





<b>GN IR 01</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Inclusion of the Beverly and Ahiak Caribou Herds
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16, Caribou</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Section 16 of Volume 6, Part 1 of the Impact Statement (IS) for West Kitikmeot Resources Corp.'s (WKR, Proponent) Grays Bay Road and Port Project (Project) states:</p> <p>“The assessment considers potential Project effects and cumulative effects on caribou using two representative herds: [Bathurst Caribou Herd], the primary mainland caribou interacting with the Project; and [Dolphin and Union Caribou Herd], the primary island caribou interacting with the Project... Other mainland caribou, such as the Bluenose-East Herd and Beverly/Ahiak Herd, interact infrequently with the Project; however, when they do, their space use and movements are similar to those of the [Bathurst Caribou Herd] (see Appendix 16A, Wildlife Baseline Report).” (WKR, 2026, p. 16-1)</p> <p>The Government of Nunavut (GN) believes that excluding the Beverly and Ahiak caribou herds from the IS creates a critical information gap for reviewers. Without consideration of these herds, the GN and others cannot fully understand the potential impacts of the proposed Project on wildlife, which cannot be fully understood or predicted due to the absence of information.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that West Kitikmeot Resources (WKR, Proponent) include the Beverly and Ahiak herds into the scope of the IS.</p>	
<b>ADDITIONAL COMMENT(S)</b>	

The assessment does not need to cover the entire Beverly and Ahiak herds; it can only focus on areas where the herd may interact with the Project and its assessed zone of influence (ZOI).

GN IR 02	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Engagement Record with Kitikmeot Wildlife Board and Affected Hunter and Trappers Organizations/Associations
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.1, Caribou.</li> </ul> </li> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026) <ul style="list-style-type: none"> <li>○ Section 37.1.1, Environmental Management System Framework</li> </ul> </li> </ul>
ISSUE/CONCERN(S)	
<p>The Kitikmeot Wildlife Board (KWB) and the Kitikmeot Hunters and Trappers Organizations/Associations (HTA/HTOs) are the regional and community-level elected wildlife representatives, respectively. The KWB and Kitikmeot HTOs work to represent the views of harvesters as elected representatives of their membership and hold valuable knowledge of wildlife.</p> <p>However, the Proponent’s IS does not clearly describe/present:</p> <ul style="list-style-type: none"> <li>• The level of engagement undertaken with the KWB or the Kitikmeot HTA/HTOs.</li> <li>• A summary of KWB or Kitikmeot HTA/HTOs shared Inuit Qaujimaningit and/or Inuit Qaujimajatuqangit (IQ), traditional knowledge and/or community knowledge on the concerns regarding this Project.</li> </ul> <p>The Project’s Environmental Management System framework (e.g., Section 37.1.1) provides a non-exhaustive list of Inuit Organizations that will help assist with the development of monitoring programs. The GN notes that the KWB is not identified here, even though the Board is responsible for regional wildlife issues.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully understand the extent of community-based wildlife knowledge considered in the assessment.</p>	

### **INFORMATION REQUEST(S)**

The GN requests that the Proponent include the following summaries in their IS:

- The level of engagement undertaken with the KWB and the Kitikmeot HTA/HTOs.
- A summary of the knowledge and/or concerns shared by the KWB and HTA/HTOs regarding this Project, including:
  - Information on how potential concerns were addressed or responded to by the Proponent.
  - How the knowledge provided was incorporated into the Proponent's assessment of potential impacts, where applicable.

### **ADDITIONAL COMMENT(S)**

A list of meeting dates, including details of discussions held with KWB and HTA/HTO board members at quorum, would help assess the effectiveness of engagement.

<b>GN IR 03</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Mapping: Wetland Plant Communities and Surface Drainage
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 15, Assessment of Potential Effects on Vegetation</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Wetlands provide critical habitat for wildlife, especially herbivores such as moose, muskox, and caribou. However, the GN notes that Section 15 of the IS does not include a map depicting the distribution of wetland plant communities, combined with attributes illustrating surface-water flow direction.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and others cannot fully understand the extent of potential upstream and downstream impacts to wetlands near the proposed road corridor.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent include, in Section 15 (Assessment of Potential Effects on Vegetation), a map showing the proposed road and corridor, the extent of wetland habitats within and adjacent to the corridor, and the direction of water movement through or across the proposed corridor.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 04</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	References to Personal Communication Informing Professional Judgement
<b>Reference</b>	<ul style="list-style-type: none"> <li>West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026)</li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The term <i>professional judgment</i> is used throughout the IS (e.g., WKR, 2026, p. 14-28, 14-29, 14-34) with no additional reference regarding whether personal communication with a specialist or technical knowledge holder helped inform professional judgment being relied on for the assessment. For transparency and clarity, the document should reference the individual(s) involved in making the professional judgment through the use of in-text citations (e.g., Jane R. Doe, John W. Doe, personal communication, 2026).</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that in-text citations identifying personal communication with a technical or specialist knowledge holder(s) replace any mentions of <i>professional judgment</i> throughout the IS, where no further reference is provided.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 05</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Mapping: Cumulative Impacts of Induced Industrial Development on Caribou Habitat
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.5, Assessment of Cumulative Effects on Caribou</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The GN notes information in section 16.5, including Tables 16.8 –13 and Figures 16.14 and 16.15. However, as written, section 16.5 of the IS does not clearly assess the potential cumulative loss of seasonal range due to induced industrial development. Specifically, the IS fails to estimate or map the Potential connector roads between the existing and the proposed Project, as it is understood that the Proponent’s Project is being advanced specifically to encourage resource extraction and other potential uses at a distance from the proposed road and corridor.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and others cannot fully understand the extent of potential cumulative loss of seasonal range for caribou.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent develop an estimate of the potential cumulative loss of seasonal range, supported by a map illustrating possible connector roads and associated infrastructure to help visualize the overall scale of effects following the opening of the proposed road into the foreseeable future.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 06</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Land-Cover Classification Uncertainty
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 15.6.3, Gaps and Uncertainties</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Section 15.6.3 of the IS states, “Coarser scale mapping at the [Regional Assessment Area] level also limits the ability to identify landcover classes and therefore cumulative effects may be over or underestimated for some classes.” (WKR, 2026, p. 37-1) However, the Proponent has not assessed the level or range of uncertainty numerically, as well as the classes within which these uncertainties exist.</p> <p>This information should be provided by the Proponent in the IS to ensure the GN and other parties can properly evaluate the extent of impacts to various land-cover classes as they relate to wildlife habitat.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent provide:</p> <ul style="list-style-type: none"> <li>• A numerical range describing the precision of landcover classifications within the study corridor.</li> <li>• A discussion on how uncertainty in landcover classification may have influenced the Proponent’s assessment of impacts on caribou, moose, and muskox and associated conclusions.</li> </ul>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 07</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Project Routing and Caribou Habitat
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.1.1.5</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The current proposed routing of the Grays Bay Road and associated corridor conflicts with the traditional spring and fall migratory routes, as well as the calving and post-calving range of the Bathurst herd and Dolphin and Union herds (and possibly the Beverly and Ahiak herds, though that information is missing from this IR).</p> <p>However, Section 16.1.1.5 of the IS states the following:  “Proactive Protection Measures: WKR’s commitment to avoiding or strictly mitigation know high-risk activities is crucial. This includes actions like avoiding or minimizing roads through calving grounds and migration routes...” (WKR, 2026, p.16-7.)</p> <p>The IS does not clearly describe what route modifications are being proposed to reduce impacts on calving, post-calving, and migratory barren-ground and Dolphin and Union caribou, nor whether such routing modifications are still under consideration to meet this requirement.</p> <p>This information is necessary for the GN and other parties so that a thorough review and understanding of the extent of potential impacts associated with the proposed routing can be undertaken and better understood.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent provide a detailed discussion of how and where road and corridor routing will be modified to minimize conflicts with calving, post-calving, and migratory barren-ground caribou herds and the Dolphin and Union caribou herd.</p>	
<b>ADDITIONAL COMMENT(S)</b>	

