



July 2nd, 2026

Nunavut Impact Review Board
29 Mitik Street
Cambridge Bay, NU, X0B 0C0

**Conformity Determination Information Requests from Gwich'in Tribal Council -
NIRB File No. 24XN038, West Kitikmeot Resources Corp's Grays Bay Road and Port
Project Impact Statement**

The Gwich'in Tribal Council (GTC) is submitting information requests to the Nunavut Impact Review Board (NIRB) in response to its May 6th letter to parties seeking information requests (IRs) on West Kitikmeot Resources Corp's (WKR) Impact Statement (IS) for its proposed Grays Bay Road and Port project (the Project).

GTC has discussed the intent of the IRs with NIRB and the Mackenzie Valley Environmental Impact Review Board (MVEIRB) and reviewed the *NIRB and MVEIRB Process Support Summary* document, released June 3, 2026. GTC understands the intent of the NIRB information requests is to provide parties an opportunity to review WKR's impact statement and to highlight areas that are not addressed, incomplete, or hinder a meaningful review. NIRB's [260506-24XN038-Conformity Determination](#) document further advises that IRs are to:

- Identify any additional information required to understand the conclusions made in the IS,
- Identify missing supporting materials, or
- Clarify the context surrounding an issue and assumptions made through the modelling

NIRB will then compile these comments for follow-up to WKR or responsible parties. IR responses ought to improve the overall content and quality of the final Impact Statement. More detailed comments and critiques on the adequacy of the Impact Statement will occur during the technical review phase, which will occur over the summer and into the fall.

Based on this understanding, GTC has compiled 11 IRs. The IRs focus on:

1. Items that are part of the Final Scope¹ or Impact Statement Guidelines² for the NIRB 24XN038 impact review but were absent or incomplete during initial review of WKR's impact statement,
2. Identify missing supporting information or materials necessary to understand IS conclusions or assumptions

¹ [NIRB 260130-24XN038 Final Scope List-OT1E, January 30, 2026.](#)

² [NIRB 260130-24XN038 Final Impact Statement Guidelines-OMAE, January 30, 2026.](#)



3. Clarify modelling assumptions, or
4. Removing barriers to meaningful participant review of the Impact Statement.

GTC notes that its review of the Impact Statement was itself incomplete due to the high volume of material and limited time available to submit Information Requests. WKR's Impact Statement consists of 43 separate documents on NIRB's Public Registry, with a total page count of 7,195 pages, presented in four different languages. The information in its present form is very cumbersome to meaningfully review.

GTC's Information Requests are presented in the table attached to this letter, in the format requested by NIRB.

GTC looks forward to reviewing how its conformity comments and concerns are addressed during the Active Review phase of the Project.

For questions or clarifications regarding GTC's submission, please contact me at Kanda.Gnama@gwichintribal.ca or call 867-777-7912.

Regards,

Kanda Kola Gnama
Director, Lands and Resources

Enclosure: GTC Information Requests

cc. Eleonora Mazzoneschi, Program Lead, Land Use and Permitting



GTC Information Requests

GTC-01

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-01
IR Directed To:	Government of Canada, Government of the Northwest Territories, Joint Secretariat Inuvialuit Settlement Region, Tłıchǫ Government, Kativik Environmental Quality Commission, Kativik Environmental Advisory Committee, Nunavik Marine Region Impact Review Board
Subject:	Transboundary governance and regulatory equivalency in jurisdictions outside of Nunavut
Reference:	Information not found in IS; e.g., MD. 1.3 Regulatory Regime (Vol.1, pdf 81), et al.
Issue/Concern:	<p>It is understood that NIRB's jurisdiction is limited to controlling project components that occur within Nunavut. Descriptions of the regulatory regime in the Impact Statement provide no reference to authorities and jurisdiction outside of Nunavut. Who will have responsibility for ensuring that mitigation measures and equivalent Project Certificate conditions set by NIRB will be applied and enforced outside of the Nunavut Territory?</p> <p>GTC requires more clarity on this topic given its main concern with the Project relates to cumulative effects of induced development, including risks to marine environments, coastlines, and caribou. More understanding is needed on the regulatory environment and the mechanisms and efforts that will be taken to ensure transboundary issues are dealt with appropriately and to a similar standard as impacts identified in Nunavut. The Project's potential risk cannot be understood absent an understanding of the regulatory measures and capacity to meaningfully address unanticipated and future impacts that occur outside of Nunavut. This requires an understanding of both the regulatory tools and actual capacity to respond and adapt to observed impacts.</p> <p>GTC notes that this question applies equally to marine traffic and vessels travelling throughout the Northwest Passage and to ports in Montreal that WKR has identified for mobilization and logistics/resupply efforts.</p>
Information Request:	<ol style="list-style-type: none"> 1. What legal authorities, monitoring programs, compliance tools, and enforcement mechanisms are available within your jurisdiction to provide safeguards for transboundary impacts directly or indirectly associated with the Project, including impacts arising from induced development? Please explain



