

July 11, 2025

Nunavut Impact Review Board
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Sent via email only

Subject: Kugluktuk Hunters and Trappers Organization Review of the Draft Guidelines for the Preparation of an Impact Statement for the West Kitikmeot Resources Corp's Gray's Bay Road and Port proposal.

The Kugluktuk Hunters and Trappers Organization (KHTO) has reviewed the Draft Guidelines for the Preparation of an Impact Statement, developed by the Nunavut Impact Review Board (NIRB), for the proposed Gray's Bay Road and Port Project by West Kitikmeot Resources Corp. (West Kitikmeot Resources Corp; the Proponent).

The KHTO does not view this project in isolation, but rather as a catalyst for a landscape-changing level of industrial development in the western Kitikmeot region which will profoundly and permanently change our way of life. The land is central to who we are as Inuit. It is where we hunt, fish, trap, travel, and teach our children. It is where knowledge is passed down, where language is strengthened, and where spiritual connections to animals and places are renewed. The land is not separate from our culture—it is our culture.

The scale of change this project will bring to our members will be permanent and far-reaching. It will fundamentally alter access to the western Kitikmeot region and open the door to widespread industrial development across our homeland. For this reason, the KHTO strongly urges the NIRB to require the Proponent to assess not only the direct impacts of the Gray's Bay Road and Port Project, but also the full scope of foreseeable projects and cumulative effects that it is likely to trigger. We acknowledge that there is uncertainty about the precise scale and nature of future development the road will enable. However, this uncertainty must not be used to avoid a robust and precautionary cumulative effects assessment. In fact, it makes such an assessment even more essential. Both the NIRB and the Proponent have a responsibility to apply a precautionary and conservative approach when analyzing cumulative effects in the CEA, particularly given the vulnerability of the ecosystems, wildlife, and cultural practices that Inuit depend on.

The KHTO has prepared the following comments and recommendations in response to the Draft Guidelines. These reflect the concerns of our members, grounded in generations of lived experience on the land, and guided by our responsibility to protect Inuit harvesting rights, cultural continuity, and the health of our environment for future generations. We urge the NIRB to ensure that these perspectives are meaningfully incorporated into the final Guidelines and that the assessment process respects and upholds Inuit values, knowledge, and ways of life.

Regards,

Amanda Dumond, Manager, Kugluktuk Hunters and Trappers Organization

Table 1: Comments and Recommendations on the Draft Guidelines for the Preparation of an Impact Statement for the West Kitikmeot Resources Corp's Gray's Bay Road and Port proposal.

#	Section	Comment	Recommendation
1.	General Comment	<p>The current Draft Impact Statement Guidelines lack sufficient detail to adequately assess the project's potential impacts on sea ice, particularly from increased marine vessel traffic associated with the proposed port and supporting road infrastructure. The intended purpose of the road and port is to facilitate the year-round movement of goods, equipment, and ore concentrate, which will result in increased marine vessel activity during shoulder and winter seasons when sea ice may still be present. The introduction of shipping lanes, especially during ice-covered periods, can directly facilitate sea ice breakage, accelerate melt patterns, and undermine the structural integrity of sea ice relied upon by Inuit communities for winter travel and harvesting. Vessel-induced ice fragmentation can also disrupt marine habitats and migratory pathways for ice-dependent species such as seals, polar bears and caribou.</p>	<p>The Impact Statement Guidelines must explicitly require assessment of the project's potential effects on sea ice, with particular focus on the role of marine vessel traffic facilitated by the road and port infrastructure. This assessment must:</p> <ul style="list-style-type: none"> • Include baseline characterization of sea ice conditions (e.g., timing, extent, thickness, and use by Inuit communities and wildlife). • Evaluate how increased vessel activity may contribute to sea ice breakage, fragmentation, and accelerated melt during ice-covered or transitional seasons. • Assess the potential effects of sea ice degradation on Inuit land use, including travel, harvesting, and cultural practices. • Identify cumulative effects from regional marine traffic and climate change that may interact with project-related impacts on sea ice. • Be informed by Inuit Qaujimajatuqangit and include engagement with Indigenous rights-holders to understand how sea ice changes may impact rights and way of life.
2.	7.4.3 Cumulative Effects Assessment	<p>The Draft Impact Statement Guidelines does not adequately require the integration of climate change as a primary driver of cumulative effects. There is no clear direction for proponents to assess how project-related impacts may be amplified by accelerating climate trends — particularly in the</p>	<p>The Guidelines must require climate change to be treated as both a baseline condition and a cumulative stressor influencing all aspects of the assessment. This includes using climate-informed timelines, evaluating interactions between project effects and climate-driven changes such as sea ice loss and permafrost thaw, and</p>