N/A

<b>GN IR 08</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Additional Contributors to Caribou Mortality Risk: Distributional Shifts
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.1.3.4, Change in Mortality Risk</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>In section 16.1.3.4 of the IS, the Proponent only considers the following effect pathways with respect to mortality risks to caribou:</p> <p style="padding-left: 40px;">“Caribou mortality may occur through collisions with vehicles using the Project. Vehicle collisions with caribou are known to occur along major highways with substantial traffic (EDI Environmental Dynamics Inc. 2015). The Project may also facilitate indirect caribou mortality through increased hunter access, thereby increasing hunting pressure, or through predator ambush (e.g., using road banks as cover to depredate caribou).” (WKR, 2026, p. 16-15)</p> <p>As such, the Proponent has not fully considered mortality risks associated with distributional shifts in migratory routes and associated seasonal range on feeding, health, productivity, and disease transmission to caribou. An assessment of these potential risks known to be associated with linear infrastructure, such as roads, will be required to fully understand impacts to caribou.</p> <p>Without this information, the GN and other parties cannot fully understand the extent of mortality risks associated with shifts in caribou migration and seasonal range.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests detailed information on the possible mortality risks associated with the known potential for roads to disrupt migratory behaviour and associated use of seasonal range.</p>	

The GN requests that the information also assesses effects on foraging success, reproductive productivity, and disease transmission, as these metrics are required to fully evaluate impacts on caribou.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 09</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Additional Contributors to Caribou Mortality Risk: Predators
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section VS.6.3, Caribou</li> <li>○ Section 16.2.2, Overview</li> <li>○ Section 16.4.4.4 Project Residual Effect</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The Proponent discusses facilitated predation throughout the IS (e.g., sections VS.6.3.2, 16.2.2, and 16.4.4.4). For example, Table 16.7 of the IS, the Proponent assessed predator risk along the road as low due to the landscape, stating:</p> <p style="padding-left: 40px;">“However, the overall risk of facilitated predation is low; the surrounding opening landscape already provides mostly unobstructed predator movement.” (WKR, 2026, p. 16-31)</p> <p>The Proponent’s assessment fails to address the well-documented effect of linear infrastructure on caribou movement, including the slowing and funnelling of animals along roads when attempting to cross, conditions that can increase predation risk. Inuit knowledge and observations from other tundra roads have long recognized that predators exploit these choke points, and substantial scientific literature describes how linear features create advantageous ambush locations within tundra habitats. The Proponent must incorporate this information into the IS to fully assess predator–prey dynamics and associated mortality risks to caribou.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully understand the extent of predation risks associated with the proposed linear infrastructure.</p>	
<b>INFORMATION REQUEST(S)</b>	

The GN requests additional information and analysis regarding the effects of tundra roads in slowing and concentrating caribou movement into choke points along linear infrastructure, and how these areas may be exploited by predators to hunt caribou.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 10</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Zones of Influence
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.2.2.6, Baseline Disturbances</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The Proponent discusses only simple zones of influence (ZOI) and does not consider disruptions to migratory behaviour or the potential for amplified habitat loss downstream of the structural disturbance.</p> <p>A road bisecting a terrestrial migratory corridor often creates an asymmetrical zone of influence. The deflection of migrating caribou can produce an expanded ZOI both upstream of the road—where caribou travel along the linear feature searching for a suitable crossing—and downstream of the road, where caribou may be unable to access preferred seasonal ranges due to upstream displacement. These effects would extend beyond what is captured by a standard ZOI analysis that the Proponent has provided.</p> <p>An assessment for this more robust modified ZOI, resulting from altered migratory movement, should be completed by the Proponent and provided to reviewers. The GN believes that this is a critical information gap for reviewers. Without it, the GN cannot fully assess the full scope of potential impacts from the Project on migratory caribou moving through the area.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent include a more robust assessment of ZOI effects to enable a realistic evaluation of negative impacts to caribou moving across the Project's linear infrastructure.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	



<b>GN IR 11</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Proven Efficacy of Mitigation Measures
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026) <ul style="list-style-type: none"> <li>○ 37B Wildlife Monitoring and Mitigation Plan <ul style="list-style-type: none"> <li>▪ Section 3, Plan and Development and Engagement</li> </ul> </li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>In Appendix 37B of the IS, WKR states,</p> <p>“In accordance with the guidance provided by the Inuit Advisory Group to WKR, and a suggestion to not “re-create the wheel” when it comes to protection measures (Inuit Advisory Group (IAG) 2025), best management practices to avoid or reduce Project-related effects on the land, water, and the animals that use it were adapted from previously approved major development projects in the Arctic”. (WKR, 2026, p.7)</p> <p>The GN notes that mitigation techniques remain largely unverified and untested in tundra environments. In particular, Mobile Protection Measures (MPM) or Mobile Caribou Conservation Measures (MCCMs) (which the Proponent intends to use; e.g., WKR, 2026, p.15) are poorly defined, lack demonstrated effectiveness over a long-term period, and have few, if any, documented examples of successful application.</p> <p>The GN was unable to identify where in the IS the Proponent discusses the validity and reliability of mitigation techniques in relied upon to reduce impacts on caribou.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the effectiveness or feasibility of the proposed mitigation measures.</p>	
<b>INFORMATION REQUEST(S)</b>	

