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Nunavut Impact Review Board
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Subject: Kugluktuk Hunters and Trappers Organization Information Requests of the Impact Statement for the West Kitikmeot Resources Corp's Gray's Bay Road and Port Project.

The Kugluktuk Angoniatit Association (KAA) has reviewed the Impact Statement for the proposed Grays Bay Road and Port Project (the Project) prepared by West Kitikmeot Resources Corp. (WKR; the Proponent) and has identified a number of areas where additional information is required to support a complete and informed review of the Project.

The Grays Bay Road and Port Project would introduce permanent road and marine infrastructure into an area of importance for KAA. Given the scale and permanence of the proposed road and port infrastructure, it is important that the Impact Statement clearly demonstrate how potential effects have been assessed, how significance determinations have been reached, and how mitigation and monitoring measures will be implemented to address identified concerns.

The Information Requests identified by KAA in Table 1 below seek additional information and clarification regarding the assumptions, methodologies, and conclusions presented in the Impact Statement. The requests are intended to support a thorough technical review of the Project to ensure that potential impacts on KAA are adequately understood and assessed as the Project moves forward.

Amanda Dummond
Manager
Kugluktuk Angoniatit Association

Table 1. Kugluktuk Hunters and Trappers Organization Information Requests on the Grayss Bay Road and Port Project

IR#	IR Source	IR Directed To	Subject	Reference	Issue/Concern	IR Request
1.	KAA	WKR And Nunavut Planning Commission	Land Use Plan	Volume 2 Section 1.2	The Impact Statement acknowledges there is currently no approved Nunavut Land Use Plan in effect for the Kitikmeot Region. KAA is concerned that approval of a major permanent transportation and industrial corridor prior to completion of the Nunavut Land Use Plan could pre-determine future land use decisions, undermine Inuit-led planning processes, and establish a de facto industrial corridor before regional land use priorities, conservation objectives, and harvesting protections are finalized.	1. Please explain why WKR believes it is appropriate to proceed with the Project in the absence of an approved Nunavut Land Use Plan. 2. Please explain what consideration was given to postponing the Project review process until completion of the Nunavut Land Use Plan. 3. Please explain how WKR assessed Project compatibility with Inuit harvesting priorities, conservation objectives, and cumulative effects management in the absence of an approved land use plan.

2.	KAA	WKR	Access	Volume 2 Section 1.6.3 Section 2.6	The proposed all-season road and associated infrastructure may increase access into currently remote areas used by Kugluktuk harvesters. KAA is concerned that increased access may lead to increased harvesting pressure from non-local users, disturbance of wildlife, safety concerns, and impacts to Inuit harvesting rights and practices. The Impact Statement does not clearly explain how access along the road corridor will be controlled or how unauthorized use will be prevented.	1. Please explain how access to the all-season road will be managed and enforced. 2. Please identify who will be permitted to use the road/port and under what conditions. 3. Please explain whether public access, recreational access, or third-party industrial access will be allowed. 4. Please provide details regarding proposed wildlife protection measures associated with road access. 5. Please explain how WKR will work with KAA and regulatory authorities to monitor and manage increased harvesting pressure and wildlife disturbance.

						6. Please clarify whether checkpoints, permits, monitoring systems, or other enforcement mechanisms are proposed.
3.	KAA	WKR	Spill response and emergency preparedness	Volume 2 Section 1.1.1 Section 2.6	The Project includes large-scale fuel storage and transportation activities, including up to approximately 10 million litres of fuel storage expandable to approximately 160 million litres. Marine transport, fuel transfer, road transport, and quarry operations create risk of spills or accidents affecting land, freshwater systems, marine waters, wildlife, and harvesting areas. KAA requires additional information regarding emergency preparedness, spill response capacity, response timelines, and community involvement.	1. Please provide details regarding anticipated fuel types, storage volumes, and transfer procedures during construction and operations. 2. Please provide detailed spill response plans for: a) marine spills; b) road-related spills c) fuel storage incidents; d) accidents involving hazardous materials. 3. Please explain what equipment and personnel would be available locally and regionally to respond to major spill incidents.

						4. Please provide estimated response timelines for spill incidents occurring along the road corridor and marine shipping routes. 5. Please explain what role KAA and local harvesters would have in spill response planning, monitoring, and emergency communications. 6. Please identify what compensation mechanisms would be available if harvesting areas, wildlife, or country food resources are affected by a spill or accident. 7. Please explain who would be legally and financially responsible for spill response, environmental cleanup, long-term monitoring, habitat

						restoration, and compensation in the event of a major spill, accident, or infrastructure failure associated with the Project. 8. Please identify what entity or entities would provide and hold these funds, whether any financial assurance, trust, bond, insurance, escrow, or contingency fund is proposed, the value of such security, and how Inuit organizations and communities would be protected in the event WKR or third-party operators become insolvent, dissolve, or cease operations.
4.	KAA	WKR	Long-term closure, reclamation, and financial security	Volume 2: Section 1.1.2 Section 1.5	The Impact Statement states that because the Project is "primarily composed of permanent	1. Please explain why WKR does not anticipate providing comprehensive

					infrastructure," WKR does not expect to post a bond or other form of financial security for reclamation obligations. KAA is concerned regarding long-term liability, maintenance, abandonment risks, and the potential future burden on Inuit, communities, or governments if the infrastructure is no longer maintained. Additional clarity is required regarding long-term ownership, maintenance obligations, reclamation planning, and financial security.	financial security for the Project. 2. Please clarify what closure and reclamation obligations would apply to: A) the Port; B) the All-season road; C) Quarries; D) Camps; E) Fuel storage facilities; F) Marine infrastructure. 3. Please explain who would be responsible for long-term maintenance and liabilities if the Project ceases operation. 4. Please explain how KAA and other Inuit organizations and communities will be protected from future environmental or financial liabilities associated with abandoned infrastructure.

5.	KAA	WKR	Harvesting, Travel, Food Security	Volume 2: Section 1.6.3 Volume 9	KAA members rely extensively on harvesting and travel throughout the Project region for food security, cultural continuity, and community wellness. The Project will profoundly affect access to harvesting areas, travel safety, wildlife availability, and confidence in country food quality. The Impact Statement does not clearly explain how direct and indirect impacts to food security and Inuit harvesting practices will be monitored and addressed over the long-term.	1) Please provide details regarding how Kugluktuk harvesting areas, travel routes, cabins, camps, and culturally important areas were identified and incorporated into the assessment. 2) Please explain how WKR assessed impacts to: A) harvesting success; B) access to harvesting areas; C) food security; D) confidence in country foods; E) Intergenerational transfer of harvesting knowledge. 3) Please explain what mitigation measures will be implemented to reduce impacts on

						harvesting activities and travel safety. 4) Please explain what monitoring programs will be implemented regarding country food quality and food security. 5) Please identify what role KAA and local harvesters will have in ongoing monitoring and adaptive management.
6.	KAA	WKR	Community benefits, employment, and contracting commitments	Volume 2: Section 2.5 Section 1.6.3	The Impact Statement references employment, training, and economic opportunities associated with the Project. However, KAA requires greater clarity regarding how Kugluktuk residents, KAA members, Inuit workers, and local businesses will benefit in practice over both construction and operations.	1) Please provide projected employment numbers for Kugluktuk residents during construction and operations. 2) Please provide details regarding Inuit employment targets and retention strategies.