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		<p>Arctic, where the effects of warming are already severe and ongoing. Key gaps include the failure to require climate-informed temporal boundaries, evaluation of synergistic effects, or an assessment of the vulnerability of valued components and traditional use areas to climate-driven change. Without this lens, the cumulative effects assessment risks overlooking significant and compounding impacts that are likely to emerge over the project's life span.</p>	<p>assessing the vulnerability of ecosystems and Indigenous land use to future climate scenarios. The assessment must also reflect the increased uncertainty and risk associated with climate change by applying a precautionary approach where data is limited.</p>
3.	Section 7.4.7 Certainty.	<p>Although the Draft Impact Statement Guidelines require proponents to identify uncertainty in impact predictions and significance determinations, there is no corresponding obligation to address these uncertainties through concrete measures. Uncertainty alone cannot justify inaction.</p>	<p>The Guidelines must require proponents to commit to precautionary or adaptive measures when high uncertainty coincides with potentially significant impacts. This could include the use of pilot projects to test mitigation approaches, research partnerships to reduce knowledge gaps, or precautionary offsets triggered by defined thresholds. Where uncertainty remains high, the burden should shift toward proactive mitigation and flexible follow-up, consistent with adaptive management principles.</p>
4.	8.1.4.2 Impact Assessment	<p>The Guidelines require permafrost assessment primarily at project infrastructure sites, such as pits and tailings facilities, where thaw may impact safety and engineering stability. However, they do not require The Proponent to assess how climate change may drive permafrost loss across the broader project footprint.</p>	<p>The Guidelines must be updated to ensure permafrost is assessed as a regional, climate-driven concern:</p> <ul style="list-style-type: none"> A. Require landscape-scale modeling of permafrost degradation, including along the full road corridor and surrounding areas, with projections of ground thaw, terrain instability, and surface water changes. B. Require adaptive monitoring and mitigation measures beyond infrastructure footprints, including clear triggers and response plans for unexpected thaw-related impacts over time.