	<p>how these measures compare to those available through the Nunavut Impact Review Board process.</p> <ol style="list-style-type: none"> 2. Describe the monitoring, compliance, and enforcement capacity available within your jurisdiction (including staffing, funding, inspection programs, monitoring networks, and coordination mechanisms) to identify and address transboundary impacts directly or indirectly associated with the Project, including impacts arising from induced development. 3. What mechanisms are available within your jurisdiction to identify, assess, and respond to unanticipated adverse effects associated with the Project, including the authority to require additional mitigation measures, monitoring, or corrective actions if existing measures prove ineffective? 4. To what extent, if any, are there differences, limitations, or gaps in the legal authorities, monitoring programs, compliance tools, enforcement mechanisms, or institutional capacity available within your jurisdiction relative to those available through the Nunavut Impact Review Board process? Please describe any areas where equivalent safeguards may not be available.
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GTC-02

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-02
IR Directed To:	Government of Canada, Government of the Northwest Territories, Province of Quebec
Subject:	Duty to Consult and Accommodate for marine and coastal impacts associated with induced development.
Reference:	Information not found in IS; important contextual information missing necessary to assess the potential of undesirable project impacts affecting Indigenous rights and interests.
Issue/Concern:	<p>It is unclear how induced development considerations will be assessed for marine and coastal environments outside of Nunavut, and what this means for Indigenous rights and interests.</p> <p>There is potential for significant adverse impacts to occur to valued marine and coastal values due to transboundary effects and induced development. GTC is concerned, for example, with potential marine vessel/traffic interactions along the coastline and in the Beaufort Delta during the construction phase of the project as well as through anticipated increases in vessel activity due to induced development, and corresponding increases in risk to valued components.</p>



	<p>The current Impact Statement (IS) lacks adequate information on induced development scenarios to answer this concern, and the scoping document does not provide clear standards on how induced development should be assessed or considered. The IS currently emphasizes a project footprint in Nunavut with little observed content regarding future marine traffic scenarios. The cumulative effects assessment appears to focus on potential expansion of Project infrastructure/facilities but not on understanding the impacts associated with increased development or shipping.</p> <p>Gwich'in have and continue to conduct traditional land marine and resource use (TLMRU) along coastal and marine areas and rely on species that spend critical life stages in waters and coastal environments that could be affected by marine shipping or accidents at sea. The current process does not provide assurances that Indigenous rights along the coast will be addressed and, if needed, accommodated outside of Nunavut. Governments must be able to demonstrate the means and commitment to uphold Indigenous rights and interests prior to approving/supporting projects that pose a risk to those rights and interests.</p> <p>GTC notes that this question also applies to Indigenous groups whose TLMRU activities occur throughout the Northwest Passage and to coastlines/shorelines thru to Montreal, which WKR has identified as a main port area for mobilization and logistics/resupply efforts.</p>
<p>Information Request:</p>	<ol style="list-style-type: none"> 1. How will the identified Governments fulfill their Duty to Consult and Accommodate obligations to ensure Indigenous rights (constitutional, treaty and inherent) and interests are not jeopardized by an accelerated and uncontrolled increase in induced developments enabled by the Project? 2. What tools and commitments will the identified Governments take to ensure that marine traffic and vessel activities are kept to a sustainable level that preserves the health of valued species and continuance of Indigenous rights and interests in areas affected by induced development outside of Nunavut?

GTC-03

<p>IR Source:</p>	<p>Gwich'in Tribal Council (GTC)</p>
<p>IR Number:</p>	<p>GTC-03</p>
<p>IR Directed To:</p>	<p>West Kitikmeot Resources Corp (WKR)</p>
<p>Subject:</p>	<p>Clarity on the source and interpretation of Indigenous Knowledge used in the IS</p>
<p>Reference:</p>	<p>See, for example, Vol.1, MD.3 Knowledge Perspectives, pdf 106; et al.</p>



<p>Issue/Concern:</p>	<p>Multiple Indigenous groups are participating in this EA as interested parties to the process. Each group has their own distinct set of concerns and unique Knowledge and value. This results in unique perspectives and comments that qualify concerns and specific context to understanding potential interactions with the Project and the respective Indigenous valued components. Likewise, the suggestions and recommendations put forth by each Indigenous group may be nuanced and distinct. It is therefore vague and unclear when Indigenous Knowledge is used as a blanket term to qualify input from all Indigenous groups based outside of Nunavut. It is also disingenuous to classify each group's unique knowledge and learnings as common or ubiquitous to all Indigenous groups. This is neither appropriate nor accurate.</p> <p>It is important that the Impact Statement (IS) clearly differentiates between Indigenous Knowledge (including both Inuit & Indigenous Knowledge) and Community Knowledge, as described by WKR.</p>
<p>Information Request:</p>	<p>Where the IS refers to Indigenous Knowledge attributed to non-Nunavut Indigenous groups, WKR to provide the following quality assurances and controls:</p> <ol style="list-style-type: none"> 1. Clearly identify the sources of Indigenous Knowledge and the regional area from which it originates and applies. This is necessary to maintain the contextual and regional basis for which the knowledge applies, and to identify regional gaps where Indigenous views and perspectives have not contributed to the proponent's understanding of potential impacts and impact pathways. 2. Identify the accuracy of the Indigenous Knowledge the proponent is using. <ol style="list-style-type: none"> 2.1. Primary information (e.g., information gathered by the Proponent or its consultants for the impact statement) should clearly describe the way Indigenous Knowledge was obtained, the context in which it was given and applies, and attributed to the group it comes from. <ol style="list-style-type: none"> 2.1.1. In the methodology section, WKR should identify their internal validation process with Indigenous groups that have provided first hand information, and what principles WKR applied when interpreting and managing that data. 2.2. Secondary information used by the Proponent (e.g., information obtained from other formal sources) should clearly describe the context in which the original data was provided, whom it comes from, and how it is specifically being applied by the Proponent or their consultants. This