					Detailed information is required regarding commitments, targets, procurement approaches, training investments, and long-term community benefit mechanisms.	3) Please explain what training programs are proposed specifically for Kugluktuk residents. 4) Please provide details regarding procurement policies and how local businesses and Inuit-owned businesses will be prioritized. 5) Please explain whether WKR intends to negotiate formal benefit agreements or monitoring committees involving KAA. 6) Please explain how WKR will publicly report on employment, contracting, and Inuit participation outcomes over the life of the Project.
7.	KAA	WKR	Project Purpose and Need	Volume 2 Section 1.6	The Projects stated purpose of improved community infrastructure	1) The Proponent must explain in more detail why the road is

					and re-supply appears wholly inconsistent with the fact that neither the road nor the port are connected to any community at any point. The additional justifications for the Project do not contextualize why this location is preferable to one that is within an existing community. The location appears arbitrary and severed from any local purpose. KAA note that the port could serve to advance Canada's sovereignty and security without the road. Furthermore the road location appears arbitrary and ineffective at connecting the port to anything of specific importance, especially given the fact that the road in the NWT is a winter road.	necessary to serve the sovereignty and security objectives of the port – the port can be adequately supplied by ocean going vessels and by air. 2) The Proponent must include "port only" as an alternative in their alternatives assessment. They should also include upgrading the port at Tuktoyaktuk as an alternative as there is already road access there.
8.	KAA	WKR	Integration of Inuit and Indigenous Perspectives into Project Design	Volume 3: Section 4.3; Section 5.5	Volume 3 states that Inuit Knowledge, Indigenous Knowledge, and Community Knowledge were integrated into the	KAA Requests the Proponent provide specific example where community and Indigenous groups,

					IS and project planning. It is not clear how concerns or recommendations from these groups changed project design, mitigation measures, routing, or significance determinations.	specifically KAA, directly influenced project decisions and examples where feedback resulted in changes to the Project.
9.	KAA	WKR	Reconciling Perspectives	Volume 3: Section 5.5	Section 5.5 states that the Proponent considered and attempted to reconcile differing perspectives raised through engagement. However, the IS does not clearly identify which concerns raised by Inuit, Indigenous groups, or communities remain unresolved or were not incorporated into the Project.	KAA requests a summary of concerns or recommendations raised during engagement that could not be incorporated into Project design, mitigation measures, monitoring or assessment conclusions, and why they were not accommodated.
10.	KAA	WKR	Governance, Inuit participation, and adaptive management	Volume 2	The Impact Statement references engagement and the use of Inuit Knowledge; however, KAA requires greater clarity regarding how Inuit organizations and harvesters will participate in Project governance, monitoring,	1) Please explain how Inuit Knowledge influenced Project routing, design, mitigation, and monitoring decisions. 2) Please provide details regarding proposed governance

					and adaptive management throughout the life of the Project. KAA is concerned that ongoing community participation and decision-making roles have not been sufficiently defined. To date, no project specific IQ study has been conducted with KAA members. The Proponent relies on data collected in previous IQ studies that were completed without Project specific context.	structures, advisory committees, or co-management mechanisms involving Inuit organizations and harvesters. 3) Please explain how KAA will participate in: A) environmental monitoring; B) wildlife monitoring; C) marine monitoring; D) adaptive management decisions; E) review of monitoring results. 4) Please explain how monitoring information and Project performance reporting will be shared with Kugluktuk and KAA. 5) Please explain whether long-term funding will be provided to support community

						participation in monitoring and technical review activities.
11.	KAA	WKR	Recognition of KAA authority, harvesting rights, and decision-making role	Section 2.1.5 Volume 3 Volume 9	KAA is concerned that the Impact Statement generally references Inuit organizations and Inuit Knowledge, but does not clearly recognize the distinct role, authority, expertise, and responsibilities of the Kugluktuk Hunters and Trappers Organization with respect to wildlife harvesting, harvesting management, land use knowledge, and protection of Inuit harvesting rights within the Kugluktuk region. KAA is further concerned that the Project may proceed in a manner that undermines Inuit harvesting rights, interferes with harvesting activities, and transfers long-term environmental and social risk onto Inuit	1) Please explain specifically how KAA participated in: A) Project planning; B) routing decisions; C) wildlife effects assessment; D) marine effects assessment; E) development of mitigation measures. 2) Please identify all recommendations, concerns, or issues raised directly by KAA during engagement activities and explain how each was incorporated, addressed, or rejected. 3) Please explain whether WKR recognizes KAA as a primary rights-holder organization with

					harvesters and future generations.	ongoing authority regarding harvesting impacts and wildlife-related monitoring within the Kugluktuk region. 4) Please explain whether WKR will commit to obtaining ongoing KAA review and input prior to: A) changes to shipping activities; B) increases in traffic levels; C) expansion of facilities; D) approval of third-party access arrangements E) implementation of adaptive management decisions affecting harvesting activities or wildlife. 5) Please explain what authority or decision-making role KAA would have if

						monitoring identifies significant impacts to harvesting, wildlife, or travel safety.
12.	KAA	WKR	Project Purpose	Section 1.6 Volume 4 – Cumulative Effects Assessment	KAA remains concerned that the Impact Statement places substantial emphasis on national economic, sovereignty, and industrial development objectives while insufficiently addressing the potential for significant and irreversible impacts to Inuit harvesting rights, wildlife, marine use, food security, and Inuit cultural continuity. KAA is concerned that the Project's stated purpose is fundamentally tied to enabling future large-scale industrial and mining development throughout the region, despite substantial uncertainty regarding long-term cumulative effects.	1) If significant adverse effects were identified as possible, please explain: A). the rationale for proceeding with the Project; B) what accommodation measures were considered; C) how WKR concluded that Project benefits outweigh risks to Inuit harvesting and land use. 2) Please explain whether WKR assessed a "no project" scenario from the perspective of protecting harvesting rights, wildlife populations, and long-term Inuit use of the region.

						3) Please provide details regarding any irreversible or permanent changes to harvesting access, wildlife movement, or marine use patterns anticipated by WKR. 4) Please explain how WKR determined that future industrial development enabled by the Project is compatible with the long-term protection of Inuit harvesting rights and traditional land use.
13.	KAA	WKR	Spatial Boundary Selection	Volume 6: Section 14.1.4 Boundaries; Section 14.1.4.1 Spatial Boundaries	The terrain, soils, and permafrost spatial boundaries were selected based on past project experience, guidance from regulators, input from Kitikmiut, other Indigenous groups, and other potentially affected communities, public interest, and professional judgment.	KAA requests that the proponent provides the rationale and methodology used to establish the boundaries and how input from Kugluktuk and other indigenous groups informed the assessment boundaries.