The GN requests that the Proponent include a full discussion and literature review of past and present successful applications of MPM's and other possible mitigative measures proposed to be used to offset potential negative impacts to caribou.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 12</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Methods to Detect Caribou
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.4.2.3, Mitigation, Management, and Enhancement Measures</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Section 16.4.2.3 of the IS states that Minimum Count Confidence Method/Metric (MCCM)-based adaptive road closures and traffic management will be used to mitigate impacts to caribou (e.g., WKR, 2026, p. 16-94); however, no further details are provided.</p> <p>If road closures are adopted as a mitigation strategy, the method used to detect caribou and determine their distance from the road will be critical for initiating closures before caribou movement behaviour is affected.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the effectiveness or feasibility of this element of the proposed mitigation measures.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent provide detailed methods for the detection of caribou approaching the road, including distance and timing thresholds, and a clear protocol for suspending road-based activities. The GN notes that this information should be provided during the review phase of the Project, not after.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 13</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Evidence Supporting Confidence in Road Mitigation
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.8.4, Mitigation, Management, and Enhancement Measures</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>With respect to caribou mitigation and monitoring, section 16.8.4 of the IS states, “there is high confidence in the success of standard mitigation and management measures based on their effectiveness in past projects (Golder Associates Ltd. 2020; Agnico Eagle Mines Ltd. 2020” (WKR, 2026, p.16-162). However, the GN notes that the Proponent does not substantiate this position in the IS with any supporting discussion or analysis.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the Proponent’s position with respect to the efficacy of the proposed mitigation for the road.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent provide a detailed discussion of the mitigation methods used, the seasonal ranges in which they were applied, and the quantitative results demonstrating their effectiveness and relevance to the Greys Bay Road.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 14</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Road Monitoring Options
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.9, Follow-up and Monitoring</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The GN notes that road-based monitoring can be a source of disturbance to wildlife and may affect the effectiveness of natural landforms in its effectiveness for early detection of approaching herds.</p> <p>While section 16.9 of the IS states “Regional monitoring from continuous review of GPS collar data (in coordination with GN and GNWT), and local-scale monitoring along the Project Road by dedicated Inuit Monitors, will provide early warning systems as part of the caribou TARP” (WKR, 2026, p.16-163) the IS does provide a broader discussion on alternative methods (e.g., collars, drones) that could be used for early warning of approaching caribou.</p> <p>The GN believes that the absence of this additional information regarding alternative methods in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the Proponent’s position with respect to the efficacy of the proposed mitigation for the road and the methods used to achieve stated goals.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent provide a detailed discussion on remote monitoring methods, such as telemetry and aerial drones, to allow for the detection of migrating caribou before being influenced by the road and its associated activities, including road-based wildlife surveys.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	



<b>GN IR 15</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Shipping Traffic and Sea Ice Crossing Corridors for Dolphin and Union Caribou
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 8 – Marine Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ 23.4.4.3, Cumulative Effects</li> </ul> </li> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16 Assessment of Potential Effects on Caribou</li> </ul> </li> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 12. (March 2026) <ul style="list-style-type: none"> <li>○ 4.3 Dolphin and Union Caribou (Island Caribou)</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The GN notes Figure 23.10 in Volume 8 of the IS, which illustrates the Northwest Passage Shipping Route and the Project Access Corridor. The GN also notes Figure 4.38 in Volume 6, Part 12 of the IS, which illustrates Dolphin and Union spring and fall migration routes across the sea ice of Dolphin and Union Strait, Coronation Gulf and Dease Strait.</p> <p>However, the GN notes that the GN could not locate in Volume 6 of the IS, a map showing the proposed shipping routes (e.g., Northwest Passage Shipping route) overlaid with Dolphin and Union caribou sea ice crossings.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the Project’s potential effects on the Dolphin and Union caribou.</p>	
<b>INFORMATION REQUEST(S)</b>	

The GN requests that the Proponent provide a map of the proposed Northwest Passage shipping route overlaid with known Dolphin and Union caribou sea-ice crossing corridors, accompanied by a discussion of potential risks to sea-ice stability and caribou migration.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 16</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Missing References to Recent Caribou Surveys
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 12. (March 2026). <ul style="list-style-type: none"> <li>○ 4.5.1.2, Populations</li> </ul> </li> <li>• Campbell, M.C., Boulanger, J., Ringrose, J., Charron, A.R., Greene, E., &amp; Mutch, C. (2022). Abundance Estimates of the Northeastern Mainland Tundra Wintering Subpopulations of Barren-Ground Caribou (<i>Rangifer tarandus groenlandicus</i>) on the Nunavut Eastern Mainland – June 2021. Executive Summary Report to the Nunavut Department of Environment and Co-Management Partners.</li> <li>• Campbell, M.C., Boulanger, J., Ringrose, J., Danahy, J., Kite, R., &amp; Charron, A.R. (2025). Abundance and Trends of the Beverly Mainland Migratory Subpopulation of Barren-Ground Caribou (<i>Rangifer tarandus groenlandicus</i>) – June 2023. Government of Nunavut, Department of Environment. File Report # 2025-01.</li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Section 4.5.1.2 of Volume 6, Part 12 of the IS does not include references to a 2021 survey of the northeast mainland herds, including the Ahiak herd and a 2023 survey of the Beverly herd (Campbell et al. 2022; Campbell et al. 2025). These more current reports should be fully integrated into the discussion of these herds to ensure the IS reflects the best available information.</p> <p>The most recent demographic information on the Beverly and Ahiak herds is absent from the discussion on these subpopulations and should be included in the discussion, along with an updated assessment of collar movements, in order to properly assess potential impacts from the Project on these herds.</p>	
<b>INFORMATION REQUEST(S)</b>	

The GN requests that the discussion for section 4.5.1.2 be updated to incorporate the most recent information regarding the abundance, trend, and distribution of the Ahiak and Beverly caribou herds.

**ADDITIONAL COMMENT(S)**

To receive copies of these reports, please contact John Ringrose, Manager of Wildlife Research, Department of Environment, Government of Nunavut: [jringrose@gov.nu.ca](mailto:jringrose@gov.nu.ca).

<b>GN IR 17</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Seasonal Range Maps for Other Caribou Herds
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 1. (March 2026) <ul style="list-style-type: none"> <li>○ Section 16.2.2.4, Movement and Distribution</li> </ul> </li> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 11. (March 2026) <ul style="list-style-type: none"> <li>○ Section 4, Ungulates</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The GN notes that section 4 of Volume 6, Part 11 of the IS includes figure 4.1, which shows the range of caribou herds (Bathurst, Dolphin and Union, Ahiak, Bluenose East and Beverly) overlaid with the Project footprint.</p> <p>However, the seasonal ranges for each of these herds are not provided in this section.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the Project's potential effects on the Dolphin and Union, Ahiak, Bluenose East and Beverly caribou herds.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent include seasonal range maps for the Bluenose East, Beverly and Ahiak herds in Section 4.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
<p>These maps should be similar to those used for the Bathurst herd (Figure 16.2) found in section 16.2.2.4 of Volume 6, Part 1.</p>	