	should include or acknowledge any uncertainties or assumptions in the use of the information and should avoid generalizing the knowledge.
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GTC-04

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-04
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	WKR administrative structure, responsibilities, expectations, and liabilities; additional details lacking on how WKR is structured to successfully complete the Project while ensuring necessary terms and conditions, Project Certificates, etc., are realistic for WKR to achieve.
Reference:	E.g., Volume 1, MD.1.1 Proponent Information, et al.
Issue/Concern:	<p>It is understood that WKR has limited staff and personnel, most of whom are administrative (e.g., management or office/community liaison workers). The proposed Project will require a substantive workforce of competent crews and significant assets/equipment to complete. Unlike other major projects, it does not appear that WKR will itself significantly expand its workforce or capacity to complete the Project. Rather, the mobilization and construction phase of the project is proposed to be completed through the hiring of contractors and facilitators to complete the works.</p> <p>The potential risks and challenges to Canadians and affected Indigenous groups from this arrangement needs to be explored. This includes an understanding of what WKR's current corporate structure looks like and how it will change as it transitions to full operations, the capacity of WKR to independently manage necessary terms and conditions for the Project's approval, and the safeguards WKR will employ to ensure any outsourcing of its responsibilities to contractors will be maintained to the standard and intent established through the EA process, including WKR's own quality control and assurance practices to ensure contractor compliance.</p>
Information Request:	<ol style="list-style-type: none"> 1. How many employees does WKR currently employ? How many employees does WKR anticipate employing during the different phases of the Project? <ol style="list-style-type: none"> 1.1. This information should clearly identify the extent that WKR is directly hiring people for the project and the type of positions expected by those positions (e.g., management, skilled or unskilled).



	<p>1.2. WKR employment numbers should be additionally represented as a percentage of the overall number of employees anticipated to successfully complete each phase of the project.</p> <p>2. The Impact Statement should also very clearly detail the legal contractual terms and conditions WKR will employ with its contractors to ensure the intent of any mitigation measures, Project Certificates, and other relevant terms and conditions (e.g., through permitting) will be enforceable by WKR and that WKR retains the legal responsibilities and liabilities for Project-related activities in its capacity as a prime consultant/contractor.</p> <p>3. The Impact Statement should identify the internal policies and practices WKR will employ as quality control and quality assurance measures that its contractors are complying with contractual terms and the associated regulatory terms and conditions set for the Project, including any Project Certificates set by NIRB and their equivalents in jurisdictions outside of Nunavut.</p>
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GTC-05

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-05
IR Directed To:	Regulatory Authorities responsible for managing Project Certificates and regulatory permits and licences associated with the Project
Subject:	WKR administrative structure, responsibilities, expectations, and liabilities; additional details lacking on how Regulatory Authorities will ensure WKR and its contractors are compliant with Project Certificates and their equivalent measures outside of Nunavut, and corresponding regulatory terms and conditions associated with the Project.
Reference:	Information not found in IS; important contextual information missing necessary to assess the potential of Regulators to uphold the intent and standard set by the EA process when the Proponent is not the one carrying out the activities.
Issue/Concern:	<p>GTC is concerned that compliance and enforcement time for Project requirements will be complicated by an administrative structure where the bulk of Project activities are not carried out by the Proponent, WKR.</p> <p>Regulatory Authorities need to provide clarity on what measures and precautions they utilize in such situations to ensure that project activities are carried out in a manner that respects the expectations and intentions of the regulatory process. This should clearly articulate</p>



	<p>if Regulatory Authorities have the capacity to follow-up with third party contractors and what challenges and lessons learnt can be applied to this Project.</p>
<p>Information Request:</p>	<ol style="list-style-type: none"> 1. How is your Agency's ability to monitor, follow-up, and enforce on Project related concerns or compliance issues affected when it is a third party completing the activities/works and not the Proponent? 2. What lessons learnt from past major projects or public-private ventures can your Agency offer where contractors have failed to live up to terms and conditions of an environmental assessment? What came of the occurrences, and what lessons can be learned from these and applied to the current project? 3. What current capacity constraints would limit your Agency's ability to adequately monitor and enforce proposed Project-related activities, including for transboundary activities and impacts and those related to induced development and cumulative effects?