					The rationale and input that informed the boundary selection is not clearly explained.	
14.	KAA	WKR	Indigenous Perspectives on the Assessment of Potential Effects on Terrain, Soils, and Permafrost	Volume 6: Section 1.41.1.1 Influence of Engagement and Inuit, Indigenous, and Community Knowledge on the Assessment; Appendix 14, Section 1.1	Throughout Section 1.4.1.1 and Appendix 14, the IS states that "Kitikmiut, other Indigenous groups, and other potentially affected communities shared comments, perspectives, concerns, and recommendations related to terrain, soils, and permafrost". It is unclear exactly how input from these groups was integrated into the assessment and design of the project.	KAA requests that the proponent provides specific examples of how Inuit and Indigenous knowledge, priorities, and concerns informed the terrain, soils and permafrost assessment and project design, and how impacts to harvesting, wildlife, and water were assessed and incorporated into mitigation measures.
15.	KAA	WKR	Impact on Eskers	Volume 6: Sections 14.3.2.2 and 14.3.2.4; Appendix 14A Figure 4.10	The IS states that the Project Road alignment crosses several eskers and concludes that effects are nonsignificant primarily because the total directly disturbed area represents approximately 33.3 ha, or 0.2% of the total esker area within the RAA.	KAA requests the Proponent: A. Provide methods used to assess traditional and functional importances of eskers impacted by the Project B. Explanation of how Inuit land use associated with

					Additionally, the IS states that terrain effects associated with Project construction are expected to be long-term and irreversible.	eskers were considered in the assessment C. Explanation of how the permanent and irreversible nature of esker disturbance was accounted for in the significance determinations D. Details/plans regarding mitigation and monitoring measures for esker crossings.
16.	KAA	WKR	Analysis of Permafrost Significance	Volume 6: VS.6.1.2; Section 14.3.4.3 and 14.3.4.4; Appendix 14A Sections 4.2.3–4.2.6	The IS states that most of the RAA is underlain by continuous permafrost and acknowledges the presence of thaw-sensitive terrain, ice wedges, and excess ground ice. It also states that some permafrost degradation is inevitable, construction on permafrost cannot be avoided, and some effects on terrain and permafrost will be permanent and irreversible.	KAA Requests the Proponent provide: A. the criteria and thresholds used to determine that permanent, long-term, and irreversible terrain and permafrost effects are not significant B. The extent of thaw-sensitive terrain that cannot be avoided by the Project; C. A rationale supporting the conclusion that residual terrain and permafrost effects

					However, the assessment still concludes that residual effects will not be significant after mitigation measures are applied, many of which rely on avoiding sensitive terrain where possible or where practical. It is unclear how the Proponent determined that these unavoidable and irreversible effects would not be significant given the uncertainty related to excess ground ice, climate change, and long-term permafrost degradation.	are not significant despite the acknowledgement that some effects are unavoidable, permanent, and irreversible.
17.	KAA	WKR	Dust Deposition	Volume 6 Section 15.3.2.2	The IS states that indirect deposition of dust may affect vegetation communities to a distance of 40 meters, however earlier the IS references a study that in Northern Alaska vegetation communities can be altered beyond 100 m.	We request the Proponent provide the rationale used to determine that 40 m is an appropriate distance for assessing dust-related effects on vegetation, including how studies reporting effects beyond 100 m were considered in the assessment.
18.	KAA	WKR	Unquantifiable effects on vegetation	Volume 6 Section 15.4.2.3	The IS states that cumulative indirect effects from changes to hydrology, permafrost	The Proponent must provide an explanation on how the mentioned indirect effects were

					and the introduction or spread of non-native and invasive plant species cannot be quantified with available information. Despite this acknowledgement, it is concluded that effects on vegetation community diversity and cumulative effects are expected to be low.	incorporated into the cumulative effects assessment given that these effects could not be quantified.
19.	KAA	WKR	Raptors	Volume 6 Section 17.8	The assessment acknowledges that it is unlikely that all raptor cliff-nests located within the LAA and RAA were identified.	The Proponent must provide **more** information on how this uncertainty was incorporated into the assessment of habitat loss and disturbance for raptors, if additional pre-construction nest surveys are proposed, and how newly identified nests would be incorporated into project design and mitigation measures.
20.	KAA	WKR	Dolphin and Union Caribou (Island Caribou)	Volume 6 Section 4.3	KAA is concerned that the assessment fails to treat sea ice as a critical migration habitat component for the Dolphin and Union caribou herd and does not quantify the	The Proponent must provide a quantitative analysis of potential Project-related disruption to sea-ice migration habitat used by the Dolphin and Union caribou herd, including

					potential effects of Project-related marine shipping and port operations on sea-ice migration habitat. Despite the importance of sea ice to the herd's annual life cycle, the assessment does not quantify potential loss, alteration, degradation, fragmentation, or reduced accessibility of sea-ice migration habitat resulting from Project-related shipping activities. KAA is concerned that the assessment does not demonstrate whether vessel traffic, shipping operations, ice management activities, or associated changes to ice conditions could affect migration timing, crossing success, habitat connectivity, or mortality risk for the Dolphin and Union herd.	loss, alteration, fragmentation, or reduced accessibility of habitat during seasonal migrations between Victoria Island and the mainland, and assess implications for migration success, habitat connectivity, and herd survival.
21.	KAA	WKR	Dolphin and Union Caribou (Island Caribou)	Volume 6 Pt 12 - Section 4.3.4	The baseline does not provide any quantified measure of sea-ice	The proponent must provide a quantified baseline of Dolphin and

				Movements and Distribution	crossing performance for the Dolphin and Union caribou herd. While migration timing and general routes are described, there is no baseline quantification of how many crossings are successful versus failed, how often crossings are aborted or redirected due to ice conditions, or how these outcomes vary by crossing location and year. As a result, the baseline does not establish the fundamental ecological performance of the sea-ice crossing system, which is the critical mechanism linking seasonal migration, survival, and population change for this Endangered herd.	Union caribou sea-ice crossing performance for all available years of data, including: A. number and proportion of successful crossings; B. number and proportion of failed or aborted crossings; C. documented or inferred mortality associated with crossing events; and D. spatial breakdown of outcomes by major crossing zones (Coronation Gulf, Dease Strait, Dolphin and Union Strait). The analysis must clearly separate outcomes by season (spring vs fall) and year and must identify instances of rerouting or delayed crossing attributable to ice conditions.

22.	KAA	WKR	Dolphin and Union Caribou (Island Caribou)	Volume Pt 12 - 6 Section 4.3.3.3 Health and Mortality	The baseline does not quantify Dolphin and Union caribou mortality or survival in a way that reflects the herd's seasonal migration ecology. Mortality is presented at an aggregate population level, without separating key life-history phases where risk is known to vary substantially (notably fall sea-ice crossings, wintering on the mainland, spring return migration, and calf survival). As a result, the baseline does not identify when or where mortality is occurring within the annual cycle, nor which mechanisms are most influential (e.g., ice-crossing failures, predation during migration staging, winter starvation/icing events, or calf losses linked to timing of migration). This prevents a defensible understanding of the drivers of the observed population decline and	The Proponent must provide baseline mortality and survival rates for Dolphin and Union caribou, broken down by migration phase and cause of mortality. Where direct empirical phase-specific rates are unavailable, provide best-available estimates or modelled proxies derived from collar data, observed mortality events, harvest-adjusted survival analyses, and/or expert elicitation, with all assumptions, limitations, and uncertainty ranges clearly documented.

