



Tłıchǫ Government

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July 16, 2025

Chairperson of the Nunavut Impact Review Board

29 Mitik Street

P.O. Box 1360

Cambridge Bay, NU X0B 0C0

Via email info@nirb.ca

Re: 24XN038 - Grays Bay Road and Port Proposal – Tłıchǫ Government Comments on DRAFT Scope List and Guidelines for an Impact Statement

Good Day,

The Tłıchǫ Government (TG) has reviewed the Draft Scope List and Draft Guidelines for the Preparation of an Impact Statement for West Kitikmeot Resources Corp's Grays Bay Road and Port Proposal. As noted in previous comments on NIRB File: 17XN011 and our [October 30, 2024 comments](#), we reiterate and stress concerns over the road's potentially serious impacts on migratory caribou – caribou that travel through the traditional lands of the Tłıchǫ, Mǫwǝi Gogha Dè Nǝtlèè, where the Tłıchǫ rely on them to exercise their constitutionally-protected harvesting rights and to practice Tłıchǫ language, culture, and way of life. Please see below for specific recommendations on the Draft documents:

<u>Reference</u>	<u>Notes/Recommendation</u>
Draft Scope list, page 5	For “Transboundary effects”, TG recommends the following wording: “...including but not limited to impacts on migrating caribou and on Tłıchǫ culture, language, way of life, and constitutionally-protected harvesting rights”. The ability to exercise these rights depends on the ability of caribou to migrate to Tłıchǫ traditional lands.
Draft Guidelines for the preparation of an Impact Statement, section 8.1.11.1 (page 67-68)	TG recommends including as part of baseline information: “habitat connectivity” – the ability for migratory caribou herds to freely migrate between seasonal habitat (e.g., from calving-grounds to post-calving, and summer range around Contwoyto Lake, and on to fall and winter ranges).

Draft Guidelines for the preparation of an Impact Statement, section 8.1.11.2 (page 68-69)	<p>TG recommends the following potential impacts be included:</p> <ul style="list-style-type: none">• Impacts on caribou, including specific impacts on the Bathurst caribou herd which is in critical low status;• Illegal harvest of caribou: with impacts from illegal harvest, overharvesting, meat wastage, and influx of harvesters. There will need to be clear and robust mitigation measures related to enforcement and monitoring (who will enforce, who will fund it, when monitoring takes place, etc.) and road and traffic management (how and when will seasonal closures be implemented, how will traffic be managed to minimize impacts on caribou and caribou migration, etc.);• Cumulative impacts on caribou and other wildlife should include consideration of other industrial development and roads, such as spur roads and mines that are induced or enabled by the project, as well as roads and other developments in the region, including in the NWT.
Draft Guidelines for the preparation of an Impact Statement, section 8.2.6 (page 78)	<p>The Draft Guidelines state that “...traditional activity and traditional knowledge consider land and water use, food security, language, cultural activities, and all harvesting by Inuit”. TG recommends that the guidelines also include traditional knowledge and activities of the Tłıchǫ and other Dene whose harvesting rights, language, food security, and cultural practices rely on migratory caribou that are potentially affected by this project.</p>

We look forward to engaging further with NIRB and the West Kitikmeot Resources Corp and further participating in this assessment. If you have any questions, please contact the Lands Regulation Division of TG by contacting Violet Camsell-Blondin, Manager of Lands Regulation (Violet.CamsellBlondin@tlcho.ca), cc'ing lands@tlcho.ca.

In Tłıchǫ Unity,



On behalf of:
Regulatory Manager Violet Camsell-Blondin
Department of Culture and Lands Protection
Tłıchǫ Government