GTC-06

<p>IR Source:</p>	<p>Gwich'in Tribal Council (GTC)</p>
<p>IR Number:</p>	<p>GTC-06</p>
<p>IR Directed To:</p>	<p>West Kitikmeot Resources Corp (WKR)</p>
<p>Subject:</p>	<p>Future expansion of Project infrastructure and activities; risk for project splitting.</p>
<p>Reference:</p>	<p>E.g., Volume 1, M.D. 2.3 Future Development, pdf 89, et al.</p>
<p>Issue/Concern:</p>	<p>It is unclear how future expansion plans are being assessed in the Impact Statement (IS). Are expansion plans being assessed to the same degree in this EA process, or being left for future study and consideration? Does WKR intend for them to be included as part of the current assessment and not subject to future screening? How are expansion plans incorporated into the cumulative effects assessment? Clarity on how Project expansion will occur and the regulatory context surrounding those developments is required to properly understand what is being assessed under the IS and what will be assessed in later processes. If the Project is being built and designed for anticipated induced development scenarios, then the expansion</p>



	<p>portions of the Project should be included in the scope of items to assess.</p> <p>There should be a clear distinction made by WKR and NIRB to ensure that project splitting is not occurring. If expansion scenarios are not to be included under the items to assess, clear triggers for each expansion component should be identified. This is necessary for regulatory certainty and consistency in how induced developments are managed in this assessment, including cumulative effects assessment.</p> <p>Clarity on how expansion components should be assessed is necessary for a meaningful review and consideration of cumulative effects related to induced development. This will inform reviewers on how much time and attention they need to focus on these expansion proposals during the current review, and whether additional information is required to understand the potential impacts of these planned Project components. If a future assessment process is anticipated, then that should be clearly articulated and noted by NIRB and other regulators. That course of action would make those future expansion components appropriate for consideration under the cumulative effects assessment. If, on the other hand, WKR wants these screened into the assessment of this project, the full scope and scale of the expansion portions should be under review as part of the current IS.</p>
<p>Information Request:</p>	<ol style="list-style-type: none"> 1. WKR should clearly state whether the identified expansion components are intended to be assessed as part of a future regulatory process and, if so, explain why their exclusion from the current assessment does not constitute project splitting. <ol style="list-style-type: none"> 1.1. In responding, WKR should address the apparent inconsistency between: (a) the stated purpose of the Project to facilitate or induce future development; and (b) the identification of expansion components intended to accommodate the scale of induced development anticipated by WKR. 1.2. The response should explain how the identified expansion scenario differs materially from the Project as currently proposed, and from the future development scenario that forms part of WKR's assessment assumptions, such that separate assessment at a future stage is warranted. 2. WKR to clearly identify all future expansion plans and list the triggers for their construction. Include any assumptions related to these management decisions, and the approximate timeline required between assessing the need, the decision to build, and the anticipated time and process required for the expansion project to manifest or become operational.



	2.1. This should identify if WKR considers these as project components being screened as part of this project or if WKR anticipates applying for a new application to build and operate those components, potentially triggering a new environmental assessment.
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GT-07

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-07
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	Clarity on transportation networks for Project mobilization and resupply of materials and equipment.
Reference:	e.g., Volume 1, MD.2 Project Components and Activities, et al.; detail lacking on how the different transportation networks will manifest.
Issue/Concern:	<p>WKR has listed different transportation network options to supply equipment and materials for mobilization, construction, and operations. However, it is unclear how these transportation networks differ materially in terms of their potential impact to locally affected communities and environments. This information is necessary to understand the corresponding risks and opportunities associated with each option.</p> <p>GTC therefore seeks clarity on the likelihood and scale of transportation networks proposed for the Project. Each of the options require sufficient detail to assess if and what potential impacts might occur, to whom, and to what extent.</p> <p>GTC notes that in the Yellowknife December workshop, WKR made a public commitment³ to explore three parallel mobilization/construction pathways:</p> <ol style="list-style-type: none"> 1. Sealift from ports in Quebec to Gray Bay (main route) 2. Secondary transport via the Tibbitt-to-Contwoyto Winter Road 3. Northwestern transport route (Dempster & ITH) to Tuktoyaktuk, then barge (with potential for barging along the Mackenzie River) <p>From the IS, it is recognized the sealift from ports in Quebec is WKR's most likely, or preferred, transport route. To improve the accuracy of the assessment and refine the understanding of impact pathways and potential impacts, it is necessary to quantify the approximate reliance on each of the considered transportation networks, and to add detail on what each option entails.</p>

³ Reference to the options referenced in the MVEIRB workshop summary report, available at: [pr49-transboundary-engagement-workshop-report-dec-8-workshop_summary.pdf](https://www.ec.gc.ca/mveirb/14959594-8000-4900-9000-000000000000/pr49-transboundary-engagement-workshop-report-dec-8-workshop_summary.pdf)