					limits the ability to assess how Project-related effects could overlap with the highest-risk periods, particularly sea-ice crossing windows and winter conditions that are known to influence survival.	
23.	KAA	WKR	Muskox	Volume 6 Section 4.6.1 Population	KAA is concerned the baseline does not determine the current population state of muskox within the Project area or broader region. While abundance estimates are provided across multiple survey years, the data are not interpreted to determine whether the population is stable, cyclic, or in a phase of transient expansion or adjustment. Without this classification, it is not possible to understand whether observed changes in abundance reflect normal variability, recovery dynamics, or underlying population instability, limiting the	The Proponent must provide an assessment of the current muskox population state within the Project area and regional context, including whether the population is stable, cyclic, declining, or in a phase of transient expansion. This assessment must be supported by available survey trends, calf recruitment rates, and any relevant demographic indicators, and must clearly describe the basis, assumptions, and uncertainty associated with the classification.

					ability to interpret future Project-related effects.	
24.	KAA	WKR	Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port project	Volume 6 PT 14 - Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port project	KAA has concerns regarding how uncertainty is addressed within the CCE model, including key behavioural, spatial, climatic, and demographic inputs used across sub-models.	The Proponent must describe how uncertainty is represented and incorporated within the CCE model, including which parameters are treated as fixed versus variable, the ranges or distributions applied (if applicable), and how parameter uncertainty is accounted for in model outputs and population projections.
25.	KAA	WKR	Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port project	Volume 6 PT 14 - Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port project	The current description of the CCE model does not provide enough detail to independently reproduce model results. Key steps, assumptions, and parameter applications are not fully clear from the documentation provided.	The Proponent must provide sufficient detail for the model to be independently reproduced. This includes providing A. Full model code or detailed step-by-step pseudocode, including clear description of all sub-model interactions and how outputs are passed between components.

						B. A complete list of all parameter values used in the model, including how each parameter is applied within the analysis. C. All input datasets used in the analysis, including descriptions of data sources, preprocessing steps, and how datasets are incorporated into the model.
26.	KAA	WKR	Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port project	Volume 6 PT 14 - Seasonal Distribution	KAA has concerns regarding the interpretation of seasonal caribou distribution patterns presented in Figures 6–13 of the report. The analysis concludes that there is no meaningful temporal shift in caribou distribution between the 2010–2019 and 2020–2024 periods. However, this conclusion appears to be based primarily on visual comparison of kernel density estimate (KDE)	The Proponent has concluded that there is no meaningful change in caribou seasonal distribution between the 2010–2019 and 2020–2024 periods based primarily on visual comparison of kernel density outputs. However, this conclusion requires quantitative and method-tested support to confirm that it is not influenced by smoothing effects or subjective interpretation of spatial patterns.

					outputs rather than formal quantitative spatial or statistical testing. While KDE maps are useful for illustrating broad-scale distribution patterns, visual interpretation alone is not sufficient to demonstrate the absence of change, particularly for a herd that has experienced long-term population decline and range contraction. Without quantitative comparison metrics, it is not possible to determine whether observed similarities in spatial patterns reflect true stability or are the result of smoothing effects inherent in KDE methods. Given the importance of accurately characterizing caribou spatial use in relation to	The Proponent must provide: a) Statistical measures of spatial change between 2010–2019 and 2020–2024, including centroid shift analysis, spatial overlap indices, or equivalent quantitative metrics describing differences in seasonal distribution. b) Formal statistical tests (or equivalent analytical methods) that support the conclusion that there is no significant difference in seasonal distribution between the two time periods.

					the Grays Bay Road and Port project, a more rigorous assessment of spatial change is required to support the conclusion of no meaningful distribution shift.	
27.	KAA	WKR	Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port project	Volume 6 PT 14 - Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port project	The Caribou Cumulative Effects (CCE) model is presented as a predictive framework for estimating caribou movement, disturbance response, and population outcomes under infrastructure and climate change scenarios. The model is built by integrating previously developed sub-models. However, the documentation does not demonstrate that either the integrated CCE model, or the specific combination and parameterization of these sub-models used in this assessment, has been formally validated	The Proponent must provide the following information to demonstrate model applicability, validation history, and transparency of supporting data for both the integrated CCE model and its component sub-models: A list of all projects or case studies where the full CCE model (as a combined system) has been used, including how the model was set up in each case. A. A list of all projects where each sub-model (movement, energy–protein, and population)

					against independent, real-world infrastructure monitoring data. There is no clear presentation of predictive performance testing comparing model outputs to independent post-construction monitoring data. As a result, it is not possible to assess the accuracy or reliability of the model in reproducing observed caribou movement patterns, avoidance behaviour, survival rates, or population-level responses under infrastructure disturbance.	has been used and tested, along with a summary of how well they performed. B. A comparison of model predictions to real-world observations for both the full model and sub-models, including caribou movement, avoidance behaviour, survival, and population changes. C. Clear identification of where validation data and results are reported, and clear separation between data used to build the model and data used to test it.
28.	KAA	WKR	Zones of Influence for Muskox	Volume 6, Section 18.4.1.1	The assessment applies a 1.5 km zone of influence (ZOI) around the road	Please provide: 1. Additional rationale for the use of the 1.5

				and Section 18.4.1.2	and quarries and a 4 km ZOI around higher activity Project components to assess indirect effects on muskox habitat. Habitat within these areas is assigned a lower suitability rating and some habitat is considered functionally lost. However, it is not clear how the selected ZOI distances and habitat rating reductions were determined for this Project or how they reflect expected muskox responses to disturbance in the area.	km and 4 km muskox ZOI distances, including how Inuit Knowledge and the cited studies were applied to the Project. 2. The basis for reducing habitat suitability ratings within the ZOI. 3. A summary of the amount of muskox habitat that is considered directly lost, indirectly affected, and functionally lost during each season.
29.	KAA	WKR	Effects on Wolverine	Volume 6 Section 18.16.1 and Section 18.16.2	The assessment concludes that effects on wolverine movement are limited to within 1 km of Project components and that the Project is not expected to create a movement barrier for wolverine. The assessment also acknowledges that natal and maternal denning periods are highly sensitive to disturbance.	Please provide: 1. The rationale and supporting information used to determine that movement effects on wolverine are limited to within 1 km of Project components. 2. The basis for concluding that the Project will not create a barrier to wolverine movement,