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5.	8.1.11.2 Impact Assessment	<p>The current guideline language suggests that the assessment of ice-breaking and ice management impacts is limited to the vicinity of the port and dock facility. This framing fails to require a broader evaluation of how shipping activities across the Coronation Gulf may affect sea ice integrity. The Gulf is a known migration corridor for the Dolphin and Union Caribou herd and supports extensive Inuit travel and harvesting. Vessel movement during freeze-up or break-up periods can disrupt ice formation, pose safety risks, and alter wildlife migration routes.</p>	<p>Section 8.1.11.2 must be revised to say</p> <p><i>“Direct and indirect impacts of shipping activities and associated ice-breaking (prior to spring break-up or following fall freeze-up), including potential sea ice fragmentation across the Coronation Gulf resulting from vessel traffic and ice management at the port and dock facility”</i></p>
6.	8.1.11.2 Impact Assessment	<p>The current draft guidelines fail to require an assessment of how project infrastructure, particularly linear features such as snow compacted, may alter predator-prey dynamics. Linear features can facilitate predator movement and access to vulnerable species, such as caribou during calving or post-calving periods, which may lead to increased predation pressure and long-term population impacts.</p>	<p>Revise Section 8.1.11.2 to include the following</p> <p><i>“Assessment of the potential for linear infrastructure and associated snow compaction to alter predator-prey relationships, including increased predator mobility along the road corridor and resulting changes in predation pressure on Caribou during sensitive periods.”</i></p>
7.	8.1.11.2 Impact Assessment	<p>Section 8.1.11 does not require the Proponent to assess the conditions under which accidental spills could occur, nor the specific pathways through which such spills may reach terrestrial wildlife and their habitat. Contamination and bioaccumulation are addressed in general terms, there is no direction to consider the types of spills that may arise during construction or operation, the environmental settings in which they may occur, or the specific consequences for wildlife species, sensitive habitat areas, or harvesting zones.</p>	<p>Revise section 8.1.11.2 to include:</p> <p><i>“Assessment of the potential for accidental spills to occur during Project activities, including identification of likely spill scenarios and associated pathways to terrestrial wildlife habitat. This assessment shall evaluate the potential impacts of such spills on wildlife species, key habitat features (e.g., wetlands, calving areas, denning sites), and areas used for traditional harvesting.”</i></p>

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8.	8.1.11.2 Impact Assessment	Section 8.1.11.2 outlines required considerations for assessing impacts to terrestrial wildlife and wildlife habitat, but it does not explicitly reference mine infrastructure or mine-site activities. Given that the project is fundamentally tied to mining development, the Guidelines must include a clear requirement to assess the impacts of the mine and its infrastructure.	Revise section 8.1.11 to include: <i>"Potential impacts of the mine and associated mine infrastructure on caribou during project construction and operation, including habitat loss and alteration, noise, dust, vibration, and increased access."</i>
9.	8.1.12.2 Impact Assessment	Bullet xix of Section 8.1.12.2 refers to "caribou calving and post-calving and wintering, wolf denning," which are unrelated to birds and bird habitat. This language appears to be mistakenly copied from Section 8.1.11 (Terrestrial Wildlife and Wildlife Habitat) and introduces confusion into the bird impact assessment requirements.	Remove bullet xix as it references wildlife species (caribou and wolves) not applicable to the Birds and Bird Habitat section
10.	Section 8.1.14.2 Impact Assessment	Section 8.1.14.2 but does not provide clear or sufficient direction to assess the full range of impacts that sea ice breakage may have on marine wildlife. Icebreaking is a major disturbance in Arctic marine ecosystems, with the potential to destroy ice-dependent habitat, disrupt migratory routes, increase noise under ice, alter predator-prey dynamics.	Revise Section 8.1.14.2 to include <i>"Assessment of the potential impacts of sea ice breakage resulting from icebreaking activities during spring break-up and fall freeze-up, including habitat fragmentation, displacement or entrapment of marine wildlife, changes to migratory pathways, underwater noise propagation through ice"</i>
11.	6.2.1 Alternatives	Section 6.2.1 outlines the requirement for assessing alternative means of carrying out the Project, but it lacks sufficient specificity to ensure a meaningful and transparent comparison of alternatives The current language focuses on technical and economic feasibility but does not explicitly require the consideration of ecologically and culturally sensitive criteria	Revise Section 6.2.1 to require a more detailed alternatives assessment for the proposed road corridor, including but not limited to: <ul style="list-style-type: none"> • Water crossing design options (e.g., culverts, bridges, snow bridges) • Road access control and land use management measures • Seasonal vs all-season access alternatives • Routing and design options that minimize disturbance to tundra wetlands, caribou