Information Request:	<p>The following information seems a minimum expectation for the IS; WKR is asked to provide updated information on:</p> <ol style="list-style-type: none"> 1. Number of shipments per transport network option, including estimated numbers and relative percentage of total transport loads. <ol style="list-style-type: none"> 1.1. Heavy vehicle loads 1.2. Number and type of shipments 1.3. Reliance on local resources (i.e., fueling, accommodations, health and social services, other) 1.4. Communities traversed or in proximity to the transportation routes <ol style="list-style-type: none"> 1.4.1. Health and social considerations to anticipate and reduce potential adverse impacts associated with an influx of transient workers 2. Local economic valuation of work, employment, and/or contracting opportunities associated with the activities, according to regional breakdown (i.e., Gwich'in Settlement Area, Inuvialuit Settlement Region, Wek'eezhii, Quebec, etc.).
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¹ Reference to the options referenced in the MVEIRB workshop summary report, available at: [pr49-transboundary-engagement-workshop-report-dec-8-workshop_summary.pdf](https://www.gtc-08.ca/pr49-transboundary-engagement-workshop-report-dec-8-workshop_summary.pdf)

GTC-08

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-08
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	Uncertainties regarding a perpetual operational Project
Reference:	E.g., IS Guidelines, section 7.2.2.2, pdf 73
Issue/Concern:	The operational period of the project has no planned closure period and is proposed as perpetual. WKR has selected a design life of 75



	years. Additional context and details are necessary to understand what the perpetual risks and liabilities are over the 75-year timeframe and for WKR to operate the road in perpetuity.
Information Request:	<p>The impact statement should clearly identify:</p> <ol style="list-style-type: none"> 1. Anticipated changes and additions to the basic project over the 75-year timeframe, including when proposed expansion activities might occur, or how long they will take (this should consider any adjustments based on WKR's response to IR GTC- 06). 2. Which aspects of the project, including proposed expansion activities, are likely to require replacement or significant repair in the 75-year operational period. 3. What the plan is beyond the 75-year timeframe to ensure project components are maintained to an operational standard in perpetuity. 4. If no perpetual plan is identified, then, as part of a precautionary approach to sustainable development, develop a closure and reclamation plan for the Project that meets current regulatory standards and expectations.

GTC-09

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-09
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	Climate Change assumptions and predictions regarding barging along the Mackenzie River
Reference:	e.g., Vol. 1, MD-22, pdf 99.
Issue/Concern:	Hay River is mentioned as a port option for mobilization and logistics in the Northwest Territories, alongside Inuvik and Tuktoyaktuk (Vol.1, MD-22, p.99). However, changes to water levels, attributed in part to climate change and upstream hydro projects, have made water levels unpredictable, and the river unnavigable for extended periods of time to heavy barge traffic. Local communities and governments are no longer relying on barge traffic to meet their resupply needs. The IS should include a discussion on climate-related risk to mobilization efforts and what contingencies will be planned to manage those risks. Discuss risks associated with low-water and climate change on barge travel from Hay River and how the removal of Hay River as a port option might affect logistics and mobilization considerations.



Information Request:	<ol style="list-style-type: none"> 1. In the case of the port at Hay River, discuss how plans will be adjusted if barge traffic is not possible due to low water levels. 2. How would this change in the logistics affect other planned activities for equipment and material mobilization and resupply efforts? 3. Discuss other areas in the logistics supply chain where climate risks and low water levels might compromise the proposed activity? Include in the discussion: <ol style="list-style-type: none"> 3.1. likely ripple effects on mobilization and resupply efforts, and 3.2. contingency plans and transportation options to get the materials to site.
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GTC-10

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-10
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	Barriers to a meaningful review – simplification needed
Reference:	General; e.g., Volume 1, Appendix A, pp800-1000; et al.
Issue/Concern:	<p>GTC notes that its review of the Impact Statement was incomplete due to the high volume of material and limited time available to submit Information Requests. WKR's Impact Statement consists of 43 separate documents on NIRB's Public Registry, with a total page count of 7,195 pages, presented in four different languages. The information in its present form is very cumbersome to meaningfully review. Improving the layout and navigational options for reviewers would be very helpful for the next phase of the technical review.</p> <p>As an example, WKR has provided a concordance table to facilitate navigation between the IS Guidelines and Scoping requirements. However, the table is 200 pages long, detracting from its utility. There are also no clear hyperlinks, meaning reviewers still need to navigate between 43 different documents.</p> <p>In a similar vein, volumes are presented in each of the official languages of Nunavut. It seems more efficient to have the reports limited to a single language, with all volumes contained within a similar folder or, ideally, document. The information request below has suggestions for improving the ability of reviewers to find relevant materials. This will ultimately lead to a smoother review experience focused on outstanding issues and not on navigation.</p>
Information Request:	<ol style="list-style-type: none"> 1. Request for the concordance table to be a stand-alone document with hyper-links to the respective sections.



