the NWT.	The GNWT recommends adding “and NWT” to the second bullet.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
				describe any benefits to NWT communities.		
35	27	6.4	Future Development	There are public documents that state the intent is to connect the Grays Bay port with southern Canada via an all-season road in the future.	There may be benefits in specifically describing how an all-season road from Jericho Station connecting to southern Canada should be treated as a future development for this assessment.	The GNWT recommends that the Draft EIS Guidelines be amended to provide clarity on how an all-season road connection from Jericho Station to southern Canada will be treated for the assessment.
36	28	7.1	Factors to be considered in the Impact Assessment Bullet (e)	The impacts mentioned in bullet e) exclude other important impacts, such as cultural, health and well-being impacts.	NIRB's states: "The environment is comprised of interconnected and interdependent biophysical, socio-economic, cultural, health, and well-being components and systems" (Section 1.4 bullet 1).	The GNWT suggests that NIRB modify bullet e) to read as follows: e): "the anticipated ecosystemic, socio-economic, cultural, health, and well-being impacts of the project, including those arising from the effects referred to in paragraph (d);"
36	28	7.1	Factors to be considered in the Impact Assessment Bullet (f)	Clarity is needed to confirm that bullet (f) of Section 7.1 is referring to both reasonably foreseeable development AND induced development when it speaks to any project that is likely to be carried out: "(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;"	The definition of "reasonably foreseeable future development" provided in the definition section is correct. However, reasonably foreseeable development does not capture developments that could/will only become feasible once the development being proposed is complete. These types of development would be considered "induced development". Given the presence of a definition for one of these terms, but not the other, there	The GNWT recommends that (1) a definition of "induced development" be added to the list of Definitions and Terms and (2) it is made clear that whenever the phrase "any project that is likely to be carried out," or similar, is used it is referring to both "reasonably foreseeable future development" and "induced development".

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
					<p>is concern that when this bullet speaks to "...any other project that... is likely to be carried out" it will be interpreted to be referring to only reasonably foreseeable developments and not also induced developments. Given that induced development is one of the intended outcomes of the development proposed, explicitly including induced development in the scope of the impact assessment is desirable.</p> <p>This concern applies throughout the Draft EIS, whenever the phrase "any project that is likely to be carried out", or similar, is used.</p>	
43	35	7.4	<p>Impact Assessment Approach</p> <p>7th bullet point</p>	<p>The mitigation hierarchy establishes an order of preference to promote project developments with the least environmental effects by eliminating as many potential adverse effects as possible. Proponents are expected to take all reasonable and practical measures to avoid impacts; those impacts which cannot be wholly avoided should be minimized as far as is practical and reasonable. Proponents should promptly apply onsite</p>	<p>It's important for proponents to clearly describe all mitigation measures in order of preference (i.e., avoid, minimize, restore, and if needed offset). The bullet point "Proposed mitigation measures to avoid, reduce, or offset predicted impacts" does not acknowledge the "restore" component of the mitigation hierarchy and implies that offsetting is considered an option to move the project ahead when it</p>	<p>The GNWT recommends changing the bullet point to read as follows: "Proposed mitigation measures to avoid, minimize, and restore predicted impacts, or offsetting as a last option to compensate for any residual predicted impacts"</p>

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
				restoration to reverse impacts which cannot be further minimized but which can practically be rendered temporary. As a last step only, offsetting should be applied to compensate for any residual impacts that remain after application of avoidance, minimization, and onsite restoration.	should only be considered as a last resort option.	
46	38	7.4.2	General	Environmental factors section should include fire, a natural environmental occurrence.	Extreme fire seasons can have impacts on the project, and on the VECs that are to be assessed.	The GNWT suggests that where appropriate, NIRB should consider the impacts of fire as an environmental factor
46	38	7.4.2	Impacts of the Environment on the Project Title of 7.4.2	The environmental factors to be considered in the assessment of impacts of the environment on the proposed project are bio-physical in nature. Given that the definition of the term "Environment" as outlined in the Draft EIS Guidelines includes aspects of the human environment including social, economic, and cultural aspects, the title of this section should clearly indicate that the factors to be considered relate to the natural environment, and not the broader definition.	Consistency in terminology	The GNWT suggests that NIRB modify the title of this section to read as follows: Section 7.4.2 "Impacts of the Natural Environment on the Project".
52-57	44-49	7.4.3	Cumulative Effects Assessment	Inconsistent use of the words "effect" and "impact".	Throughout the Draft EIS Guidelines, but particularly in Section 7.4.3, the cumulative effects assessment is also	The GNWT recommends that the Draft EIS Guidelines be amended to ensure a consistent use of the works