					However, the basis for the 1 km disturbance distance and the conclusion that movement effects will remain localized is not clearly explained.	particularly during natal and maternal denning periods. 3. An explanation of how disturbance to denning females was considered in the movement assessment and residual effects conclusions.
30.	KAA	WKR	Grizzly Bear Habitat Loss	Volume 6 Section 18.12.1	The assessment concludes that habitat effects on grizzly bear are negligible because the total habitat loss represents less than 1% of suitable habitat within the RAA. However, the assessment also identifies eskers and other rugged terrain features as important grizzly bear habitat, including denning habitat. Comparing habitat loss to the entire RAA hides the importance of habitat features that occur at a much smaller scale and may be disproportionately	Please provide: 1. The amount and proportion of grizzly bear habitat loss and alteration within the PDA and LAA, in addition to the RAA. 2. The amount of habitat loss or alteration affecting eskers, denning habitat, and other habitat features identified as important for grizzly bears. 3. An explanation of how the assessment determined that effects are negligible where habitat loss is permanent and irreversible and may

					affected by Project activities.	affect habitat features identified as important by Inuit Knowledge.
31.	KAA	WKR	Moose Movement Across the Road Corridor	Volume 6 Section 18.8.2.4	The assessment says the Project is not expected to create a barrier to moose movement, but it also says moose movement in the Project area is not well understood and that some moose may avoid roads. It is not clear how WKR weighed those points when reaching its conclusion.	Please explain the basis for concluding that the Project will not create a barrier to moose movement, including how movement across the road corridor was assessed and whether road avoidance was considered. Please also explain whether any monitoring or follow-up will be done to confirm the conclusion during construction and operation.
32.	KAA	WKR	Dust mitigation	Volume 7, Section 7.1.5 Mitigation, Management, and Enhancement Measures	Dust generated from road construction and vehicle traffic can affect aquatic systems when it settles into nearby waterbodies or is transported via surface water runoff or snow meltwater. Road dust can potentially increase turbidity and sedimentation, degrade or smother spawning	Include dust mitigation strategies, including dust suppression, riparian vegetation, setbacks between roads and waterbodies, erosion control, proper drainage design, construction timing restrictions, monitoring programs, and use of appropriate construction materials.

					habitat, harm fish health, alter food webs, and introduce contaminants.	
33.	KAA	WKR	Water and sediment quality guidelines	Volume 7, Section 19.1.2.1 Surface Water, Groundwater, and Sediment Quality Guidelines	The assessment applies federal water and sediment quality guidelines but does not clearly show that provincial guidelines were considered where they may be more comprehensive or up to date. Best practice is to use the most stringent and relevant criteria, including provincial benchmarks when they provide additional parameters or newer scientific guidance.	Incorporate provincial guidelines alongside federal standards.
34.	KAA	WKR	Temporal distribution of surface water and sediment quality data	Volume 7, Section 19.2.1.2 Surface Water and Sediment Quality, and Appendix 19C: Freshwater and Sediment Quality Data Summary Report	Surface water and sediment quality data within the Local Assessment Area (LAA) and Regional Assessment Area (RAA) were compiled from previous studies and existing data sets. No new field sampling was conducted specifically for this assessment. Much of the available data were collected in	Collect updated water and sediment quality sampling to better reflect present-day conditions.

					2012. However, current conditions may differ from those baseline datasets due to climate change-driven alterations to hydrology, permafrost, slope stability, water temperatures, ice regimes and contaminant pathways.	
35.	KAA	WKR	Wetlands	Volume 7	The assessment does not explicitly consider wetlands as a distinct valued component (VC). This omission may underestimate their importance, given their role in regulating hydrology, trapping sediments, filtering contaminants, and maintaining connectivity. These ecological functions are particularly valuable in permafrost environments, where wetlands are often closely linked to shallow groundwater processes and seasonal flow dynamics.	Map wetland areas within the Project area and include wetlands as a valued component (VC). Characterizing their extent, function, and sensitivity to strengthen the assessment and reduce uncertainty in predicting hydrological and ecological impacts.

36.	KAA	WKR	Arctic char	Volume 7, Section 0.2.2.4 Fish Community	The assessment acknowledges the presence of both anadromous and freshwater populations of Arctic char; however, it does not demonstrate a sufficient understanding of how these populations specifically use habitats within the Project area. Arctic char exhibit variable life-history strategies that can differ significantly between watersheds, including migration patterns, spawning locations, and seasonal habitat use. This is especially important in Arctic systems, where fish populations often rely on a limited number of critical habitats and may be more vulnerable to disturbance. Without site-specific information on movement timing, migration routes, overwintering areas, and spawning habitat use within the Local and Regional Assessment	Conduct additional site-specific monitoring to support a more robust impact assessment for Arctic char.

					Areas (LAA and RAA), the assessment may not fully capture how project activities could impact sensitive life stages of Arctic char.	
37.	KAA	WKR	A quantitative approach to assess fish health, growth, and survival	Volume 7, Section 20.3.3. Change in Fish Health, Growth, or Survival	The Fish and Fish Habitat Protection Policy Statement (DFO 2019) indicates that qualitative assessment methods may be appropriate where the likelihood of impacts to fish productivity is low, or effects are expected to be minor. However, the application of a qualitative approach in this context may not be sufficient given the sensitivity of Arctic ecosystems and sensitivity of species such as Arctic char. Arctic fish populations often rely on a limited number of critical habitats (e.g., spawning and overwintering areas), exhibit slow growth and low productivity, and have limited capacity to	Use a quantitative approach to assess fish health, growth, and survival to better capture the magnitude and timing of effects and improve confidence in impact predictions.

					recover from disturbance. As a result, even small, localized changes to habitat or water quality can have disproportionately large ecological consequences.	
38.	KAA	WKR	Macroinvertebrate Baseline Assessment	Vol 7. Freshwater Enviro pt. 12	KAA sees a clear gap in the Impact Statement, as recent macroinvertebrate baseline data is effectively absent. The assessment relies on historical surveys and general scientific literature rather than proponent-sought field data at each water crossing. This is significantly concerning because fish species found at these crossings, such as stickleback and juvenile lake trout, rely on macroinvertebrates as their main food source. Road construction will increase sediment loading into streams, which can fill interstitial spaces and damage the habitat	KAA insists that a full macroinvertebrate survey program be completed at all crossings prior to breaking ground. Sampling should be done at all affected crossings and evaluate metrics such as species richness and diversity (e.g., Simpson's Index, evenness, richness etc.), along with community composition at a reference site. This will provide a proper baseline and allow KAA to assess the significance of these streams.

					these organisms require for reproduction. Without real baseline data, the assessment cannot properly evaluate this risk or support any conclusions on impacts to fish and fish habitat.	
39.	KAA	WKR	Fish Spawning Potential Assessment	Vol 7. Freshwater Enviro pt. 12	KAA acknowledges the spawning potential assessment was categorized by none, low, moderate, or high outlined in section 4.2.2; however, this is at best a qualitative assessment and does not ensure that valuable spawning habitat is not being jeopardized, nor does it provide reviewable data to make these inferences. Lake Trout, a culturally significant species to Kugluktuk, have been observed to spawn in river systems according to both science (Gatch et al., 2021)and local Indigenous Knowledge. To alter their spawning	The Proponent must conduct redd surveys during the fall and juvenile density assessments during early spring to enumerate spawning activity in all LAA streams where crossing are being proposed. Areas where redds are identified or young of the year salmonids are captured would be severely opposed by KAA for road development.

					habitat by modifying waterflow dynamics, removing riparian vegetation, or mobilizing sediment into LAA streams is deeply concerning to Kugluktuk. To accurately assess whether the development of the road will affect spawning habitat, a quantitative baseline assessment of spawning activity must be included in the IS.	
40.	KAA	WKR	Metal Leaching / Acid Rock Drainage (ML/ARD) assessment	260417-24XN038-Vol 07 Freshwater Enviro Pt.3-IR2E; 260417-24XN038-Vol 07 Freshwater Enviro Pt.4-IR2E	The ML/ARD report only does acid base accounting (ABA), but lacks information on risks of contaminant leaching and quantified loadings to the environment, including risks of contaminants from blasting	We request the Proponent to provide quantified information and models on risks of contaminant leaching and loadings from construction materials. This should also include risks from contaminants derived from blasting.
41.	KAA	WKR	ML/ARD assessment	260417-24XN038-Vol 07 Freshwater Enviro Pt.3-IR2E; 260417-24XN038-Vol 07	The ML/ARD report uses ABA results, which only reflect acid drainage risks, as a foundational metric to gauge and quantify environmental risks from road construction materials,	We request the Proponent to provide additional information on quantified risks and loadings from pH-neutral contaminant leaching risks, such as As, Sb, Se and blasting-derived