	<ol style="list-style-type: none"> 1.1. The separate document should be formatted to reduce the overall length of the table (e.g., by adjusting the width of the comment column and other columns accordingly). 1.2. The column “Page Range Start” should include the actual pdf page number to facilitate quick navigation by reviewers. 1.3. WKR is requested to add hyperlinks to volumes and sections. Ideally this would link to the documents on NIRB’s public registry. If not possible, WKR should create an online database (e.g., Dropbox, or something similar) where reviewers can easily navigate directly from a concordance table hyperlink. 2. Separate the documents into their respective languages for ease of review. This will substantially reduce the size and volume of each document, allowing documents to be amalgamated, thereby reducing the overall number of documents to keep track of. <ol style="list-style-type: none"> 2.1. If NIRB follows a different protocol, then disregard this portion of the IR. Greater effort should then go into adding hyperlinks into the concordance table, as per request 1 above.
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GTC-11

IR Source:	Gwich’in Tribal Council (GTC)
IR Number:	GTC-11
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	Ease of review and functionality - Mitigations and Commitments
Reference:	e.g., Volume 1, Appendix B; et al
Issue/Concern:	<p>WKR has provided a helpful list of mitigations and commitments. However, as with the concordance table and volume of material, the number of mitigations and commitments is extensive. The table in Volume 1, Appendix B, currently runs for 46 pages and lists 364 distinct IDs for commitments and mitigations. Presumably these are identified by order of appearance in the various documents. To improve the efficiency of the review and make it easier to compare and consider mitigations and commitments, WKR should amalgamate the mitigations and commitments wherever possible. For example, mitigations could be presented according to the pathway of effect they are targeting.</p> <p>This will make it easier to manage and review similar measures and commitments. This will help ensure that review time is well-spent and efforts are not being duplicated. It will also ensure consistent standards and expectations are set, which should make it easier for</p>



	<p>WKR to develop and execute management plans and monitoring programs.</p> <p>For example, if multiple mitigations and commitments relate to installing road signs to support public safety and reduce instances of wildlife collisions, these ought to be amalgamated. Similarly, erosion and sediment control measures, or adaptive management practices, etc., could be amalgamated, with specific nuances related to the topic discussed in that section or as sub-sections to the mitigation or commitment (e.g., coastal ESC considerations vs standard roadway, water crossings, site drainage, quarries, etc.).</p>
Information Request:	<p>1. To improve the efficiency of the review and make it easier to compare and consider mitigations and commitments, WKR should amalgamate the mitigations and commitments wherever possible.</p>

GTC-12

IR Source:	Gwich'in Tribal Council (GTC)
IR Number:	GTC-12
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	Transboundary effects and assumptions related to marine traffic and vessels need clarification and potential adjustment.
Reference:	e.g., Volume 10, 33 Transboundary Effects Assessment; Volume 10, Appendix A; Volume 1, MD.2 Project Components and Activities; Volume 1 MD.10.2 (pdf 191); IS guidelines and Scoping document...spatial (section 7.2.2.1, pdf 71); temporal (section 7.2.2.2, pdf 73), et al
Issue/Concern:	<p>WKR's selection of spatial and temporary boundaries for valued components identified in the NIRB final scoping document and impact statement guidelines do not appear to extend into areas outside of Nunavut. GTC considers this a deficiency of the Impact Statement that is not in alignment with the intent of the NIRB scoping and impact statement guidelines documents. The narrow scope taken for setting spatial and temporal boundaries for valued components affected by the Project outside of Nunavut, over the lifetime of the Project, significantly reduces the value of the transboundary effects assessment. This risks the perpetuation of significant knowledge gaps and issues of public concern related to transboundary effects, including direct project components that occur outside of Nunavut.</p> <p>WKR has selected a project-specific boundary that downplays the potential role of impacts outside of Nunavut. Section 33.3 of Volume</p>



10 (pdf 94), for example, identifies three main categories of transboundary effects where residual project impacts are possible. However, because WKR has selected local and regional assessment areas (LAA, RAA respectively) relative to the project, the boundaries do not extend far from the project and remain wholly within Nunavut. This effectively excludes the assessment of transboundary effects under the LAA and RAA. In turn, this prohibits the identification of Project-associated residual effects for transboundary components. This may prohibit transboundary effects from being included or considered in the cumulative effects assessment (CEA). The CEA need only consider project components that have a residual component AND interact with reasonably foreseeable future activities, and other projects identified on the Project Inclusion List (PIL). If there are no identified residual effects or no overlap between the projects, then WKR has no obligation to study them. By limiting the LAA and RAA to Nunavut and areas proximate to the Project, WKR is arbitrarily excluding most transboundary effects from consideration in the cumulative effects assessment. A similar challenge exists for the PIL, which limits projects and induced activities to those proximate to the port or road (e.g., project-centric). No projects or future activities outside of Nunavut were observed identified. This effectively means that issues of transboundary effects are unlikely to be assessed for project-related effects or in consideration of future developments and activities. In both cases, these boundary limitations can prohibit transboundary effects from being assessed in a CEA. Given the significant concerns expressed by participating parties about transboundary and cumulative effects experienced/felt outside of Nunavut, this may significantly limit the Impact Assessment's ability to meaningfully consider valued components affected by the Project that exist outside of Nunavut.

GTC is concerned that limiting the geographic range of the spatial boundary will result in an impact statement that does nothing to advance the understanding or shed light on knowledge gaps and uncertainties related to transboundary effects associated with this Project. Again, this includes direct project components with transboundary effects that will occur in perpetuity, as well as indirect and induced effects related to induced developments (as defined by NIRB).