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
					referred to as the cumulative impacts assessment. The Cumulative Impact Monitoring Program (NWT CIMP) of the GNWT recommends use of the term cumulative impacts over cumulative effects. However, the main concern with the Draft EIS Guidelines is that both terms are being used interchangeably within a single document.	“effect” and “impact”. The GNWT recommends use of either “cumulative impacts” or “cumulative effects”.
52-57	44-49	7.4.3	Cumulative Effects Assessment	Reasonably foreseeable future development, as defined by NIRB and similarly by MVEIRB, includes projects or activities that are likely to occur, including those currently under regulatory review or that will be submitted for regulatory review in the near future, as determined by the existence of a proposed project description, letter of intent, or any regulatory application filed with an authorizing agency.	Given the spatial and temporal extent of the proposed project within the Slave Geological Province, there will be areas of high mineral potential that have not been explored that may become financially and logistically feasible with an all-season road. Limiting the extent of the cumulative effects assessment to project "likely" to occur based on existing projects or activities is limiting the scope of cumulative impacts likely to occur in the proposed project area.	The GNWT recommends that the Draft EIS Guidelines be amended to require an assessment of the potential impacts of induced development given that this project has the potential to make exploration of areas of high mineral potential in the Slave Geological Province more attractive.
52-57	44-49	7.4.3	Cumulative Effects Assessment	The cumulative impacts assessment needs to include the potential impacts of induced development, but to do so the	As part of the cumulative impacts assessment, the proponent should include the methodology and results used to develop the list of induced	The GNWT recommends that the Guidelines be amended to require the proponent to conduct a cumulative effects assessment which includes an

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
				proponent needs to first identify potential induced development.	developments used for the cumulative effects assessment.	induced development assessment and to include the methodology for the induced development assessment in the Impact Statement. NWT CIMP of the GNWT is currently developing guidance about the best practices for evaluating induced development. This document can be shared with NIRB when available.
58	50	7.4.4	Last paragraph	The second to last sentence describes components of the socio-economic environment to be considered in the assessment of transboundary impacts. The GNWT acknowledges that the list is non-exhaustive, however one of the impacts that should be assessed is impacts to tourism in the NWT. Increased traffic from the proposed project has the potential to impact tourism activities in the NWT, such as aurora viewing.	Increased traffic from the proposed project has the potential to impact tourism activities in the NWT, such as aurora viewing.	The GNWT recommends the Draft EIS Guidelines be amended to include tourism in the NWT as a component of the socio-economic environment to be assessed.
64	56	8.1.3.1	Baseline Information for Noise and Vibration Bullets (ii) & (iii)	Review of available studies and research on the potential impacts of noise and vibrations on terrestrial and marine wildlife behaviours must ensure that noise and vibrations thresholds/findings are based on the auditory thresholds of wildlife	For example, the lowest audible frequency for reindeer has been reported to be 63 Hz. However, a recent study from Perra et al. (2022) found an auditory threshold lower limit of 30 Hz and quantified reindeer sensitivity thresholds to	The GNWT recommends that the Draft EIS Guidelines be amended to require that the literature review focus on findings from studies that link auditory sounds (in Hz) from noise and vibration activities of mining and shipping operations to