<b>GN IR 18</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Data Gap - Collar Data Removed from Analysis
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 6 – Terrestrial Environment, Part 13. (March 2026) <ul style="list-style-type: none"> <li>○ Appendix A</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Section A.1.3 of the IS describes procedures for preparing telemetry data for analysis, and summarizes that,</p> <p style="padding-left: 40px;">“Thus, for a caribou to be retained for analysis, its GPS locations in a given season and year needed to cover at least 50% of that seasonal period within the 95% [Utilization Distribution (UD)] seasonal range (see Caribou Collar Data and Seasonal Ranges in Section 4.1.2).” (WKR, 2026, p. A-2)</p> <p>The GN notes that all normally functional telemetry data from collared caribou has ecological significance and should be displayed for review and consideration to fully assess potential impacts of the road project on Barren-ground caribou.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests the Proponent list and seasonally map all normally functional barren-ground caribou telemetry data that was removed from the spatial analysis to allow for the assessment of the significance of the data removed up to and including the 95% UD. The GN believes that this additional spatial information could better inform understanding of potential Project impacts to barren-ground caribou.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

GN IR 19	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Uncertainty Regarding Vessel Activity Outside of Open-Water Season
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 8 – Marine Environment. (March 2026) <ul style="list-style-type: none"> <li>○ Section 23.4.1, Justification of Projects Rated No Interaction</li> </ul> </li> </ul>
ISSUE/CONCERN(S)	
<p>Section 23.4.1 of the EIS states,</p> <p>“WKR does not plan to receive vessels outside of the open-water season. Furthermore, all third-party user groups, including those listed as Reasonably Foreseeable Induced (RFI) projects/activities, have committed to using the port only during open-water season, typically from late June through October.</p> <p>WKR has agreed to accommodate crew changes for icebreaking vessels operated by the CCG (via the airstrip), but only during the open-water season. Icebreaker operations in the Arctic generally occur from June to November, after which vessels return south. No regular vessel traffic, including CCG ships, will access the port outside the open-water season.” (WKR, 2026, p.23-107)</p> <p>As demonstrated above, the IS does not clearly confirm whether shipping could occur outside the open-water season. This lack of clarity is significant, as shipping during non-open-water periods could disrupt sea-ice formation or stability and pose substantial risks to Dolphin and Union caribou during their spring and fall sea-ice migrations.</p> <p>The GN requests that the Proponent clarify whether there are any foreseeable situations in which shipping traffic could occur outside the open-water season, including activities that may affect sea-ice formation or occur before sea-ice melt.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the Project’s potential impacts on the Dolphin and Union herd.</p>	

**INFORMATION REQUEST(S)**

The GN requests further discussion on the likelihood that shipping traffic in the spring or fall could disrupt sea-ice conditions in ways that may affect Dolphin and Union caribou migrations.

The Proponent must describe what assurances or measures, if any, will be implemented to prevent interference with Dolphin Union caribou sea-ice migrations from shipping activity and/or icebreaking operations.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 20</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Cumulative Impacts of Public Use and Ecotourism on Wildlife
<b>Reference</b>	<ul style="list-style-type: none"> <li>West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026)</li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The GN anticipates that public desire to use the proposed road will be high for activities such as harvesting, establishing camps, and increased ecotourism or sport-hunting. These induced activities are likely to result in additional seasonal range disturbance and increased impacts on wildlife, particularly caribou, muskox and moose. However, the GN notes that the IS does not provide a cumulative impact assessment of wildlife impacts from these activities.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the combined effects of these activities on wildlife.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests a more detailed assessment of the cumulative impact on wildlife arising from the use of the road for harvesting, establishing camps, and increased ecotourism or sport-hunting.</p>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 21</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Snow Clearing and Management
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026) <ul style="list-style-type: none"> <li>○ Appendix 37B, Wildlife Monitoring and Mitigation Plan</li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Appendix 37B of the IS states that,</p> <p style="padding-left: 40px;">“Snowbanks will be maintained so they are not an obstruction to movement for caribou and other wildlife. Creation of snowbanks will generally be avoided (for operational reasons to avoid snow drifts on the road on the lee side of the bank), except where not technically feasible; the height of snowbanks will maintained at less than 1 m and snow plowing will be conducted in such a way as to limit the angle and vertical height of the snowbank edge.” (WKR, 2026, p. 17)</p> <p>Furthermore, WKR states that the ‘Effectiveness Monitoring Schedule’ for this mitigation will be “as needed” (WKR, 2026, p. 17).</p> <p>As such, the GN notes that the IS provides no clarity on how snow clearing along the approximately 230 km road will be consistently monitored, measured, and managed to prevent interference with wildlife movement across or directly adjacent to the road.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the potential impacts of the proposed Project on wildlife movement.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent include additional information in Appendix 37B of the IS regarding how snow clearing will be measured, monitored, and managed to mitigate potential negative effects on migratory movements across the road corridor.</p>	
<b>ADDITIONAL COMMENT(S)</b>	

N/A

<b>GN IR 22</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Wildlife Protection Measures: Missing Criteria Determining Wildlife Right-of-Way
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026) <ul style="list-style-type: none"> <li>○ Appendix 37B, Wildlife Monitoring and Mitigation Plan <ul style="list-style-type: none"> <li>▪ Section 7 Mitigation Measures</li> </ul> </li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The IS states,</p> <p>“Wildlife will have the right-of-way when they occur on or immediately adjacent to the roadway. All vehicles and equipment must slow down to 30 km/h when wildlife occur within line of sight of the driver and must stop for 20 minutes when wildlife are within 100 m of the road and show intent to cross. Vehicles may proceed after 20 minutes when wildlife no longer show intent to cross. When animals are on the road, drivers must stop and wait for them to leave the area. If wildlife do not leave the road after 20 minutes since stopping, vehicles are to move forward no faster than a walking pace until the individuals leave the road, and may resume the posted speed limit once the vehicle has driven past the animals.” (WRK, 2026, p.15).</p> <p>However, based on the above, the GN notes that the EIS does not describe the behavioural cues or other criteria that will be used to distinguish an animal intending to cross from one that no longer poses a crossing risk.</p> <p>Additionally, the GN notes that “a walking pace” is not defined, and it is unclear whether any deterrents (e.g., vehicle horns) would be used to encourage wildlife to move off the road.</p> <p>The GN believes that the absence of this information in the EIS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the efficacy of the proposed monitoring/mitigation approach.</p>	
<b>INFORMATION REQUEST(S)</b>	

The GN requires a more detailed explanation of:

1. The criteria that will be used to distinguish an animal that intends to cross the road from one that does not.
2. The speed of a walking pace.
3. If other deterrents are planned to be used in this situation.
4. Any training programs or other methods that are planned to standardize the approach of collecting and interpreting behaviour.
5. The methods incorporated to measure approach distances, observe wildlife, determine and quantify behaviour.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 23</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Triggers for Road Restrictions
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026) <ul style="list-style-type: none"> <li>○ Section 6.0 , Wildlife Protection Measures</li> <li>○ Appendix 37B, Wildlife Monitoring and Mitigation Plan <ul style="list-style-type: none"> <li>▪ Section 6, Human Activity Management in Relation to Wildlife</li> </ul> </li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Section 6 of the IS states that the Proponent will “[restrict] road use during sensitive periods or when caribou are observed in close proximity to the road.” (WKR, 2026, p. 18)</p> <p>The GN notes that some triggers are discussed in Section 6 of the Appendix 37B. For example, WKR states</p> <p style="padding-left: 40px;">“At least 10 caribou cows with calves moving onto or towards the road or other infrastructure during the caribou summer season (i.e., June 29 to September 6)” (WKR, 2026, p. 12)</p> <p>However, full details, such as the trigger distance, are generally not provided.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the efficacy of the proposed monitoring/mitigation approach.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests that the Proponent provide detailed information on how road activity and traffic will be restricted during sensitive periods, including clearly defined restriction categories, the specific trigger distances and conditions for each category, and the expected duration of restrictions once triggered.</p>	
<b>ADDITIONAL COMMENT(S)</b>	

The GN notes that the Proponent states the following in Appendix 37B

“Further details regarding the mitigation and monitoring strategies will be developed through ongoing discussions with governing bodies and other interested parties, and any working groups established to monitor Project-related effects.” (WKR, 2026, p. 8)

The GN believes it is necessary that a substantially complete Wildlife Management Plan be available before the conclusion of the Review process, rather than deferred to future discussions. A substantially complete Wildlife Management Plan is needed during the Review so that reviewers can assess whether proposed mitigation measures are feasible, effective, and sufficient. Deferring key details to future working groups prevents parties from fully evaluating potential impacts or determining whether the Proponent’s measures are adequate.

<b>GN IR 24</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Communication Protocols for Road Management
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026) <ul style="list-style-type: none"> <li>○ 37B Wildlife Monitoring and Mitigation Plan <ul style="list-style-type: none"> <li>▪ Section, Human Activity Management in Relation to Wildlife</li> </ul> </li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>Communication of site alerts and temporary shutdowns due to wildlife is discussed throughout section 6 of Appendix 37B. For example,</p> <p style="padding-left: 40px;">“All personnel onsite will be alerted by radio when a temporary shutdown occurs and for what area of the Project, and what everyone’s responsibilities are for the temporary shutdown. Temporary shutdowns will also include email communications, postings on information boards, and discussions during morning meetings.” (WKR, 2026, p.12)</p> <p>However, the Proponent does not indicate what communication protocols will be in place to ensure the general public and other commercial users of the road will follow the same protocols as WKR staff for site alerts and temporary shutdowns in real time.</p> <p>The GN notes that without clear, enforceable communication measures for all road users, mitigation actions cannot be applied consistently, and the effectiveness of the entire system could be compromised.</p> <p>The GN believes that the absence of this information in the IS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the efficacy of the proposed monitoring/mitigation approach.</p>	
<b>INFORMATION REQUEST(S)</b>	

The GN requests that additional protocols for communication and compliance of site alerts and shutdowns with the public and other users of the road be provided and discussed.

**ADDITIONAL COMMENT(S)**

N/A.

<b>GN IR 25</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Seasonal Range Use Monitoring Before and After Road Development
<b>Reference</b>	<ul style="list-style-type: none"> <li>• West Kitikmeot Resources Corp. Grays Bay Road and Port Project Impact Statement: Volume 11 – Management Plans. (April 2026) <ul style="list-style-type: none"> <li>○ 37B Wildlife Monitoring and Mitigation Plan <ul style="list-style-type: none"> <li>▪ Section 8.1, Monitoring Objectives and Framework</li> </ul> </li> </ul> </li> </ul>
<b>ISSUE/CONCERN(S)</b>	
<p>The IS states that the primary monitoring metrics (to verify effects predictions in the Project’s effects assessment and to verify the effectiveness of mitigation and measures) for caribou are the following:</p> <ul style="list-style-type: none"> <li>“• Amount of direct and indirect selected habitat loss</li> <li>• Species occurrence and distribution (within and outside of an expected ZOI)</li> <li>• Timing and location of PDA crossings</li> <li>• Mortality events” (WKR, 2026, p. 21)</li> </ul> <p>However, the GN notes that the proposed primary monitoring metrics focus almost entirely on post-construction conditions. To meaningfully verify effects predictions and assess the effectiveness of mitigation, these metrics must also incorporate pre-construction occurrence and distribution data. Without a baseline, it is not possible to determine how caribou behaviour, seasonal range use, or migratory patterns have changed in response to the road. Including pre- and post-construction comparisons, such as ratios or other measures of change, would provide a clearer understanding of range-wide impacts and allow reviewers to evaluate whether the Project is altering caribou movement at a meaningful scale.</p> <p>The GN believes that the absence of this information in the EIS creates a critical information gap for reviewers. Without it, the GN and other parties cannot fully evaluate the efficacy of the proposed monitoring/mitigation approach.</p>	
<b>INFORMATION REQUEST(S)</b>	

The GN requests that the primary monitoring metrics include an assessment of seasonal range use before road construction and after the opening of the road.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 26</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corporation
<b>Subject</b>	Update Government Departments
<b>Reference</b>	Volume 9, Section 28 Assessment of Potential Effects on Infrastructure and Services
<b>ISSUE/CONCERN(S)</b>	
<p>Throughout Section 28, the proponent references the GN-Department of Community and Government Services (CGS). For example:</p> <p style="padding-left: 40px;">“The GN’s Department of Community and Government Services is now responsible for annual dry cargo resupply, and the Petroleum Products Division is responsible for bulk fuel resupply.” – pg. 28-23</p> <p style="padding-left: 40px;">“Emergency services (i.e., ambulance, policing, and fire services) within Kitikmeot communities are provided either by the agencies and departments of the GN (e.g., Health and Social Services, Community and Government Services)” – pg. 28-26</p> <p>The Government of Nunavut announced a department reorganization in 2024, restructuring GN-CGS and GN-Economic Development and Transportation into the following new departments: Community Services; and Transportation and Infrastructure Nunavut.</p> <p>Where appropriate, ongoing reference to the relevant GN divisions should use the updated associated department. Draft project management plans or new plans and mitigation measures must be updated to align with the appropriate GN services and contacts.</p>	
<b>INFORMATION REQUEST(S)</b>	
The GN requests that the proponent:	