For example, WKR identifies marine traffic scenarios to support the Project during both construction and operations, with marine vessels originating from Tuktoyaktuk, NWT, and from Montreal, Quebec (e.g., see Volume 1, MD.2 or GTC-07). These are direct project components. Marine traffic is also expected to increase under most,



	<p>if not all, of the anticipated future development scenarios expected for the Project, including those on the Project Inclusion List (PIL). And while WKR’s discussion on transboundary effects (e.g., in Volume 10 section 33.3.2) identifies nine VCs with potential transboundary effects, the assessment draws conclusions that are not intuitive given the potential for impact. For example, that marine effects are not significant because the RAA does not extend outside of Nunavut; that assessment of caribou does not contribute to determinations of significance; or that impacts of noise on marine mammals is not significant because it’s only seasonal.</p> <p>GTC therefore seeks an adjustment in the methodology used by WKR to use a valued-centric approach to spatial and temporal boundaries that captures concerns raised by participating Indigenous groups about transboundary effects, and for the meaningful consideration of transboundary effects in the cumulative effects assessment.</p>
<p>Information Request:</p>	<ol style="list-style-type: none"> 1. WKR to adapt a valued-centric approach and not a project-centric approach in its selection of spatial and temporal boundaries, especially those identified as having a likely transboundary effect. 2. Include identified issues of potential transboundary effects in the cumulative effects assessment. 3. Update the Project Inclusion List and cumulative effects assessment with more detailed descriptions and scenarios of the reasonably foreseeable future activities. 4. Extend the boundary of possible marine activities, including those associated with marine traffic, to recognize the travel routes of marine vessels from their anticipated port of origin. These marine components should be additionally recognized as transboundary effects if they extend outside of Nunavut. 5. WKR to update its impact statement and Reasonably Foreseeable Induced list that makes up part of the PIL to reflect NIRB’s definitions of <i>Induced effects</i> and <i>Induced Development</i>. GTC notes that the NIRB definitions (found on pdf page 7 of the Impact Statement Guidelines) do not match the logic WKR is using to assess issues of induced effects and induced developments (as noted from its position on the Project including no induced projects – Volume 10 pdf page 69).

GTC-13

<p>IR Source:</p>	<p>Gwich’in Tribal Council (GTC)</p>
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IR Number:	GTC-13
IR Directed To:	West Kitikmeot Resources Corp (WKR)
Subject:	Project Inclusion List (PIL) may be missing or omitting important and reasonably foreseeable future activities.
Reference:	e.g., Volume 10, Appendix A; Volume 1, MD.2 Project Components and Activities; et al
Issue/Concern:	<p>The PIL is missing or provides inadequate detail on anticipated projects that are likely to occur if the Project is constructed and operated. These projects need to be specifically added to the PIL list and considered in detail as part of the cumulative effects assessment. WKR also needs to justify why marine components identified on the PIL are limited to a 10km radius from the Project and do not include the full extent of their marine vessel transit. For example, WKR identifies marine traffic scenarios to support the Project during both construction and operations, with shipments originating from Tuktoyaktuk, NWT, and from Montreal, Quebec (e.g., see Volume 1, MD.2 or GTC-07). These are direct project components. Marine traffic and the number of vessels are also expected to increase under most, if not all, of the anticipated future development scenarios expected for the Project, including those on the PIL. It is therefore important that marine traffic and vessel components are given appropriate and meaningful consideration in the cumulative effects assessment.</p> <p>It is also not obvious if the PIL contains WKR’s own future plans and activities that will be influenced by the construction and operation of the Project. WKR’s website⁴ identifies various mineral properties and projects, including Arcadia Bay, a “significant drill program”, and Other Projects. This includes projects in the Coronation Gulf that would become more economically viable if the Project is approved. If these projects are not currently a part of the PIL, then WKR should justify their exclusion from the Reasonably Forseeable Induced (RFI) list.</p>
Information Request:	<ol style="list-style-type: none"> 1. Update the PIL to include marine traffic and vessel components directly related to the Project and to other projects identified on the PIL to capture the expected marine route travelled by those ships. <ol style="list-style-type: none"> 1.1. Explain the rationale for marine components on the PIL that have a listed distance of less than 10km. 1.2. Update the RAA for marine vessels and marine traffic to reflect their likely port of origin.

⁴ [Projects | West Kitikmeot Resources Corp](#)



	<ol style="list-style-type: none"> 1.3. Update the cumulative effects assessment accordingly should this result in the identification of potential residual project effects or interactions with the project during the construction phase or for the perpetual operational period. 2. Update the PIL to include WKR’s future plans and projects that will become more likely if the Project goes ahead. These projects should be added to the Reasonably Forseeable Induced (RFI) list. <ol style="list-style-type: none"> 2.1. For projects WKR deems inappropriate to add to the RFI, provide a rationale as to why they should not be added to the list. This rationale should meaningfully address the improved economics and logistics that the Grays Bay Road and Port project offer, and WKR’s own improve finances and corporate stability that come with owning the facilities and collecting tolls from Project-users, for perpetuity. 3. Update the PIL as appropriate based on the additional information provided by governments and participating parties to NIRB during this round of Information Requests.
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GTC-14