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
				<p>themselves, not human auditory thresholds.</p>	<p>frequencies ranging from 30 to 16,000 Hz. The results indicate that anthropogenic sounds previously thought to be beyond the hearing range of Rangifer are likely to be audible to the species, and therefore have the potential to affect their soundscape.</p> <p>Perra et al. (2022). Exploring auditory thresholds for Reindeer, Rangifer tarandus. Journal of Veterinary Behavior, 52-53: 37-44.</p>	<p>the lower and upper limit auditory thresholds that are audible to terrestrial and marine wildlife (each species will have a different threshold). The literature review should also focus on the spatial scale of impacts (e.g., how far does caribou need to be from the noise and vibration activities for the sound to be inaudible). A comparison study of terrestrial and marine wildlife behaviour before and after a specific noise and vibration activity (i.e., blasting) is not enough to determine the direct and indirect impacts of noise and vibration on wildlife.</p>
75	67	8.1.10.2	<p>Impact Assessment for Vegetation</p> <p>Bullet (ix)</p>	<p>Bullet point (ix) states that the proponent should look into the potential impacts of loss or alteration of habitat on terrestrial and marine wildlife due to pollutants and noise.</p>	<p>Potential impacts to wildlife from loss or alteration of habitat should be considered broadly, looking at all possible causes – not just limited to contaminants and noise. There may be other factors besides contaminants and noise that could cause loss or alteration of wildlife and marine habitat.</p>	<p>The GNWT recommends changing the bullet point to read as follows: "Potential impact from the loss or alteration of habitat (i.e., vegetation) and its effects on wildlife, wildlife calving grounds, and marine habitats".</p>
75	67	8.1.11.1	<p>Terrestrial Wildlife & Wildlife Habitat</p>	<p>Bullet (i) requires the description of wildlife populations, distributions, and ecologies in the Regional Study Area,</p>	<p>To properly assess transboundary impacts, this section should include</p>	<p>The GNWT recommends changing the bullet point to read as follows: "...This description should include reference</p>

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
			Baseline Information Bullet (i)	with emphasis on identified wildlife VECs and species with special designations with a reference to species having significant ecological functions, and/or of importance for Inuit life and culture. The bullet does not mention importance to communities, life, and culture of Indigenous peoples living in the NWT.	Indigenous peoples living in the NWT.	to species having significant ecological functions, and/or of importance for Inuit, Dene, Métis and Inuvialuit life and culture;”.
76	68	8.1.11.1	Terrestrial Wildlife and Wildlife Habitat Baseline Information Bullet (vi)	Bullet point (vi) states that the proponent should identify key wildlife habitats in the Local Study Area and Regional Study Area.	Identification of water crossings, sea ice crossings, land bridges, and caribou trails are missing as key wildlife habitats (although they are mentioned in the context of Inuit harvesting).	The GNWT recommends that the Draft EIS Guidelines be amended to require the proponent to consider water crossings, sea ice crossings, land bridges, and caribou trails as key wildlife habitats.
76	68	8.1.11.2	Terrestrial Wildlife and Wildlife Habitat Impact Assessment Bullet (i)	Bullet point (i) states that the proponent should analyze the impacts of the proposed project on important wildlife habitat.	Similar to the comment above, important habitat should include water crossings, sea ice crossings, land bridges, eskers, and caribou trails. It will be important during the analysis to identify the number of water crossings (out of 230 water crossings that the proposed road will intercept) that are being used by caribou (known through collar data and TK). How will the proponent	The GNWT recommends that the Draft EIS Guidelines be amended to include water crossings, sea ice crossings, land bridges, and caribou trails in the assessment of important habitat. The impact assessment should clearly identify the number of important habitats that will be impacted by the proposed project, as well as clearly describe the measures taken to avoid and minimize the