1. Confirm the appropriate GN departments and divisions within the Impact Statement.
2. Update existing documents as necessary and ensure development of Mitigation and Management plans, etc., includes the correct GN department and appropriate contacts.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 27</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corporation
<b>Subject</b>	Consultation Summary
<b>Reference</b>	Volume 3 Volume 9 Appendix 25A
<b>ISSUE/CONCERN(S)</b>	
<p>WKR notes their use and integration of community/public/indigenous engagement throughout the Impact Statement, such as through primary research, previous consultation efforts in 2017, through NIRB submissions, and from the 2025 IAG meetings.</p> <p>Introduction for each Valued Components (VC) in Volume 9 acknowledges the efforts to consider knowledge and feedback and to incorporate it into the project:</p> <p style="padding-left: 40px;"><b>Influence of Engagement and Inuit, Indigenous, and Community Knowledge on the Assessment ...</b>Through various meetings, workshops, and direct conversations, WKR listened to the cultural, environmental, and social priorities shared by engaged groups. These have been considered in the IS and project design. A summary of engagement activities conducted from 2016 to 2025 is presented in Volume 3, Section 6 (Public Engagement).</p> <p>A list of People and Community Interviews (Volume 9, Appendix 25A, Appendix A, A-1) supports the People and Communities Baseline Report (Appendix 25A). Methods and analysis are described as follows:</p> <p style="padding-left: 40px;">“The findings of primary research interviews, focus groups, and meetings were recorded by written notes and audio recording, when consent was granted. Written notes and audio recordings were typed and transcribed, respectively. Primary research underwent thematic analysis, which grouped findings into major themes that align with the various People and Communities VCs. Key findings of data analysis were integrated into the baseline report.”</p>	

Table 6.2 (Volume 3) and several Tables summarizing Inuit, Indigenous, and Community Knowledge and Engagement Feedback related to each VC (Volume 9), provide high level concerns attributed to organizations or consultation activities.

However, an intermediate summary of interview/focus group/personal communication (both the questions and feedback) is not presented. Notably, there are reports on the IAG meetings that do offer more detail on issues raised and discussed. Such a summary document on the remaining consultation activities would guide the reviewer from the context of what was said or group agreement on 'community' or organization perspectives to the major themes and key findings which the proponent integrated into their assessment and mitigation measures. For example, the IS includes several quotations as part of their assessment that is attributed to a single community member or an organization during community engagement activities.

Such a consultation summary allows reviewers to better understand context behind concerns raised by community members and organizations including the breadth of issues raised within organizations or communities, any contrasting perspectives within communities, and to better inform reviewers on the adequacy of the proposed management or mitigation to meet expectations of those consulted.

### **INFORMATION REQUEST(S)**

For each consultation and engagement activity listed, the GN requests the proponent provide, where possible:

1. A summary of consultation questions and responses that lead to the major themes and key findings integrated in the Impact Statement.
  - a. Include context such as the nature of the consultation activity, how the questions were asked, whether general agreement to statements existed within groups or communities, and if common/competing statements were made among several groups or communities.

### **ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 28</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corporation
<b>Subject</b>	Data Inconsistencies or errata
<b>Reference</b>	Volume 9, Table 27.8, pg. 27-35
<b>ISSUE/CONCERN(S)</b>	
Table 27.8 presents educational attainment for each Kitikmeot community for Men+ and Women+ and includes totals. However, some of the numbers for Men+ and Women+ do not add up to Total. Please clarify.	
<b>INFORMATION REQUEST(S)</b>	
The GN requests the proponent: 1. Clarify and/or correct the values in Table 27.8 Highest Certificate, Diploma or Degree.	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 29</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Estimated Impact on Gross Domestic Product
<b>Reference</b>	Volume 9: Section 27, page 27-56
<b>ISSUE/CONCERN(S)</b>	
<p>While we are informed of the GDP impact, we have no information on the level of investment leading to this outcome. The relation between the cost of a project and its GDP impact is important. It determines how efficient is the project in maximizing the economic impact for each dollar invested. This ratio or relation varies across Canada. A lower impact is expected in remote regions.</p> <p>On page 27-57, we read: ‘... the five-year construction phase ... in Nunavut are estimated to total \$74.8 million annually.’ It is unclear what will be the capital expenditure leading to this yearly GDP impact of \$74.8 million for each of these five years.</p> <p>Being publicly funded, the cost of the project needs to be stated in the proponent application. The yearly GDP impact stated does not give us this information.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests the proponent:</p> <ol style="list-style-type: none"> <li>1. Clarify the level of capital expenditure that will be required to generate the stated yearly GDP impact.</li> </ol>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 30</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Main labour assumption underlying the GDP impact
<b>Reference</b>	Volume 9: Section 27, pages 27-56/57 and pages 27-68/69
<b>ISSUE/CONCERN(S)</b>	
<p>Table 27.20 informs us that 675 workers will be working in Nunavut on a yearly basis. The following table, which is unnumbered, indicates that 192 of them will be Nunavut residents. The remaining 483 workers will be non-residents on fly-in fly-out arrangements. Therefore, in terms of employment, we have two very different figures at the bottom of the two Nunavut-labeled columns. However, the GDP impact presented in Table 27.14 has only one Nunavut column and thus only one number. It is unclear which employment numbers (675 or 192) the GDP impact of \$74.8 million is predicated on.</p> <p>Obtaining this information would reduce confusion, i.e. how many workers will be needed to achieve the impact stated.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests the proponent:</p> <ol style="list-style-type: none"> <li>1. Clarify which of the following two employment numbers: 675 (resident Nunavummiut + non-resident non-Nunavummiut) or 192 (resident Nunavummiut) the GDP impact of \$74.8 million is predicated on.</li> </ol>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

<b>GN IR 31</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Methodology used in the econometric model
<b>Reference</b>	Volume 9: Section 27, page 27-56+
<b>ISSUE/CONCERN(S)</b>	
<p>An econometric assessment needs to be built around a model. In this case, the model would be the construction of a similar road that occurred in the past or the construction of a series of similar roads. Normally, the methodology accompanying the econometric model would give us information on this matter.</p> <p>It is necessary for the reference points, the basis on which these estimates were developed, to be understood. This allows the reviewer to be confident in the value and rigour of the output of the econometric model.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests the proponent provide:</p> <ol style="list-style-type: none"> <li>1. The road or roads used to inform the econometric model and in what years these roads were constructed.</li> </ol>	
<b>ADDITIONAL COMMENT(S)</b>	
N/A	

GN IR 32	
<b>Department</b>	Department of Community Services Department of Family Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corporation
<b>Subject</b>	Inuit Human Resources and Business Development Plan
<b>Reference</b>	Volume 9, Section 27 Volume 11 Grays Bay Road and Port Project Inuit Human Resources and Business Development Plan
ISSUE/CONCERN(S)	
<p>Community members and organizations have expressed interest and concerns to ensure Nunavummiut benefit from local employment and from economic or training opportunities. The Proponent repeatedly links mitigation and enhancement measures to the development of a Labour Relations Strategy, a Training Strategy, and a Procurement Strategy, which are briefly introduced:</p> <p><i>A Labour Relations Strategy will be developed and implemented to enhance and retain local Inuit employment, with a focus on preferential Inuit hiring. The Labour Relations Strategy will detail skills and entrance requirements, employee benefits, employee communication, work rotation schedules, employee orientation programs and ongoing support for project workers during employment.</i></p> <p><i>A Training Strategy will be developed and implemented to identify specific skill requirements for employment on the Project, provide pre-employment training for Inuit and youth (in partnership with local educational institutions and Inuit organizations), and to implement on-the-job training and apprenticeship programs.</i></p> <p><i>A Procurement Strategy, focused on Inuit contracting opportunities, will be developed and implemented to facilitate regional and Inuit business involvement. The Procurement Strategy will prioritize the use of local construction equipment to increase local revenues and reduce the need to transport equipment from outside of the region. Procurement packages will also be tailored to local businesses where possible (e.g., smaller packages).</i></p> <p>(Volume 9, Section 27.3.4.2)</p> <p>These Strategies have not yet been developed, and only a few details of what the proponent may or will develop are suggested. It is unclear what activities will be proposed, how they will address project effects, and how the proponent will develop and implement them. Early awareness of skill requirements and contracting needs for the</p>	

project provide residents and agencies the opportunity to develop the training and business development programs to meet these needs.