IR Source:	Gwich’in Tribal Council (GTC)
IR Number:	GTC-15
IR Directed To:	Government of Canada; Government of Nunavut (GN); Kitikmeot Inuit Association (KIA)
Subject:	Assessment of anticipated future development scenarios for induced developments associated with the Grays Bay Road and Port Project.
Reference:	e.g., Volume 10, Appendix A; et al
Issue/Concern:	<p>The Project is receiving financial and regulatory support from numerous governments and was originally advanced for development by KIA, with support from Canada and GN.</p> <p>It is a reasonable assumption that the various government agencies responsible for pursuing and supporting the Project have done their own due diligence assessments regarding potential economic and socio-economic benefits associated with a permanent road and port. In other words, that some level of studies or analysis have occurred by these governments to justify their support of the Project.</p> <p>Information related to economic and induced development scenarios identified by these governments is important to understand what reasonably foreseeable induced development scenarios Governments anticipate should the Project be built and come into operation.</p> <p>The various and respective government agencies are therefore requested to provide relevant studies and assessments related to economic analysis and socio-economic costs and benefits of an</p>



	<p>operational road and port at Grays Bay. A summary of anticipated induced development scenarios used to inform the studies, and induced development scenarios considered likely to occur because of the Project being built are requested. This information is necessary to inform parties and WKR on future scenarios and induced development associated with the project and may reduce existing knowledge gaps related to a future with the Project. This is also in keeping with NIRB's use of the precautionary principle in considering how the Project may interact with valued components. Clarity on this topic was not evident in the initial impact statement review.</p>
<p>Information Request:</p>	<ol style="list-style-type: none"> 1. Submit related studies and summaries of analysis to the NIRB Public Registry of government-led or funded analyses, studies, or other forms of assessment related to economic and socio-economic costs, benefits, and potential of an operational road and port at Grays Bay like that proposed by WKR. 2. Provide a summary of anticipated induced development scenarios, including a minimum anticipated scenario, and an anticipated likely scenario, of projects, activities, and potential over the lifetime of the project (e.g., in perpetuity). <ol style="list-style-type: none"> 2.1. Identify underlying assumptions related to the development scenarios. 2.2. Provide the timeline of construction and operation of projects or activities identified. 2.3. Identify marine traffic or vessel components related to the construction or operation of the Project or for those supporting terrestrial-based projects, as well as expected increases in marine traffic and vessels anticipated with the development of a major port at Grays Bay, and the likely source of travel of these vessels within and beyond Nunavut.

GTC-15

<p>IR Source:</p>	<p>Gwich'in Tribal Council (GTC)</p>
<p>IR Number:</p>	<p>GTC-15</p>
<p>IR Directed To:</p>	<p>Government of Canada; Government of Nunavut (GN); Kitikmeot Inuit Association (KIA)</p>
<p>Subject:</p>	<p>Assessment of anticipated future development scenarios for induced developments associated with the Grays Bay Road and Port Project.</p>
<p>Reference:</p>	<p>e.g., Volume 10, Appendix A; et al</p>
<p>Issue/Concern:</p>	<p>The Project is receiving financial and regulatory support from numerous governments and was originally advanced for development by KIA, with support from Canada and GN.</p>



	<p>It is a reasonable assumption that the various government agencies responsible for pursuing and supporting the Project have done their own due diligence assessments regarding potential economic and socio-economic benefits associated with a permanent road and port. In other words, that some level of studies or analysis have occurred by these governments to justify their support of the Project.</p> <p>Information related to economic and induced development scenarios identified by these governments is important to understand what reasonably foreseeable induced development scenarios Governments anticipate should the Project be built and come into operation.</p> <p>The various and respective government agencies are therefore requested to provide relevant studies and assessments related to economic analysis and socio-economic costs and benefits of an operational road and port at Grays Bay. A summary of anticipated induced development scenarios used to inform the studies, and induced development scenarios considered likely to occur because of the Project being built are requested. This information is necessary to inform parties and WKR on future scenarios and induced development associated with the project and may reduce existing knowledge gaps related to a future with the Project. This is also in keeping with NIRB's use of the precautionary principle in considering how the Project may interact with valued components. Clarity on this topic was not evident in the initial impact statement review.</p>
<p>Information Request:</p>	<ol style="list-style-type: none"> 3. Submit related studies and summaries of analysis to the NIRB Public Registry of government-led or funded analyses, studies, or other forms of assessment related to economic and socio-economic costs, benefits, and potential of an operational road and port at Grays Bay like that proposed by WKR. 4. Provide a summary of anticipated induced development scenarios, including a minimum anticipated scenario, and an anticipated likely scenario, of projects, activities, and potential over the lifetime of the project (e.g., in perpetuity). <ol style="list-style-type: none"> 4.1. Identify underlying assumptions related to the development scenarios. 4.2. Provide the timeline of construction and operation of projects or activities identified. 4.3. Identify marine traffic or vessel components related to the construction or operation of the Project or for those supporting terrestrial-based projects, as well as expected increases in marine traffic and vessels anticipated with the development of a major port at Grays Bay, and the likely source of travel of these vessels within and beyond Nunavut.