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
					avoid or minimize the number of water crossings (and other important habitat features) used by caribou (and other wildlife) that will be impacted by the proposed project?	number of important habitats impacted by the proposed project (e.g., change in route alignment to reduce the number of water crossings used by caribou that will be impacted by the proposed project from 230 to XXX).
77	69	8.1.11.2	Terrestrial Wildlife and Wildlife Habitat Impact Assessment Bullet (ii)	Bullet point (ii) states that the proponent should look into direct and indirect impacts from potential ice-breaking associated with shipping activities and ice management at the port/dock facility.	The cumulative effects of later freeze up from climate change and ice-breaking activities related to the proposed project when ice is forming could be detrimental to Dolphin and Union caribou's migration corridor between Victoria Island and the mainland.	The GNWT recommends that the Draft EIS Guidelines be amended to require a clear definition of when shipping will occur (other than "open season") and how the shipping season will be defined. For example, will other ships (i.e., ice breaker cruise ship) be allowed near or at the port after the proponent has stopped their own shipping operations for the season?

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
77	69	8.1.11.2	Terrestrial Wildlife and Wildlife Habitat Impact Assessment Bullet (ii)	Bullet point (ii) requires an assessment of the potential impacts on the population size, abundance, distribution, and behaviour of wildlife VECs from various factors but does not consider tundra fires. Tundra fires have recently started in the Kitikmeot region of Nunavut.	It's important to consider direct and indirect impacts of tundra fires on wildlife and wildlife habitat, especially as tundra fires are likely to occur in higher frequency and greater extent with climate change.	The GNWT suggests including a bullet point in Section 8.1.11.2 (b) that says, "Direct and indirect impacts from tundra fires and the cumulative impacts of climate change on tundra fire frequency and extent".
76	68	8.1.11.2	Terrestrial Wildlife and Wildlife Habitat Impact Assessment Bullet (iii)	Bullet point (iii) states that the proponent should look into the potential impacts of ground traffic and air traffic disturbance on wildlife but does not include impacts of marine traffic.	Marine traffic associated with the Proponent's activities and/or marine traffic from other activities (especially activities who may not follow the proponent's guidelines) should be considered in the impact assessment.	The GNWT recommends that the Draft EIS Guidelines be amended to require the proponent to consider the potential impacts of marine traffic on wildlife during open water season and consideration for marine traffic that is not associated with activities from the proposed project.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
76	68	8.1.11.2	Terrestrial Wildlife and Wildlife Habitat Impact Assessment Bullet (xi)	Bullet point (xi) states that the proponent should look into the potential impacts of loss or alteration of habitat on terrestrial and marine wildlife due to pollutants and noise.	Potential impacts to wildlife from loss or alteration of habitat should be considered broadly, looking at all possible causes – not just limited to contaminants and noise. There may be other factors besides contaminants and noise that could cause loss or alteration of wildlife and marine habitat.	The GNWT recommends changing the bullet point to "Potential impacts from the loss or alteration of habitat (i.e., vegetation)".
78-79	70-71	8.1.12.2	Birds and Bird Habitat Impact Assessment	It is unclear if the project will include the use of wind turbines. The 2024 Project Proposal does not mention wind turbines, but bullet point xiii in Section 8.1.11.2 of the draft EIS Guidelines mentions wind turbines.	If there are wind turbines as part of the project (which has been implied by bullet point xiii in Section 8.1.11.2), then the Proponent should be considering impacts of wind turbines on birds.	The GNWT suggests that if the Project includes wind turbines, then Section 8.1.12.2 should be amended to include an additional bullet point that says "Potential impacts of wind turbines on birds during project construction and operation, specifically during migration".
80-81	72-73	8.1.13.2	Marine Environment Impact Assessment	It seems that the impact assessment for the freshwater environment (Section 8.1.9) has a greater consideration of ice than the impact assessment for the marine environment (Section 8.1.13.2).	The impact assessment for the marine environment doesn't fully consider changes to sea ice (e.g. freeze up, break up, thickness, formation or maintenance of open water leads) that may result from the proposed project. This is important for wildlife (e.g., polar bears, seals, caribou that migrate across sea ice), as well as for people (e.g., effects	The GNWT recommends that the Draft EIS Guidelines be amended to include considerations for changes to sea ice in the impact assessment for the marine environment.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
					access to harvesting areas, safety when traveling on the land).	
81	73	8.1.14.2	Marine Wildlife Impact Assessment Bullet (iv)	Bullet point iv states that the proponent should conduct a risk assessment of the potential introduction of invasive aquatic species due to ballast water discharge, ship wash, and hull fouling.	Introduction of invasive species, including disease vectors, in/on equipment and ballast water can become a serious issue, especially from climate-sensitive pathogens and diseases. These potential impacts are not strictly limited to marine wildlife as these diseases/pathogens can transfer to terrestrial wildlife either directly or indirectly (through a terrestrial intermediate host).	The GNWT recommends that the Draft EIS Guidelines be amended to include consideration for the impacts of invasive diseases and pathogens from marine equipment and ballast water that can transfer to terrestrial wildlife (e.g., climate-sensitive pathogens/diseases, terrestrial intermediate hosts).