In the absence of these Plans and strategies, even in draft form, their adequacy as proposed mitigation cannot be determined.

It is not clear when these strategies will be developed and to what level of detail.

Further, it is not clear whether or how these strategies will align with appropriate organizations and agencies with training and skill development mandates, such as GN.

The Inuit Human Resources and Business Development Plan, which includes the Labour Relations Strategy, Training Strategy, and Procurement Strategy, should be developed with input from existing training/apprenticeship and skill development administrators in the territory, including the GN, to align resources and prepare Nunavummiut for project employment and business contracts. For example, hiring plans and skilled labour needs for the project should be sent to GN-Family Services, Career Development Division to support Nunavummiut in meeting employment requirements and training. All apprenticeship and occupational certification for Nunavummiut is done through the GN.

The Plan must be developed as part of the Technical Review or prior to the Final Hearing for reviewers to determine the adequacy of the Plan.

### **INFORMATION REQUEST(S)**

The GN requires the proponent:

2. Prepare the Inuit Human Resources and Business Development Plan, including the Labour Relations Strategy, the Training Strategy, and the Procurement Strategy, and that includes at a minimum the following details:
  - a. Skill requirements for employment, anticipated contracting needs, and proposed training programs necessary to support Nunavummiut in accessing employment and business contracts.
  - b. Initiatives to support employee retention and career development.
  - c. The Travel Policy, Employee Assistance programs, Apprenticeship programs.
  - d. Whether and how these strategies and initiatives align with existing training and skill development agencies or programs, such as GN.
3. Develop these Strategies and initiatives during the Technical Review and complete a final draft prior to the Final Hearing.

a. Any outstanding commitments or intentions must include a proposed timeline for development.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 33</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Missing information
<b>Reference</b>	Volume 9, Table 28.7, pg. 28-37
<b>ISSUE/CONCERN(S)</b>	
<p>Table 28.7 Project Interactions with Infrastructure and Services identifies the project activities that might interact with the identified effects: Change in community infrastructure/access to services; Change in accommodation and housing availability; Change in transportation infrastructure; Change in community resupply. Interactions are identified by either a check (anticipated effect) or dash (no anticipated effect).</p> <p>Near the end of the table (pg. 28-40) there are two interactions that do not have either a check or dash. Specifically:</p> <ul style="list-style-type: none"> <li>• Project Activity – Winter Road construction and use creating change in community infrastructure and access to public services;</li> <li>• Project Activity – Waste management creating change in accommodation and housing availability.</li> </ul> <p>Further, the second paragraph after Table 28.7 on page 28-40 contains an incomplete sentence (highlighted):</p> <p style="padding-left: 40px;">"Activities for each Project phase will have labour requirements, which could affect community services and infrastructure. However, <u>it is not possible to isolate the effects of individual activities related to local spend</u> Therefore, <u>these effects</u> are addressed collectively as part of the "procurement of goods, and services; employment of workers" activity for each phase."</p> <p>In both cases, updates and clarity on the proponent's conclusions or discussions are necessary for reviewers to assess the assumptions, considerations, and conclusions.</p>	
<b>INFORMATION REQUEST(S)</b>	
<p>The GN requests the proponent:</p> <ol style="list-style-type: none"> <li>1. Update Table 28.7 with the appropriate check or dash.</li> </ol>	

2. Update the identified sentence to clarify the proponent's intent.

**ADDITIONAL COMMENT(S)**

N/A

<b>GN IR 34</b>	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Travel Policy
<b>Reference</b>	Volume 9, s. 28.3.1.1 Assumptions Volume 9, s. 28.3.3 and s. 28.3.4 Volume 11, Appendix 37J, s. 3.1.1.3, pg. 6 Travel Policy
<b>ISSUE/CONCERN(S)</b>	
<p>The proponent proposes that resident project workers will use commercial airlines to the hubs of Cambridge Bay or Kugluktuk or Yellowknife, possibly with short-term overlap, then chartered further to/from site. Approximately 15% Nunavut employees during construction (which is estimated at 200-500 people per year) and approximately 50-100% Nunavut employees during operation/maintenance (which is estimated at 54 total operational workforce) – s. 28.3.1.1, pg. 28.36.</p> <p>The proponent presents potential impacts of transporting employees, including on community infrastructure and services and on accommodations/housing availability in communities.</p> <p>“WKR will implement a Drug and Alcohol Policy which will apply to all personnel and contractors on-Site, at work camps, and during transit through communities. Implementation of the Drug and Alcohol Policy will reduce demand on police services as a result of potential substance use by workers who are transiting through Yellowknife, Cambridge Bay, and Kugluktuk. WKR will also develop and implement a Travel Policy if personnel transiting to/from the Project site are weathered in in a community. Implementation of the Travel Policy will govern personnel behaviour in LAA communities during travel delays, including acceptable social interactions with residents” - s. 28.3.3.3, pg. 28-46.</p> <p>"Project activities during Construction and Operations and Maintenance may increase demand on temporary accommodations in the LAA. This effects pathway is associated with the use of temporary accommodations (i.e., hotels, motels) in</p>	

communities through which workers transit on their way to and from the Project and project work camps." - S. 28.3.4.1, pg. 28-49.

"WKR will develop and implement a Travel Policy in the event that personnel transiting to and from the Project site are weathered in in a community. The Travel Policy will include plans for accommodation, meals, use of medical services, and other needs for personnel." - s. 28.3.4.2, pg. 28-49.

The proponent has suggested their Travel Policy will mitigate potential impact of employee transit through communities, using temporary accommodations, and governing their behaviour while to reduce impact on local infrastructure and services.

However, there is no Travel Policy developed to review and consider the adequacy of the mitigation presented.