				Freshwater Enviro Pt.4-IR2E	but completely ignores risks of pH-neutral contaminants such as As, Sb, Se, as well as blasting-derived contaminants. The risks from these are independent from ARD and ABA constraints. Table 4-5 (pt.4) shows that such pH-neutral contaminants do present elevated risks.	compounds. This should be performed on all materials of interest, not only on those that presented specific ABA results relating to ARD risks.
42.	KAA	WKR	ML/ARD assessment	260417-24XN038-Vol 07 Freshwater Enviro Pt.3-IR2E	The ML/ARD report only discusses materials used for the construction of the road. No information is given on construction materials used for the construction of the aerodrome and seaport facilities.	We request the Proponent to provide information on the construction materials planned to be used for the construction of the aerodrome and the seaport, as well as a comprehensive characterization of geochemical risks (i.e., a ML/ARD study that includes ABA as well as models on risks of contaminant leaching and loadings)
43.	KAA	WKR	Freshwater and Sediment Quality Summary Report	260417-24XN038-Vol 07 Freshwater Enviro Pt.8-IR2E	The monitoring data provided is limited to the summer open-water season (July and August)	We request the Proponent to provide information on water quality during the winter or the spring freshet,

						which are critical periods for understanding peak flows, sediment transport, and potential seasonal shifts in water chemistry.
44.	KAA	WKR	Effects to Marine water quality	Vol 8. Marine Enviro Pt.2	The IS does not identify a snow clearing management plan nor does it consider an effects assessment of snow disposal into Grays Bay. This represents a key deficiency for a port setting project. It is likely that sizeable snow piles will be plowed and stockpiled adjacent to or dumped directly into port waters. Given the increased foot traffic and heavy machinery that will take place at the port, the snow will inevitably accumulate contaminants, not limited to: road salts, hydrocarbons, inorganic waste, sediment, and heavy metals. When snow is dumped into marine environments or melts in concentrate near the shoreline, these	1. Explain whether snow disposal was assessed and provide the rationale for excluding it from the marine effects assessment. 2. The Proponent must conduct an effects assessment on Grays Bay with specific attention to how contaminants may be transported through pathways into the harbour. To support this modelling, the Proponent should review data and impacts from other Canadian port authorities that dispose of snow, in order to understand the temporal dynamics of contaminant release from snow and its

					contaminants are rapidly released without treatment. How increased runoff will dilute or enrich the harbour's salinity is also not adequately assessed, and together these concerns pose adverse risk to local aquatic species.	potential contribution to harbour pollution.
45.	KAA	WKR	Marine Mammals in the RAA	Vol 8. Marine Enviro Pt.5	The IS does not provide a sufficient assessment of marine mammals that occur within the RAA, as it does not account for species becoming present due to climate change. Existing baseline information on marine mammals relies heavily on two regional surveys (LGL in 2012 and Stantec in 2025) and broad, historical ecological characterization. This approach is inconsistent with the current ecological variability of Arctic marine systems, where whale	Provide the rationale for concluding baseline information is sufficient despite the absence of multi-year monitoring and the increasing occurrence of climate-driven marine mammal species. KAA strongly urges the implementation of a targeted, multi-year marine mammal baseline program to quantify whale presence, distribution, and habitat use throughout the entire RAA, with particular emphasis on open-water seasons. This program

					occurrence has been non-localized and changing temporally. For example, the Government of Canada notes that observations of orcas, humpbacks, minkes, and dolphins are becoming frequent in Nunavut coastal areas due to rising water temperature (PKC, 2025). These species must be identified and assessed in the IS.	should integrate year-round aerial and vessel-based surveys, passive acoustic monitoring, and real-time Inuit Knowledge on species observations. The omission of these cryptically observed species from the IS does not adequately reflect the full risk of vessel-related collision impacts.
46.	KAA	WKR	Marine Mammals in the RAA	Vol 8. Marine Enviro Pt.5	The acoustic baseline is limited to a single hydrophone deployment solely within the LAA (for just 1 month), providing insufficient spatial coverage. The dataset produced no confirmed whale detections and only one seal detection, indicating the results are not sufficient to characterize marine mammal presence or habitat use. No passive acoustic monitoring was conducted in the RAA, despite vessel traffic and associated risks	Explain how one month of acoustic data is sufficient to characterize marine mammal use throughout the RAA. The Proponent must implement a multi-year passive acoustic monitoring program with hydrophone deployments in both the LAA and RAA. Amundsen Gulf would be a reasonable representation of regional whale and seal habitat, and would help define how these species

					extending both easterly and westerly of the LAA. KAA believes this to be a significant gap, as cetaceans are more likely to occur in offshore, deeper-water habitats within the RAA, and utilize the LAA intermittently. As the port would increase vessel traffic regardless, it's defensible and necessary to assess the larger RAA radius for marine mammal detections.	could be using the LAA/RAA for feeding, habitat, or migratory purposes.
47.	KAA	WKR	Invasive Species through ballast water	Vol 8. Marine Enviro Pt.5	The IS does not address the risk of invasive species introduction through vessel ballast water, which is a significant omission. Marine vessels routinely transport invasive organisms such as tunicates, mussels, and green crab in ballast tanks, and without evaluation or mitigation measures through a management plan, these species can be released into receiving	1. Explain how invasive species risks associated with ballast water were considered and why they were excluded from the assessment. 2. The Proponent must complete an effects assessment as part of the IS, addressing invasive species and their potential impacts on the natural benthic ecosystem.

					waters. This presents a direct pathway for these species to disrupt fish nurseries and sensitive benthic habitats. The absence of this analysis overlooks a well-documented vector of ecological impact and leaves a critical gap in understanding and managing project-related risks.	3. The Proponent must also prepare a management plan for invasive species to be included in Volume 11 of the IS documentation.
48.	KAA	WKR	Governance and Decision-Making	Volume 9: Section 24.5.1	The IS states that potential adverse effects on cultural practices, laws, governance systems, and decision-making abilities may occur as a result of changes to resource availability, access and perceptions of land and resource quantity. However the assessment concludes that these effects are not significant, primarily due to the continued role of KIA.	KAA requests the Proponent explain how significance determination was evaluated for other groups other than KIA, including KAA.
49.	KAA	WKR	Drug toxicity mitigation	Vol 9.	A strict prohibition on possession of alcohol or illicit drugs on company property is likely to	1. The Proponent must provide mitigation strategies for the strong potential that