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			<p>migration, and culturally significant Inuit travel routes</p> <ul style="list-style-type: none"> • Future use scenarios and associated cumulative impacts • Closure and reclamation alternatives
12.	7.4.3 Cumulative Effects Assessment	<p>The Grays Bay Road and Port Project must not be viewed in isolation. This project is a catalyst for future industrial development across the western Kitikmeot region, including mining expansion, exploration activity, and increased marine and land-based transport. We are concerned that the Proponent may unknowingly exclude reasonably foreseeable future development from the cumulative effects assessment (CEA), particularly if those developments have not yet formally entered the regulatory system. This risks significantly underestimating the scale of cumulative effects on caribou, sea ice, Inuit harvesting practices, and regional land use.</p>	<p>Inuit rights holders must have a direct role in determining which future projects are considered reasonably foreseeable in the CEA. This determination must be informed by Inuit Qaujimagatuqangit, regional land use knowledge, and community perspectives on development trajectories, rather than relying solely on formal regulatory status or proponent-defined criteria.</p>
13.	6.4 Future Development	<p>Since the Project is an enabler of other development projects (e.g. mines, pipelines, fuel storage, military infrastructure, etc.) it is critical the Impact Assessment take into consideration a series of reasonably foreseeable development scenarios. For example, a low, medium and high scenario. These scenarios must capture the full potential extent of development.</p>	<p>The Proponent must work with KHTO to create development scenarios that are reflective of the full extent of reasonably foreseeable projects the Gray's Bay Road and Port Project will enable.</p>
14.	General Comment	<p>KHTO wishes to express its serious concern regarding the potential implications of Bill C-5, <i>An Act to support the One Canadian Economy</i>, as it may pertain to the review and approval of the Grays Bay Road and Port Project (GBRPP). We understand that this legislation includes provisions aimed at streamlining or accelerating approvals for projects deemed to be in the national interest</p>	<p>KHTO recommends that NIRB and the Government of Canada explicitly exempt the Grays Bay Road and Port Project from any fast-track mechanisms, presumptive approvals, or reduced timelines associated with Bill C-5 or any future federal initiative aimed at accelerating infrastructure projects. We further recommend the following:</p>

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		<p>or vital to the Canadian economy. The Federal Government did not consult with Indigenous Peoples prior to passing this law, which we believe is unconstitutional and a circumvention of the Duty to Consult.</p> <p>KHTO strongly maintains that no project—particularly one of the scale and potential environmental and cultural impact as the GBRPP—should be subject to any form of expedited or guaranteed approval that bypasses or undermines the established processes of environmental assessment, community consultation, and Inuit rights consideration as articulated in the Nunavut Agreement, the Canadian Environmental Assessment Act, and related co-management frameworks.</p> <p>The Grays Bay Road and Port Project intersects with lands and waters that are of critical importance to Inuit harvesting, caribou migration, fish habitat, and other ecological and cultural values. The KHTO emphasizes that any development in this region must be evaluated through a comprehensive, transparent, and fully inclusive assessment process that reflects the Inuit Qaujimajatuqangit (IQ) principles, supports Inuit self-determination, and incorporates both scientific and IQ in decision-making.</p>	<ol style="list-style-type: none"> 1. Commitment to Full Review: Reaffirm that the GBRPP will undergo a full and rigorous environmental and socio-economic assessment by the Nunavut Impact Review Board (NIRB), in line with Article 12 of the Nunavut Agreement. 2. Respect for Inuit Rights: Guarantee that Inuit rights, including rights to harvest and maintain traditional livelihoods, are fully respected, and that Inuit are meaningfully engaged at every stage of the process. 3. Transparent Decision-Making: Ensure all decisions regarding the project are transparent, publicly accessible, and grounded in the co-management principles that define the governance of Nunavut's lands and waters. 4. Cumulative Impacts Analysis: Require a detailed cumulative effects assessment, especially with regard to caribou populations and other key species, that includes Indigenous knowledge and monitoring frameworks led by Inuit organizations. <p>KHTO reiterates that economic development cannot and must not come at the expense of the environment or the rights and futures of Inuit communities. We call on all responsible authorities to uphold the integrity of the regulatory process and ensure Inuit voices remain central in any decisions impacting our territory.</p>