### **INFORMATION REQUEST(S)**

The GN requests the proponent:

1. Prepare a draft Travel Policy to articulate how the proponent would mitigate any potential effects of transiting employees in Nunavut communities. This may include:
  - a. What temporary accommodations would be utilized
  - b. How the proponent would accommodate employees if traditional accommodations were not available, and
  - c. Policies and guidelines the proponent aims to include regarding employee behaviour while still under company transportation and how the company may address issues
  - d. Other expectations the proponent determines necessary to include in their policy
2. Develop the Travel Policy during the Technical Review and complete a final draft prior to the Final Hearing.
  - a. Any outstanding commitments or intentions must include a proposed timeline for development.

### **ADDITIONAL COMMENT(S)**

N/A

GN IR 35	
<b>Department</b>	Community Services
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Risk Management
<b>Reference</b>	<p>Volume 9, S. 28.3  Volume 9, Table 28.1, pg. 28-6  Volume 11, Attachment H4 Risk Management and Emergency Response Plan  <i>Emergency Measures Act</i>, <a href="https://canlii.ca/t/8lvf">https://canlii.ca/t/8lvf</a>  <i>Fire Safety Act</i>, <a href="https://canlii.ca/t/8l3q">https://canlii.ca/t/8l3q</a></p>
ISSUE/CONCERN(S)	
<p>The assessment of project impact on community search and rescue services is speculative and presents broad assumptions, limited evidence for conclusions, and residual effects that 'may' or 'could' result. For example,</p> <p style="padding-left: 40px;">"Project construction will result in new land- and marine-based infrastructure in the RAA, which <b>may</b> increase the number of commercial ships, community members, Project workers, and visitors to the Kitikmeot Region traveling through the land and marine environment. In turn, this <b>may</b> increase demand on Coast Guard, Coast Guard Auxiliary, and search and rescue services in the event that travelers require assistance in unfamiliar terrain or during adverse weather events." (Vol. 9, s. 28.3.3.1, Coast Guard and Search and Rescue, pg. 28-42</p> <p>The assessment relies heavily on proposed or under-developed mitigation. Proposed mitigation is summarized as:</p> <ul style="list-style-type: none"> <li>• Develop and implement a Risk Management and Emergency Response Plan for all phases of the project</li> <li>• Be self sufficient for SAR operations, informing relevant authorities as needed</li> <li>• Include any protocols for notification or compensation if required</li> </ul> <p>(Vol. 9, s. 28.3.3.2, pg. 28-44)</p>	

Residual Effects concludes an increase in the number of people using the land and marine environments may increase demand on the CCG and SAR activities (Vol. 9, s. 28.3.7, pg. 28-63). Similar mitigation is applied. Cumulative Effects present a similar overview, conclusions, and mitigation. The broad speculation and lack of certainty on project effects requires a robust management plan with clear roles and responsibilities for the proponent and other emergency responders.

Mitigation has been proposed as commitments to future development of measures or as broad statements of intent. The Risk Management and Emergency Response Plan is very rudimentary, describing only what will be developed or included, challenging the ability to assess the adequacy or success of the mitigation. For example, there is no certainty provided on whether the proponent's search and rescue teams, protocols, or equipment will be as efficient as existing resources. There is little clarity on how existing resources may be utilized or relied upon.

In addition to the above, the GN notes that Table 28.1 (Vol. 9) does not include the *Emergency Measures Act* or the *Fire Safety Act*.

The Government of Nunavut, Department of Community Services includes responsibility for Nunavut Emergency Management. Alignment with GN on SAR and other emergency measures is necessary to prepare adequate response, and the Emergency Measures Act allows for the Emergency Measures Officer (notably the Director of Nunavut Emergency Management) to review, make recommendations, and keep on file an emergency measures plan from any Government, Agency, or Corporation operating in Nunavut Territory. As such, a project of this size and the vast area under consideration requires engagement with the GN Director of Nunavut Emergency Management. Alignment with the Fire Marshal may also be necessary.

The Risk Management and Emergency Response Plan must be developed with input from search and rescue or emergency response leaders in the territory, including the GN. The Plan must be developed as part of the Technical Review or prior to the Final Hearing for reviewers to determine the adequacy of the Plan.

### **INFORMATION REQUEST(S)**

The GN requires the following:

1. The proponent engages with GN-Nunavut Emergency Management.

2. The proponent includes the *Emergency Measures Act* and the *Fire Safety Act* in Table 28.1 and in their obligations under relevant legislation.
3. The proponent prepares a Risk Management and Emergency Response Plan with input from search and rescue and emergency response leaders in the territory, including the GN.
  - a. The Plan should be developed during the Technical Review and a final draft complete prior to the Final Hearing.
  - b. Any outstanding commitments or intentions must include a proposed timeline for development.

**ADDITIONAL COMMENT(S)**

N/A.

<b>GN IR 36</b>	
<b>Department</b>	Transportation and Infrastructure Nunavut
<b>Organization</b>	Government of Nunavut
<b>IR Directed to</b>	West Kitikmeot Resources Corp.
<b>Subject</b>	Community Sealift Operations Originating from Grays Bay
<b>Reference</b>	<p>Volume 9, Section 25 Change in Market Food System,  s. 25.3.4.1;  s. 25.3.4.3;  s. 25.3.4.4</p> <p>Volume 9, Section 28.4.5 Change in Community Resupply</p>
<b>ISSUE/CONCERN(S)</b>	
<p>The proponent's submission notes potential benefits to sealift resupply services to four Kitikmeot communities (Kugluktuk, Cambridge Bay, Gjoa Haven and Taloyoak). The Proponent indicates that improved sealift access would be valued by various community stakeholders, and this may be part of the rationale for major public funding anticipated for the project.</p> <p>For reasons of geography, the existing sealift resupply service in these communities is poor in comparison to most other Nunavut regions, with only one sailing which arrives late in the season. As the proponent has noted, in theory project infrastructure would make it possible to transport non-perishable items (e.g. construction materials) overland from Yellowknife to Grays Bay and then by barge to the communities.</p> <p>The viability of such a sealift service is dependent on certain assumptions such as the ability of a shipping business to transport goods by truck along private roads, access laydown space at Grays Bay, and make use of marine infrastructure at Grays Bay.</p> <p>The assertion that the project will enhance community resupply cannot be validated as a realistic business opportunity unless the proponent undertakes measures to ensure that user terms will be unambiguous, non-restrictive, and economically feasible.</p>	

**INFORMATION REQUEST(S)**

The GN requests the proponent:

1. Clarify whether the proponent will facilitate access to Grays Bay Port and Road infrastructure by one or more transport businesses for the purposes of providing sealift resupply services to Kitikmeot communities.
2. Clarify in what ways this access would be different from that available to mining companies and their contractors.
3. Clarify what, if any, existing or planned arrangements the proponent has with the owners of the Tibbitt to Contwoyto Winter Road and the reasonably foreseeable Arctic Economic and Security Corridor. Confirm if or how the proponent's access to that infrastructure extends to a transport business delivering goods to Kitikmeot communities via Grays Bay.

**ADDITIONAL COMMENT(S)**

N/A.