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
81	73	8.1.14.2	Marine Wildlife Baseline Information	There are baseline information requirements that are identified for terrestrial wildlife that are applicable to marine wildlife but are not included in Section 8.1.14.2.	A complete assessment of impacts on marine wildlife is required.	<p>The GNWT recommends that the Draft EIS Guidelines be amended to include the following bullet points:</p> <ul style="list-style-type: none"> - Description of the population health of identified VECs, with a discussion of contaminant loadings in representative species important to Inuit as a food source. - Identification of habitats of any rare or sensitive species, such as Species at Risk, or those with similar designations or federal and territorial status. - Description of the migratory patterns and routes of marine wildlife VECs and the corresponding periods when these routes would be affected by the project. - Discussion of the relative health of VEC populations, including contaminant loading in representative marine wildlife VEC species. - Details regarding available information on potential impacts to marine wildlife associated with noise and vibrations from relevant scientific research and Traditional Knowledge.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
						<p>- Discussion of other pertinent issues as identified through public engagement..</p>
81-82	73-74	8.1.14.2	Marine Wildlife Impact Assessment	There are elements from the impact assessment identified for terrestrial wildlife that apply to marine wildlife but are missing in this section (Section 8.1.14.2).	A complete assessment of impacts on marine wildlife is required.	<p>The GNWT recommends that the Draft EIS Guidelines be amended to include the following bullet points:</p> <ul style="list-style-type: none"> - Direct and indirect loss of habitat from the presence of and use of infrastructure, the conduct of project activities and associated sensory disturbances. - Direct and indirect impacts from potential degraded water quality and ground contamination, as well as airborne contaminants resulting from project facilities and associated activities. - Direct and indirect impacts from potential ice-breaking (prior to spring break-up or following fall freeze-up) associated with shipping