					incentivize possession and distribution of stronger, more easily concealed substances (e.g. high-purity methamphetamine, fentanyl, moonshine)	unregulated, high-potency substances will circulate on premises and into surrounding regions. 2. The Proponent must examine alternatives to strict prohibition that could help alleviate the dangers (including toxicity and organized criminal elements) of a fully unregulated market.
50.	KAA	WKR	Substance use in the workplace	Vol 9. 26.3.5.1 Project Effects Pathways	Discussion of the impacts of the rotational work, time away from friends and family, intense labour, long commutes, homesickness and accommodation facility living on mental health, work-related stress levels and coping mechanisms (e.g., substance use), but no mitigations provided in case of onsite substance use adverse effects.	1. The Proponent must provide, examine and report on resources related to minimizing risks to workers who experience acute drug toxicity onsite from substance use. 2. The Proponent must examine and provide potential overdose response protocols (e.g. Naloxone On Site, Tailgate Toolkit) for mitigating risk of death from acute drug toxicity.
51.	KAA	WKR	Injury care (as pertaining to substance use)	Vol 9. 26.1.2	Discussion of the legislation surrounding workplace injuries, but	1. The Proponent must provide, examine and report on resources

					no details provided on care of injured workers. This is especially important in the context of increasingly lethal unregulated drug supplies.	related to minimizing risks to workers prescribed painkillers for workplace injuries, particularly concerning flexibility around prescription windows, after which individuals often transition to the unregulated market. 2. The Proponent must provide resources explaining how persistent workplace injuries will be managed alongside fitness for work policy, particularly if pain management of injuries continues into resumption of work (e.g. alternative work options).
52.	KAA	WKR		Vol 9. 25.2.2.3 Country Foods	Disruption of the intergenerational transmission of Inuit Knowledge, language, and skills are attributed to substance use and suicide, but resources examining the inverse patterns should also be explored. If substance use or harm to mental health are driven by lack	The Proponent must provide, examine and report on resources that probe the impacts of disruptions to cultural practices (including traditional harvesting) on substance use, mental health, and suicide.

					of access to quality country foods and other cultural practices, this influences mitigation strategies.	
53.	KAA	WKR	Gender-based violence and policing by RCMP	Vol 9. 9.6.3.2	The Proponent explains that policing by the RCMP has a negative impact on gender-based violence, from the perspective of Inuit women, but mitigations around harms of policing and criminalization are not provided. Rather, multiple new layers of potential criminalization are introduced around drugs and alcohol (e.g., 8.3.1; 9.5.1.2; 27.3.1; 28,3.2).	1. The Proponent must provide resources delineating the causal relationship between policing and gender-based violence and provide mitigation strategies for these mechanisms to minimize harms on women, girls, and 2SLGBTQQIA people in the RAA. 2. The Proponent must establish the alignment of Project Policies concerning police response with MMIWG2S Call For Justice 5.4-5.7 (policing reform).
54.	KAA	WKR			As explained in the MMIWG2S Final Report, demand for sex work increases significantly during construction and operation of a Project, and these impacts can place women, girls and 2SLGBTQQIA people at	1. In accordance with MMIWG2S Call for Justice 4.3, the Proponent must declare and delineate its support for "programs and services for Indigenous girls, and 2SLGBTQQIA people in the sex industry to

					increased risk of sexual violence as well as human trafficking. These risks are not mitigated in the Project plan, and sex workers (who experience both gendered violence and criminalization) are not discussed.	promote their safety and security." 2. Further, the Proponent must provide a policy implementation roadmap explaining how its Policies will support safety and protection of people in the sex industry.
55.	KAA	WKR	People with disabilities	Vol 9. 27.3.7.4	The Proponent explains that People with disabilities may experience greater adverse effects due to pre-existing barriers to inclusion in the Project and limited social safety nets (Table 27.3).	The Proponent must provide resources on best practices for mitigating adverse effects on people with disabilities, and provide a roadmap for offsetting those effects.
56.	KAA	WKR	Communicable disease care	Vol 9. Table 26.10	Interaction of workers through transit and camp settings may enable transmission of communicable diseases, but few mitigations are in place for this. Northern communities already experience considerable lack of frontline health care access for managing TB outbreaks and STI dissemination.	The Proponent must provide resources highlighting effective mitigation strategies in use elsewhere for reducing communicable diseases, and provide a list of best practices and available tools for managing disease transmission.

57.	KAA	WKR	Cumulative impacts of transient workforces	Vol 9. 26.4.6.3	The Proponent describes that transient workforces for other projects in the RAA will only act cumulatively with the Project if they overlap temporally, and some possibilities are listed for this, but the main mitigation to govern workers' behavior is a proposed Travel Policy that, it is hoped, other project proponents will also implement.	1. The Proponent must provide a plan and timeline for drafting the Travel Policy, including worker behaviours it intends to address, an ongoing evaluation plan (i.e. whether the Policy is working) and the adjustments that will be made if the Policy is found to be failing its purpose. 2. The Proponent must provide resources describing practices implemented in other Projects that helped mitigate harmful behavior in project areas by transient workers.
58.	KAA	WKR	Project Capital Cost	Section 27.3.6.3	The Proponent has stated that the total capital expenditure is estimated at $1.2 billion dollars. This estimate seems very low given the technical complexity of infrastructure development in the Kitikmeot. The return on investment is dependent on a reasonably well	Provide a detailed breakdown of the capital cost estimate for the Project, with a clear division of cost breakdown for the port and the road separately. Include details on the extent to which different variables affect cost estimated (e.g., inflation, fuel, scheduling,

					constrained up front capital cost which his not provided.	sequencing, construction methods)
59.	KAA	WKR			While the Impact Statement emphasizes potential economic opportunities, KAA is concerned that the Project may also contribute to significant adverse socio-economic effects including increased pressure on housing, social services, policing, substance use, family stress, inequitable distribution of benefits, and disruption of traditional land-based activities. KAA is concerned that the assessment appears to assume economic benefits will outweigh negative impacts without sufficient supporting analysis.	1) Please provide details regarding all adverse socio-economic effects identified by WKR for Kugluktuk. 2) Please explain what assumptions were used regarding: A) population influx; B) rotational workforce effects C) housing pressures D) policing and public safety demands; E) impacts to traditional lifestyles; F) inequality in distribution of Project benefits. 3) Please explain what mitigation measures and funding commitments are proposed to address adverse social impacts in Kugluktuk.

						4) Please explain whether WKR intends to negotiate community wellness, cultural support, or social infrastructure funding agreements with KAA and other local Kugluktuk organizations. 5) Please explain how WKR assessed the risk that increased industrialization and wage employment may reduce time spent on harvesting, language use, cultural activities, and intergenerational knowledge transfer.
60.	KAA	WKR	Future Shipping and Marine Cumulative Effects	Volume 10 Section 32	KAA is concerned that cumulative marine effects may be underestimated because future shipping associated with induced development remains uncertain.	1. Please provide the maximum reasonably foreseeable annual shipping scenario considered in the cumulative effects assessment. 2. Please explain how cumulative effects

						from future vessel traffic on marine mammals, harvesting activities, and travel safety were assessed. 3. Please explain how cumulative marine effects would be managed if shipping volumes substantially exceed current projections. For example, if the Arctic shipping season is extended. 4. Please identify all vessel classes included in the marine traffic estimates. 5. Please explain whether supporting marine traffic associated with mining operations was included.