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
						<p>activities, and ice management at the port/dock facility.</p> <ul style="list-style-type: none"> - Potential impacts on marine wildlife from increased hunting pressure resulting from improved access due to Project infrastructure. - Potential impacts of contamination to sources of traditional food as a result of bioaccumulation (i.e., food chain uptake through air, water and soil) as well as any proposed monitoring methods to track these potential impacts. - List of all potential contaminants and a determination of whether possible uptake of these contaminants into country foods will result from project activities. - Potential impacts from the loss or alteration of habitat due to pollutants and noise and any ancillary effects. - Evaluation of the relative health and potential for chemical toxicity for inherently sensitive wildlife species based on an analysis of exposure pathways and demographic parameters.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
81	73	8.1.14.2	Marine Wildlife Impact Assessment Bullet (vi)	Bullet point vi states that the proponent should look into the potential effects of marine shipping activities on marine wildlife. The effects of marine shipping should be extended to consider effects of shipping on terrestrial wildlife that use sea ice (e.g. caribou).	Dolphin and Union caribou (a terrestrial species) migrate between Victoria Island and the mainland twice a year through sea ice crossings.	The GNWT suggests that the Draft EIS Guidelines be amended to expand the assessment of the effects of marine shipping to include the effects of shipping on terrestrial wildlife that use sea ice (e.g. caribou).
82	74	8.2	General	The Draft EIS Guidelines do not consider community engagement as a mechanism to develop indicators of wellness (ie. health, community and family wellness).	Community input on indicators is supported by recent research (see: Measuring Wellness Through Indigenous Partnerships: A Scoping Review (ie. Plume, Carroll, Nadeau, and Redvers, 2024)). Community input may help ensure a development of trust between the project and communities and ensure indicators which matter to community members are included in project monitoring efforts.	The GNWT recommends that the Draft EIS Guidelines be amended to require engagement with Indigenous governments and Indigenous organizations in the development of indicators for wellness.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
82	74	8.2	Socio-Economic Environment and Impact Assessment First sentence of first paragraph	The statement omits reference to health.	Consider including reference to health in the paragraph. Also consider adding “Community” to wellbeing to qualify the type of wellbeing that is being referred to. This suggestion is in line with the content of Subsection “ 8.2.9 Health and Wellbeing ”	The GNWT recommends rephrasing this sentence to read as follows: “The assessment of potential adverse and beneficial impacts on the socio-economic environment such as community well-being, physical and mental health , culture, and traditional land and/or aquatic uses (including hunting, harvesting, gathering, and cultural expression and connection), archaeology, food security, economic conditions , employment, training, and contracting opportunities shall be undertaken with a level of effort and expertise at least equivalent to that applied to the assessment of ecosystemic values.”
83	75	8.2.1.1	Bullet ii)	This should also include regions in the NWT.	There may be economic impacts in the NWT from this project.	The GNWT recommends adding “and NWT” after Nunavut.
83	75	8.2.1.2	Impact Assessment	Should include tourism impacts in the NWT.	The project could have impacts on tourism in the NWT.	The GNWT recommends that the Draft EIS Guidelines be amended to include tourism impacts in the NWT.
83	75	8.2.2.1	Employment – Baseline Information	Bullet ii) speaks to assessing the current local and national labour force available to satisfy the needs of the project. As a project with transboundary implications	The project could have positive economic outcomes for both NWT and NU residents. The strength of assessing the northern labour supply	The GNWT recommends that Draft EIS Guidelines be amended to include a bullet for a adopting a preferential

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
				consideration could be given to assessing northern labour supply.	could be extended to the NWT, benefitting the NU by providing northern experience.	northern hiring practice/ plan in section 8.2.2.1.
85	77	8.2.3.2	Education & Training Impact Assessment Bullet vi)	Bullet vi) Speaks about the potential for longer term community capacity building programs regarding how mine training plans can enhance the transferability of skills after the mine closure (e.g. management and HR skills, computer skills, heavy equipment skills, finance skills, etc.)	To make the option for training program demand driven based on local needs and priorities that suit the local context.	The GNWT recommends that the Guidelines be amended to require a description of training programs and details on how they will be tailored to local communities based on their needs and priorities.
85	77	8.2.4	Contracting and Business Opportunities	The project could present positive economic development opportunities for the NWT and Nunavut residents.	Potential for increased sourcing and movements of materials, fuel, labour and supplies from the NWT, as well as increased mining exploration on both sides of the border. Flights through Yellowknife airport (YZF) could benefit northern owned airlines and expediting companies.	The GNWT suggests adding a bullet extending northern preferential contracting opportunities to northern owned businesses in section 9.2.4. Consider adding the use of flights for both freight and personnel through Yellowknife airport (YZF).
87	79	8.2.6.2	Traditional Activity and Knowledge Impact Assessment Bullet (ii)	Bullet point (ii) states that the Proponent should look into the potential impacts of the project development and marine shipping on accessibility to areas for hunting, fishing, marine harvesting, traveling, and recreational/religious activities.	Inuit also travel on sea ice to access areas for harvesting terrestrial and marine wildlife, fishing, traveling, and other activities.	The GNWT recommends that the Draft EIS Guidelines be amended to include consideration for the impacts to sea ice that might affect people's safety and/or their ability to travel and harvest.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
91	83	8.2.9.3	Health and Wellbeing Topics for Discussion	The Topics for Discussion subsection does not include impacts of the project on cultural well-being of impacted communities (including transboundary communities).	NIRB should consider including "Potential disruptions to Inuit and other Indigenous groups' ability to hunt, which is vital not only for sustaining livelihoods but also for maintaining cultural continuity, with broader implications for the overall well-being of the community."	The GNWT recommends that the Draft EIS Guidelines be amended to include the additional bullet: "(ix). Potential disruptions to impacted communities' (including transboundary communities) ability to hunt, which is vital not only for sustaining livelihoods but also for maintaining cultural continuity."
91	83	8.2.10.2	Community Infrastructure and Public Services Impact Assessment Bullet (iii)	Bullet (iii) does not include impacts to health care, medical system, and emergency response services in the NWT	The GNWT currently has an agreement with the Government of Nunavut to provide certain health and emergency responses services to residents of the Kitikmeot region. Potential impacts of the project on the provision of healthcare services, as well as planning for emergency services should accidents occur requiring the medical evacuation of employees, should be assessed.	The GNWT recommends that this bullet be amended to include consideration of impacts to the GNWT health care system.
92	84	8.2.11.2	Human Health & Safety Impact Assessment Bullet (v)	Bullet (v) is limited to potential effects on physical health. There are potential additional effects on mental health to consider.	There may be additional mental health related effects to consider such as trauma due work-related accidents or injuries, etc.	The GNWT suggests adding potential effects on mental health to bullet (iv).
106	98	11.3.3	Socio-Economic Environmental Plans	This paragraph focuses on proponent requirements to present plans, policies to minimize negative effects on the	The assessment of the Grays Bay Port and Road Project should consider of potential additional impacts and	The GNWT recommends including other northerners and Northern Indigenous people in this section.

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
			First paragraph	socio-economic environment and to optimize positive impacts. The focus is on impacts and benefits for Inuit, and Inuit Owned Firms.	benefits to other Northerners and Indigenous peoples—not just Inuit—because the land, resources (including mobile resources), span multiple traditional territories, and inclusive participation ensures fair economic benefits, stronger regional unity, and respect for Indigenous rights.	
			General	<p>There are many sections that would benefit from some project specific edits as they may have been copied from a previous project that was for a mine or a mine road.</p> <p>The document should be checked for the following words/term at a minimum: tailings, mine, mining, mine closure, underground, in-situ, deposits, pit, nuclear, rock, project roads, turbines, transmission lines, temporary closure, final closure, Cumberland Sound, and vision of expansion.</p>	The Draft EIS Guidelines should be specific to the project being assessed.	GNWT recommends that NIRB update the Draft EIS Guidelines to remove terminology that is not relevant to the assessment, construction, and operation of a road and port.
			General	NIRB has not yet issued final draft Standard Impact Statement Guidelines following the 2024 comment period, and information about how NIRB	Comments on the draft Standard Impact Statement Guidelines may be relevant to the Draft EIS Guidelines for the Grays Bay project. An example of a 2024 comment that is relevant to	GNWT suggests that NIRB review comments submitted in 2024 on the draft Standard Impact Statement Guidelines for relevance to the current document and, where it

PDF Page	Page	Section	Paragraph or reference	Issue	Rationale	Suggested change
				considered comments on that document is not available.	the current document is GNWT's 2024 comment that the defined term "Indigenous groups asserting s. 35 rights "is not appropriate to use in all cases as some Indigenous groups, such as the Tłıchǫ, have <i>established</i> Treaty harvesting rights in part of Nunavut. (See GNWT 2024 comments for full comment).	accepts those comments, apply them to the Guidelines for the Grays Bay project.