						6. Please provide estimated annual traffic by vessel type.
61.	KAA	WKR	Reasonably Foreseeable Development	Volume 10 Section 32	The Project is intended to facilitate future mining and industrial development. It is unclear whether the cumulative effects assessment captures the full extent of reasonably foreseeable development enabled by the Project.	1. Please identify all reasonably foreseeable future developments included in the cumulative effects assessment. 2. Please explain the criteria used to determine whether a future development was included or excluded. 3. Please provide the rationale for concluding that excluded developments would not materially influence cumulative effects predictions.

62.	KAA	WKR	Reasonably Foreseeable Induced Development Scenario	Volume 10 Section 32	The cumulative effects assessment relies on a Reasonably Foreseeable Induced (RFI) Development Scenario that includes the Izok, High Lake, and Hackett River projects. However, the basis for selecting these developments, excluding other potential future developments, and deriving associated traffic projections is not clearly explained. The assessment also does not appear to evaluate alternative development scenarios or the uncertainty associated with future industrial growth enabled by the Project.	1. Please describe the methodology and screening criteria used to identify developments included in the RFI scenario. 2. Please identify all mining and exploration projects considered and explain why projects not included in the RFI scenario were excluded. 3. Please explain why only a single induced development scenario was assessed and whether alternative development scenarios (e.g., low, high, or full build-out scenarios) were considered. 4. Please provide the assumptions, calculations, and

						supporting data used to estimate future marine traffic, aircraft traffic, and road traffic associated with the RFI scenario. 5. Please describe how uncertainty associated with future mine development, production rates, transportation requirements, and Project-enabled industrial growth was incorporated into the cumulative effects assessment.
63.	KAA	WKR	Induced Development Traffic Assumptions	Volume 10 Section 32	The projected shipping, aircraft, and road traffic associated with the RFI scenario are presented without sufficient supporting information regarding mine production assumptions, transportation requirements, or logistics	1. Please provide the mine production assumptions used to estimate induced marine, air, and road traffic volumes. 2. Please provide the assumptions and calculations used to estimate:

					planning. It is unclear whether these projections represent average, maximum, or conservative estimates.	A) approximately 30 concentrate vessels annually B) approximately 35 aircraft movements annually; C) approximately 7 to 60 concentrate truck movements annually. 3. Please identify whether supporting traffic associated with fuel delivery, construction, resupply, contractors, exploration activities, and emergency response was included in the traffic estimates. 4. Please explain whether the traffic estimates represent average, peak, or maximum reasonably foreseeable operating conditions.
64.	KAA	WKR	Exploration and Future	Volume 10 Section 32	The RFI scenario appears focused on future mine operations but does not	1. Please explain how increased mineral exploration activity

			Development Assumptions		clearly describe how Project-induced exploration activity and subsequent development opportunities were incorporated into the cumulative effects assessment.	enabled by the Project was incorporated into the cumulative effects assessment. 2. Please provide the assumptions used regarding future exploration camps, drilling programs, seasonal access, and associated transportation activity. 3. Please explain why exploration-related effects were not assessed separately from future mine development activities. 4. Please explain how the cumulative effects assessment accounts for future discoveries and development opportunities that may arise as a result of Project infrastructure.

65.	KAA	WKR	Cumulative Effects Assessment – Significance Determinations	Volume 10 Section 32	The basis for determining that cumulative effects are not significant is not clearly described.	1. Please identify the criteria, thresholds, and indicators used to determine cumulative effects significance. 2. Please explain how uncertainty was incorporated into significance determinations. 3. Please identify any cumulative effects predictions that relied primarily on professional judgement rather than quantitative analysis.
66.	KAA	WKR	Accidents and Malfunctions – Spill Scenarios	Volume 10 Section 34	The basis for selecting accident and spill scenarios for assessment is unclear.	1. Please provide the criteria used to identify and screen accident and malfunction scenarios.

						2. Please explain why the selected scenarios are representative of reasonably foreseeable worst-case events. 3. Please identify any high-consequence scenarios that were considered but not assessed.
67.	KAA	WKR	Accidents and Malfunctions – Spill Response Effectiveness	Volume 10 Section 34	The effectiveness of proposed spill response measures is not clearly quantified.	1. Please identify the key assumptions used in the accident and malfunction assessment. 2. Please explain how environmental conditions, response times, and seasonal factors were incorporated into consequence modelling 3. Please provide the assumptions used regarding spill detection,

						mobilization, containment, and recovery. 4. Please explain how spill response effectiveness was incorporated into residual effects predictions. 5. Please identify any accident scenarios where full recovery or containment was not assumed.
68.	KAA	WKR	Climate Change, Monitoring, and Management	Volume 10 Section 35.3.3; Volume 11 Section 37.1.4 and 37.1.5	The assessment concludes that permafrost degradation, terrain instability, erosion, flooding and other environmental conditions are not expected to affect Project infrastructure. However, the management plans indicate that monitoring, thresholds, and management measures	Please Provide: 1. The indicators that will be monitored to assess climate related impacts 2. Thresholds and triggers that would result in management action 3. Corrective measures that would be implemented if monitoring identifies climate related impacts to Project infrastructure

					will be developed in the future.	
69.	KAA	WKR	Watercourse Crossings	Volume 2 Section 1.5.1 and 2.1.1	The Project includes approximately 58 major watercourse crossings and 164 minor drainage structures. While the Impact Statement indicates that crossings will be designed to accommodate fish passage and comply with Fisheries Act requirements, insufficient information has been provided regarding the location, sensitivity, design, and long-term performance of these crossings. Additional information is required for KAA to assess potential effects on fish habitat, harvesting activities, travel routes, and aquatic ecosystems.	The Proponent must provide: 1. A complete inventory and mapping of all proposed watercourse crossings, including crossing type, waterbody name, and identification of fish-bearing watercourses. 2. Information regarding fish species known or expected to occur at each crossing location and identification of crossings considered sensitive from a fish habitat perspective. 3. A description of how crossing designs accommodate fish passage and protect aquatic habitat.

						4. A description of how climate change, permafrost degradation, erosion, and changing hydrological conditions have been incorporated into crossing design and long-term maintenance planning. 5. Details regarding monitoring, inspection, maintenance, and adaptive management measures proposed for watercourse crossings throughout Project operations.
70.	KAA	WKR	Pit/Quarry Development, Aggregate Extraction, and Rehabilitation	Volume 2, Section 1.5.1; Section 2.1.1	The Project includes the development and operation of approximately 40 temporary and permanent quarries and borrow sources. The Impact Statement provides limited information regarding	The Proponent must provide: 1. A map and inventory of all proposed quarry and borrow sites, including estimated extraction volumes, duration of

					the location, scale, operation, environmental management, and rehabilitation of these sites. Additional information is required to understand potential impacts on wildlife, harvesting activities, land use, water resources, and long-term landscape disturbance.	use, and intended purpose. 2. A description of the criteria used to select quarry locations, including consideration of wildlife habitat, harvesting areas, water resources, and Inuit Knowledge. 3. Details regarding blasting activities, including anticipated frequency, seasonal timing, wildlife mitigation measures, and communication protocols with affected communities and Hunters and Trappers Organizations. 4. A description of environmental management measures related to dust, erosion, sedimentation, water use, and surface

						water protection at quarry sites. 5. A description of progressive rehabilitation measures and final closure objectives for temporary and permanent quarry sites.

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